



**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**

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**Inspector:** Ronald Wicks  
**AI ID:** 3076

**Site Name:** Patapsco WWTP  
**Facility Address:** 3501 Asiatic Ave, Curtis Bay, MD 21226  
**County:** Baltimore City County

**Start Date/Time:** April 06, 2022 09:45 AM  
**End Date /Time:** April 08, 2022 12:58 PM

**Complaint Number:**  
**Media Type(s):** NPDES Municipal Major Surface Water

**Contact(s):**

Neal Jackson, Plant Manager  
Eric Johnson Wastewater Supervisor  
Aaron Thomas, Senior Associate, Hazen and Sawyer  
Bernard Williams of Williams Environmental  
Emily Grace, Associate, Hazen and Sawyer

**NPDES Municipal Major Surface Water**

**Permit / Approval Numbers:** 15DP0580  
**NPDES Numbers:** MD0021601  
**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, Visual Observation  
**Delivery Method:** Email  
**Weather:** Clear Average

**Inspection Findings:**

The Patapsco WWTP is a 73 MGD capacity activated sludge with a pure oxygen fed reactor biological treatment with ferric chloride for removal of phosphorus. The treatment system has Biological Aerated Filter (BAF) system and denitrification filters to meet ENR standards. There is chlorination, dechlorination and post aeration prior to final discharge to the Patapsco River, designated Use II waters protected for estuarine and marine aquatic life.

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The average flow is approximately 55-57 MGD; however, during heavy rainfall flows can double due to infiltration from sewer lines

Today a Performance Audit Inspection (PAI) was conducted for compliance with the individual NPDES Discharge Permit MD0021601 and State number 15-DP-0580 for the Patapsco WWTP. The permit effective date is 10/1/2017, expiration date 09/30/2022 and a reapplication date of 03/31/2021. The renewal application has been received. The facility's activity code or standard industrial classification (SIC) is 4952 and the North American Industry Classification System (NAICS) is 22132. On this date, I met Mr. Neal Jackson, Plant Manager and Mr. Eric Johnson, Wastewater Operations Supervisor II, representing the Patapsco WWTP on-site for this audit. I also met Mr. Aaron R. Thomas, Senior Associate, Hazen and Sawyer, Ms. Emily Grace, Associate, Hazen and Sawyer and Mr. Bernard Williams of Williams Environmental. Hazen and Sawyer and Williams Environmental have been hired by Baltimore City to assist with getting the Patapsco WWTP into compliance with the NPDES permit.

There have been a series of effluent violations for the following constituents:

- Five-day biochemical oxygen demand (BOD<sub>5</sub>)
- Total suspended solids (TSS)
- Total phosphorous (TP)

This evaluation is a follow up to previous inspections and to discuss proposed sludge management practices at the site.

The inspection began with an introductory meeting and then a discussion centering on the effluent violations caused by the buildup of solids within the treatment components of the WWTP and discharges of FOG regulated by Special Condition M of the permit.

The headworks grit facility was declared a safety and human health hazard after an accident that caused a fatality. After the accident no one was allowed in the building. According to Mr. Thomas, all safety issues have been addressed and proper venting and air circulation have been provided making the building safe for entry. Upon entry, Hazen and Sawyer determined that all six grit chambers were filled with rags, grit and other debris and the grit removal system was not functioning as designed. Currently the basins are being cleaned and the non-functioning clamshell cranes have been repaired. Mr. Thomas further stated that once the grit chambers are cleaned, the Baltimore City DPW will provide routine removal and proper maintenance of the grit removal system. According to Mr. Thomas, the grit removal system will be functional by the first week of May 2022. Maintaining the grit removal system will lead to improvements in the mitigation of FOG. Mr. Thomas also informed me that the grit building will be rehabilitated under Capital Project SC 938. The bid has not been awarded as of this date.

Patapsco WWTP's biosolids are processed by Synagro, Inc., a private company, located on site that draws the undigested biosolids from the sludge blending tanks and then dewateres the biosolids.

