Maryland Department of Environment
Water and Science Administration
Compliance Program
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Inspector: Samantha Coffman
AI ID: 8449

Site Name: Back River WWTP
Facility Address: 8201 Eastern Ave, Baltimore, MD 21224
County: Baltimore County

Start Date/Time: April 26, 2023 10:30 AM
End Date /Time: April 26, 2023 02:30 PM

Media Type(s): NPDES Municipal Major Surface Water

Contact(s): Ronald Turner, Plant Superintendent, Back River WWTP
Andrea Buie-Branam, Chief of ERCS, Baltimore City DPW
Michael Hallmen, Chief of Wastewater Facilities Division, Baltimore City DPW
Betty Jacobs, Back River WWTP
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NPDES Municipal Major Surface Water

Permit / Approval Numbers: 15DP0581
NPDES Numbers: MD0021555
Inspection Reason: Follow-up (Non-Compliance), Initial Quarterly
Site Status: Active
Compliance Status: Noncompliance
Site Condition: Noncompliance
Recommended Action: Additional Investigation Required
Evidence Collected: Photos or Videos Taken, Visual Observation
Delivery Method: Email
Weather: Partly Cloudy

Inspection Findings:

The Back River Wastewater Treatment Plant (WWTP) is an activated sludge process sewage treatment plant with biological nutrient removal by Modified Ludzack-Ettinger process, ferric chloride for phosphorus removal, denitrification filters for enhance nutrient removal (ENR), polishing sand filters, chlorination, and dechlorination. The flow is split at a junction box and the larger portion of the flow (up to 130.0 MGD) goes to Outfall 001 to the Back River via a step cascading aeration system and the remaining portion (up to 50.0 MGD) goes to Outfall 002, and sent to Tradepoint Atlantic. The effluent from Outfall 002 is further chlorinated and sent to a storage reservoir

known as the High Head Reservoir. The water was once used by International Steel Group (ISG), formerly Bethlehem Steel Corp., for industrial cooling water. The steel mill is closed and Tradepoint Atlantic purchased the steel mill property and portions of this water discharges through 3 outfalls on the Tradepoint Atlantic property. Tradepoint Atlantic discharges the wastewater from High Head Lake through outfalls 012, 013 and 014, under the authorization of their NPDES permit.

Coordinates and receiving waters for the Tradepoint Atlantic outfalls:

Outfall Number	Receiving Water Name	Latitude	Longitude
012	Patapsco River	39.00° 12.00' 48.00''	76.00° 29.00' 39.00''
013	Patapsco River	39.00° 13.00' 12.53''	76.00° 29.00' 43.32''
014	Bear Creek	39.00° 13.00' 39.00''	76.00° 29.00' 29.00''

The facility's activity code or standard industrial classification (SIC) is 4952 and the North American Industry Classification System (NAICS) is 2213. The receiving water is the Back River for Outfall 001, which is protected for Use II, water contact recreation and the protection of aquatic life and Outfall 002 discharges to the Bear Creek and the Patapsco River also protected for Use II waters.

On April 17, 2023, Baltimore City DPW provided (via email to MDE) a Back River WWTP Progress Report that was dated April 17, 2023 and signed by Michael Hallmen.

On April 26, 2023, I conducted a follow-up compliance evaluation inspection at the Back River WWTP. On-site I met Ronald Turner, Andrea Buie-Branam, Betty Jacobs, Dan Latova, Dana Gams, and Rayford McEachern representing the Back River WWTP. I began the inspection with an opening conference where I discussed follow-up items from previous evaluations with Back River WWTP representatives. Specific details regarding the treatment processes and plant operations listed below:

- Headworks (fine and coarse screening and grit removal system)
- Primary settling tanks (PST)
- Activated Sludge Plants
- Secondary clarifiers
- Denitrification filters (DNF)
- Operations and Maintenance (O&M)
- TRC & DO Quality Assurance
- PCB Minimization Plan (PMP)

Below is a summary of the discussions that occurred during the opening conference and information that I gathered during the progression of the inspection:

Headworks

An independent contractor, ProStart, is currently operating and maintaining the headworks.

During the 12/14/2022 inspection, Ronald Wicks requested that the Back River WWTP provide to the Department the results for ambient air monitoring at the headworks for lower explosive limits (LEL), oxygen (O_2) and H_2S for the 4th quarters of 2022. The Department received the requested data on 1/30/23.

