



**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:** Christopher Lepadatu  
**AI ID:** 8449

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

**Start Date/Time:** July 02, 2024 09:30 AM  
**End Date /Time:** July 02, 2024 12:00 PM  
**Media Type(s):** NPDES Municipal Major Surface Water

**Contact(s):** Andrea Buie-Branam – Chief of ERCS, Baltimore City DPW  
Schott Moffat – Policy Analyst, ERCS, Baltimore City DPW  
Mack Cohen – Intern, Baltimore City DPW  
Timothy Simmons – Operations Engineer, Back River WWTP  
Ndfireke Williams – Operations Engineer, Back River WWTP

## **NPDES Municipal Major Surface Water**

**Permit / Approval Numbers:** 15DP0581

**NPDES Numbers:** MD0021555

**Inspection Reason:** Follow-up

**Site Status:** Active

**Compliance Status:** Compliance

**Site Condition:** Additional Investigation Required

**Recommended Action:** Continue Routine Inspection

**Evidence Collected:** Photos or Videos Taken, Record Review, Visual Observation

**Delivery Method:** Email

**Weather:** Calm, Clear, Good

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### **Inspection Findings:**

#### Introduction:

Back River Wastewater Treatment Plant (WWTP) is operated by Baltimore City DPW. Some areas/systems of the WWTP are operated by subcontractors including the Headworks, Denitrification Building, and Centrifuges. The facility is authorized to discharge treated effluent through Outfalls 001 and 002. Outfall 001 discharges to Back River, a designated Use II waterway. Use II waterways support estuarine and aquatic life and shellfish harvesting. Outfall 002 discharges to Tradepoint Atlantic who then discharge via three (3) outfalls under their industrial discharge permit (#05DP0064) to Bear Creek and the Patapsco River which is also designated as a Use II waterway. Final effluent discharge at Back River WWTP is split at a junction box and a large portion of the flow (up to 130.0 MGD) goes to Outfall 001 via a step cascading aeration system and the remaining portion (up to 50.0 MGD) goes to Outfall 002.

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The current permit has been administratively extended since it expired on April 30, 2023. A revised permit renewal application (#22DP0581) was received by MDE on May 26, 2023.

Back River WWTP is an activated sludge process sewage treatment plant with biological nutrient removal by Modified Ludzack-Ettinger process, ferric chloride for phosphorous removal, denitrification filters for enhanced nutrient removal (ENR), polishing sand filters, chlorination, and dichlorination.

On this day, I met with the individual(s) listed above for an opening conference followed by a site walk and closing conference.

Consent Decree:

As of November 2023, Baltimore City and the Department signed a Consent Decree, Case No. 24-C-22-00386, which establishes specific goals and objectives related to the operation and maintenance of the Patapsco WWTP. As a result, maintenance items observed during the site inspection will be notated in the relevant areas of the inspection report and not itemized in the Violation(s) section as in previous inspection reports. The goals and objectives in the Consent Decree are noted below for monitoring and tracking progress. My updates during this inspection are indicated in red text. The table below has been updated with the information included in the Consent Decree Report provided on May 15, 2024. Requests for deadline extensions have been received. Deadlines in the table will be updated if and when extensions are granted.