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According to the permittee, Synagro is no longer processing solids at the rate specified by their contract causing excess solids in the final effluent. Mr. Jackson reported that for more than 6 months, Synagro has not been processing sludge at the contracted rate and it has come to a point where it is affecting plant operations and the final effluent.

According to Synagro, the analysis of the sludge samples revealed high hydrocarbon concentration in the sludge. Synagro reported that there is a fire hazard concern and the potential for an explosion associated with the levels of hydrocarbons detected in the sludge. According to Mr. Thomas, Hazen & Sawyer has determined and demonstrated that the sludge from the blending tanks has high TPH however the sludge from the GSTs is free of TPH. The Baltimore City DPW is now in negotiations with Synagro to work out a plan to start pumping the sludge directly from the GSTs instead of the blending tanks. According to Mr. Thomas, there are already plans to replace the sludge blending tanks into digesters in the near future.

The next topic of discussion was the media leakage problem from the BAF. The media loss has been an ongoing problem since 2020 when media loss was observed at cell #5. The filters used are Veolia Water technologies (VWT), biological activated filter (BAF). According to Mr. Jackson, the media leakage problem is still ongoing. He further stated that after several inspections, Kruger USA, manufacturer, has indicated that the media loss is normal. In the BAF process, wastewater flows upwards through the cells that contain tightly packed media that provides a surface for the microorganisms to attach to and grow. Air is added to the bottom of the cell to provide oxygen for the microorganisms to thrive. I explained that the discharge of the media to the surface waters of the State are not acceptable, and this issue must be addressed and resolved.

## Site Review

After the meeting, I conducted a site review accompanied by Mr. Jackson, Mr. Thomas, Ms. Grace, and Mr. Williams. The first stop was at the PSTs. There were five of the six PSTs online at this time. I observed a considerable amount of floating scum and FOG. According to Mr. Jackson, the increase in flow due to rainfall and ongoing maintenance at the grit building caused the FOG from the grit chambers to wash down to the PSTs. I observed that all of the PSTs were overwhelmed with floating scum and FOG. Three of the PSTs can now be manually rotated to keep the scum troughs open using a tool designed by Mr. Eric Johnson. According to Mr. Jackson, the troughs are rotated twice a day and manually skimming with a net is being conducted as well. I noticed that a trash can has been placed in the skimming area as I requested during the 10/6/21 inspection to place the skimmed materials. However, I observed that the skimmed material is still being placed on the walkway deck and gratings. This practice defeats the purpose of skimming because the skimmed materials can get back into the system.

During periods of high flows or hydraulic overloads, as experienced today more frequent rotations are required. I observed the final effluent from the scum troughs and observed no floating scum going over the weir. Next, I traveled to the channel where the incoming effluent from the GSTs is returned to the channel that mixes with the PST effluent. The GST effluent was a dark grey color due to high solids content. During the preliminary meeting, I asked what was the TSS concentration of the effluent from the GSTs. According to Mr. Williams the TSS concentration of

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the GST effluent is 4, 000 mg/L. If functioning properly, the final effluent should be between 200 – 500 mg/L.



4/6/2022 PST scum trough requires turning. Mr. Thomas, from Hazen and Sawyer turns the scum trough with tool designed to rotate the trough.

