



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: July 14, 2022 09:00 AM
End Date /Time: July 28, 2022 04:19 PM

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

Ronald Turner Rayford McEachern
Betty Jacobs
Andrea Buie-
Branam
Kari Hanson
Joseph Miller

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: DryAverage

Inspection Findings:

The Back River Wastewater Treatment Plant (WWTP) is an activated sludge process sewage treatment plant with Biological Nutrient Removal (BNR) (Modified Ludzak-Ettinger Process 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 millions of gallons per day (MGD) goes to Outfall 002, which is further chlorinated and sent to Bear Creek via 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, a follow-up inspection was conducted for compliance with NPDES permit #MD0021555, and state discharge permit #15-DP-0581 at the Back River WWTP. The permit effective date is May 1, 2018 , expiration date of April 30, 2023. I was joined by Environmental Compliance Specialist Kari Hanson and Joseph Miller with the Maryland Department of the Environment (MDE or the Department), Water and Science Administration, Compliance Program.

During the course of the inspection, I met Betty Jacobs, Ronald Turner, Dan Latova, Dana Garris, Andrea Buie-Branam, and Rayford McEachern, representing the Back River WWTP. During the inspection, I evaluated the main components of the effluent treatment process 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)

I. Headworks

I began the site review with an evaluation of the major treatment components of the new headworks facilities consisting of coarse and fine screening and grit removal system, equalization tanks, and a new influent pumping station. In April 2022, Baltimore City contracted with Professional Startup & Operating Services Inc. (ProStart) to operate the headworks system.

Early this year, there were problems identified with the ventilation and air exchange system in the headworks building that is causing high concentrations of hydrogen sulfide (H₂S) in the air. H₂S can corrode silver and copper circuit parts. The ambient concentration of H₂S in the headworks building has affected electrical conductors and current carrying parts. **During this inspection, I learned that the problem has not been resolved.** The corrosion can lead to excess heating that will over-stress the circuits and compromise operations. According to the ProStart operator, all control systems were working and online. The headworks is equipped to manage the plant capacity of 180 MGD and the two equalization tanks are used during rainfall to reduce the volume of flow going into the treatment system. The ProStart representative stated that when flows exceed 150 MGD and the equalization tanks are filled they have the capability to send the influent to other empty tanks on site. According to Turner, the headworks has handled flows of 280 MGD without problems or the need for the equalization tanks.

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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.

II. PST

In the course of discussion at the preliminary entrance meeting, I learned that the repairs to PST #1 were completed and it was put back online this morning. During the previous inspection conducted in 2021 and 2022, there have only been two functioning PSTs (#8 and #11) out of the 11 PSTs at the site. **Getting PST #1 online is a major step forward in the management of solids throughout the treatment system.** The two largest PSTs are #1 and #2, both measuring 200 feet in diameter. PST# 7 is being refurbished by the Maryland Environmental Services (MES) and is scheduled to be brought back online sometime next month. It has been determined that five PSTs are required for effective treatment of average flows of 130 MGD. Currently flows are at historically low levels.

During the inspection of PST #1, I observed that the scum rake did not appear to be working and there were a lot of floating black solids similar to what I have observed in the CCC and secondary clarifiers. This condition is caused by anoxic conditions in the water due to over-aged sludge. According to Latova, problems developed with the pump and the skimmer arm after getting the PST online. He explained that the ingoing lines have been closed since the PST has been offline. The black balls were in the lines and when the valves were opened the black balls entered the PST.

The primary settling is the first stage of treatment after the removal of trash and grit in the headworks building. The PSTs are designed to settle and remove the solids or sewage sludge from the wastewater by gravity and remove the floating scum and fats oil and grease (FOG). Typically, PSTs are designed to remove a large percentage of the total suspended solids (TSS) and reduce the biochemical oxygen demand (BOD_5) of the wastewater. I observed that PSTs #8 and #11 were both operational. However, they must treat solids or sludge loads beyond their capacity. The Back River WWTP must consider this load when determining and conducting routine preventative maintenance tasks and tank cleanings.

I was informed by Latova on July 18, 2022 that the repairs had been made to PST#1 by the service contractor, Ross Technical Services, and it was now functioning satisfactorily.

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7/14/22 PST #1 when not functioning.

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7/14/22 PST #7 was recently cleaned by MES. Parts are on order and this PST is scheduled to be online in August 2022.

