UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103-2029

Report Title:	Clean Water Act Compliance Inspection Report
Inspection Date(s):	04/4-6/2023
Regulatory Program(s):	National Pollutant Discharge Elimination System (NPDES)
Type of Activity:	Pretreatment Compliance Inspection– Publicly Owned Treatment Works
Facility Name:	Back River WWTP
Facility Address:	8201 Eastern Avenue Baltimore, MD 21230
Lat/Long:	39.299489, -76.49435
County/Parish:	Baltimore
Permit Number:	MD0021555
NAICS & SIC Codes:	221320/4952
Unique Project #:	3E23WN086A

Facility Representative: **Point of Contact**

Ms. Pat Boyle – Pretreatment Coordinator ☒
Phone: (410) 396-9695 Email: pat.boyle@baltimorecity.gov

EPA Inspectors:

Jim Kline (3ED13) Lead Inspector
Phone: (304) 234-0263 Email: kline.james@epa.gov
Kaitlin McLaughlin (3ED33) Inspector
Phone: (215) 814-2393 Email: Mclaughlin.kaitlin@epa.gov

James Kline Digitally signed by James Kline Date: 2023.08.03 13:48:13 -04'00'

Report Preparer Signature/Date — Jim Kline, Inspector (3ED13), NPDES Section — Date

JESSICA DUFFY Digitally signed by JESSICA DUFFY Date: 2023.08.04 08:45:18 -04'00'

Supervisor Signature/Date — Jessica Duffy, Section Chief, NPDES 2 Section — Date

I. Contents

II. Introduction

On April 4-6, 2023, a core inspection team composed of EPA Lead Inspector Jim Kline (Inspector Kline) and Inspector Kaitlin McLaughlin (Inspector McLaughlin) from the U.S. Environmental Protection Agency (EPA) Region III, National Pollutant Discharge Elimination System (NPDES) Section hereinafter (EPA Inspection Team) conducted an on-site Pretreatment Compliance Inspection (PCI) of the Back River Waste Water Treatment (hereinafter Back River) Pretreatment Program. Back River is located at 8201 Eastern Avenue East in Baltimore, MD 21224 **(See Attachment #1- Photo #1)**. The purpose of the inspection was to observe the program's compliance with the Clean Water Act (CWA) and the applicable Federal Pretreatment Regulations. The Facility's National Pollutant Discharge Elimination System (NPDES) permit (ID: MD0021555) has been included **(See Attachment #2)**. Prior to the PCI, the Maryland Department of the Environment ("MDE") was notified of the inspection. Mr. Michael Richardson, Chief WW Permits Division and Ms. Marjorie Mewbourn, Pretreatment Coordinator, attended the inspection.

All information included in this report is the result of observations made by the Inspectors, statements made by Back River and/or Clean Harbor of Baltimore (Clean Harbor) representatives, materials shown to the Inspectors by Back River and/or Clean Harbor representatives and/or documents provided by Back River and/or Clean Harbor representatives to the Inspectors at the time of, or subsequent to, the inspection.

III. Back River- Opening Conference

The EPA Inspection Team conducted an Opening Conference at Back River at 8:30 AM. The EPA inspection Team and the MDE Representatives met with the following Back River Representatives:

Table 1: Inspection- Opening Conference Attendee List (Back River)

Name	Affiliation	Title	Telephone	Email
EPA Region III Inspection Team				
Jim Kline	EPA	Lead Inspector	(304) 234-0263	kline.james@epa.gov
Kaitlin McLaughlin	EPA	Inspector	(215) 814 2393	mclaughlin.kaitlin@epa.gov
Jessica Duffy *	EPA	NPDES Acting Section Chief	(215) 814-3212	duffy.jessica@epa.gov
MDE- Baltimore Representatives				
Michael Richardson	MDE	Chief, WW Permits Division	(410) 537-3323	michael.richardson@maryland.gov
Marjorie Mewbourn	MDE	Pretreatment Coordinator	(410) 537-3651	marjorie.mewbourn@maryland.gov
Back River Representatives				
Pat Boyle	Back River	Pollution Control Program Administrator/ Pretreatment Coordinator	(410) 396-9695	pat.boyle@baltimorecity.gov
Michael Hallmen **	Back River	Division Chief WW Facilities Division	(410) 396-9806	michael.hallmen@baltimorecity.gov