Per inspection on 2/24/23: According to Ronald Turner, Odor Control System C is still being seeded and there is no current status of the programmable logic controller (PLC) cards for Odor Control System C.

According to the Back River WWTP Progress Report (dated 4/17/23): All three odor scrubbers are in full operation. Air monitoring reports were provided on 11/17/22 and 1/30/23.

During my discussion with Ronald Turner today 4/26/23, Mr. Turner informed me that: All three odor controls are up and operating. Mr. Turner stated that they will provide an update for the status of the PLC cards for Odor Control System C.

As a reminder:

- The Back River WWTP should ensure that the TSS concentration of the flushing water is maintained at an acceptable concentration.
- The Back River WWTP should ensure that the H_2S sensors are operative and reliable by checking the accuracy through routine frequent calibration checks.

PSTs

According to the Back River WWTP Progress Report (dated 4/17/23): Ongoing repair and maintenance efforts continue. 4 PSTs are in operation (#1, 7, 8, and 11) per area SOP. Completed and ongoing maintenance is being conducted in accordance with the operator's shift responsibilities.

During my discussion with Ronald Turner today 4/26/23, Mr. Turner informed me that: PSTs #1, 7, 8, and 11 are fully in service. PST #9 is waiting for rehab work to be done on it. They are getting ready to do work on PST #5, and PST #5 will be taken offline when PST #2 is brought back in service.

Activated Sludge Plants

Per the 1/26/23 inspection report: The DO monitoring probes used to continuously monitor the DO in the biological reactors are not functional. According to Back River WWTP staff, there is a DPW purchase request for 60 ChemScan stainless steel DO probes, controllers, and converters/expansion boxes and associated equipment to automatically monitor and control the DO at the activated sludge plants.

According to the Back River WWTP Progress Report (dated 4/17/23): Probes have been ordered. There is a 6 month timeline for receipt of materials. Installation will occur within 60 days of receipt of material.

During my discussion with Ronald Turner today 4/26/23, Mr. Turner informed me that: They are still waiting for parts.

Secondary Clarifiers

According to the Back River WWTP Progress Report (dated 4/17/23): [The] contractor has completed all work removing vegetation. Continued maintenance from plant staff is ongoing.

During my discussion with Ronald Turner today 4/26/23, Mr. Turner informed me that: Vegetation has been removed from all the secondary clarifiers. Badger Daylighting did the vegetation removal work. Back River staff are preparing to set up a regular maintenance schedule with Badger Daylighting.

DNF

Per inspection on 2/24/23: According to Michael Hallmen, they are planning to have Eney Electric connect a permanent power supply for Quad 2. According to Ronald Turner, Calmi Electric has also been contracted to do other electrical work around the plant. According to Turner, parts have been ordered to repair the air valve for filter #11 on Quad 3.

During my discussion with Ronald Turner today 4/26/23, Mr. Turner informed me that: Quad 2 is still on a temporary power supply. All 52 filters are online.

Equipment and Maintenance Projects

I discussed the status of various operations and maintenance projects requiring attention.

- *Assets Management*

    - Per the 1/26/23 inspection report: The Department determined that there was insufficient accountability for inventory and specified that inventory control must be included in the revised O&M program. According to Turner, both Atkins Inc. and Hazen and Sawyer are conducting plant-wide assets evaluations. Turner further stated that DPW has been working on an assets management plan since October of 2022, but he is unsure when the plan will be complete.

    - Per inspection on 2/24/23: According to Ronald Turner, Atkins is overseeing work on the assets management plan and it is still in progress. According to Turner, Atkins is still collecting data around the plant.

    - Per inspection today 4/26/23: According to Ronald Turner, the status of the assets management plan is the same and it is still in progress.

- *Wasting and Sludge Management Plan*

    - Per inspection on 2/24/23: According to Ronald Turner, the wasting and sludge management plan is still in progress and part of it will be done by Atkins. According to Mahmudul Hasan, Back River staff and Atkins are working on determining mass balance modeling with an approximate timeline of a couple weeks. According to Mr. Turner, there is a legal issue (they are waiting on legal work with an approximate timeline of April or May) with Jacobs Engineering. According to Mr. Turner, once legal work is done, they anticipate Jacobs Engineering will be doing/overseeing operations and maintenance on the sludge line (everything except the headworks and scale works) for about 5 years.