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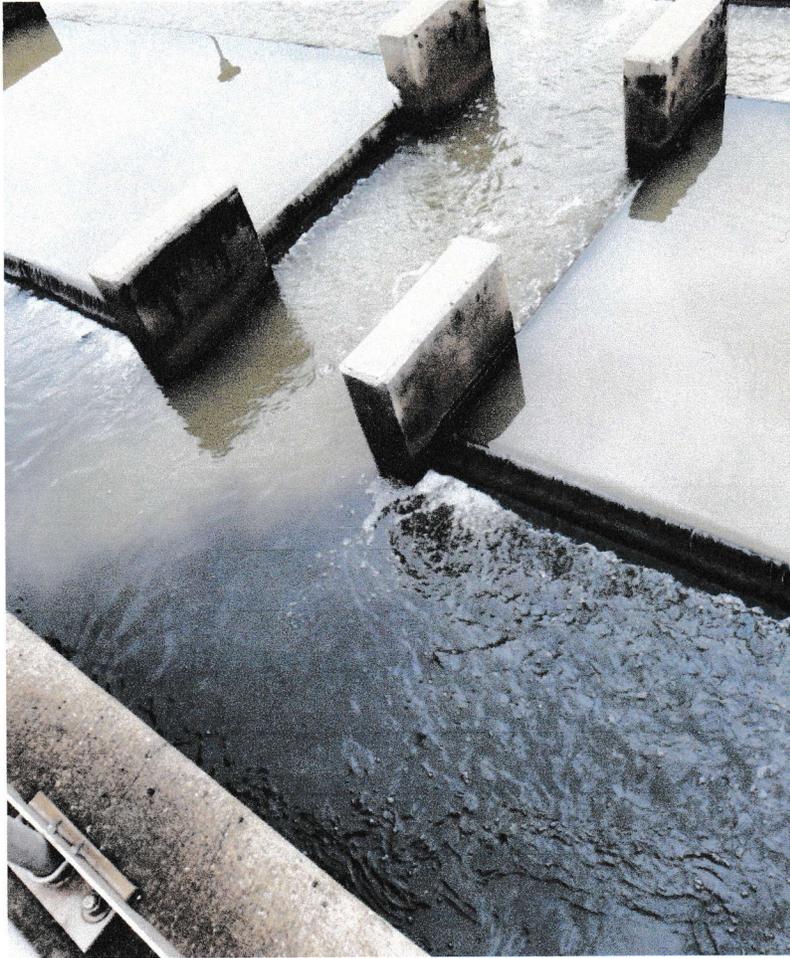


4/6/22 another of the 18 scum troughs requiring attention



4/6/22 FOG and scum on PST

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4/6/22 Dark grey effluent on the right is effluent from GSTs mixing with PST effluent. Color caused by 4,000 mg/L or higher TSS. This water is going to the biological reactors for secondary treatment.

The next stop is at the fine screening building. The City has appropriated the funds to upgrade the bar screens by replacing all the internal parts and installing a more effective wash system. Two of the bar screens have been overhauled and reinstalled. I noticed that the refurbished units were not online. According to Mr. Jackson, the screens needed to be cleaned because rags are preventing them from functioning so the operator took them offline until they can be serviced. Three bar screens were online at this time. I observed that there is still a problem with trash accumulation on the conveyor belts. The transport system does not appear to be functioning possibly due to the buildup of trash on the belts.

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4/6/22 Trash overflowing the belt transport system

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4/6/22 Trash overflowing the belt transport system

The Patapsco WWTP is proposing to use the former Tailings Transfer Station as a sludge storage area to store sludge that would allow the WWTP to remove solids from the plant. This was discussed with Mr. Jackson and Mr. Johnson during my 1/31/22 inspection. I explained at that time and during the biweekly technical meeting that any sludge storage must be done in way to ensure that all runoff and pollution prevention guidelines are followed, and all provisions are addressed and documented in the facility's SWPPP.

Next, we traveled to the Tailings Transfer Station to evaluate the utilization of this area for untreated sludge storage. I found that the area is already being used to store sludge. The storage area is partially covered, and the concrete pad of the transfer station is sloped slightly to the rear. When I first inspected this area there were open grated drains covering the length of the front of the pad that are connected back to the WWTP. The grated drains were designed to collect drainage from the pad and prevent pad drainage from going into the roadway where there are storm drains that flow to waters of the State. On the date of this inspection, I found that the open grates on the drains were replaced with solid plates and along the inside perimeter of the plates is a small berm constructed of sandbags. Therefore, any drainage from the sludge will flow into the roadway instead of going back to the treatment plant. This configuration is not acceptable. The solid plates must be immediately removed and replaced with open grates that allow drainage from the pad to go to the WWTP. During the initial discussion with Mr. Jackson on 1/31/22, we agreed the sludge would be placed towards the back of the transfer station beyond the yellow line marking on the side

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walls and keep the front open. Today, I found sludge has been place at the front of the transfer station, and the sludge has breached the sandbag berm overflowing onto the roadway.



4/6/22 stored untreated sewage sludge. Sludge should have been placed to the rear of the yellow marking on the right side of the picture.