Back River WWTP Consent Decree (CD) Overall Progress Tracking Summary				
CD Paragraph Reference	Activity	CD Deadline	Actual Date Completed	Compliance Status (11/25/23)
132-BR	Replace H2S Sensors	12/15/2023	5/16/2023	Complete
133(a)-BR	Clean and complete repairs on at least 8 PSTs to ensure they are fully functional and capable to operate as designed. * 6 units in service	1/1/2024	FM Letter Sent 12/20/23 Requested extension: 3/31/24	88%
133(b)-BR	Clean and complete repairs to all 11 PSTs to ensure they are fully functional and available for use. * In progress	12/31/2025		81%
134-BR	Baltimore City to have and maintain an adequate supply of Dissolved Oxygen (“D.O.”) probes.	12/1/2023	11/7/2023	Complete
135-BR	Baltimore City shall maintain Activated Sludge Plants No. 2 & 3 as well as their associated clarifiers.	Ongoing		Compliant
135(a)-BR	Submit for review and Department approval the standard operating procedure (SOP) for removal of vegetative growth in the final clarifiers.	1/15/2024	12/15/2023	Complete
135(b)-BR	Implement vegetative growth plan.	Upon approval of 135(a)-BR		Awaiting Approval
135(c)-BR	Maintain average sludge blanket depth of 2 to 4 feet in final clarifiers.	Ongoing		Compliant
135(d)-BR	Maintain manual operations until Activated Sludge PLCs are updated and set up for automatic operation.	Ongoing		Compliant
136(a)-BR	Complete evaluation of sand filters. Within 10 days of sand filter evaluation, request approval for change of use of the approved sand filter, OR	4/30/2024	4/30/2024	Complete
136(b)-BR	Submit plan and schedule for implementation of sand filter improvements (Sand Filter Improvement Plan). Immediately upon approval City shall implement the approved Sand Filter Improvement Plan.	5/10/2024	5/10/2024	Complete
137-BR	Repair all Gravity Belt Thickeners (GBTs) to operate as designed.	6/30/2024	7/2/2024	Complete
138-BR	Repair and install one of the three non-operational Dissolved Air Flotation (DAF) systems and thickened sludge pumps.	12/31/2023	12/5/2023	Complete
139-BR	Issue Notice to Proceed (NTP) with contract for rehabilitation of the egg-shaped digesters. Complete rehabilitation of egg-shaped digesters.	8/16/2023 (NTP) 9/16/2027 (Rehab)		Issued 10%
140-BR	Create and submit a Centrifuge Maintenance Plan to the Plaintiffs for review and the Department’s approval.	12/15/2023	12/15/2023	Complete
141-BR	Complete repairs and installation of Centrifuge #4 to operate as designed. * some parts received, waiting on installation.	12/31/2023	FM Letter Sent: 12/20/2023 and	55%

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			2/14/2024 Requested extension: 4/30/24	
142-BR	Submit Staffing Plan	12/31/2023	12/22/2023	Complete
143-BR	City to have, maintain, and make available to the Department the formal written operation and maintenance procedures (Back River WWTP SOP)	6/30/2024		20%
144-BR	City to submit a report that identifies what processes are currently automated and conduct a feasibility study for automation of additional processes, with a plan and schedule for future automation.	5/13/2024	5/13/2024	Complete
145-BR	Baltimore City shall have, maintain, and update a Computerized Maintenance Management System (CMMS) as a functional work order system to ensure that the plant and its equipment operate as designed.	Ongoing		Compliant
146-BR	Complete a condition assessment and inventory of existing assets in order to develop an asset management program. Complete development and begin implementation of asset management program within 90 days of assessment and inventory.	11/15/2024 (Assessment) 2/12/2025 (Commence Implementation)		75%  Not Started

The table above will be updated during future inspections.

Site Walkthrough:

*Headworks*

Raw sewage enters the plant at the mechanical screen building where there are four (4) coarse screening units. Each unit is rated for flows up to 200 million gallons per day (MGD). During normal flows, one coarse screening unit is sufficient to treat the average daily flow. In general, they rotate which coarse screening unit is in operation every week.

Effluent from coarse screening flows into two (2) deep wet wells that are over 50 feet deep. The headworks influent pumping station has eight (8) lift pumps installed to pump the screened wastewater from the wet wells to the Fine Screening System. During periods of high flow, screened wastewater can be pumped to two (2) above ground storage tanks each with a capacity of 18 million gallons. The two tanks are connected by two 14- to 16-inch pipes near the top of the tanks to allow one to overflow into the other as needed.

The Fine Screening System features six (6) fine screening units rated for flows up to 100 MGD each. No issues were reported with the fine screening units.

