



# Maryland

## Department of the Environment

Larry Hogan, Governor  
Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary  
Horacio Tablada, Deputy Secretary

February 16, 2022

The Honorable Kumar P. Barve  
House Environment and Transportation Committee  
House Office Building, Room 251  
Annapolis, Maryland 21401

### **Re: House Bill 621 – Sewage Treatment Plants - Effluent Discharges - Monitoring, Evaluation, and Inspection**

Dear Chair Barve and Members of the Committee:

The Maryland Department of the Environment (MDE or the Department) has reviewed HB 621, entitled *Sewage Treatment Plants - Effluent Discharges - Monitoring, Evaluation, and Inspection*, and would like to share some information regarding this legislation as drafted.

HB 621 contains the following requirements: if within a 24-month period the Department finds that a wastewater treatment plant (WWTP) has discharged in excess of its effluent limits, failed to “maintain basic operation and maintenance,” or failed to update and submit its wastewater capacity plan (if required), the Department must “hire” an inspector for the WWTP. This inspector is to “remain on site” at the plant until: 1) the discharge complies with effluent limitations, as shown by discharge monitoring reports (DMRs), for 180 days; 2) the WWTP complies with “basic operation and maintenance requirements;” and 3) submit and updated wastewater capacity plan, if already required, to the Department. HB 621 would require the Department to report annually on these requirements to the General Assembly. Additionally, this would require the Department to provide an inspector on site, around the clock, at any facilities that trigger these requirements and require those inspectors to “remain on site” until a site is considered compliant. If this bill were to pass as drafted, it would have a significant impact on the Department.

Additionally, not all plants that treat sewage are publicly-owned treatment works. There are many privately-owned plants that treat the sewage from shopping centers, mobile home parks, hotels, and similar facilities in areas that are not served by public utilities. Many of these facilities are small, automated plants with no facilities to accommodate a 24-hour on site presence.

Finally, a continuous, on-site inspector presence will not prevent effluent violations. Municipal WWTPs might require capital projects to address their issues, which would be unaffected by having an inspector remain on site. There may also be minor issues, or upsets, that cannot be readily prevented or anticipated, which would occur whether an inspector is on site or not.

Thank you for considering the Department’s information regarding this legislation. We will continue to monitor HB 621 during the committee’s deliberations, and I am available to answer any questions you may have. Please feel free to contact me at 410-260-6301 or [tyler.abbott@maryland.gov](mailto:tyler.abbott@maryland.gov).

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Sincerely,

A handwritten signature in black ink, appearing to read "Tyler Abbott", written over a horizontal line.

Tyler Abbott

cc: The Honorable Robin L. Grammer  
Lee Currey, Director, Water and Science Administration