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4/6/22 Sewage sludge overflowing the berm.

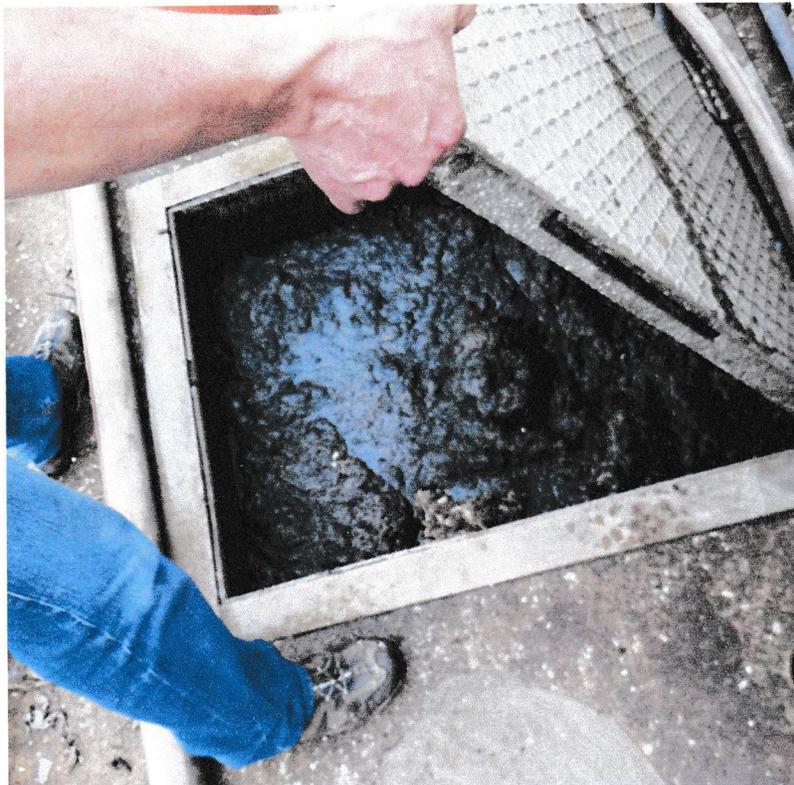
The facility has covered the storm drains with filter cloth and topped with gravel. This arrangement will assist with sediment control issues during construction, but this will not prevent pathogenic bacteria from untreated sewage sludge entering the waters of the State. The sludge should be removed from its current location and placed to the rear of the yellow marking on the side walls.

The next area of evaluation were the GSTs discussed earlier. The facility has 3 GSTs (#1, #2 and #4) and two are online. The #4 GST is down for repairs. The scrapers, drive and pumps need to be replaced and according to Mr. Thomas it will be back online sometime between 8/22 and 9/22. During an inspection of the # 1 GST, I observed that the sludge blanket is too high blocking the weirs flow. The weirs are cleaned daily. The # 2 GST skimmer was not in complete alignment with the surface of the water. The sludge blanket on GST#2 is also high causing the top layer of supernatant to be dark grey. The GSTs are designed to thicken biosolids to produce a concentrated solids product and a relatively solids-free supernatant. It is evident that the GSTs at the Patapsco WWTP are not producing a relatively solids-free supernatant. This problem has led to monthly effluent violations for BOD, TP and TSS and process control issues. There is almost a threefold increase in the monthly average TSS concentration from 12/31/21 to 2/28/22, which in turn has caused a higher monthly average BOD concentration for the same period. The biological reactors are not nitrifying because the BOD of the influent is too high because of the solids concentration. This in turn has led to issues with controlling ammonia. The monthly average ammonia concentration has doubled from 12/31/21 to 2/28/22 because nitrifying bacteria are not oxidizing ammonia to nitrite due to the higher BOD concentration. If corrections are not made the facility is poised to exceed the seasonal ammonia limits for 2022 as well.

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4/6/22 GST #1



4/6/22 Sludge pit at GST was completely filled. The pit collects the sludge from the GST.