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7/14/22 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.

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7/14/22 Grit dewatering system

III. Biological Reactors

The effluent from PSTs flows to a series of biological reactors for nitrogen (N) removal. The facility has three trains with six reactors in each train for a total of 18. Two of the reactor trains have a three-pass design designated A, B, and C. The third activated sludge plant called Activator #4 consisting of six reactors with a two-pass design.

During the previous inspection in June, the effluent from the PSTs flowing to activated sludge plants was a dark gray color indicating a high concentration of solids in the waste stream. During this inspection, **I observed that the effluent appeared visually to have less solids.**

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

1. Some of the mixers in Activator 3 were not functioning as designed. According to the Baltimore City Department of Public Works (DPW), there are plans to repair or replace the failing and inoperable mixers.
2. The computerized Dissolved Oxygen (DO) monitoring equipment used to continuously monitor the DO is not functional, so the DO is being measured manually. However, manual measurement is 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.** During the weekly

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progress meetings, MES discussed plans for replacing this equipment, but no specific dates to begin the project have been made.

3. Vegetation is growing in certain areas of the reactors.

IV. Secondary Clarifiers

Activators #2, #3, and #4 have 36 associated clarifiers and during this inspection, 34 were online. During an inspection of the clarifiers for the Activator #2 and Activator #3, I observed problems with maintenance, operation, and performance of the clarifiers. There was algae, duckweed and vegetation growing on and around the weirs of the clarifiers. 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. Steps should be taken to manually scrap the weirs.

As stated in the March 22, 2022, inspection report, algae growth in secondary clarifiers is a common problem for all uncovered weirs on secondary clarifiers. It requires regular maintenance to remove and is a normal maintenance issue for these secondary clarifiers. Algae can cause problems with TTSs within the treatment system and can cause problems with pumps by increasing the chances of clogging. The weirs on all secondary clarifiers should be routinely scrubbed to remove the algae. This should be done at least weekly in the summer and more frequently as necessary. The algae and vegetation should be removed from all of the secondary clarifiers. On July 21, 2022, per my request, the plant manager, submitted to the Department a service proposal from Badger Hydrovac to clean all of the secondary clarifiers. The contractor will clean the 24 final clarifiers as the plant can operationally make them available. Once cleaned, the Back River WWTP should conduct proper maintenance of the secondary clarifiers.

During the last inspection conducted on June 2, 2022, I observed that the scraper arm on secondary clarifier 16A was missing the flange, so it was incapable of skimming for surface scum. The arm was repaired and is now capable of skimming the scum.

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7/14/22 Blocked weirs due to algae and vegetation causing short circuiting of the weirs.

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7/14/22 Vegetation growing in the secondary clarifiers that are compromising settling.

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7/14/22 Vegetation and algae causing short circuiting of the weirs on the secondary clarifiers and large amounts of vegetation in the stilling well and floating on the surface of the water in the clarifiers.

V. Denitrification Filters

The wastewater travels from the clarifiers to the DNF building. There are four filter quads, and each quad contains 13 Tetra Denitrification Filters with 52 total filters. Baltimore City has a contract with ProStart to operate and maintain the system. When we arrived at the control room, I spoke to the ProStart operator who told me that 44 of the 52 filters were functioning.

During an inspection, I found that the DNF was in various stages of disrepair. **Although there were problems, the DNF was in much better condition than I found during the June 2, 2022, inspection.** Some of the filters were submerged under water due to clogging. The water was moving through the filters, but due to being submerged there was minimal filtration. Some of the filters had a layer of floating solids and the remainder contained stagnant water with either floating scum or floating black sludge. With flow rates down, I observed that some of the overflow weirs were not level, and the overflow of water was limited to a small section of the filter. There was also a breach in the filter that should be addressed to prevent a greater issue at a later date. Midge flies were observed around the DNF.