Ken Stuart	Back River	Pollution Control Program Supervisor	(410) 396-9800	---
Ronald Turner **	Back River	WWTP Manager	(410) 396-9800	---
Andrea Buie **	DPW Baltimore	Chief Environmental Regulatory Compliance & Safety	(410) 396-5398	---

** Did not attend April 4th*

*** Attended April 4th only*

The EPA Inspection Team displayed their credentials to Mr. Hallmen and Ms. Boyle at the outset of the inspection. Inspector Kline informed both Mr. Hallmen and Ms. Boyle that any information that the Facility deemed to be confidential business information ("CBI") should be identified to the EPA Inspectors during the inspection and it would be handled as CBI according to EPA's CBI procedures. Photographs were taken during the inspection by Inspector Kline and are provided in Attachment 1. Ms. Boyle stated Baltimore has two waste water treatment facilities, Back River and Patapsco Waste Water Treatment Plants. Inspector Kline informed Ms. Boyle that only Back River was subject to this inspection.

A. Back River- Background Information

Back River is a wastewater treatment plant, owned and operated by the city of Baltimore which dates back to 1907. According to Ms. Boyle, prior to the construction of Back River, the property was primarily used for housing along with a resort hotel. According to Mr. Hallmen, Back River has a hydraulic capacity of 130 million gallons per day and discharges to the Back River. Mr. Hallmen added, Back River has 270 full-time employees who cover three shifts for continuous around-the clock coverage all year-round.

According to Mr. Hallmen, Back River is operating under a consent order with MDE that has been in place since June 2022. Mr. Hallmen added operational oversight was assigned to the Maryland Environmental Service (MES) due to effluent violations, insufficient staffing, and lack of operational maintenance. Mr. Hallmen stated since the consent order he believed Back River has improved overall in a timely fashion and is in a much better position. Inspector Kline asked Mr. Hallmen to discuss the recent explosion that occurred at Back River. Mr. Hallmen stated an explosion occurred on March 15, 2023 in the Synagro dried sludge pelletizer building. Mr. Hallmen stated the building was built about twenty to twenty-five years ago and is owned and operated by Synagro. Mr. Hallmen shared that it was believed a mineral oil line had leaked which soaked the pellets and caused the explosion. Mr. Hallmen stated nobody was hurt and the building was designed and functioned as it should in the event an explosion ever would occur.

B. Back River- Observations

In addition to the personnel attending the opening conference; John Hagens, Pollution Control Analyst 3 and Kenny Perry, Pollution Control Analyst 1 (both Back River employees) attended a tour of the Back River facility. The first stop was at the Headworks. According to Mr. Hallmen, the headworks construction project was completed and put into service in October 2021. Mr. Hallmen stated Back River has not had a pass-through event since the new headworks has come on-line. According to Mr. Hallmen, the initial receiving point includes new course screens along with new fine screens at the Headworks which vastly improved the removal of solids buildup and vastly improved plant performance. Mr. Hallmen added that three of the primary settling tanks (PSTs) were currently on-line which allows solids in the wastewater to settle to the bottoms and the scum to float to the surface for removal.

A windshield assessment was conducted of the sludge control station, the decommissioned methane flare, water tower, Building #4 Reactors, and the DNF (denitrification) Building. The next stop was near the Synagro Pelletizer Building. Mr. Hallmen stated this was the building that was involved in the explosion in March **(See Attachment #1- Photo #2)**. Mr. Hallmen introduced the EPA Inspection Team to Mr. Joe Hurt, Area Director-Synagro and Mr. Chris Blaylock, EHS Manager for URL Contracting. Both Mr. Hurt and Mr. Blaylock stated the reconstruction is on-track to be completed within four months.

The next stop was in the area of Outfall #001. The EPA Inspection Team was introduced to three Back River employees; Ms. Dana Garris, Operations Supervisor II; Mr. Dan Latova, Operations Engineer; and Mr. Steven Jones, Instrument Supervisor 1. Inspector Kline asked where effluent samples were collected. Mr. Latova stated samples are collected at two locations. Ms. Garris stated her staff samples three times a day for Ecoli, pH, dissolved oxygen (DO) and residuals from a valve above the plant effluent leading to the river **(See Attachment #1- Photo #3)**. Mr. Steven Jones stated his staff are responsible for the set-up, operation, and calibration of the three Hach AS950 refrigerated composite samplers that are located inside the OFB Shed **(See Attachment #1- Photo #4)**. Inspector Kline requested as-built drawings of the effluent piping since samples are collected from two different locations. Mr. Latova stated he wasn't certain such drawings exist. Mr. Latova did close a valve within the Sampling Shed to show the EPA Inspection Team that the flow to the outside valve would decrease to a stop approximately a minute later.