    - Per inspection today 4/26/23: According to Ronald Turner, the status of the wasting and sludge management plan is the same and it is still in progress. According to Mr. Turner, they have not heard any news about Jacobs Engineering yet.

- *Gravity Sludge Thickener (GST)*

    There are six GSTs. Two units are needed for designed capacity and one for current flow conditions.

    - During my discussion with Ronald Turner on 2/24/23, Mr. Turner informed me that: GST #3 and #5 are in service. GST #1 is waiting to be repaired. GST #2 and #4 are holding tanks. GST #6, #7, and #8 have drive and gear box issues, and parts have been ordered for them.

    - During my discussion with Ronald Turner today 4/26/23, Mr. Turner informed me that: There are 3 GSTs in service (#1, 3, and 5).

- *Gravity Belt Thickener (GBT)*

There are eight GBTs. Six GBTs are needed for current flows and seven for design capacity.

- During my discussion with Ronald Turner on 2/24/23, Mr. Turner informed me that: There are four GBTs operating (#4, 5, 7, and 8). GBT #5 has been fixed and is in service. GBT #1 has a belt roller issue. GBT #2 requires rehabilitation (long-term issue). GBT #3 has a belt roller issue. GBT #6 has a bearings issue. ACE has been hired to assist maintenance staff and assist with outstanding needs.

- According to the Back River WWTP Progress Report (dated 4/17/23): Repair and maintenance are done on an as needed basis. Currently have 7 available belts.

- During my discussion with Ronald Turner today 4/26/23, Mr. Turner informed me that: As of this morning, 5 GBTs are online (#3, 5, 6, 7, and 8).

- *Dissolved Air Flotation (DAF) Tanks*

  There are four DAF tanks on site.

  - During my discussion with Ronald Turner on 2/24/23, Turner informed me that: Badger has cleaned out rags from DAF #1 and they expect it to be in service again by the end of the day. They are waiting on parts for DAF #2. The status of DAF #3 and #4 is the same, DAF #3 has mechanical issues and DAF #4 is missing the screw auger. ACE has been contracted to deal with the DAF issues.

  - According to the Back River WWTP Progress Report (dated 4/17/23): DAF #1 and #2 are back in service.

  - During my discussion with Ronald Turner today 4/26/23, Mr. Turner informed me that: DAF #1 is in service. DAF #2 is not in service due to a screw auger leak and problem with the pressure relief. The status of DAF #3 and #4 is the same, [DAF #3 has mechanical issues and DAF #4 is missing the screw auger].

- *Centrifuge Maintenance Plan*

  - According to Ronald Turner, Jacobs Engineering will be responsible for preparing the Centrifuge Maintenance Plan.

  - During my discussion with Ronald Turner and Back River WWTP staff today 4/26/23, Mr. Turner and staff informed me that: The status of the Centrifuge Maintenance Plan is the same. They have not heard any news about Jacobs Engineering yet. Centrifuges 1, 2, and 3 have been in service. Centrifuges 1, 2, and 3 are on standby this morning for a power switch over, but are expected to imminently return to service today. Synagro brought down two portable centrifuges from Delaware. The two portable centrifuges are in service onsite.

- *Updated Written Operations and Maintenance (O&M) Manual*

  - Per the 2/24/23 inspection report: According to Ronald Turner, Atkins is overseeing the GAP analysis and preparing a plan. The timeframe for completion of the plan is still 3 months. Mr.

Turner further stated that Atkins is taking care of asset management, training, safety, and performance optimization.

- According to Ronald Turner today 4/26/23: The status of the O&M Manual is the same and Atkins is overseeing the plan's preparation.

- *Evaluation of Current Staffing and Staffing Plan*

  - Per the 2/24/23 inspection report: According to Ronald Turner, Atkins is overseeing work on the staffing plan. Mr. Turner stated that when Jacobs comes in, all the personnel currently working on sludge line will be moving to the other side of the plant.

  - During my discussion with Ronald Turner today 4/26/23, Mr. Turner informed me that: The status of the staffing plan is the same. They have been using ProStart to supplement the staffing shortage.

