Maryland Department of Environment
Water and Science Administration
Compliance Program
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Inspector: Ronald Wicks
AI ID: 8449

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

Start Date/Time: August 16, 2022 09:48 AM
End Date /Time: August 19, 2022 12:18 PM

Complaint Number:
Media Type(s): NPDES Municipal Major Surface Water
Contact(s):
Betty Jacobs
Andrea Buie-Branam
Chris Kroen
Rayford McEachern
Dan Latova

NPDES Municipal Major Surface Water

Permit / Approval Numbers: 15DP0581
NPDES Numbers: MD0021555
Inspection Reason: Follow-up (Non-Compliance)
Site Status: Active
Compliance Status: Noncompliance
Site Condition: Noncompliance
Recommended Action: Continue Routine Investigation
Evidence Collected: Photos or Videos Taken, Record Review, Visual Observation
Delivery Method: Email
Weather: Dry Average

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, sand filters, chlorination, and dechlorination. The flow is split at a junction box and the larger portion of the flow goes to Outfall 001 to the Back River via cascading outfall and the remaining portion of about 20 million gallons per day (MGD) goes to Outfall 002, which is further chlorinated and sent to Tradepoint Atlantic.

The facility's activity code or standard industrial classification (SIC) is 4952, and the North American Industry Classification System 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 Bear Creek and Patapsco River also protected for Use II waters.

On August 16, 2022, I met Betty Jacobs, Andrea Buie- Branam, Chris Kroen, Rayford McEachern, and Dan Latova representing Back River WWTP for an announced inspection pursuant to state permit #15-DP-0581 (NPDES MD0021555), Back River WWTP. During a preliminary meeting with the above staff, I discussed my plans and what I intended to accomplish on this date. My primary goal was to evaluate and determine progress made since the last monthly inspection with regards to the following:

During the preliminary meeting, I discussed the status of the major components listed below:

- Headworks (fine and coarse screening and grit removal system)
- Primary settling tanks (PST)
- Biological reactors
- Secondary clarifiers
- Denitrification filters (DNF)
- Sand filters
- Chlorine contact chambers (CCC)
- Staffing
- Solids Management

I. Headworks

Problems with the biological wet odor scrubber system in the headworks building have prevented satisfactory control and removal of hydrogen sulfide (H_2S) in the building. The H_2S is corroding the silver and copper circuit parts. The ambient concentration of H_2S in the headworks building has affected electrical conductors and current carrying parts, which can impair or prevent automated functions from engaging as designed. An independent contractor, ProStart, is currently managing the headworks. The ProStart manager was on vacation and currently not available for comment. During the preliminary meeting, Jacobs informed me that the odor scrubber system is being evaluated. ProStart's running plan is flushing water through the system and reseeding the odor control scrubbers with a new batch of microorganisms to try and remediate issues with the odor control system. During the last inspection on July 14, 2022, the permittee was advised to report the status of the odor control system to the Maryland Department of the Environment (MDE or Department) within 30 days of the receipt of the report.

II. Primary Settling Tanks (PST)

In the course of discussion at the preliminary meeting, I confirmed that currently there are three functioning PSTs online. At this time, there are three functioning PSTs (#1, #8 and #11) out of the 11 PSTs at the site. PST# 7 is being refurbished by the Maryland Environmental Services (MES). During today's preliminary meeting, Kroen stated that the scheduled date to bring this PST back online has been moved from August 2022 to mid to late September 2022. It was determined after further evaluation that scum baffles are required for optimal performance.

A third-party engineering evaluation determined that five PSTs are required for effective treatment of average flows of 130 MGD. Currently, flows are at historically low levels.

