



**Maryland**  
Department of  
the Environment

Wes Moore, Governor  
Aruna Miller, Lt. Governor

Serena McIlwain, Secretary  
Suzanne E. Dorsey, Deputy Secretary

**SEP 07 2023**

**CERTIFIED MAIL / ELECTRONIC MAIL**

AD Robinson, Vice President Infrastructure/Engineering  
Quantum Maryland, LLC  
500 East 4th Street, Suite 333  
Austin, Texas 78701

**Re: Quantum Maryland, LLC - Manor Woods Road, AI# 175029  
Notice of Referral to the Office of the Attorney General**

Dear Mr. Robinson:

The Maryland Department of the Environment, Water and Science Administration, Compliance Program (Department) is concerned regarding the Quantum Maryland, LLC Site located at 5601 Manor Woods Road in Frederick County, Maryland (Site) and the ongoing violations that have occurred and continue to occur at the Site from April 2023 through the present, as indicated in the field inspection reports from this time period.

The Department expects Quantum Maryland, LLC to maintain compliance with the Environmental Covenant dated December 29, 2017, the General Permit for Stormwater Associated with Construction Activity, the Erosion & Sediment Control Plans, and any other plans approved by the Department's Water and Science Administration and Land and Materials Administration in addition to the Environment Article. After careful consideration, the Department believes that a formal enforcement action is necessary to address the ongoing violations and has decided to refer this matter to the Office of the Attorney General (OAG). Once an attorney is assigned to this case, they will contact you. If you have any questions, please do not hesitate to contact Mr. Patrick Noyes, Enforcement Section Manager, Compliance Program at (410) 537-3510 or by email at [patrick.noyes@maryland.gov](mailto:patrick.noyes@maryland.gov).

Thank you for your prompt attention to this matter.

Sincerely,

Arno Laud, Chief  
Enforcement Division  
Compliance Program  
Water and Science Administration

ADL:bpl