TRC & DO Quality Assurance

- According to the Back River WWTP Progress Report (dated 4/17/23): Ongoing training and supervision will be provided to ensure that quality assurance measures, specified in Standard Methods 4020I, are followed.

- During inspection today 4/26/23: According to Andrea Buie-Branam, TRC data was sent to MDE and Inspector Kari Hanson. According to Ms. Buie-Branam, they are having the lab look into getting primary standards.

PCB Minimization Plan (PMP)

- Per inspection on 2/24/23: According to Ronald Wicks (Administrator, MDE WSA Compliance), the PCB Minimization Plan (PMP) was submitted to the Department on 2/17/23.

Site Review

After the opening conference, I conducted a site review beginning at the headworks. I was accompanied by Andrea Buie-Branam, Betty Jacobs, Herbert Bell, and Vel Subramanian.

Sewage enters the plant at the mechanical screen building where there are four course screening units, and each unit can treat flows up to 200 million gallons per day (MGD). Therefore, during normal flows one coarse screening unit is sufficient to treat the average daily flow. After coarse screening the sewage flows to the deep wet wells. There are two deep wet wells that are over 50 feet deep that receive wastewater from the Coarse Screening units. Wastewater travels from the deep wet wells through suction pipes that draw water into the Headworks Influent Pumping Station. The influent headworks pump station has 8 lift pumps. The lift pumps are used to pump the screened sewage from the wet wells to the fine screening system.

During this inspection, no problems were observed at the coarse screening units area. The floor by the coarse screening units was observed to be free of debris/rags.

The next stop was at the fine screening building. The headworks is equipped with six fine screening units with a processing flow rate of up to 100 MGD each. The fine screened sewage then travels to the grit removal system.

During this inspection, no problems were observed at the fine screening units area. The floor by the fine screening units was observed to be free of debris/rags.

4/26/23 Fine screening unit #3 was observed to be operating during inspection.

Travelling bridges remove grit from the waste stream, and this is done at the rectangular tanks. Each traveling bridge has an 80 MGD capacity and under current flow conditions 2 bridges are required for satisfactory grit removal. There are 8 traveling bridges and each is connected to a grit unit. The bridges travel back and forth using submersible pump/suction plate systems, that continuously removes settled grit from the tanks and transfers the grit to the grit dewatering processes consisting of spinning classifiers. The classified grit is dried and then sent off-site for disposal. The sewage flows from the grit removal system to a junction box and then to the PSTs.

During this inspection, the floor of the grit removal area was observed to be free of debris.

The next area of evaluation was at the PSTs. No issues were observed during inspection of PSTs #8, 11, and 7. The scum trough at PST #1 was observed to be clogged with scum and requires routine maintenance.

The primary settling is the first stage of treatment after the removal of trash and grit in the headworks building. The PSTs are designed to settle and remove the solids or sewage sludge from the wastewater by gravity and remove the floating scum and fats, oil and grease (FOG). Typically, PSTs are designed to remove a large percentage of the total suspended solids (TSS) and reduce the biochemical oxygen demand (BOD_5) of the wastewater. Therefore, it is

important to maintain the PSTs in good condition at all times.

4/26/23 PST #1 – scum trough was observed to be clogged with scum.

The outdoor areas by the pelletech building and dried sludge loading building were observed during inspection. No liquids were observed to be leaving the pelletech building. South-east of/behind the dried sludge loading building, an area of pooled water was observed past the trench drains. Betty Jacobs stated it is pooled rain water. South-east of the dried sludge loading building, no liquids were observed to be entering the stormwater management culvert. The stormwater management culvert drains toward a Nontidal Wetland area between the site and Bread & Cheese Creek (which is a Use I & Use II waterway). In front of the dried sludge loading building, no liquids were observed to be entering the storm drain inlet.

At the mobile dewatering and disposal area, portable centrifuges are being utilized. According to Betty Jacobs, the storm drain inlets are protected and the area is contained. According to Ms. Jacobs, there is a containment area behind the smoke stack and anything released to the containment area is pumped out. **Responsible parties should ensure that best management practices and containment measures are implemented and maintained as necessary to prevent pollution of waters of the State.**

After primary settling, the wastewater flows to the flow distribution building and from there the wastewater flows to the Activated Sludge Plants #2, #3 and #4 containing a series of biological reactors for nitrogen removal. Each Activated Sludge plant has six reactors. Activated Sludge Plants #2 and #3 have a three-pass train designated A, B

and C for each reactor and #4 is a two-pass system. Activated Sludge Plant # 4 is a newly constructed addition to the secondary biological treatment. Construction was initiated during the ENR upgrades to the Back River WWTP covered under Contract 882 of the previous consent agreement. There are a total of 36 secondary clarifiers. Each Activated Sludge Plant has 12 secondary clarifiers.