III. Biological Reactors and Secondary Clarifiers

During the preliminary meeting, I discussed the Activated Sludge Reactor Plants (#2, #3 and #4) with Latova. The secondary clarifiers associated with Activator #2 that are not in service are #5B, #7A, #16A and #16B. The secondary clarifiers associated with Activator #3 that are not in service are #11A and #12B. Activator #4 has one secondary clarifier (#18) that is not functional. This secondary clarifier is still online, but there is a problem with the diffuser. According to Latova, they are planning to drain the clarifier in the near future and fix the problem.

Latova explained to me that when I conducted my site review that I would find algae on the weirs of the secondary clarifiers. He stated that the problem is partially due to low flows. The Back River WWTP has informed the Department that they would like to take one of the two older activated sludge reactor plants offline to make repairs and clean the solids out of the tanks. Since flows are down, this would be an optimal time to conduct this maintenance. I asked when this project would start and Jacobs stated that they do not have sufficient staff for this project.

IV. Denitrification Filters (DNF)

The DNF are being maintained by an independent contractor, ProStart. The DNF were not discussed during the initial meeting. The details can be found in the site review section of the report.

V. Sand Filters

During the preliminary meeting, I learned that approximately 20 of the 48 sand filters are functioning. According to Kroen, parts are on order for repairs, and they are waiting on the delivery of 20 backwash pumps ordered earlier this year. The Department's July 14, 2022 inspection report specifies that the permittee shall submit an update on the status of the repairs to the sand filters every 30 days until all of the sand filters are operational.

VI. Chlorine Contact Chambers (CCC)

Jacobs indicated that the booms, that were requested by the Department to prevent floating solids from discharging, were received and have been placed in the outlet to the CCC to prevent floating solids from going into the Back River.

VII. Solids Management

According to Kroen, centrifuges #1 and #2 are functional and #3 has a programming issue. Centrifuge #4 was refurbished by the manufacturer and is on site. Parts are required for the installation, so the installation date has been changed from this week to September 6, 2022. During this inspection, I found that centrifuges #1 and #2 were not processing (dewatering) today. According to Kroen, there is too much space in the digesters making it unsafe, so the biosolids that normally would go to the centrifuges are now going to fill the digesters. Kroen stated that they are trying to get the level in the digesters between 3 to 3.6 feet.

The last two items on my list to discuss are staffing and slightly rising total nitrogen values that occurred in July. According to Latova, they have not been able to get qualified staff because management at the plant do not select candidates for the positions. This is done by the Baltimore City Human Resources Department (HR). Most applicants selected by HR do not have sufficient

training or job experience to be able to function satisfactorily. He further stated that there are not sufficient staff to be able to provide training hours needed to get the applicants to a point where they can function on their own. During the same discussion, the Back River WWTP staff indicated that in July, there were three significant storms, a power outage, and a failure of the blower switches creating the perfect-storm scenario that impacted treatment causing a rise in nitrogen levels.

Next, I conducted a site review accompanied by Andrea Buie-Branam, Chris Kroen, and Rayford McEachern starting at the PSTs.

During the inspection of the PSTs, I found the following:

There were no problems observed with the three PSTs #1, #8 and #11 that were online. These PSTs appeared to be functioning as designed and the skimmers were working on all three PSTs.
The PST #5 is being cleaned of solids by the independent contractor, Badger Daylighting Corporation. As previously mentioned, PST #2 and # 7 have been cleaned out and #7 is scheduled to be online in about one month bringing the number of active PSTs up to four.

8/16/22 PST #1

8/16/22 PST #2

8/16/22 PST #7

Next, I inspected the secondary clarifiers. During the preliminary meeting, I was told that seven of the 37 secondary clarifiers were not in service. However, I observed that secondary clarifier #13A was not functioning as designed due to floating vegetation that had clogged the scum collection opening to the scum pit. Due to the blockage, the skimmer cannot function as designed to collect the floating scum. According to Kroen, the crew from Badger was going to begin cleaning this clarifier today.