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7/14/22 Submerged DNF filter

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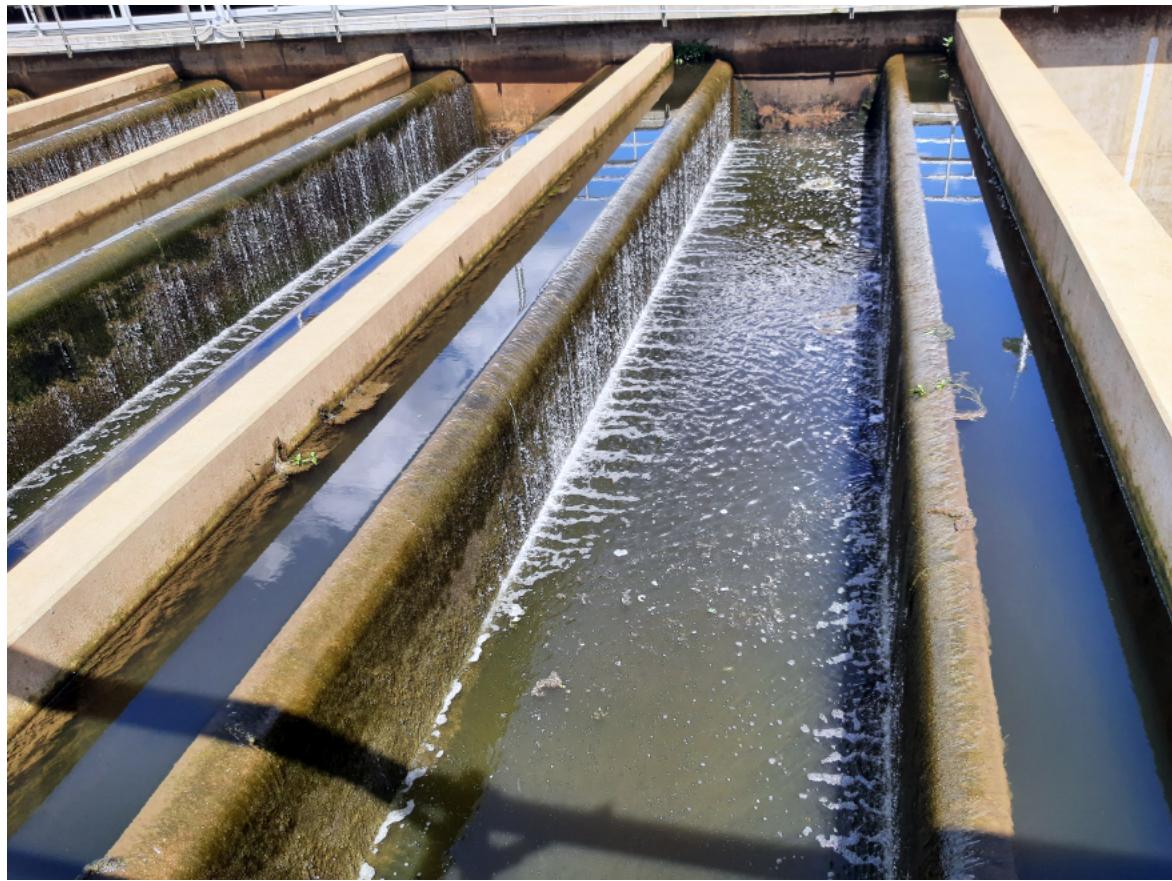


7/14/22 Nonfunctioning DNF with stagnant water



7/14/22 Floating solids

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7/14/22 Unlevel weir. Overflow limited to the far end.

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7/14/22 Water breach near the top of the weir

VI. Sand Filters

The effluent from the DNF flows to the clear well and then to the sand filters. I continued this inspection with an inspection of the sand filters. During this morning's opening meeting I was told that 24 of the 48 sand filters are in operation. The reported number of operational sand filters varies and goes up and down during the weekly status reports. In order for the Department to assess the progress being made to get all of the sand filters back in operation, the Back River WWTP shall provide a report weekly 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.

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7/14/22 Out of service sand filter

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7/14/22 In service sand filter

VII. Chlorine Contact Chambers

The wastewater travels from the sand filters to the CCC where the wastewater is disinfected and then dechlorinated. The quality of wastewater in the contact chambers is continually improving due to the equipment repairs and improvements that MES was able to fast track through to completion.

The permittee has installed floating booms upstream of the final overflow at the request of the Department. 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.

During the preliminary meeting, the plant manager stated that the current booms are a temporary measure, and the Back River WWTP has ordered eight booms designed for this application to cover the entire contact chamber area. 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.

VIII. Staffing

My observations, during the inspection site reviews and my conversations with management and operating staff, point out that the Back River WWTP has a major staffing problem

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caused by a shortage of trained 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. 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. During my interviews with staff, I asked why automated processes and equipment are being operated manually. The answer is that the automated process response time is too slow or is unresponsive. 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; and
- 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.