During the next phase of this evaluation, the east/south-east side of Activated Sludge Plant #3 was observed. Mixers were observed to be functioning at Activated Sludge Plant #3.

Secondary clarifiers 13B, 12A, 12B, and 14B were observed during inspection. The scum trough at secondary clarifier 13B was observed to be clogged with scum and requires routine maintenance. The skimming arm on secondary clarifier 12A was observed to be missing the skimming flap. According to Betty Jacobs at the time of inspection, secondary clarifier 12B is most likely being taken down for maintenance. The scum trough at secondary clarifier 14B was observed to be clogged with scum and requires routine maintenance.

4/26/23 Secondary clarifier 13B – scum trough was observed to be clogged with scum.

4/26/23 Secondary clarifier 12A – the skimming arm on secondary clarifier 12A was observed to be missing the skimming flap.

4/26/23 Secondary clarifier 14B – scum trough was observed to be clogged with scum.

During inspection, backwash clarifier #2 was observed. Upon our arrival at backwash clarifier #2, staff were observed to be removing solids and trash from the ground next to backwash clarifier #2. The ground was observed to be disturbed at the area of removal. **Responsible parties should stabilize the disturbed area in accordance with erosion and sediment control standards.**

The next stop was at the DNF building. There are four filter quads, and each quad contains 13 Tetra Denitrification Filters with 52 total filters. Baltimore City has a contract with ProStart to operate and maintain the DNF treatment process.

During an inspection of the filters in quads #1 and #2, there were still floating solids observed in the filter at the end of the quad (also observed during inspection on 1/26/23 and 2/24/23).

4/26/23 Solids and trash observed to be floating on water surface in the DNFs.

During inspection at the DNF building and filter quads, Betty Jacobs left the site review/tour group and Timothy Simmons joined the site review/tour group.

We then traveled to the sand filters. The functioning sand filters are used to polish the wastewater coming from the DNF. I observed no problems during inspection of the functioning sand filters.

Next, I inspected the final effluent at the step aeration system. During an evaluation of the final effluent, I observed that the effluent was clear with no visible particulates. Much less flow was observed today than observed in previous inspections. According to Timothy Simmons, they are most likely taking it down to scrape the algae off.

During an inspection of the chlorine contact chambers, I observed no problems. At the request of the Department, the Back River WWTP installed floating booms upstream of the final overflow to preventing floating scum and solids observed during previous inspections from discharging to the surface waters of the State. These booms were in place and functioning satisfactorily. There was no evidence of floating material breaching the final booms during this evaluation.

4/26/23 Final Effluent at the step aeration system.

After the site review, we went back to the administration building for an exit conference to discuss my findings with Ronald Turner and Andrea Buie-Branam.

Only well-trained, dedicated plant operators can be expected to perform adequate physical inspections, repairs, and preventive maintenance. The Back River WWTP should ensure that all staff are adequately trained and committed to the satisfactory operations of the treatment plant. Optimal maintenance activities at the Back River WWTP can be multifaceted and requires a variety of operator skills to be effective. Therefore, adequate staff and ongoing staff training are necessary. There has not been adequate long-term planning for staff replacement and system upgrades and changes at the Back River WWTP. Many of the skills necessary for routine and preventive maintenance at the site are not readily available and goes beyond the routine wastewater apprenticeship training programs. The Back River WWTP should develop a plan to ensure that there are sufficient staff that are qualified for assigned tasks. A staffing plan must be developed to access current staffing levels, required staffing needs and a projection of future staffing requirements in order to evaluate and identify staffing needs at the WWTP. This must be done to ensure that the WWTP functions efficiently and complies with General Condition B3a and b of the NPDES permit.