There was algae and vegetation growing on and around the weirs of the clarifiers that were being used for wastewater treatment. This is causing short circuiting of the weirs. This problem has been reported during previous inspections. According to Latova, the influent flow is down causing the water in the clarifiers to move through at a very slow pace causing the algae buildup. Control measures should be taken to address the problem on a continuous basis.

Algae growth in secondary clarifiers is a common problem for all uncovered weirs on secondary clarifiers. It requires regular measures to keep the problem under control. Algae can cause problems with total suspended solids (TSS) within the treatment system and can cause problems with pumps by increasing the chance of clogging. The weirs on all secondary clarifies should be routinely scrubbed to remove the algae or other control measures as deemed necessary.

8/16/22 Secondary clarifier 13A. Opening to the scum pit is clogged. Water spray is being used to try to keep the pit open.

8/16/22 Secondary clarifier #5A. Reed grass growing on and around the weirs.

8/16/22 Vegetation on the weir of a secondary clarifier

Next, I inspected the biological reactor tanks at Activator Plants #2 and #3, and I observed the following problems:

1. The reactor tanks required maintenance, including some of the mixers in the reactors were not functioning as designed, blowers not functioning, and the tanks needed to be cleaned of solids.
2. The computerized dissolved oxygen (DO) monitoring equipment used to continuously monitor the DO is not functional, so the DO must be measured manually to determine if the target DO in each stage is being met. However, not at the level necessary to ensure stable DO concentrations at the target level. This process should be automated to ensure proper and stable DO levels for each reactor zone. This has been reported in previous inspection reports and during the weekly progress meetings. No specific dates to begin the project have been made.
3. Vegetation is growing in certain areas of the reactors.

The next stop was at the DNF building. There are four filter quads, and each quad contains 13 Tetra Dentification Filters with 52 total filters. Baltimore City has a contract with ProStart to operate and maintain the system. When I arrived, I went to the control room to discuss the operation with the ProStart operator, Arch Foreman. Foreman told me that 51 of the 52 filters were online. I checked the control panel to verify, and then went to filter quads #1 and #2.