The last area visited on the tour was the Septage Receiving Station (SRS) **(See Attachment #1- Photo #5)**. According to Mr. Hallmen, the SRS has been down for about three years. This concluded the tour.

C. Back River- Industrial Pretreatment Program File Review

The EPA Inspection Team and the MDE Representatives returned from the Back River tour and started the review of the Industrial Pretreatment Program at Back River. Ms. Boyle is the Back River Pretreatment Coordinator and has been employed by Back River since 1993. Mr. Ken Stuart works alongside with Ms. Boyle as the Pollution Control Supervisor. Mr. Stuart stated he has worked at Back River since 1987. Both Ms. Boyle and Mr. Stuart oversee the Back River Industrial Pretreatment Program. Mr. John Hagens from Back River also attended this portion of the inspection

According to Ms. Boyle, Back River has fourteen permitted industrial users **(See Attachment #3)**. Ms. Boyle stated Back River has eight categorical industrial users (CIUS) and six significant non-categorical industrial users (SNIUs). The eight CIUS include: Aalberts Surface Treatment Corporation, Arco Metals Inc., Clean Harbors of Baltimore Inc. (Clean Harbors), Clendenin Brothers Inc., Eisal Inc., Emergent BioSolutions,

Emergent BioSolutions-Camden Campus, and Turnbull LLC. The six SNIUs include: Ace Uniform Services Inc., Chesapeake Uniform Rental Inc., Cintas Corporation, Dietz & Watson Corporation, Hospital Central Services Cooperative Inc., Sherwin Williams Company, and Valley Proteins Inc.

Inspector Kline asked which were the largest CIUs. Mr. Stuart stated the largest CIU was Clean Harbors, a centralized waste treatment facility and the second largest was Emergent BioSolutions-Camden Campus, a pharmaceutical manufacturer. Inspector Kline asked which SNIU was the largest. Mr. Stuart answered Emergent BioSolutions was the largest SNIU and is the largest IU. Inspector Kline asked both Ms. Boyle and Mr. Stuart if these IUs had any permit parameter exceedances in the past three years.

Mr. Stuart and the EPA Inspection identified the following exceedances for Clean Harbors over the past three years (sampling conducted by Clean Harbors revealed 3 permit excursions):

-December 17, 2021- Copper: Permit limit 0.405 mg/L. Result 2.1 mg/L
-December 31, 2021- Monthly average for Copper: Permit limit: 0.301 mg/L. Reported: 0.4488 mg/L
-March 1, 2021- TPH: Permit Limit: 100 mg/L. Reported: 132 mg/L

Sampling conducted by Back River of Clean Harbors revealed three occasions where the lower detection limits were higher than the permit limit:

-May 19, 2022- Titanium: Limit: 0.094 mg/L. Result was non-detect (ND), but detection limit was higher than permit limit (0.2 mg/L was DL)
-June 4, 2020- Titanium: Limit: 0.094 mg/L. Result was ND, but detection limit was higher than permit limit (0.2 mg/L was DL)
-Nov 24, 2020- 2-4-6-trichlorophenol: Limit: 0.155 mg/L. Result was ND, but detection limit was higher than permit limit (0.2 mg/L was DL)

