



Maryland

Department of the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

CERTIFIED MAIL/ELECTRONIC MAIL

Yosef Kebede, Head
Bureau of Water and Wastewater
Baltimore City Department of Public Works
200 Holliday Street
Baltimore, Maryland 21202

Re: Back River Wastewater Treatment Plant, AI# 8449, 15-DP-0581A
Information Request

Dear Mr. Kebede:

The Maryland Department of the Environment (the “Department”) acknowledges the recent corrective actions that the Baltimore City Department of Public Works (the “City”) has implemented at the Back River Wastewater Treatment Plant (the “Back River WWTP”) to address operational and mechanical deficiencies. However, the City must expedite its retention of sufficient qualified staff and conduct all appropriate work to bring all of the essential processes and units into efficient operation in order to ensure compliance with the Back River WWTP’s discharge permit, State Discharge Permit No. 15-DP-0581A.

The Department has met with City personnel on several occasions and has reviewed the following documents submitted by the City:

- the letter from Yosef Kebede to Lee Currey, dated September 7, 2021;
- the “Strategic Plan for MDE Compliance,” undated, submitted on September 17, 2021;
- the “Strategic Plan for MDE Compliance at Back River Wastewater Treatment Plant,” undated, submitted on October 7, 2021;
- the letter from Michael Hallmen to Ron Wicks, dated October 20, 2021;
- the “Progress Report,” dated November 15, 2021;
- the email from Michael Hallmen to Sharon Talley, dated November 22, 2021 re: “Operator Certifications - PWWTP and BRWWTP,”
- the “BRWWTP Progress Report,” dated November 30, 2021;
- the “Back River WWTP Plant Operational Assessment,” undated, submitted on December 20, 2021;
- the “BRWWTP Progress Report,” dated January 5, 2022;
- the “BRWWTP Progress Report,” dated January 15, 2022;
- the “Back River Operation Changes.xlsx” and the “Back River status spreadsheet.xlsx,” submitted on January 29, 2022; and
- the “220211 Back River status spreadsheet.xlsx,” submitted on February 11 and 15, 2022.

Mr. Yousef Kebede, AI# 8449
Back River WWTP

The Department's review has raised significant concerns about (a) the City's prioritization of projects, (b) long completion deadlines, and (c) the absence of a full treatment train engineering report.

This letter serves as a request for additional information on the prioritization of projects and the City's target completion dates of projects intended to bring the Patapsco WWTP into permit compliance on the following topics:

- a. Adequate Staffing
- b. Primary Settling Tank Cleaning, Maintenance, & Repair
- c. Enhanced Nutrient Reduction & Denitrification Filters
- d. Sand Filter Rehabilitation
- e. Suspended Solids Reduction
- f. Capital Project List
- g. Third-Party Certified Engineering Evaluation & Report
- h. Industrial Stormwater Discharge Permit
- i. Plant Tour & Meeting

The Department's request for additional information is attached hereto as "Attachment A." Obtaining this information from the City is necessary for the Department to understand the scope and nature of the short, intermediate, and long-term actions required to operate the plant efficiently now, tomorrow, and into the future.

The Department appreciates the City's continued cooperation in this matter. If you have any questions, please do not hesitate to contact Ms. Sharon Talley, Program Manager, Compliance Program at (410) 537-3510 or by email at sharon.talley@maryland.gov.

Sincerely,



D. Lee Currey (Mar 4, 2022 12:52 EST)

D. Lee Currey, Director
Water and Science Administration

DLC:ldr

Enclosures (via electronic mail only)

cc: Alice Volpitta, Baltimore Harbor Waterkeeper, Blue Water Baltimore
Jonathan E.C. May, Assistant Attorney General
Nathan P. Short, Assistant Attorney General