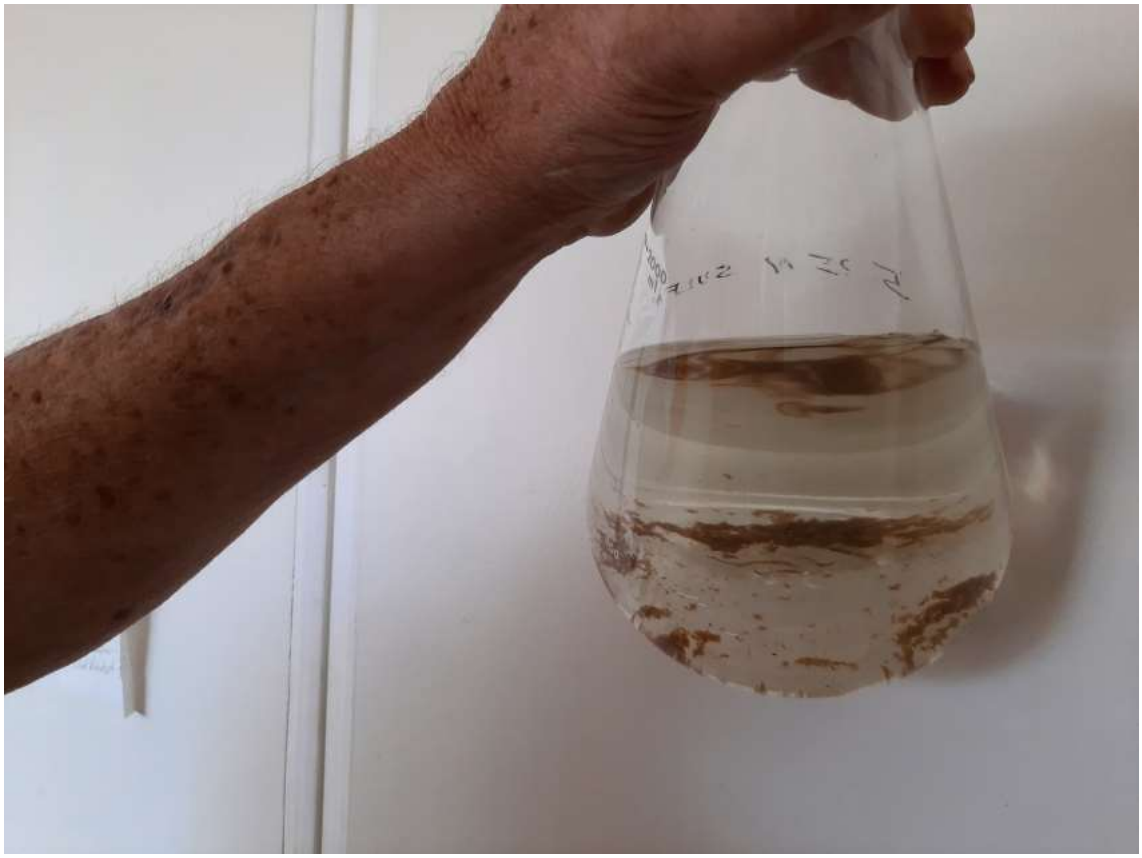
During an inspection of the filters in quads #1 and #2, I found that not all of the filters were functioning as designed. I asked Foreman, to accompany me to quads #1 and #2, and showed him that some of the filters were not functioning as designed. Many of the filters were submerged under the wastewater being treated. According to Foreman, the filters contained solids that were preventing them from filtering and functioning properly. He further indicated that these filters need to backwash to remove the solids. I asked him why the filters had not been backwashed. He indicated that the filters are being backwashed; however, only one filter per quad can be backwashed at a time. Foreman further stated that the filters were functioning satisfactorily on the previous day, but around 3:00 a.m.this morning they received influent with a high solids concentration much higher than the filters were designed to treat. According to Foreman, the filters were not designed to handle influent with a solid's concentration of more than 10 milligrams per liter. He stated that he collected a sample of the influent, which he later showed to me and Buie-Branam. The sample had settled and floating particles.

During a "bump" (Nitrogen Release Cycle), to remove small bubbles of nitrogen gas that get trapped by the media, I observed some granular particles mixed with the foaming water and floating on the surface of the water in the filter cell. These particles appeared to be media from the filter. During the exit interview, Kroen stated that he has observed media in the water during the bump cycles. Since this media can affect downstream processes and equipment, the Back River WWTP should investigate and determine if this is a serious concern.

8/16/22 Submerged filter

8/16/22 DNF with floating scum layer

8/16/22 DNF in Quad #3 Note dark grey water showing high solids concentration



8/16/22 Sample of influent with high amount of suspended solids entering the DNF system at approximately 3:00 a.m.

6/16/22 Quad #3 filter #11 out of service filter.

8/16/22 Solids in filter located in Quad 3. This should be investigated.