The following violations were observed under Environment Article Title 9 for the Back River WWTP:

1. Crucial equipment maintenance and repairs are not being performed by the Back River WWTP at the level necessary to efficiently operate and maintain the treatment works as detailed in this report. In addition, there is a list of equipment requiring maintenance listed under Equipment and Maintenance Projects in this report. The Back River WWTP has failed to provide enough qualified staff to adequately operate and maintain the WWTP. This is a violation of General Condition B3a and b of the NPDES permit, which specifies the following:
    - Facilities shall be operated efficiently to minimize upsets and discharges of excessive pollutants.
    - The permittee shall provide an adequate operating staff qualified to carry out operation, maintenance and testing functions required to ensure compliance with this permit.

2. There has not been adequate long-term planning for staff replacement and system upgrades and changes at the Back River WWTP. A staffing plan is necessary to determine the gap between current staffing levels and required levels to comply with General Condition B3a and b of the NPDES permit.

3. GBTs #1, 2, and 4 are not online and need specific repairs to function as designed.

4. The DAF tanks (#2, 3, and 4) are not online for various reasons listed above.

5. The DO monitoring probes used to continuously monitor the DO in the biological reactors are not functional. According to Ronald Turner, the DO monitoring and other associated equipment have been ordered and Back River WWTP staff are waiting for parts.

6. The scum trough on PST #1 is clogged with scum and requires routine maintenance. This is a violation of General Condition B3 of the NPDES permit.

7. The scum troughs on secondary clarifiers 13B and 14B are clogged with scum and require routine maintenance. The skimming arm on secondary clarifier 12A is missing the skimming flap. This is a violation of General Condition B3 of the NPDES permit.

To bring this site into compliance with Environment Article Title 9, the Back River WWTP should make the following corrections:

A. With respect to item #1 above, the Back River WWTP should immediately comply with the requirements under General Condition B3 of the NPDES permit and adequately operate and maintain the treatment works.

B. With respect to item #2 above, the Back River WWTP should immediately submit to the Department a comprehensive staffing plan. The plan should be implemented by the date of submission to the Department to ensure that there is sufficient staff to comply with the requirements of General Condition B3b of the NPDES permit.

C. With respect to item #3 above, the Back River WWTP should comply with General Condition B3 of the NPDES permit and immediately make plans to perform the necessary repairs to the GBTs. In addition, the Back River WWTP should keep the Department informed on the status of the repairs to the GBTs in the monthly status report to be submitted to the Department.

D. With respect to item #4 above, the Back River WWTP should comply with General Condition B3 of the NPDES permit and immediately make plans to perform the necessary repairs to the DAF tanks. In addition, the Back River WWTP should keep the Department informed on the status of the repairs in the monthly status report to be submitted to the Department.

E. With respect to item #5 above, the Back River WWTP should keep the Department informed monthly on the status of the replacement of the DO sensors and associated equipment necessary to automatically monitor and control the DO in the reactors at the activated sludge plants. All equipment necessary for treatment must be kept in satisfactory condition in order to comply with the requirements of General Condition B3 of the NPDES permit.

F. With respect to item #6 above, the Back River WWTP should maintain the PSTs as required to keep them functioning properly to comply with the requirements under General Condition B3 of the NPDES permit. The scum pit should be pumped out as necessary and the scum trough should be cleaned. Going forward, the scum troughs on the PSTs should be routinely inspected and the scum pits pumped out as necessary to keep the scum trough openings clear.

G. With respect to item #7 above, the Back River WWTP should maintain the secondary clarifiers as required to keep them functioning properly to comply with the requirements under General Condition B3 of the NPDES permit. The scum pits should be pumped out as necessary and the scum troughs should be cleaned. The skimming flap for the skimming arm on secondary clarifier 12A should be installed. Going forward, the scum troughs on the secondary clarifiers should be routinely inspected and the scum pits pumped out as necessary to keep the scum trough openings clear.

STATE LAW PROVIDES FOR PENALTIES FOR VIOLATIONS OF MARYLAND ENVIRONMENT ARTICLE TITLE 9 FOR EACH DAY THE VIOLATION CONTINUES. THE DEPARTMENT MAY SEEK PENALTIES FOR THE AFOREMENTIONED VIOLATIONS OF TITLE 9 ON THIS SITE FOR EACH DAY THE VIOLATION CONTINUES.

Inspector: Samantha Coffman 5/30/23 Received by: _____

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Signature/Date

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