



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 16, 2021 4:11PM
End Date /Time: June 25, 2021 4:11PM

Media Type(s): NPDES Industrial Stormwater

Contact(s):
Betty Jacobs
Plant Manager
Ronald Turner
Supervisor
Rayford
McEachern,
Engineer

NPDES Industrial Stormwater

Permit / Approval Numbers: 12SW0630
NPDES Numbers: MDR000630
Inspection Reason: Follow-up (Non-Compliance), Initial Yearly, Routine Scheduled
Site Status: Active
Compliance Status: Noncompliance
Site Condition: Noncompliance
Recommended Action: Additional Investigation Required
Evidence Collected: Photos or Videos Taken, Record Review, Visual Observation
Delivery Method: Email
Weather: Clear Good

Inspection Findings:

The Back River WWTP is a 180 MGD activated sludge process sewage treatment plant with BNR (MLE process), ferric chloride for P removal, sand filters, Enhanced Nitrogen Removal, chlorination and dechlorination. The flow is split at a junction box after the sand filters. The main portion of the flow goes to Outfall 001 to Back River via cascading outfall and the remaining flow goes to Outfall 002, which is further chlorinated and sent to Tradepoint Atlantic, where it flows to High Head Lake and then discharged to Bear Creek through outfalls at the Tradepoint Atlantic site. The facility's activity code or standard industrial classification (SIC) is 4952 and the North

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American Industry Classification System (NAICS) is 2213. The receiving water for the stormwater is Back River and a tributary named Bread and Cheese Creek. The Back River basin is protected for Use II, water contact recreation and the protection of aquatic life.

Today an announced inspection was conducted for compliance with the General Stormwater Discharge Permit NPDES # MDR000630 and State # 12-SW- 0630 at the Back River WWTP. This general permit has expired and been administratively extended by the Maryland Department of the Environment. (Department). I met Mr. Ronald Turner, Ms. Betty Jacobs, and Mr. Rayford McEachern representing the permit holder, on site, for an evaluation of the records and reports pursuant to the above authorization.

Chesapeake Bay Restoration Requirements

This facility is not subject to Chesapeake Bay Restoration Requirements based on the criteria in Part III A of the above authorization.

Nutrient Reduction Progress Report

The permittee is not required to submit Nutrient Reduction Progress Report Form.

Benchmark Monitoring

There are no benchmark monitoring requirements for this facility that require electronic reporting through NetDMR

I began this inspection with a review of the records and reports for the period January 1, 2019, through the present. Below are the items covered during this review:

- Stormwater Pollution Prevention Plan (SWPPP)
- Quarterly Visual Inspections
- Routine quarterly Facility Inspections
- Training Records
- Annual Comprehensive Site Compliance Evaluations
- Stormwater Pollution Prevention Team Assessments
- Corrective Action Reports and associated maintenance records

Below are the findings of this review:

Stormwater Pollution Prevention Plan (SWPPP)

During the previous inspections, I found that there was no acceptable topographical map that extends at least ¼ mile beyond the property boundaries. During this inspection, I found that the permittee has prepared suitable topographical maps as described above. These maps contain most of the information required by the permit. The following additional information should be included on the maps.

The map does not contain specific required information detailed below:

1. The site map does not contain information on whether any of the receiving waters are impaired and if so, whether the waters have TMDLs established. The Back River basin is on the 303-d list as impaired by PCBs, sediment, chlordane, nitrogen, phosphorous, sulfates, and chlorides. There are TMDLs for nitrogen, phosphorous and tPCBs.
2. The map does not show all locations of potential pollutant sources described in Part III.C.3 of the permit.
3. The locations of the activities listed in Part III C 2 c xiv of the permit that are exposed to precipitation are not designated on the maps.

The SWPPP has been revised and updated to meet some of the site conditions, corrective actions and MDE compliance inspections. However, changes to the SWPPP are not being signed by a person described in Part II.C.2 of the permit or by a duly authorized representative of that person, as required under Part II C 3 of the permit.

Routine Facility Inspections

The permittee has failed to conduct routine stormwater inspections at least quarterly as specified in Part V A 1 of the permit for 2019, 2020 and 2021.

Quarterly Visual Inspections

The permittee could not provide records of the visual inspection for the 3rd and 4th quarter of 2019 and the 1st and 2nd quarters of 2021. These visual inspections are required by Part VA3 of the permit.

The quarterly visual inspections for 2020 were performed as required. However, there was no documentation to verify that one of the visual inspections for 2020 was conducted during a snow melt event as required by Part V 3 c of the permit.

Outfall 005 is designated as an active outfall in the SWPPP. I observed that there are no visual inspections for that outfall. According to Mr. Turner, a barrel fell in the manhole where outfall 005 is monitored. This barrel blocking the runoff flow and preventing the permittee from collecting samples. Mr. Turner indicated that the manhole is the only location where a sample can be collected.

Training Records

During a review of the training records, I observed that not all staff has received stormwater pollution prevention training as required by Part III.B.1.b.ix of the permit.

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Annual Comprehensive Site Compliance Evaluations

During a review of the records, I found that the last annual comprehensive site compliance evaluations was conducted on October 27, 2018. There were specific corrective actions required for the 2018 evaluation, however; there was no documentation with the report indicating that the required corrective action or follow-up measures were completed as specified in Part IV C, Part IV D and Part V A 1 of the permit.