Inspector Kline requested and received a copy of the Back River Enforcement Response Plan **(See Attachment #4)**. Inspector Kline completed the Field Audit Checklist with assistance from Inspector McLaughlin **(See Attachment #5)**. The EPA Inspection Team obtained input from Ms. Boyle and Mr. Stuart in the completion of the checklist. The checklist is divided into five sections with applicable comments related to each section. Inspector Kline requested and received a copy of the IU Permit issued to Clean Harbors **(See Attachment #6)**. Inspector Kline asked if Clean Harbors had developed a Slug Control Plan. Ms. Boyle stated Clean Harbors was required to have a Slug Control Plan. Ms. Boyle stated Clean Harbors did not have a Slug Control Plan, but they did have a Spill Prevention, Control, and Countermeasure (SPCC) Plan. Inspector Kline reviewed a copy of the Spill Prevention, Control, and Countermeasure (SPCC) Plan for Clean Harbors dated April 2018 **(See Attachment #7)**. Inspector Kline did not observe written procedures or contact information regarding notification of slugs or spill incidents to Back River by Clean Harbors. Inspector Kline also did not observe a listing of all stored chemicals kept at Clean Harbors. On April 18, 2023, Inspector Kline received an e-mail from Mr. Jim Childress, Clean Harbors Vice President of Environmental Compliance. The e-mail contained the SPCC Plan, and a Slug Discharge Control Plan (SDCP) dated April 14, 2023 **(See Attachment #8)**.

During the file review of Clean Harbors, Inspector Kline asked Ms. Boyle to see copies of waste profiles or representative waste manifests generated by Clean Harbors. Ms. Boyle stated she did not have copies of waste profiles or manifests for wastes coming into CH.

As part of the PCI, the EPA Inspection selected Clean Harbors as the IU tour portion of the inspection. Inspector Kline set the meeting time at 8:30 AM on April 5, 2023, for the onsite inspection at Clean Harbors. This concluded the PCI for the day. The EPA Inspection Team and Ms. Duffy would return to Back River at 2:00 PM on April 5, 2023, to complete the file review.

IV. IU Inspection- Clean Harbors

A. Clean Harbors- Opening Conference

The EPA Inspection Team along with Jessica Duffy, NPDES Acting Section Chief arrived outside the northwestern gate at Clean Harbors at 8:30 AM on April 5, 2023. The MDE Baltimore Representatives had arrived at the south-western gate. All EPA and MDE Representatives were received and directed to the Clean Harbors conference room.

Table 2: Inspection-Opening Conference Attendee List (IU- Clean Harbors (CH))

Name	Affiliation	Title	Telephone	Email
EPA- Region III Inspection Team				
Jim Kline	EPA	Lead Inspector	(304) 234-0263	kline.james@epa.gov
Kaitlin McLaughlin	EPA	Inspector	(215) 814- 2393	mclaughlin.kaitlin@epa.gov
Jessica Duffy	EPA	NPDES Acting Section Chief	(215) 814- 3212	duffy.jessica@epa.gov
MDE- Baltimore Representatives				
Michael Richardson	MDE	Chief, WW Permits Division	(410) 537-3323	michael.richardson@maryland.gov
Marjorie Mewbourn	MDE	Pretreatment Coordinator	(410) 537-3651	marjorie.mewbourn@maryland.gov
Back River Representative				
John Hagens	BRWWTP	Pollution Control Analyst 3	(410) 396-9800	---
Clean Harbors (CH) Representatives				
Charles Hart	CH	Facility General Manager	(443) 537-5177	hart.charles2@cleanharbors.com
Jim Childress	CH	Vice President, Environmental Compliance	(615) 643-3175	childress.james@cleanharbors.com
Todd Blake	CH	Senior Environmental Compliance Manager	---	Todd.blake@safety-kleen.com
Darrell Gowe	CH	Facility Operations Manager	(410) 244-8200	---
Larvelricus "V" Harris	CH	Facility Operations Manager	(410) 244-8200	---

Bill Fornoff	CH	Director of Labs	(410) 244-8200	---
Katie Schwarz	CH	Lab Manager	(410) 244-8200	---
Valerie Saliba	CH	Facility Administrator	(410) 244-8200	---

The EPA Inspection Team displayed their credentials to Mr. Hart at the outset of the inspection. Inspector Kline informed the Clean Harbors Representatives that any information that the Clean Harbors deemed to be confidential business information ("CBI") should be identified to the EPA Inspectors during the inspection and it would be handled as CBI according to EPA's CBI procedures. During the inspection, Clean Harbors Representatives did not identify CBI. Photographs were taken during the inspection by Inspector Kline and are provided in Attachment 1.

Inspector Kline explained that the purpose of the inspection was to observe the Back River Pretreatment Program's compliance with the Clean Water Act (CWA) and the applicable Federal Pretreatment Regulations. The inspection was conducted as part of a routine periodic inspection and was coordinated with the Maryland Department of the Environment ("MDE").

