MEMORANDUM

Date: November 6, 2026

To: All Maryland Wastewater Treatment Operators

From: J. Martin Fuhr, WWSO Board Secretary

Subject: Updates Regarding Wastewater Treatment 6 (W6) Spray Irrigation Licenses

Over the past year, the WWSO Board and staff have recognized growing confusion regarding W6 certification requirements for spray irrigation facilities and groundwater discharge facilities. Historically, an active Wastewater Treatment 5A (W5A) license met facility compliance needs. However, recent inspection citations caused an influx of temporary W6 applications, many of which stalled due to a lack of available W6 Operators in Responsible Charge (ORCs). We heard your concerns about the sudden change without advance warning, understand the frustration, and treated the matter with the seriousness it deserves.

In response, groups across MDE's Water and Science Administration (WSA) convened to find a practical solution. During the September WWSO board meeting, the WSA's Deputy Director Matt Rowe outlined MDE's future course of action at the top of the agenda. MDE's plan of action consists of formulating long-term regulatory updates (including groundwater discharge permits and operator classification reviews) and establishing the following immediate actions for wastewater operators and facilities directly affected:

- **Clearing Past Violations:** Because existing permits did not clearly specify the required license class, WSA is exercising enforcement discretion to officially drop past compliance citations issued solely for lacking a W6 license.

- **A Pause on Future Citations:** Inspectors will not issue new violations or non-compliance designations for lacking a W6 license during inspections and audits while regulations and permits are updated.

- **W5A Licenses Remain Valid:** Active Operator W5A licenses fully cover spray irrigation facility operations during this interim period. You do not need an immediate W6 license during this interim period.

We truly appreciate your patience as we work together toward a smoother, more straightforward system. If you or your facility has been affected by this situation and Board staff have not yet reached out, please contact us directly.