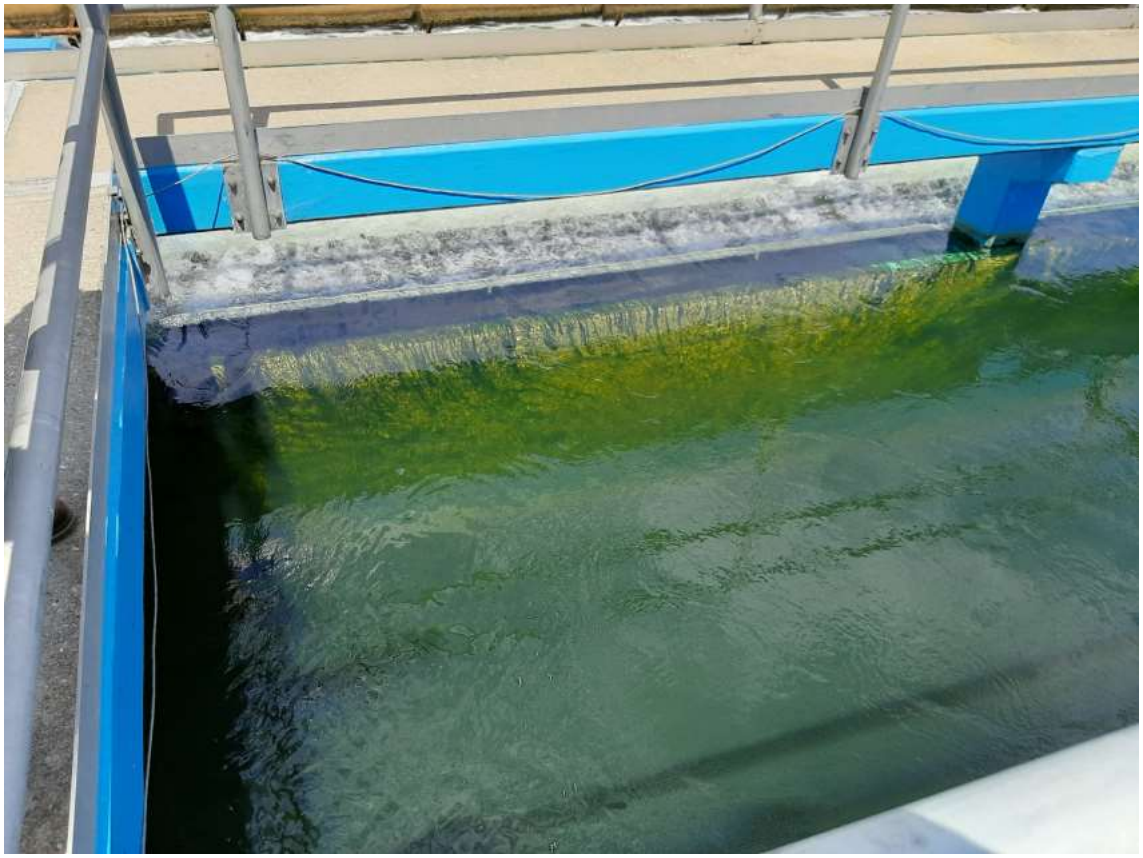
The effluent from the DNF flows to the clear well and then to the sand filters. During this morning's preliminary meeting, I was told that about 20 of the 48 sand filters are in operation. Parts and backwash pumps are on order repair out of service units. During the July 14, 2022, evaluation, the Department required the Back River WWTP to provide a report detailing the current status of all 48 sand filters. The status report shall detail which filters are operational, filters requiring repairs, type of repairs necessary to get each filter back online, and timeframe for getting each filter back in service.

Next, I inspected the chlorine contact chambers. During the last evaluation, I observed that the Back River WWTP installed floating booms upstream of the final overflow. This was done at the request of the Department to prevent floating scum and solids observed during inspections done in 2021 and 2022. At that time, I observed that the booms were being breached on the sides and a

small portion of the floating solids were floating through. Today, I observed that the Back River WWTP has installed additional booms downstream of the original booms as an extra measure. There was no evidence of floating material breaching the final booms during this evaluation.

8/16/22 Recently installed booms since the last evaluation

Next, I inspected the final effluent at the step aeration system and at the sampling station. I found the final effluent to be clear with a slight green tint and no suspended or floating particulates.