B. Clean Harbors- Background Information

Inspector Kline asked Mr. Hart to describe what Clean Harbors does at their facility. Mr. Hart stated Clean Harbors purchased the facility in 1989. Clean Harbors continues to provide treatment for a variety of wastewater at this location. Mr. Hart stated the former owner of the facility was ChemClear. According to Mr. Hart, Clean Harbors is situated on an approximately six-acre site. Clean Harbors is a permitted Resource Conservation Recovery Act (RCRA) Transfer Storage and Disposal Facility (TSDF) for hazardous wastes. Mr. Hart stated Clean Harbors operates under an Air Quality Permit issued by the MDE and has used oil and fuel oil tanks. Inspector Kline asked Mr. Hart if Clean Harbors has a Stormwater Permit. Mr. Hart stated they certify as non-exposure.

Inspector Kline asked Mr. Hart how many employees work at this Clean Harbors location. Mr. Hart stated there are thirty-three full-time employees for continuous operations twenty-four hours a day, every day of the year. Mr. Hart added that processing occurs only during the hours of 7AM until 11PM. Live off-loading occurs from 6:00 AM until 9:00 PM- Monday through Friday.

Mr. Hart stated Clean Harbors treats organic and inorganic waste water and also does fuel blending operations. Mr. Hart added Clean Harbors also does transfer loading of wastes at this facility. Inspector Kline asked how wastes are transported to Clean Harbors. Mr. Hart stated water is transported in and out by tanker trucks or by rail tankers.

Inspector Kline asked Mr. Hart to describe the operations at Clean Harbors. Mr. Hart stated before anything is delivered to Clean Harbors, the Central Profile Group will evaluate the waste profile and determine which Clean Harbors Facility can effectively receive and manage the waste along with determining the least cost routing. Once the Baltimore facility is determined to receive the waste, the waste is transported to this facility. All waste is sampled immediately after arriving at his facility. The on-site lab analyzes the waste and determines if the waste is comparable to the profile created by the Clean Harbors Profile Group. Once a positive

determination is made, the waste water is off-loaded at the Pretreatment Area. Inspector Kline requested and received a generic process flow diagram **(See Attachment #9)** and a layout-map of the facility **(See Attachment #10)**.

According to the process flow diagram, the process consists of eleven units; 1. Receiving and storage 2. Pretreatment and Storage 3. Organics Extraction 4. Solids Handling 5. Raffinate Polishing Treatment and Storage 6. Sludge Handling 7. Metals Removal Treatment 8. Effluent Storage 9. Extract Handling 10. Fuels Blending and Transfer 11. Reactors System. According to Mr. Hart, the treatment process is tailored to the type and amount of waste received. The wastewater is pumped from the rail or tank trucks directly to the pretreatment storage tanks. Pretreatment typically consists of suspended solids removal and metals precipitation, pH adjustment and phase separation. Floating organic liquids are removed from the surface and pumped to the extraction tanks and are used for fuels blending. Sludges are removed using a filter press.

C. Clean Harbors- Observations

Inspector Kline requested to tour Clean Harbors. The tour started at the Sample Shed. According to Clean Harbors, Katie Schwarz, Lab Manager, this is where all effluent samples are collected. Inside the Sample Shed the EPA Inspection Team and Ms. Duffy observed two ISCO portable composite samplers, models 3700 and 3710 **(See Attachment #1- Photo #6)**. Ms. Schwarz stated the 3710-model belonged to Clean Harbors and the 3700-model belonged to Back River. Inspector Kline observed a clear hose that was attached to a shut-off valve. Ms. Schwarz stated this is the sampling location for the effluent. The EPA Inspection Team decided that Inspector Kline would continue with the tour and both Inspector McLaughlin and Ms. Duffy would prepare to conduct sampling along with Clean Harbors Lab Personnel.

Inspector Kline observed the tanker truck Receiving Station **(See Attachment #1- Photo #7)**. Inspector Kline observed a stainless steel Coliwasa Sampler adjacent to a stairwell **(See Attachment #1- Photo #8)**. Mr. Hart stated this is where samples are taken from the tanker trucks and a similar sampler is in the rail tanker area. This area appeared to be neat and orderly with no evidence of spill or other obvious concern.