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From the GSTs we traveled to the high-pressure pure oxygen reactors, which are below ground. The problem with the compressor at the liquid oxygen plant have been corrected and according to Mr. Jackson, the repaired compressor is working satisfactorily and the repairs to the second compressor have been made and the compressor is ready for shipment back to the plant.

The next I conducted an evaluation of the secondary clarifiers. The water in the clarifiers was grey due to the TSS concentration. There were also media pellets observed in the water of secondary clarifier #1. According to M. Jackson, the media is coming from backwash from the BAF system.



4/6/22 Secondary clarifier

The ENR filter building was the next stop during the site review. The facility has 22 biological aerated filters for nitrification and currently BAF cell #21 is out of service. BAF filter cell #5 has been identified as the malfunctioning cell that is leaking media. There are 34 denitrification filters (DNF) and currently all are online. Earlier today during the preliminary meeting, I received email notice that the facility reported a bypass of the BAF system. During my discussion with Mr. Jackson regarding the incident, he informed me that the bypass was necessary to prevent damage to the system due to the high solids concentration in the wastewater going into the BAF system. The BAF system was now back online. Next, I inspected the filter backwash chamber. There was no filter backwashing occurring at this time, however, residual media can be seen on the horizontal beam in the backwash chamber (See picture below)

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4/6/22 BAF system back online after the bypass



4/6/22 Overflow from BAF to DNF

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4/6/22 Residual media in backwash chamber from backwash system

Next, I inspected the chlorine contact basins prior to the final discharge. There are 4 contact chambers and 3 of the 4 are currently online. Each contact chamber has 3 scum logs or troughs to remove floating scum. I observed the final effluent prior to discharge, which was an opaque grey color indicating higher-than-normal solids concentration in the effluent. I also notice a heavy scum layer on the surface of the water in the chlorine contact basins. According to Mr. Jackson, the scum was due to the bypassing of the BAF system earlier today.

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4/6/22 Heavy layer of scum at the chlorine contact chamber

The facility is collecting a 24-hr, flow-proportioned composite samples at Outfall 001 in accordance with the requirements of the permit. The primary refrigerated, automatic composite sampler was inspected, and I found that the temperature of the compartment was satisfactory, and the sampling container was also clean. However, the intake tubing had an accumulation of solids on the inside wall, and it should be replaced or thoroughly cleaned. The temperature of the refrigerated compartment was 4.4 degrees C, which meets 40 CFR Part 136 requirements. The facility also has an identical back-up refrigerated, automatic composite sampler, which I also checked and found to be in the same condition and requiring replacement or cleaning of the intake tubing. I inspected the final effluent in the sampling container and observed that the composite sample was an opaque dark grey with visible particulates (see pictures). This condition is not acceptable, and measures must be taken to correct the problem of high solids in the final effluent and throughout the treatment system. According to Mr. Jackson the high solids are due to the earlier bypassing of the BAF.

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Field measurements were checked, and the results are listed below:

Parameter	Result
pH	7.18 SU
Dissolved Oxygen	8.5 mg/L
Total residual chlorine (TRC)	<0.01 mg/L

The calibration records were reviewed for DO and pH and were found to be acceptable. The colorimeter used for the measurement of TRC is checked for accuracy before use with secondary standards. To comply with EPA requirements, the colorimeter should also be checked at least quarterly with a series of primary standards.



4/6/22 Automatic sampler

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4/6/22 Final effluent composite sample dark opaque grey with particulates

The management of solids at Patapsco WWTP has become increasingly problematic because the solids processing facility, Synagro Inc. has not been able to successfully keep up with the processing of the solids that are being generated by the treatment system on a daily basis. According to Synagro, the analysis of the sludge revealed high hydrocarbon concentrations. Synagro reported that there is a fire hazard concern and the potential for an explosion associated with the levels of hydrocarbons detected in the sludge. Therefore, the air drier normally used to efficiently process sludge is not being used. Synagro is no longer pelletizing the sludge but is processing solids to cake and at a much slower rate and this slower rate is not adequate to keep up with the amount of solids being produced by the wastewater treatment system.