8/16/22 Final effluent prior to step aeration

8/16/22 Final effluent at step aeration system

VII. Staffing

My observations, during the inspection site reviews along with conversations with management and operating staff, point out that the Back River WWTP has a major problem maintaining equipment and adequately controlling processes caused by a shortage of qualified staff. When discussing and obtaining information on routine equipment preventive maintenance (PM) schedules and tasks, I am told that there are not enough qualified staff to operate the plant and also perform routine PM. This is a violation of General Condition 3b of the NPDES permit, which requires the Back River WWTP to provide an adequate operating staff qualified to carry out operation, maintenance, and testing functions required to ensure compliance with the permit.
Due to the lack of qualified staff, there is a greater potential for operational problems that could affect human health and the environment. This problem along with the delayed turnaround times for microbiological samples (E. coli), analytical results for E. coli are sometimes not received in sufficient time to make satisfactory public health decisions.

In order for the plant to operate satisfactorily, it is essential for the Back River WWTP to have adequate qualified mechanics and certified operators. In addition, the Back River WWTP must begin to satisfactorily maintain computerized equipment and operations so that there is no need for operators to perform manual checks like DO measurements in the reactors. The Supervisory Control and Data Acquisition (SCADA) system should be used to the fullest extent possible. A fully functional SCADA system can generally reduce the number of staff required to operate the

plant. If this is the case, then the automated operations are not being maintained as required, staff has not been trained properly or both.

- The Back River WWTP should conduct a comprehensive evaluation of staffing needs.
- Evaluate all processes to find ways to operate more efficiently.
- Provide training programs for management, mechanics, operators, and support staff.
- Routine meetings with contractors, like ProStart that are managing certain plant operations. ProStart should provide Back River WWTP with an operations plan that addresses all issues, requirements of running the system and PM, maintenance schedules, and any identified expectations.
- Find a way to improve operating practices like improving housekeeping and establishing preventive maintenance procedures for all equipment and processes, and training.
- Preventive maintenance procedures should be designed to reduce incidents of equipment breakdowns and inefficiency.

The July 14, 2022 inspection report specifies that the Back River WWTP shall submit to the Department a plan on addressing staffing needs.

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

1. There are not enough qualified staff to adequately operate and maintain the Back River WWTP.

2. The DNF are not functioning as designed and many of the filters were submerged under the wastewater entering the filters because of solids clogging the filters. Consistent backwashing is required to unclog the filters and keep them functional. According to the ProStart operator, solids concentrations going into the filters are sometimes above what the filters are designed to handle. In addition, during the nitrogen release cycle or bump, some of the filter media is rising to the surface and entering the clear well. This media may compromise downstream processes and equipment. During the 6/2/22 Compliance evaluation report, it was determined that the DNF required service due to various mechanical reasons or were clogged preventing satisfactory performance. The permittee was required to submit, by August 10, 2022, a status report to the Department detailing the status of all 52 DNF with a scheduled date for all maintenance and repair items. In a response letter dated August 5, 2022, Baltimore DPW informed the Department that the electrical problems associated with the performance of the DNF has been addressed by temporary means and reported the following: “ENEY Electric has completed all work to provide temporary power supply to Quad #2. All but one filter are operational as of August 4, 2022. ProStart is developing a contract with ENEY Electric to supply a permanent power supply”. The Back River WWTP has only addressed the power supply problem required to bring the DNF in Quad #3 online. The problem with the clogging of the filters in all four Quads has not been addressed. During this 8/16/22 inspection, I found that filter #11 in Quad #3 was down for repairs and twelve filters were submerged due to clogging by solids.

3. Algae and vegetation were observed on and around the weirs of the secondary clarifiers that is causing the short circuiting of the system. This condition can impact TSS in the waste stream being treated. In addition, vegetation on the surface of the water of the clarifiers is preventing the adequate removal of surface scum. This has been an ongoing problem that has not been resolved due to unsatisfactory maintenance. On August 5, 2022, the Department received a letter from Baltimore City DPW stating that Badger Daylighting (Badger) has submitted a proposal and scope of work to clean algae and vegetation from 24 of the secondary clarifiers. As noted in this report, Badger was onsite during this evaluation. The cleaning of the clarifiers by Badger will correct current unsatisfactory conditions in the secondary clarifiers but the one-time cleanings are not a long-term solution to this problem.