Inspector toured the rail tanker area **(See Attachment #1- Photo #9)** and proceeded to the off-loading area outside the Pretreatment Area **(See Attachment #1- Photo #10)**. Inspector Kline observed the inorganics and metals removal areas along with the filter press inside the Pretreatment Building. This area appeared to be neat and orderly with no evidence of spill or other obvious concern.

Inspector Kline toured the Lab. Mr. Bill Fornoff provided Inspector Kline with copies of the New York State Department of Health Wadsworth Center- Certificate of Approval for Laboratory Service, which was issued April 1, 2023, and expires April 1, 2024. This certificate lists the analytes that the Clean Harbors Lab is approved to test **(See Attachment #11)**. Inspector Kline asked Mr. Fornoff if the Lab conducts pH field tests. Mr. Fornoff stated yes, they conduct pH testing and showed Inspector Kline the calibration log. Inspector Kline requested a copy of the completed entry for April 3, 2023 **(See Attachment #12)**. Mr. Fornoff showed Inspector Kline the buffers used for the three-point calibration. Inspector Kline observed that all buffer solutions were good and had not yet expired.

D. Clean Harbors- Sample Collection

Ms. Duffy, Ms. Hart and Inspector McLaughlin proceeded with sample collection as outlined in the Quality Assurance Project Plan (QAPP) for Clean Harbors Effluent Sampling. Clean Harbors requested split samples. Ms. Duffy explained we did not have a split sampler, but Clean Harbors can collect a duplicate sample or provide a split sampler for a true split. Clean Harbors also did not have a split sampler and agreed to collect a duplicate sample for their independent analysis.

There were two composite samplers installed at the effluent sampling location. One belonged to Clean Harbors and one belonged to Back River WWTP. Ms. Hart indicated the onsite composite samplers were set to collect 96 discrete samples over a 24-hour period. The sample containers in the composite samplers were black with residue from previous sampling and Ms. Duffy requested that each container be thoroughly cleaned and rinsed prior to this sampling event. Ms. Hart cleaned the non-dedicated sampling containers in the onsite laboratory. The hosing connected to the composite samplers were also dirty with residue **(See Attachment #1 – Photos #13-15)**. The clean containers were placed back into the samplers and an equipment blank was collected by running deionized water supplied by the Region 3 laboratory through all non-dedicated sampling equipment including the dirty hosing in the same manner as the sample would be collected the following day. Samples were preserved in the field immediately following sample collection. The equipment blank was collected for metals and SVOC analysis at 10:30 AM on Wednesday April 5, 2023.

Ms. Duffy and Inspector McLaughlin conducted field calibration of the YSI for pH. Results of the calibration were within acceptable ranges and are recorded in the logbook. After calibration, a field pH analysis was recorded at 9.33, which was within the Clean Harbor IU Permit Limits. Ms. Duffy collected grab samples for total petroleum hydrocarbon (TPH), Cn, and laboratory pH at 11:05 AM on Wednesday April 5, 2023. TPH sample containers were pre-preserved and Cn samples were preserved in the field immediately following sample collection. TPH and Cn samples were placed on ice. Ms. Duffy noted the samples were off-gassing and thus created headspace in the volatile organic analysis (VOA) vials used for TPH analysis. The effluent water was pungent with chemical odor and was as dark, cloudy, and effervescing. Ms. Hart indicated this was typically how the effluent looked. Ms. Hart showed Ms. Duffy and Inspector McLaughlin the setting on the composite samplers which indicated 96 discrete samples over a 24-hour period. Both composite samplers were utilized to ensure enough sample volume is collected for all analyses. The sample team prepared the composite samplers to start collection at 11:30 AM on Wednesday April 5, 2023 and be completed with collection at 11:30 AM on Thursday April 6, 2023. Both composite samplers were filled with ice for sample preservation during collection period. Inspector Kline provided Mr. Hart a receipt, which Mr. Hart signed for the grab samples collected on April 5, 2023. Ms. Duffy placed locks on each sampler to prevent access to the sample containers during sample collection **(See Attachment #1- Photos #11 & #12)**. Inspector Kline requested that each sampler not be disturbed until after the sampling event concluded on April 6, 2023. Inspector Kline took a photograph of both samplers prior to leaving Clean Harbors **(See Attachment #1- Photo #13)**. Mr. Hart stated nobody would need to or go into the Sample Shed until we returned.