This has led to a backlog of untreated solids and higher than optimal TSS concentrations of the final effluent. Patapsco WWTP is storing the unprocessed solids at an on-site transfer station. According to Mr. Thomas, Hazen and Sawyer has a solution that was proposed to Synagro to minimize TPH in the sludge by taking the sludge directly from the GSTs instead of from the sludge blending tanks. To date Baltimore City DPW has not come to an agreement with Synagro on how to resolve this situation.

The monthly average TSS results noted above have increased almost 3-fold from December 2021 to February 2022. Data is not yet available for March 2022, however based on conditions observed at the treatment works on the day of this inspection, the TSS concentrations for the month of March 2022 may be even higher. High concentrations of TSS can damage process equipment, make it

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necessary to bypass certain necessary treatment processes and make it more difficult to treat and remove phosphorous. A reduction in TSS will also reduce BOD loads as well allowing for better nitrification. The data show that the TSS concentration at Outfall 001 ranged from 14 mg/L to 112 mg/L and an average of 34 mg/L for the month of February 2022. The very high TSS concentrations were not continuous, however; these levels can cause acute conditions during the days of high TSS discharges such as:

1. Lower than normal dissolved oxygen at the point of discharge for the period of the discharge.
2. Clog the gills of fish swimming in the area of the discharge
3. Increased turbidity in the mixing zone

**With respect to the above MDE authorization the following violations of Environmental Article 9 by the Patapsco WWTP were observed on this date:**

1. The final effluent was an opaque dark grey color with particulates indicating high solids concentration and turbidity. This problem is because the solids processing facility, Synagro Inc. has not been able to successfully keep up with the processing of the solids that are being generated by the treatment system. This has caused an increase of solids in the final effluent. To address this problem, Patapsco WWTP is now storing the excess solids at an on-site transfer station for disposal or treatment at a later date.
2. Although the Patapsco WWTP is having problems dealing with dewatering and disposal of sewage sludge, the facility has an obligation to comply with the conditions of the permit. There were eight reported effluent violations for the period January 1, 2022 – February 28, 2022, see Table 1 below.

**Table 1**

Date	Parameter	Result	Permit Violation	Permit Limitation
January 2022	Enterococcus	April Geomean 63.7 MPN/100 mL	Exceeded Monthly Geomean	35 MPN/100 mL
January 2022	Total Phosphorous	Monthly Average Concentration 2.4 mg/L	Exceeded Monthly Average Concentration	2.0 mg/L
January 2022	BOD	Weekly Average Concentration 50 mg/L	Exceeded Weekly Average Concentration	45 mg/L
January 2022	BOD	Monthly Average Concentration 39 mg/L	Exceeded Monthly Average Concentration	30 mg/L
February 2022, 2/8-2/14	Total Phosphorous	Weekly Average Concentration 3.2 mg/L	Exceeded Weekly Average Concentration	3.0 mg/L
February	Total	Monthly Average	Exceeded Monthly	2.0 mg/L

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2022,	Phosphorous	Concentration 2.8 mg/L	Average Concentration	
February 2022	TSS	Monthly Average Concentration 34 mg/L	Exceeded Monthly Average Concentration	30 mg/L
February 2022	BOD	Monthly Average Concentration 33 mg/L	Exceeded Monthly Average Concentration	30 mg/L

3. The Patapsco WWTP is storing unprocessed sludge in a position that could cause pathogens and bacteria to enter waters of the State.
4. The BAF system is still losing media and discharging filter media to the surface water of the State.
5. The Patapsco WWTP has not submitted a formal written description of measures taken for the entire year 2021 to comply with the FOG mitigation plan as specified in Special Condition M of the permit. However, on March 14, 2022, the Patapsco WWTP submitted to the Department a revised FOG mitigation plan. This plan is under review, but does not address the requirements specified in Special Condition M.
6. The colorimeter is checked before use with secondary standards but not quarterly using a series of primary standards.
7. The intake tubing on the automatic samplers had an accumulation of solids that could compromise sample results.
8. During this evaluation, I observed problems with maintenance and operations in certain areas of the plant that can lead to process issues.

