

**City of Baltimore
Department of Public Works**

Consent Decree
Quarterly Report

Reporting Period:
November 15, 2024, to February 15, 2025

Wastewater Facilities Consent Decree
Case No. 24-C-22-000386



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1.0 INTRODUCTION

This Calendar Quarterly Report is submitted pursuant Paragraph 170 of the Consent Decree (Case No. 24-C-22-000386).

Since summer 2021, when the Baltimore City (the City) