

## **Maryland Department of Environment**

Water and Science Administration Compliance Program 1800 Washington Blvd, Suite 420 Baltimore, MD 21230-1719 410-537-3510, 1-800-633-6101

**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**: June 02, 2022 09:18 AM **End Date/Time**: June 08, 2022 05:28 PM

**Complaint Number:** 

Media Type(s): NPDES Municipal Major Surface Water

Contact(s):

Rayford McEachern, Wastewater Engineer Dana Garris, Wastewater Operator 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: Additional Investigation Required

Evidence Collected: Photos or Videos Taken, Record Review, Samples Taken

**Delivery Method:** Email **Weather:** Clear Average

#### **Inspection Findings:**

The Back River Wastewater Treatment Plant (WWTP) is an activated sludge process sewage treatment plant with BNR (MLE process), ferric chloride for phosphorus removal, Denitrification 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 MGD goes to 002, which is further chlorinated and sent to Tradepoint Atlantic.

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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.

Today an unannounced routine inspection was conducted for compliance with the individual federal discharge permit NPDES # MD0021555 and state discharge permit # 15-DP-0581 at the Back River WWTP. The permit effective date is 5/1/2018, expiration date of 4/30/2023. A permit renewal application was submitted electronically on 11/4/21.

On this day, initially I met Rayford McEachern and later during the biological treatment evaluation, I met Dana Garris representing the permittee. During my entrance meeting with McEachern, I discussed my plans and what I expected to accomplish during this evaluation. I explained to McEachern that during this inspection I planned to evaluate the physical and chemical water treatment processes. The records and reports and sludge management will be evaluated during another comprehensive evaluation.

After my preliminary meeting with McEachern, I began the site review at the primary settling tanks (PST) accompanied by McEachern. The primary settling is the first stage of treatment after the removal of trash and grit in the headworks building. The facility has 11 PSTs on site. Currently only two of the 11 PSTs are operational. The two functioning PSTs are #8 and #11. The PSTs are designed to settle and remove the solids or sewage sludge from the wastewater by gravity. The PSTs also remove the floating scum and fats oil and grease (FOG). Typically, PSTs are designed to remove over 50% of the total suspended solids (TSS) and reduce the biochemical oxygen demand (BOD<sub>5</sub>) of the wastewater. I observed that PSTs #8 and #11 were operational. Because of the incoming flow rate, some of the flow was being diverted to nonfunctioning PSTs (#9 and #10) because the flow rate was too much for the two functioning PSTs to handle. Some of the PSTs are in various stages of repairs, while others have not been addressed, as noted in the pictures below:

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6/2/22 PST #9. This PST is being used for primary treatment. There is minimal settling of solids and no scum or FOG removal of the wastewater flowing through this PST. This PST was reported as functional by Baltimore City during the 4/25/22 weekly meeting with the Maryland Department of the Environment (MDE of Department)). However, today Dan LaTova, plant engineer, explained that the arm ... "fell off" ... of PST# 9 making the PST nonfunctional. The PST is not being operated as designed.

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PST #10. This PST is being used for primary treatment. There is minimal settling of solids and no scum or FOG removal of the wastewater. The PST is not being operated as designed.

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6/2/22 PST recently cleaned. There was no identifying number for this PST and McEachern was unsure as to the identity of this PST. No one was available for assistance.



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6/2/22 PST #6 Nonfunctioning PST filled with solids and vegetation



6/2/22 PST #5 Nonfunctioning PST filled with vegetation

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6/2/22 PST #7 was recently cleaned by the Maryland Environmental Service (MES) contractors. This PST is scheduled to be online by August 2022.

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6/2/22 PST with no identifying number, however according to McEachern, this is PST #2 The solids are being broken up with water spray.

Based on my observations the Back River WWTP does not have the sufficient number of PST that are functioning as designed to settle out solids with an acceptable detention time and the ability to adequately skim off and dispose of floating scum and FOG. There were several PSTs that have been cleaned; however, drives, other parts and equipment are required to make the necessary repairs to make these PSTs functional. One of the cleaned PSTs is scheduled to be repaired and be online by August 2022.

During the next phase of this inspection, I conducted an evaluation of the headworks. There, we met Baltimore City employee, Lorraine Bendolph. The headworks were recently upgraded. The upgrades consist of new piping, coarse and fine screening, grit removal system, equalization tanks, and a new influent pumping station. The headworks project was turned over to Baltimore City on 8/1/21, and at that time the city became responsible for all maintenance and operations of the headworks. In April 2022, Baltimore City contracted with Professional Startup & Operating Services Inc. (Prostart) to operate the headworks system.

In early 2022, there were ventilation problems identified in the headworks building causing a buildup of hydrogen sulfide (H2S). The ambient concentration of H2S led to corrosion of certain circuits within the headworks building. During my discussion with Bendolph, I was told that the ventilation filter system had become clogged with filter particles preventing the removal of H2S. Now the filters are changed every 3 months and the H2S monitors were moved to different

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locations to better monitor the ambient air. According to Ms. Bendolph, there have been no problems since the routine filter changes were implemented. I was informed during the weekly MDE, MES and Baltimore City Department of Public Works (DPW) meeting that Baltimore City addressed the problems with the corrosion of the copper and silver components of the various systems at the headworks.



6/2/22 H2S monitor in the headworks building

Next, I inspected the screening and grit removal processes in the headworks building. The screening units have coarse and fine screens, and larger more effective grit removal system than the previous system. In addition, there are two 36 MG storage capacity/equalization tanks that can be utilized during high flows to prevent collection system backups during high flow events above 400 MG.

Waste enters the plant at the mechanical screen building where there are four coarse screening units that are rotated, and each unit can handle a flow rate of 200 million gallons per day (MGD). According to Bendolph only one coarse screening unit was needed during normal operations. There was one unit in service during this inspection. The coarse screened sewage flows from the coarse screens 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

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suction pipes that draw water into the Headworks Influent Pumping Station. The influent headworks pump station has eight lift pumps. Four of these pumps are used to pump the screened sewage from the wet wells to the fine screening system. The rags and other trash are collected in dumpsters then removed and dried at an on-site transfer station. After drying the trash is taken off site for disposal.

The headworks is equipped with six fine screening units with a processing flow rate of 100 MGD. During this inspection, all six units were online. The fine screened sewage then travels to the grit removal system. Traveling Bridges remove grit from the waste stream, and this is done at the rectangular tanks. 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 coarse and fine screening and grit removal system appeared to be functioning as designed.



6/2/22 Flow equalization tanks

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6/2/22 Grit removal system- Traveling Bridges suction the grit from the tanks to overhead conveyors that convey the grit to a dewatering system consisting of spinning classifiers.



6/2/22 Grit dewatering system

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6/2/22 Dewatered grit is conveyed to dumpsters for removal.

The wastewater from the grit removal system flows to the PSTs discussed previously for primary stage settling. The wastewater leaving the PSTs flows to a series of biological reactors for nitrogen removal. The facility has two trains with six reactors in each train for a total of 12. Each reactor has a three-pass design designated A, B and C. There is also a third activated sludge plant called Activator #4 consisting of six reactors with a two-pass design that was recently seeded and put into service. This reactor is still in the startup phase, but is currently in operation.

The wastewater traveling in the channels from the PSTs to the activated sludge plants was a dark gray color indicating a high concentration of solids in the waste stream.

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6/2/22 Effluent from the PSTs flowing to the first stage of biological treatment, activator plants 2, 3, and 4, The effluent had a medium gray color. Brown color due to ferric chloride addition for phosphorus removal.

Next, I inspected the Activator Plants 2,3 and 4, and I observed the following problems:

- 1. Some of the mixers were either not functioning or barely turning causing a buildup of floating solids. Mixing raises the dissolved oxygen (DO), and increases the activity of the microorganisms and keeps the organic materials thoroughly mixed within the reactors improving efficiency.
- 2. The DO monitoring equipment used to continuously monitor the DO were not functional, so the DO is being measured manually.
- 3. Vegetation growing in certain areas of the reactors due to high solids levels.



6/2/22 Heavy layer of solids and vegetation preventing proper operation of the reactor

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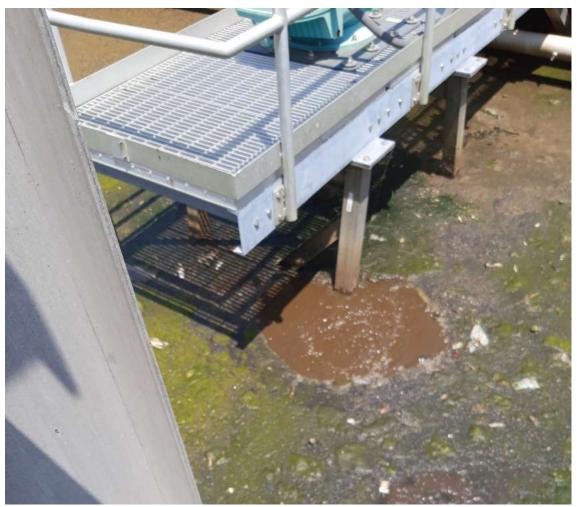
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6/2/22 Reed grass coming up through grating above a reactor basin.

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6/2/22 Mixer in reactor barely turning. Note accumulation of solids due to poorly functioning equipment.

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6/2/22 Mixer not functioning in biological reactor. The mixers keep the organic materials thoroughly mixed within the reactors improving efficiency.

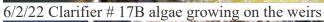
The next stop was at Activator Plant #4. The plant has six new reactors, and each reactor has two associated secondary clarifiers. All activators and clarifiers were online. I found that the reactors were functioning properly with no problems observed. The wastewater travels from the biological reactors to the secondary clarifiers for final settling. The Activator #4 is in the 30-day startup period.

During an inspection of the associated secondary clarifiers for Activator Plant #4, I observed that algae was growing on the weirs of the clarifiers. According to Garris, Baltimore City is not responsible for maintaining these clarifiers. She told me that the city has a contract with Prostart to manage Activator Plant #4, and to contact Prostart.

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6/2/22 Clarifier 17 A algae growing on weirs

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Activators #2 and #3 have 24 associated clarifiers and during this inspection 22 were online. During an inspection of the clarifiers for the Activator #2 and Activator #3, I observed similar problems with maintenance, operation, and performance of the clarifiers. There was evidence of algae growth on the weirs of the clarifiers. This problem has been reported during previous inspections. As stated in the 3/22/22 inspection report, algae growth in secondary clarifiers is a common problem for all uncovered secondary clarifiers. It requires regular maintenance to remove and is a normal issue for all uncovered secondary clarifiers. Algae can cause problems with total suspended solids within the treatment system and can cause problems with pumps by increasing the chances of clogging. The weirs on all secondary clarifies should be routinely scrubbed to remove the algae. This should be done at least weekly in the summer and more frequently as necessary.

I observed that the problem of an excessive buildup of solids in the secondary clarifiers observed during my 3/22/22 inspection has been corrected. The solids, reed grasses and other vegetation have been removed and there was no visible sludge blanket as observed previously. However, there is vegetation beginning to return as well as algae that requires removal before the vegetation gets out of hand as observed during 2021 and early 2022.

In addition, I observed that the scraper arm on secondary clarifier 16 B was broken. The scraper flange on the arm was missing so it was incapable of skimming for surface scum. The facility should have the arm repaired to get the clarifier back in operation.



6/2/22 Secondary clarifier 16 B missing scraper flange.



6/2/22 Vegetation growing in secondary clarifier 14A



6/2/22 Vegetation growing in a secondary clarifier

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6/2/22 Vegetation in secondary clarifier 16 B

The wastewater travels from the clarifiers to the denitrification filter (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 we arrived at the control room, I spoke to the Prostart operator who told me that 12 of the 52 filters were not operating.

During an inspection of the DNF, I found that not all the filters were functioning as designed. Many of the filters were submerged under water due to clogging. Many of the filters had a floating layer of scum that appeared to be emulsified FOG that may be due to inadequate primary treatment. This oily scum will prevent functional operation of the filter and affect the efficiency of the filters. I found that 16 of the 52 filters were not functioning as designed. Some of the filters have been out of service for so long that the water in the filters have become septic. Several of the submerged filters had water flowing through and may have been showing as functional. However, a submerged filter should not be counted as operational. After inspecting the filters, I traveled back to the control room to speak with the Prostart operator, to obtain more information regarding the DNF, however I was not able to find him and no one else was available.

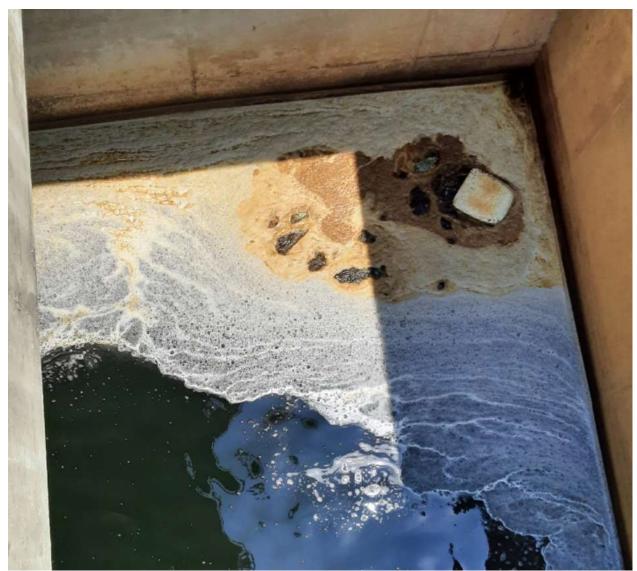


6/2/22 Submerged DNFs



6/2/22 Floating scum and emulsified FOG in DNF

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6/2/22 – Effluent from the DNF system. There is a layer of floating scum in one corner of the chamber

The effluent from the DNF flows to the sand filters. I continued this inspection with an inspection of the sand filters. The facility has 48 sand filters and according to Garris, 21 of the filters were online and functioning. There were contractors working on the sand filters when I arrived. I was told that they planned to have three more online by the end of the day taking the number of inservice sand filters up to 24.

The wastewater travels from the sand filters to the contact chambers where the wastewater is disinfected and then dechlorinated. The wastewater in the contact chambers was in much better condition than observed during previous inspections on 3/22/22, 3/26/22, 4/16/22, and 4/22/22. During those inspections, I observed a dark gray colored effluent with floating solids and particulates. Today the effluent was a transparent light green/green color with no floating solids or particulates. Since my last inspection, the permittee has performed maintenance at the chlorine contact chambers. The bottom solids were removed, and the chlorine contact chambers were

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cleaned. The permittee has also installed floating booms upstream of the final overflow to contain the floating solids. During an inspection of the booms, I observed that the booms were being breached on the sides and a small portion of the floating solids were floating through. According to Garris, the current booms are a temporary measure and Baltimore City has ordered eight booms designed for this application to cover the entire contact chamber area. She was unsure when the booms were expected to arrive. Until the eight booms arrive, the permittee shall keep MDE updated on the expected arrival of the eight booms and inspect and skim the discharge from all of the contact chambers until the booms are installed.

The facility is collecting 24-hr, flow-proportional composite samples at Outfall 001 in accordance with the requirements of the permit. I inspected the primary refrigerated, automatic composite sampler and found that the temperature was satisfactory, but the container for Outfall 001 had some discoloration from residue. The accumulation of residue should be cleaned with detergent and acid as specified in the 6/16/21, report. Most of the intake tubing was not visible for inspection. However, it is recommended that the intake tubing is replaced on a routine basis (e.g., every 1-2 weeks). The temperature of the thermometer in the refrigerated compartment was 5.4 degrees C, which meets 40 CFR Part 136 requirements. During a review of the calibration records, I did not see any annual accuracy verification records for the thermometer or a certificate of compliance for 2022. These records shall be provided to MDE for review.

When I asked to observe the discharge from Outfall 002, Ms. Garris informed me that there was no plant effluent going to Outfall 002 at the moment. McEachern told me that he reported to MDE yesterday that Tradepoint Atlantic requested that the Back River WWTP cease discharges to Outfall 002 in order for them to make repairs and connections to their lines. The flow to Outfall 002 ceased on 6/1/22, and was restarted on 6/6/22.

Next, I evaluated the flow measuring systems for 001 and 002. The effluent flows are monitored in a vault with full flowing pipes that have mag meters. The signal from the mag meters is totalized and recorded on a circular chart recorder, and sent to a computer trend chart that tracks flow. The date of the last accuracy checks on the mag meters for Outfalls 001 and 002 were on 4/14/22.

#### Field instrument calibration records

The calibration records were reviewed for DO and pH and were found to be acceptable. However, there are no quality assurance (QA) records for the DO test SM 4500 O G. Records in the quality assurance logbook state that QA checks were performed for the Amperometric Procedure SM 4500 Cl D for total residual chlorine (TRC). However, no records for these checks were available.

In accordance with Standard Methods 4020I quality assurance requirements for the measurement of DO, the following quality assurance requirements must be met:

- 1. Duplicate analysis must be performed at a rate of 10% to assess precision.
- 2. A zero-oxygen sample must be run at a rate of 20%.
- 3. Documentation for membrane changes for the DO probe. According to YSI, the DO meter manufacturer membrane changes should be done at a frequency of every 4–8 weeks.

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In accordance with Standard Methods 4020I quality assurance requirements for total residual chlorine the following QA/QC requirements must be met:

- 1. *Method blank (MB):* Include at least one MB daily or with each batch of 20 or fewer samples, whichever is more frequent. The MB includes the reagent water and all other chemical reagents that come in contact with the sample during analysis including any preservatives.
- 2. Laboratory-fortified blank (LFB): The laboratory must analyze at least one LFB with each batch of samples.
- 3. Duplicate analysis must be performed at a rate of 10% to assess precision.

The on-site field measurements for samples collected on 6/2/22, show compliance with the effluent limitations (see Table 1 below)

Analyte 6/2/22	Results	Compliance
Hydrogen ion (pH)	7.1 SU	Yes
TRC	<0.1 mg/L	Yes
DO	8.3 mg/L	Yes

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

- 1. Currently there are an insufficient number of functional PSTs available for satisfactory treatment of the primary waste stream. Only two of the 11 PSTs were in service and in order for the plant to operate two nonfunctional PSTs were used to treat the incoming sewage. Since these nonfunctioning PST are not capable of satisfactory primary treatment as designed, a portion of the treatment system is being bypassed by sending the sewage through nonfunctioning tanks and by-passing plant-designed primary treatment.
- 2. The accuracy of the thermometers used to monitor the temperature of the automatic samplers are not checked at least annually.
- 3. The Back River WWTP has placed temporary floating booms at the chlorine contact chambers. This is a temporary measure until the eight booms designed for this application to cover the entire contact chamber area arrive (when they do).
- 4. During the course of this inspection, I observed maintenance and repair problems for treatment system processes that are being run by a private contractor, Prostart.
- 5. Some of the mixers in the reactors were either not functioning or barely turning.
- 6. The DNFs are not functioning as designed or are not functioning at all. The DNFs require service due to various mechanical reasons or are clogged.
- 7. Secondary clarifier 16 B was missing the scum scraper flange.

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8. Unacceptable algae and vegetation growth was observed on the weirs of the secondary clarifiers that is causing the short circuiting of the system. This condition can impact total suspended solids in the waste stream being treated.

- 9. There are unacceptable accumulations of solids and vegetation in the bioreactors that are interfering with the biological process.
- 10. There are no quality assurance records for the DO test SM 4500 O G. Records as required by the approved method.
- 11. There are no quality assurance records for the Amperometric Procedure SM 4500 Cl D for TRC.

# 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 shall get the PSTs cleaned and operational to improve the quality of the final effluent. There should be sufficient functioning PSTs in service to accommodate expected influent flows. Within 15 days of the receipt of this inspection report, the Back River WWTP shall submit to the Department a status report on the condition of all PSTs and a schedule of when the repairs necessary to make each PST functional will be completed. The Back River WWTP shall also submit a progress report every 14 days detailing the status of each PST.
- B. With respect to item #2 above, within 7 days of the receipt of this report, the thermometers in the automatic sampler shall be checked for accuracy against a NIST certified or traceable thermometer and the results submitted to the Department for review. Thereafter, the thermometer accuracy checks shall be conducted at least annually. The results shall document and used to assess the daily accuracy of the thermometers.
- C. With respect to item #3 above, within 15 days of the receipt of this report, the permittee shall submit a status report regarding the expected date of delivery of the eight booms. Then the Permittee shall submit a status report every 14 days to keep the Department updated on the expected arrival of the eight booms. The Back River WWTP shall routinely inspect daily and skim the discharge from all of the contact chambers until the booms are installed.
- D. With respect to item #4 above, the Back River WWTP shall continually ensure that Prostart is operating the treatment process in a manner that optimizes the nutrient removal capability of the facility as stipulated in the Grant Agreement for ENR upgrade. Prostart shall provide adequate operating staff qualified to carry out operation, maintenance and testing functions required to ensure compliance with the NPDES permit. The contracted operating staff shall be certified by the Board of Waterworks and Waste Systems Operators. Within 15 days of the receipt of this letter, the Back River WWTP shall submit to the Department the names of the Prostart operating staff along with a copy of their operator's license and their assigned work location.

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E. With respect to item #5 above, within 15 days of the receipt of this report, the Back River WWTP shall submit to the Department a status report on the condition of all nonfunctioning mixers and a schedule of when the repairs necessary to make each mixer functional will be completed.

- F. With respect to item #6 above, the Back River WWTP shall determine the cause of the problems with the out of service denitrification filters and make the necessary repairs. The problem with the clogged filters should be repaired so that the ENR treatment is not bypassed. Within 15 days of the receipt of this report, the permittee shall submit a status report to the Department detailing the status of all 52 DNF with a scheduled date for all maintenance and repair items.
- G. With respect to item #7 above, the Back River WWTP shall order and replace the scum scraper flange on clarifier 16 B.
- H. With respect to item #8 above, the weirs on the secondary clarifiers shall be routinely inspected and scrubbed as necessary to prevent aggressive algae growth. All vegetation should be removed from the secondary clarifiers and routine maintenance shall be performed to prevent the recurrence of the problem. The Back River WWTP shall submit a progress report every 14 days detailing the status of the vegetation removal from the clarifiers.
- I. With respect to item #9 above, vegetation and solids shall be removed from the bioreactors to ensure efficient biological process treatment. The Back River WWTP shall also submit a progress report every 14 days summarizing the status of the solids removal from the bioreactors.
- J. With respect to item #10 above, in accordance with Standard Methods 4020I quality assurance requirements for the measurement of DO, the following quality assurance requirements must be met:
  - 1. Duplicate analysis must be performed at a rate of 10% to assess precision.
  - 2. A zero-oxygen sample must be run at a rate of 20%.
  - 3. Documentation for membrane changes for the DO probe. According to YSI, the DO meter manufacturer membrane changes should be done at a frequency of every 4–8 weeks.
- K. With respect to item #11 above, in accordance with Standard Methods 4020I quality assurance requirements for total residual chlorine the following QA/QC requirements must be met:
  - 1. *Method blank (MB):* Include at least one MB daily or with each batch of 20 or fewer samples, whichever is more frequent. The MB includes the reagent water and all other chemical reagents that come in contact with the sample during analysis including any preservatives.
  - 2. Laboratory-fortified blank (LFB): The laboratory must analyze at least one LFB with each batch of samples.

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3. Duplicate analysis must be performed at a rate of 10% to assess precision.

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	No Violations	
renewal?	Observed	
Does the facility operate as authorized by their current	Out of Compliance	See Narrative
permit?		Section
Has the Permittee exceeded the permitted capacity of	No Violations	
the WWTP?	Observed	
Is the number and location of discharge points as	No Violations	
described in the discharge permit?	Observed	
Has permittee submitted correct name and address of	No Violations	
receiving waters?	Observed	
Is the permittee meeting the compliance schedule per	No Violations	
permit requirements?	Observed	
Has the operator or superintendent been certified by the	4 - Not Evaluated	
Board in the appropriate classification for the facility?		
Are adequate records being maintained for the sampling	4 - Not Evaluated	
date, time, and exact location; analysis dates and times;		
individual performing analysis; and analytical results?		
Are adequate records being maintained for the	4 - Not Evaluated	
analytical methods/techniques used?		
Does the permittee retained a minimum of 3 years	No Violations	
worth of monitoring records including raw data and	Observed	
original strip chart recordings; calibration and		
maintenance records; and reports?		
Do lab records reflect that lab and monitoring	Out of Compliance	Only on-site
equipment are being properly calibrated and		measurements
maintained?		

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Inspection Item	Status	Comments
		evaluated. See
		Narrative Section
Does the permittee/laboratory use suitable QA/QC	Out of Compliance	See Narrative
procedures and operate a formal quality assurance (QA)		Section. Only field
program using appropriate controls?		measurements
		evaluated.
Has the permittee submitted the monitoring results on	No Violations	
the proper Discharge Monitoring Report form?	Observed	
Do the Discharge Monitoring Reports reflect permit	No Violations	
conditions?	Observed	
Has the permittee submitted these results within the	No Violations	
allotted time electronically?	Observed	
Is the facility being properly operated and maintained	Out of Compliance	See Narrative
including:(a) stand-by power or equivalent provisions		Section
available, (b) adequate alarm system for power or		
equipment failure available, (c) all treatments units are		
in service, .		
Is sewage sludge managed correctly per permit	4 - Not Evaluated	
requirements?		
If a by-pass occurred since last inspection, has the	No Violations	
permittee submitted notice of the by-pass within the	Observed	
allotted time?		
If a non-complying discharge occurred since the last	No Violations	
inspection, was the regulatory agency notified within	Observed	
the allotted time?		
If applicable, has the permittee complied with all	4 - Not Evaluated	
special conditions of their permit?		
Have overflows occurred since the last inspection?	4 - Not Evaluated	
Have records of overflows been maintained at the	4 - Not Evaluated	
facility for at least five years?		
Are flow measuring devices properly installed and	No Violations	
operated, calibration frequency of flow meter adequate,	Observed	
flow measurement equipment adequate to handle		
expected ranges of flow?		
Are discharge monitoring points adequate for	No Violations	
representative sampling?	Observed	

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## NPDES Municipal Major Surface Water - Inspection Checklist

Inspection Item	Status	Comments
Do parameters and sampling frequency meet the	No Violations	
minimum requirements?	Observed	
Does the permittee use the method of sample collection	No Violations	
required by the permit?	Observed	
Are analytical testing procedures used approved by	No Violations	
EPA?	Observed	
If alternate analytical procedures are being used, has	No Violations	
proper approval been obtained?	Observed	
Has the permittee notified the Department of the name	No Violations	
and address of the commercial laboratory?	Observed	
Were discharges observed at the authorized outfalls?	No Violations	
	Observed	
If discharges were observed, do the discharges or	No Violations	
receiving waters have any visible pollutants observed?	Observed	
Were discharge samples collected?	No Violations	
	Observed	
Does this facility have coverage under a NPDES	No Violations	
stormwater discharge permit?	Observed	
If the permittee has coverage under a NPDES storm	4 - Not Evaluated	
water permit, has a stormwater pollution prevention		
plan been developed and implemented as required?		
Are the permit conditions being met?	Out of Compliance	See Narrative
		Section

Inspector:	Ronald Wicks 6 10 22	Received by:	
	Ron Wicks /Date ron.wicks@maryland.gov 410-537-3510		Signature/Date
			Print Name

Inspection Date: Site Name:

June 02, 2022 Back River WWTP

Facility Address:

8201 Eastern Ave, Baltimore, MD 21224

Inspection Date: Site Name: Pacility Address:

June 02, 1411 Back River WWTP 9201 Cassern Ave, Baltimore, MD 21224

NPDES Municipal Major Surface Water - Inspection Checklist

Inspection Item	Status	Comments
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 pullutants observed?	No Violations Observed	32
Were discharge samples collected?	No Violations Observed	
Does this facility have coverage under a NPDES stormwater discharge permit?	No Violations Observed	
If the permittee has coverage under a NPDES storm water permit, has a stormwater pollution prevention plan been developed and implemented as required?	4 - Not Evaluated	
Are the permit conditions being met?	Out of Compliance	See Narrative Section

Inspector:

Ron Wicks /Date ron.wicks@maryland.gov 410-537-3510

Received by:

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