Inspector Kline and Ms. Duffy returned to Clean Harbors at 10:30 on April 6, 2023. The locks placed on each sampler appeared intact and undisturbed **(See Attachment #1- Photo #14)**. Ms. Schwarz opened the Clean Harbors sampler first and then the Back River sampler. Effluent which had collected in both sample containers appeared to have the same characteristics of the effluent collected for the grab sample on April 5, 2023. At the direction of Ms. Duffy, Ms. Schwarz combined the liquid from each sampler into a precleaned larger container **(See Attachment #1- Photo #15)** (note: this container was also used when collecting the equipment blank).

Samples were collected for select Metals and SVOC analysis; only those compounds or metals listed in IU permit for Clean Harbors were requested for analysis. Ms. Duffy held the individual sample containers while Ms. Schwarz filled each container. The EPA bottles included four amber bottles and four 500 ml HPDE plastic bottles **(See Attachment #1- Photo #16)**. The Clean Harbors sample bottles included a 100-150 ml plastic bottle, a 250 ml bottle for metals and an amber one-liter bottle for semi-volatile organic compounds (SVOCs) **(See Attachment #1- Photo #16)**. Ms. Duffy and Inspector Kline placed all the samples collected on April 6th inside coolers with ice immediately following sample collection. Inspector Kline provided Mr. Hart a receipt for the remaining samples collected on April 6, 2023. Ms. Duffy and Inspector Kline left Clean Harbors at 12:15 PM and transported their samples to the EPA- Environmental Science Center (ESC) at Ft. Meade. Custody of samples was transferred at 2:17 PM to Warren Furtune at the ESC. Ms. Duffy transported the remaining samples to UPS for shipment to the EPA- Region 6 laboratory for overnight delivery. Custody of TPH samples was relinquished at 4:00 PM on April 6, 2023. Samples were in a cooler with custody seals affixed; the cooler was placed in a box at the request of UPS. Ms. Duffy informed the region 6 laboratory coordinator that samples were shipped and received confirmation that the samples were received at 9:35 AM on April 7, 2023 with the custody seals intact.

E. Clean Harbors- EPA Sample Results and Analytical Reports

Ms. Duffy received the analytical report for the TPH samples from the Region 6 Laboratory on May 9, 2023 **(See Attachment #13)**. See Table 1 below for results:

Sample ID	Result	Result Unit	Lab Qualifier	Permit Limit	Limit Unit	Sample Type
CH-EFF-01	258	mg/L	J	100	mg/L	Parent
CH-EDD-D	255	mg/L	J	100	mg/L	Field Duplicate

Qualifiers:

J: The identification of the analyte is acceptable; the reported value is an estimate.

Ms. Duffy received the analytical report for the remaining samples from the region 3 laboratory on May 17, 2023 **(See Attachment #14)**. All results were below the limits set in the permit.

Ms. Duffy received an additional analytical report from the region 3 laboratory on May 22, 2023 **(See Attachment #15)**. The laboratory determined they had standard reference material for o-cresol and p-cresol. These analytes were initially not requested because the laboratory indicated they did not have standard reference material and the result would only be indicated as a presence/absence of a Tentatively Identified Compounds (TICs). These results were also below the limits set in the permit.

V. Closing Conferences

After the inspections of Back River and Clean Harbors, the EPA Inspection Team met with the facility representatives at their respective locations to conduct closing conferences. The EPA Inspection Team shared preliminary observations with each facility. The EPA Inspection Team reiterated to the facility representatives

that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by EPA upon the additional review of records and documentation. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference after EPA reviewed additional materials following the inspection.

VI. List of Attachments

Attachment 1. Photos
Attachment 2. NPDES Permit
Attachment 3. Back River IU listing
Attachment 4. ERP- Back River
Attachment 5. IU Checklist
Attachment 6. IU Permit CH
Attachment 7. SPCC-CH
Attachment 8. SDCP-CH
Attachment 9. Clean Harbors Flow Diagram
Attachment 10. Clean Harbors map
Attachment 11. NY State Lab Certificate- CH
Attachment 12. pH Log- CH
Attachment 13. Region 6 Laboratory Final Analytical Report for Clean Harbors Baltimore/Back River
Attachment 14. Region 3 Laboratory Final Analytical Report for Clean Harbors Baltimore
Attachment 15. Region 3 Laboratory Supplemental Report for Clean Harbors Baltimore