Effluent from the fine screening system travels to the Grit Removal System. Eight (8) grit channels equipped with traveling bridges remove grit from the fine-screened wastewater. Each grit channel and traveling bridge has an 80 MGD capacity. Under normal flow conditions, two grit channels are necessary for satisfactory grit removal. The traveling bridges move back and forth along the grit channel using a submersible pump / suction plate system to remove settled grit from the channels and transfer the grit to classifiers for further dewatering. The classified grit is then dried and transported off-site for disposal. No issues were reported with the grit removal system.

No issues were reported with the odor control system.

*Primary Settling*

Effluent from the Grit Removal System flows to a junction box then to the Primary Settling Tanks (PSTs). Primary Settling is the first stage of treatment where solids and sludge are allowed to settle by gravity and any floating scum or fats, oils, and grease (FOG) is removed. Generally, PSTs are designed to remove a large percentage of the total suspended solids (TSS) and reduce the biochemical oxygen demand (BOD) of the wastewater.

There are eleven (11) PSTs at the facility. During the site inspection, the following observations were made:

- Units 1, 3, 4, 9, 10, and 11 are in service.
- Unit 5 is finishing electrical work, will be test run shortly.
- Unit 6 is clean, beginning rehab work.

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- Unit 8 is out of service for baffle and weir repairs.
- Units 2 and 7 are offline while repairs are made to C-station (pump station).



Image 01: PST #9.

### *Sludge Handling / Processing*

Five (5) GSTs were observed to be in service at the time of the site inspection – GST’s 1, 3, 5, 6, and 7. GST’s 2 & 4 are being used as sludge holding / mixing tanks. GST #8 is out of service long-term in need of an overhaul.



Image 02: GST #7.

GBTs use gravity and a porous drainage belt to dewater and thicken sludge. The WWTP has 8 GBTs in total. All eight (8) GBTs were observed to be in service. It was reported that five (5) units are needed for average daily flows. After testing, five units will be put into service with the other three units on standby.

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Image 03: Typical GBT unit.

The WWTP has four (4) Dissolved Air Flotation Units (DAFs) installed. A DAF unit is designed to remove TSS, FOG, and BOD from wastewater. DAFs are ideal for processing particles and floc that are of neutral density, slow-settling, or buoyant. DAF 1 was in service. Maintenance work on DAF 2 is in the process of being completed. DAF 3 and 4 are drawn down and out of service for repairs / refurbishment. The work on DAF 3 and 4 is expected to be a major overhaul of the units.

From the GSTs, GBTs, and DAF units, sludge is transferred to sludge holding tanks #1 or #26 which are located near the centrifuge building and drying facility. The facility has four (4) centrifuges in total, three (3) of which are operational. Unit #4 is still in the process of scheduling repairs and waiting on additional parts.

It was reported that sludge processing depends on the volume of sludge available as well as the dry storage capacity. Sludge Production and Disposal reported for the month of May 2024 is provided in the table(s) below.

Sludge Production and Disposal, May 2024				
Date	Total Sludge Production (dry tons)	Centrifuge Sludge Disposal (to compost) (dry tons)	Pelletech Pellets Disposal (dry tons)	Total Sludge Disposal (dry tons)
5/1	33.3	34.4	-	34.4
5/2	41.0	28.2	-	28.2
5/3	67.8	26.3	-	26.3
5/4	62.7	NA	-	NA
5/5	73.5	NA	-	NA
5/6	65.4	25.87	-	25.9
5/7	63.4	14.76	-	14.8
5/8	63.9	12.68	-	12.7
5/9	72.4	16.96	-	17.0
5/10	73.2	11.97	-	12.0
5/11	78.6	NA	-	NA
5/12	86.7	NA	-	NA
5/13	91.8	19.88	-	19.9
5/14	107.7	16.73	-	16.7
5/15	85.8	27.36	-	27.4
5/16	64.1	28.54	-	28.5
5/17	63.8	25.96	-	26.0
5/18	91.3	NA	-	NA
5/19	34.1	NA	-	NA
5/20	63.0	19.52	-	19.5
5/21	76.2	21.83	-	21.8
5/22	89.2	19.04	-	19.0
5/23	66.0	35.81	-	35.8
5/24	64.9	31.67	-	31.7
5/25	82.7	NA	-	NA
5/26	83.7	NA	-	NA

