

**Comment Response Document
Regarding the Water Quality Analysis of Heavy Metals for the Lower Gunpowder Falls
Baltimore County, MD**

Introduction

The Maryland Department of the Environment (MDE) has conducted a public review of the proposed Water Quality Analysis (WQA) of heavy metals for the Lower Gunpowder Falls. The public comment period was open from August 1, 2003 through August 30, 2003. MDE received one set of written comments.

Below is a list of commentors, their affiliation, the date comments were submitted, and the numbered references to the comments submitted. In the pages that follow, comments are summarized and listed with MDE's response.

List of Commentors

Author	Affiliation	Date	Comment Number
Robert Koroncai	Office of Watersheds, U.S. Environmental Protection Agency	August 13, 2003	1 through 3

Comments and Responses

1. The commentor requested that the document include further description of the nature of the physical habitat degradation in the Lower Gunpowder Falls, given that there is reportedly no appreciable sediment deposition in the streambed.

Response: An explanation has been included in the document. The following statement has been included in the fifth paragraph of Section 3.0 (Water Quality Characterization): The Lower Gunpowder Falls is classified as a high gradient stream, therefore sediment entering the channel from soil erosion due to stream bank instability tends to be flushed out leaving no appreciable deposition of fine grained material. It is generally accepted that coarse grained material has no significant potential to accumulate toxic substances.

2. The commentor stated that an additional arsenic criterion of 41 µg/l exists based upon fish consumption which should be included in the criteria table, because it is the most conservative of the criteria.

Response: The document has been revised to include the human health (fish consumption) water quality criterion for arsenic as the most stringent and applicable numeric criterion.

3. The commentor stated that references in the text and tables to the mercury standard should be removed, because the document does not contain a data evaluation for that standard and the mercury impairment has been addressed separately through fish tissue monitoring.

FINAL

Response: The Department thinks that references to the mercury standard should remain in the Lower Gunpowder Falls document, because mercury cannot be excluded from the list of heavy metals potentially causing an impairment in the watershed.