4. A status report on the current condition and performance of the odor control scrubbers to control H_2S at the Headworks building is due by September 5, 2022.

5. The Back River WWTP has completed 4 quarters of total Polychlorinated Biphenyl (tPCB) congener testing for 2021 and the results show that the facility has exceeded the assigned WLA of 48.5 grams per year and 18.6 grams per year at Outfall 001 and Outfall 002, respectively. Special Condition A2 footnotes 4(b) and 4(c) of the permit specifies that if the facility's annual tPCBs load exceeds the WLA, the permittee shall submit a plan to the Department for approval to track the sources and Best Management Practice (BMP) implementation within 60 days of exceedance of the annual WLA for tPCBs. Therefore, the Back River WWTP must prepare and submit a PCB Minimization Plan (PMP) to the Department for approval. This plan is overdue and violates the Special Condition 2a of the permit.

6. The Back River WWTP has contracted the operations of certain treatment processes (Headworks, DNF system, Activator Plant #4) to ProStart, an independent contractor. The Back River WWTP has not provided documentation as requested to verify that contract staff operating the treatment works meet the certification requirements in Title 12 of Environmental Article, Annotated Code of Maryland, and Section 26.06.01 of the COMAR. This documentation was due by July 10, 2022.

7. Approximately 20 of the 48 sand filters are operational. There are various parts and pumps that are required to get all 48 of the filters functional.

8. During the June 2, 2022 inspection, I observed that some of the mixers in the biological reactors were either not functioning or barely turning at Activated Sludge Plants #2 and #3. The Back River WWTP has failed to submit a status report on the condition and scheduled dates to get the failing and nonfunctioning mixers repaired as specified by the inspection report. This report was due by July 10, 2022.

9. The Department's June 16, 2021 inspection report stated that more detailed training of staff was necessary and updated more comprehensive procedures on general operations and maintenance were required. The report specified that the Back River WWTP shall develop an updated Operations and Maintenance (O&M) Manual considering at minimum the following areas of concern:

1. Emergency Situations BMP
2. Energy conservation
3. Equipment record system
4. Inventory management
5. hydraulic overloads
6. Staff scheduling
7. Laboratory contracts and deliverables
8. Permit requirements
9. Preventative maintenance and planning
10. Process control
11. Pumping stations
12. Safety
13. Sludge disposal
14. Staff training
15. Treatment chemical supply
16. Treatment process
17. O&M Manual review

The updated comprehensive O&MManual was due by February 12, 2022. The Department has not received a copy of the updated O&M Manual to date.

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

A. With respect to item #1 above, within 30 days of the receipt of this report, the Back River WWTP shall submit to the Department a list of all operations and maintenance staff, certification status, assigned duties, and work location. In addition, a list of vacant O&M positions at the Back River WWTP.

B. With respect to item #2 above, the Back River WWTP shall adequately address the problem associated with the DNF quads to comply with II Special Condition 2A footnote [5], which states that "The permittee shall operate the ENR facility in a manner that optimizes the nutrient removal capability of the facility as stipulated in the Grant Agreement for ENR upgrade". Within 30 days of the receipt of this report, the Back River WWTP shall provide to the Department a strategic plan for the control of solids into the DNF system to prevent the clogging of the filters in order to optimize and enhance nutrient removal.

C. With respect to item #3 above, the weirs on the secondary clarifiers shall be routinely inspected and scrubbed as necessary to prevent aggressive algae growth. All vegetation shall be removed from the secondary clarifiers and routine maintenance shall be performed to prevent recurrences of the problem.

D. With respect to item #4 above, the Back River WWTP shall submit, by September 5, 2022, a status report on the current condition and performance of the odor control scrubbers at the Headworks Building. In addition, an update on the status of repairs shall be submitted to the

Department every 30 days until the Back River WWTP can provide data showing that the H_2S is under control and the corrosion problem is permanently resolved.