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5/27	98.5	NA	-	NA
5/28	85.2	30.8	-	30.8
5/29	108.1	31.75	-	31.7
5/30	107.3	27.32	-	27.3
5/31	95.0	31.61	-	31.6
Total	2,340.6	539.03	-	539

*Activated Sludge Plants (ASPs)*

Effluent from Primary Settling flows to a flow distribution building to one (1) of three (3) Activated Sludge Plants (ASPs) numbered 2, 3, and 4. The ASPs each contain six (6) biological reactors for nitrogen removal. ASPs 2 and 3 have a three-pass train designated A, B, and C for each reactor while ASP 4 is a two-pass system. There are twelve (12) secondary clarifiers associated with each ASP for a total of thirty-six (36) secondary clarifiers at the facility.

It was reported during a previous site inspection that efforts were focused on maintaining ASPs 2 and 4. A capital improvement project is planned in the near future for ASP 3 which will take ASP 3 off-line for repairs. Timothy Simmons reported the status of the different ASP facilities at the time of the site inspection – whether the reactor is online, standby, or out of service.

ASP Process Control Sheet		
Reactor	Pass A	Pass B
ASP 2		
5	Online	Online
6	Online	Online
7	Online	Online
8	Online	Online
9	Online	Online
10	Online	Standby
ASP 3		
11	Standby	Online
12	Out of Service	Out of Service
13	Standby	Standby
14	Standby	Standby
15	Online	Online
16	Standby	Standby
ASP 4		
17	Online	Online
18	Online	Online
19	Online	Online
20	Online	Online
21	Online	Online
22	Online	Online

*Denitrification Filters (DNFs)*

At the DNF building, there are four filter quads with each quad containing 13 Tetra Denitrification Filters with a total of 52 filters. It was reported that all 52 filters were functional and in operation at the time of the site inspection. It was reported that the filters are coming due to refresh the filter media and this may begin in the coming months.

*Sand Filters*

The sand filters at the facility are used to polish the wastewater coming from the DNF building. There are 48 total filters. Timothy Simmons reported that a capital improvement project is underway for replacing the media in 14 filters and another project is underway for sand filters #2 thru #6 to change the filter media with a high-flow sand. No issues were observed or reported with the sand filter system.

*Chlorination / De-chlorination Facility and Final Outfalls*



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The final effluent at the step aeration system was observed to be clear and without any noticeable foam, solids, or odor. No visible floating scum or solids were observed in the chlorine contact chambers at the facility. The temperature of the composite samplers in service for Outfall 001 was observed to be 5°C and 3.5°C. The temperature of the composite sampler for Outfall 002 was observed to be 2.5°C.



Image 04: Step Aeration system, final effluent.

I reviewed the lab located at the Chlorination / De-chlorination Facility. No violations were observed with the logbooks. Copies of the pH and DO calibration records were provided to me for review.

#### Closing Conference:

After the Chlorination / Dichlorination Facility, we returned to the administration building for an exit conference.

#### Records Review:

Following the site inspection, laboratory reports and calibration records were reviewed. DMRs for May 2024 were reviewed. No violations were observed in the pH and DO calibration records or the laboratory analysis reports. No violations were observed in the NetDMR submissions.

#### *Non-Compliance Report(s) / Bypass Events*

On June 3, 2024, a temporary shutdown of effluent to Outfall 002 was reported at Back River WWTP. It was reported that the shutdown of Outfall 002 was requested by Trade Point Atlantic for pump repairs.