IX. Laboratory Analysis

- The American Society for Testing and Materials (ASTM) Method 6919-09 is reported as the test procedure for the analysis of total ammonia as N. This procedure is not the correct procedure for the analysis of ammonia. The correct approved ASTM test procedures for the analysis of ammonia are ASTM 6919-17, ion chromatography, ASTM D1426-15 (A), Nesslerization, and ASTM D1426-15 (B), electrode.
- The analytical laboratory's reporting limit (RL) for TSS is 5 milligrams per liter (mg/L) using Standard Method 2540D. The range for this method is 0.5 – 2,000 mg/L. Based on the RL of 5 mg/L, the data show that on many occasions the facility is reporting no TSS load for the day because the TSS concentration is reported as 0. Solids that may be present are not reported because the laboratory's RL of 5 mg/L is not sensitive enough to quantify to a reportable level. The analytical balance that is being used by the laboratory for this test may not be sensitive enough. The TSS results from samples collected by the Department using another laboratory have shown TSS concentrations as low as 1.4 mg/L.

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

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1. There are problems with the ventilation and air exchange system in the headworks building that is causing high concentrations of H₂S in the air.
2. The reported number of operational sand filters varies and goes up and down during the weekly status reports.
3. There are not enough qualified staff to adequately operate the treatment system.
4. The RL of 5 mg/L for TSS is not sensitive enough for reporting in support of the Clean Water Act. TSS concentrations are present, but reported as 0 because the laboratory cannot detect TSS at the level necessary to detect
5. The ASTM method 6919-09 is reported as the test procedure for the analysis of total ammonia as N. This procedure is not the correct procedure for the analysis of ammonia.

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 report on what is being done to correct the problem(s) with the ventilation system at the headworks building and what is currently being done to protect circuits from corrosion due the H₂S. An update on the status of the repairs to the ventilation system shall be submitted every 30 days until the problem is resolved.
- B. With respect to item #2 above, within 30 days of the receipt of this report, the Back River WWTP shall 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. 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 operational.
- C. With respect to item #3 above, within 30 days of the receipt of this report, the Back River WWTP shall submit to the Department a plan on addressing staffing needs. General Condition 3b of the NPDES permit, requires that the Back River WWTP shall provide an adequate operating staff qualified to carry out operation, maintenance and testing functions required to ensure compliance with the permit.
- D. With respect to item #4 above, the Back River WWTP shall ensure that the laboratory is able to quantify TSS to a concentration sufficiently sensitive to detect TSS in the effluent.
- E. With respect to item #5 above, the Back River WWTP shall ensure that the laboratory is using a 40 CFR Part 136 approved test procedure for the analysis of ammonia as N.

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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	
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?	2 - Not Applicable	
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?	Out of Compliance	See report
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?	No Violations Observed	
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 report
Is sewage sludge managed correctly per permit requirements?	No Violations Observed	
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,	No Violations Observed	

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NPDES Municipal Major Surface Water - Inspection Checklist

Inspection Item	Status	Comments
was the regulatory agency notified within the allotted time?		
If applicable, has the permittee complied with all special conditions of their permit?	Out of Compliance	See report
Have overflows occurred since the last inspection?	4 - Not Evaluated	
Have records of overflows been maintained at the facility for at least five years?	4 - Not Evaluated	
Are flow measuring devices properly installed and operated, calibration frequency of flow meter adequate, flow measurement equipment adequate to handle expected ranges of flow?	4 - Not Evaluated	
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?	Out of Compliance	See report
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	
Were discharge samples collected?	No Violations Observed	Not during the inspection
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 storm water pollution prevention plan been developed and implemented as required?	4 - Not Evaluated	
Are the permit conditions being met?	Out of Compliance	See report

Inspector:

Ronald Wicks 7/28/22

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

Received by:

Signature/Date

Print Name

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Do parameters and sampling frequency meet the minimum requirements?	No Violations Observed	
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If discharges were observed, do the discharges or receiving waters have any visible pollutants observed?	No Violations Observed	
Were discharge samples collected?	No Violations Observed	Not during the inspection
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 storm water pollution prevention plan been developed and implemented as required?	4 - Not Evaluated	
Are the permit conditions being met?	Out of Compliance	See report

Inspector:

Ronald Wicks 7/18/22

Ron Wicks /Date
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Received by:

 8/5/2022
Signature/Date

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