E. With respect to item #5 above, the Back River WWTP must prepare and submit a PMP to the Department for approval within 60 days of the receipt of this report. On November 8, 2021, the Department provided the Baltimore City DPW with a copy of the Department's guidance document on the preparation of an acceptable PMP. The PMP was due 60 days after the permittee exceeded the tPCB WLA at Outfalls 001 and 002. The non-submittal of the PMP is a violation of Special Condition 2a of the permit. Submit the delinquent PMP as required.

F. With respect to item #6 above, within 10 days of the receipt of this report, the Back River WWTP shall submit the overdue report containing the names of the ProStart operating staff and any contract operators along with a copy of their operator certification license and their assigned work location. In addition, a plan of action that addresses how the Back River WWTP plans to continually track the certification status of all contractors that will be operating and maintaining the treatment works shall be prepared and submitted within 30 days of the receipt of this report.

G. With respect to item #7 above, as specified by the July 14, 2022 inspection report, the Back River WWTP shall provide a report detailing the current status of all 48 sand filters by September 5, 2022. The status report shall detail which filters are operational, filters requiring repairs, the type of repairs necessary to get each filter back online, and the timeframe for getting each filter back in service. An update on the status of the repairs to the sand filter shall be submitted every 30 days until all of the sand filters are operating as designed.

H. With respect to item #8 above, the Back River WWTP shall submit the overdue status report. The report was due to the Department on July 10, 2022.

I. With respect to item #9, the Back River WWTP shall submit the overdue Operations and Maintenance Manual. The report was due February 12, 2022.

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.

NPDES Municipal Major Surface Water - Inspection Checklist		
Inspection Item	**Status**	**Comments**
Does the facility have a discharge permit?	No Violations Observed	
Is the discharge permit current?	No Violations Observed	
If the permit is not current, has facility applied for renewal?	No Violations Observed	

Inspection Date: August 16, 2022
Site Name: Back River WWTP
Facility Address: 8201 Eastern Ave, Baltimore, MD 21224

NPDES Municipal Major Surface Water - Inspection Checklist		
Inspection Item	**Status**	**Comments**
Has the Permitee exceeded the permitted capacity of the WWTP?	No Violations Observed	
Is the number and location of discharge points as described in the discharge permit?	No Violations Observed	
Has permittee submitted correct name and address of receiving waters?	No Violations Observed	
Has the permittee submitted the monitoring results on the proper Discharge Monitoring Report form?	No Violations Observed	
Has the permittee submitted these results within the allotted time electronically?	No Violations Observed	
Is the facility being properly operated and maintained including:(a) stand-by power or equivalent provisions available, (b) adequate alarm system for power or equipment failure available, (c) all treatments units are in service, .	Out of Compliance	See Narrative
If a non-complying discharge occurred since the last inspection, was the regulatory agency notified within the allotted time?	No Violations Observed	
If applicable, has the permitee complied with all special conditions of their permit?	Out of Compliance	See Narrative
Are discharge monitoring points adequate for representative sampling?	No Violations Observed	
Do parameters and sampling frequency meet the minimum requirements?	No Violations Observed	
Does the permittee use the method of sample collection required by the permit?	No Violations Observed	
Are analytical testing procedures used approved by EPA?	No Violations Observed	
If alternate analytical procedures are being used, has proper approval been obtained?	No Violations Observed	
Has the permittee notified the Department of the name and address of the commercial laboratory?	No Violations Observed	
Were discharges observed at the authorized outfalls?	No Violations Observed	
If discharges were observed, do the discharges or receiving waters have any visible pollutants observed?	No Violations Observed	
Does this facility have coverage under a a NPDES stormwater discharge permit?	No Violations Observed	
Are the permit conditions being met?	Out of Compliance	See Narrative

Inspector: Ronald Wicks 8/19/22
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Received by: Elizabeth R Jacobs 8/29/2022
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