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

- A. With respect to item 1 above, the Patapsco WWTP should devise a permanent solution for the management of solids produced by the treatment process. Within 30 days of the receipt of the report the Patapsco WWTP must submit a plan addressing a permanent solution for the proper management, treatment and disposal of solids produced by the treatment process. The Patapsco WWTP shall keep the Department informed of the progress made to find a solution on the proper management and handling of solids at the treatment plant. The facility should consider the use of Frac tanks for the holding of sludge.
- B. With respect to item 2 above, The Patapsco WWTP must comply with the condition of the permit and operate the plant in a manner necessary to eliminate effluent violations and bypasses of necessary treatment processes.

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- C. With respect to item 3 above, The Patapsco WWTP must remove the unprocessed sludge from the front of the Tailings Transfer Station and moved to it the back of the pad to the rear of the yellow lines on the wall. The solid plates should be removed from the front drains and replace with the open grated drains so that pad drainage can be collected and sent to the WWTP for processing.
- D. With respect to item 4 above, the discharge of the filter media to the surface waters of the State is not acceptable, and the Patapsco WWTP must address and resolve this violation. Within 30 days of the receipt of this report the Patapsco WWTP, shall submit a corrective measures plan to mitigate media loss and an engineered plan to collect and prevent the media from entering the Patapsco River.
- E. With respect to item 5 above, within 30 days of the receipt of this report, the permittee should submit to the Department a report detailing all specific measures and actions taken to ensure compliance with the FOG Mitigation Plan for the year 2021 as required by Special Condition. Then, the permittee shall begin submitting on an annual basis at the end of each calendar year all measures taken during the year to comply with the FOG Mitigation Plan.
- F. With respect to item 6 above, the colorimeter should be checked for accuracy at least quarterly using a series of primary standards in the range of 0.05 to 4.0 mg/L. A low (near the permit limit) and a high range check are recommended. The results of these checks must be recorded and be available for review.
- G. With respect to item 7 above, the intake tubing on the automatic samplers should be thoroughly cleaned or replaced
- H. With respect to item 8 above, the permittee should ensure that all process equipment is maintained appropriately at all times, and routine service and preventative maintenance is performed to ensure satisfactory operation of the treatment works.

*State law provides for penalties for violations of Maryland Environment Article Title 9 for each day the violation continues. The Maryland Department of the Environment 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	

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Inspection Item	Status	Comments
Does the facility operate as authorized by their current permit?	No Violations Observed	
Has the Permittee 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	
Is the permittee meeting the compliance schedule per permit requirements?	4 - Not Evaluated	
Has the operator or superintendent been certified by the Board in the appropriate classification for the facility?	4 - Not Evaluated	
Are adequate records being maintained for the sampling date, time, and exact location; analysis dates and times; individual performing analysis; and analytical results?	4 - Not Evaluated	
Are adequate records being maintained for the analytical methods/techniques used?	4 - Not Evaluated	
Does the permittee retained a minimum of 3 years worth of monitoring records including raw data and original strip chart recordings; calibration and maintenance records; and reports?	4 - Not Evaluated	
Do lab records reflect that lab and monitoring equipment are being properly calibrated and maintained?	4 - Not Evaluated	
Does the permittee/laboratory use suitable QA/QC procedures and operate a formal quality assurance (QA) program using appropriate controls?	4 - Not Evaluated	
Has the permittee submitted the monitoring results on the proper Discharge Monitoring Report form?	No Violations Observed	
Do the Discharge Monitoring Reports reflect permit conditions?	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
Is sewage sludge managed correctly per permit requirements?	Out of Compliance	See Narrative
If a by-pass occurred since last inspection, has the permittee submitted notice of the by-pass within the allotted time?	No Violations Observed	
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 permittee complied with all special conditions of their permit?	No Violations Observed	
Have overflows occurred since the last inspection?	No Violations Observed	
Have records of overflows been maintained at the facility for at least five years?	No Violations Observed	
Are flow measuring devices properly installed and operated, calibration frequency of flow meter adequate, flow measurement equipment adequate to handle expected ranges of flow?	No Violations Observed	

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

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Received by: Neal Jackson 4-8-2022  
 Signature/Date  
Neal Jackson  
 Print Name