Stormwater Pollution Prevention Team Assessments

I found that there were no records or evidence that the results of the annual comprehensive inspections were being used to evaluate the effectiveness of the SWPPP. In addition, the Stormwater Pollution Prevention Team members list in the SWPPP is out of date. Some members listed are no longer at the site. The team member list should be updated, as necessary.

With respect to the above MDE authorization, the following violations were observed at the Back River WWTP under Environment Article Title 9:

1. The permittee has failed to conduct the required quarterly routine facility inspections as specified in Part V A 1 of the permit.
2. The documentation and follow up measures for the findings of the annual comprehensive inspection for 2018 have not been addressed as specified in Part IV C, Part IV D and Part V A 1 of the permit. Problems that require corrections were identified in the annual inspection report; however, no follow up measures were taken to ensure that the problems detected were addressed within the permit designated timeframe.
3. The permittee has failed to perform the required visual inspections as specified by Part V A 3 of the permit.
4. The permittee failed to conduct at least one quarterly visual assessment during a snow melt event as required by Part V A 4 of the permit.
5. Updates to the SWPPP are not being signed as specified in Part II C 3 of the permit.
6. The Back River WWTP has not provided stormwater pollution prevention training for all employees as required by Part III.B.1.b.ix of the permit.
7. The SWPPP site map does not contain specific required information in specified in Part III C 2 c of the permit.

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8. There were no records documenting that the pollution prevention and control objectives of the SWPPP have been addressed or met through pollution prevention team meetings and through Environmental Quality Management records.
9. The facility has failed to conduct visual assessments at Outfall 005 because a barrel fell into the manhole where the stormwater is monitored. This barrel is obstructing access to the flow and preventing visual assessments at Outfall 005.

To bring this site into compliance with Environment Article Title 9, the following corrections should be made by the Back River WWTP:

- A. With respect to item #1 above, the permittee should immediately begin conducting the routine facility inspections required and specified in Part V A 1 of the permit.
- B. With respect to item #2 above, when repairs or corrections are necessary following a stormwater related inspection, all repairs or modification measures must be made before the next storm event, if possible, or as soon as practical following that storm event. If corrective actions cannot be taken or the problem fully addressed within 30 days, the permittee should contact the Maryland Department of the Environment (Department) Compliance Program and make the Department aware of the situation. Please refer to Part IV.C Corrective Action Deadlines and Part IV.D. Corrective Report in the 12SW 0629 permit for appropriate time frames.
- C. With respect to item #3 above, the permittee should begin conducting visual inspections, quarterly as specified in the permit.
- D. With respect to item #4, at least one quarterly visual assessment must capture snowmelt discharge.
- E. With respect to item #5 above, all changes or update to the SWPPP, including any corrective actions taken should be signed by a responsible person described in Part II.C.2 of the permit or by a duly authorized representative of that person.
- F. With respect to item #6 above, the Back River WWTP should begin performing stormwater pollution prevention training taking advantage of virtual and online training platforms to meet the requirements in Part III.B.1.b.ix of the permit. The Maryland Department of the

Environment recommends that the pollution prevention training be conducted at least annually

- G. With respect to item #7 above, the site map should meet all the requirements in Part III C 2 c of the permit should be developed.
- H. With respect to item #8 above, records and documentation should be maintained of Pollution Prevention team meetings and other quality management indicators signifying whether the pollution prevention and control objectives of the SWPPP are being meet.
- I. With respect to item #9 above, the Back River WWTP should immediately begin making arrangements to remove the barrel from the manhole where the storm water runoff from Outfall 005 should be evaluated. Once removed, the permittee should begin visual assessments of Outfall 005 as required by the permit.

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 Industrial Stormwater - Inspection Checklist

<i>Inspection Item</i>	<i>Status</i>	<i>Comments</i>
Does the facility have a discharge permit?	No Violations Observed	
Has a Stormwater Pollution Prevention Plan (SWPPP) been implemented as required?	No Violations Observed	
Is the number and location of discharge outfalls as described within the Stormwater Pollution Prevention Plan (SWPPP)?	No Violations Observed	
Are identified outfalls representative of stormwater discharges from the site?	No Violations Observed	
Does the Stormwater Pollution Prevention Plan (SWPPP) require modifications to prevent runoff of pollutants?	Out of Compliance	See Narrative Section
Are adequate records being maintained for the quarterly routine facility inspections?	Out of Compliance	See Narrative Section
Are adequate records being maintained for the quarterly visual monitoring?	Out of Compliance	See Narrative Section

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<i>Inspection Item</i>	<i>Status</i>	<i>Comments</i>
Are adequate records being maintained for the annual comprehensive evaluation?	Out of Compliance	See Narrative Section
Are adequate records being maintained for the employee training who are implementing activities necessary to meet the conditions of the permit?	Out of Compliance	See Narrative Section
If monitoring of benchmark parameters is required, has the permittee performed the required quarterly monitoring?	2 - Not Applicable	See Narrative Section
If monitoring of benchmark parameters is required, has the permittee submitted quarterly benchmark monitoring results electronically within the allotted time?	2 - Not Applicable	See Narrative Section
Were visible pollutants observed in the receiving waters or in a position likely to pollute water of the State?	2 - Not Applicable	No Discharges
If discharges were observed, were samples of the discharge taken?	2 - Not Applicable	No Discharges

Inspector: Ronald Wicks 6/25/2021
 Ron, Wicks/Date
 ron.wicks@maryland.gov
 410-537-3510

Received by: _____
 Signature/Date

 Print Name