On June 11, 2024, the Department was notified of a broken sludge hose that occurred on June 9, 2024, at Back River WWTP. It was reported that an 8-inch hose split and an estimated 250 gallons of sludge spilled in the immediate area of the split. It was reported that the spill was cleaned up and no material escaped to nearby storm drains or manholes. The spill occurred behind the centrifuge building. On this day, I observed the area where the spill occurred and found that the area was clear with no lasting impacts from the spill.

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Image 05: Hose Split. Affected area in center of image.

On June 17, 2024, the Department was notified of a shutdown request for Outfall 002 at Back River WWTP. It was reported that the shutdown of Outfall 002 was made at the request of Tradepoint Atlantic due to pump issues at their facility. Outfall 002 was shut down on June 17 at 9:00 a.m. and resumed on June 18 at 6:30 a.m. During this shutdown, pH, DO, and Chlorine Residual for Outfall 002 were not recorded. Plant operations were not affected.

On June 21, 2024, the Department was notified of a shutdown request for Outfall 002 at Back River WWTP. It was reported that the shutdown of Outfall 002 was made at the request of Tradepoint Atlantic due to pump issues at their facility. The shutdown was to begin at 2:00 p.m. on June 21 and end at 6:30 a.m. on June 24.

On June 24, 2024, the Department was notified of a flushing water line break at Back River WWTP. It was reported that, on June 22, 2024, at 12:15 a.m., an area supervisor observed water flowing down the road behind pump station #2. It was determined that an underground drain line broke and was bubbling out onto the road. At 12:30 a.m., sandbags were placed around a nearby storm drain in the path of the discharge. The valve crew was able to isolate the line and reduce the discharge by an estimated 95% at 8:15 a.m. A full repair of the line break was completed by 1:00 p.m., Monday, June 24, 2024. During the clean-up efforts, the vac-con truck experienced a hydraulic hose break causing fluid to leak in the immediate area of the truck. After the truck was repaired, cleanup of the line break, and the hydraulic fluid was completed on June 26, 2024. It is estimated that one gallon of hydraulic fluid spilled onto the ground. It is estimated that a total of 38,000 gallons of discharge escaped during the line break. An estimated 300 gallons of flushing water was released into the nearby storm drain before the sandbags were installed. After cleanup, lime was applied to the affected grassy area.

On this day, I reviewed the area associated with the above event and observed no lasting impacts other than a large area of disturbed soil and ponded water. The ponded water on the roadway was reportedly related to recent rain events since the cleanup and not residual water from the release.



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Image 06: Area of Flushing Water line break.

On June 28, 2024, the Department was notified of a shutdown request for Outfall 002 at Back River WWTP. It was reported that the shutdown of Outfall 002 was made at the request of Tradepoint Atlantic due to pump issues at their facility. Flow was shut down at 9:00 a.m. on June 28 and resumed at 9:00 a.m. on June 29. During this shutdown, pH, DO, and Chlorine Residual for Outfall 002 were not recorded. Plant operations were not affected.

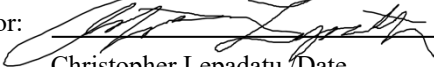
On July 1, 2024, the Department was notified of a shutdown request for Outfall 002 at Back River WWTP. It was reported that the shutdown of Outfall 002 was made at the request of Tradepoint Atlantic due to pump issues at their facility. Flow was shut down at 6:30 a.m. on July 1 and resumed at 7:00 a.m. on July 2. During this shutdown, pH, DO, and Chlorine Residual for Outfall 002 were not recorded. Plant operations were not affected.

As of November 2023, Baltimore City and the Department have signed a Consent Decree – Case No. 24-C-22-00386 which establishes specific goals and objectives related to the operations and maintenance of the Back River WWTP. As a result, maintenance items observed during the site inspection will be notated in the relevant areas above and not itemized in the Violation(s) section as in previous inspection reports.

**A follow-up inspection will be conducted.**

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Inspector:  7/25/24  
Christopher Lepadatu / Date  
christopher.lepadatu@maryland.gov  
410-537-3521

Received by: \_\_\_\_\_  
Signature/Date

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Print Name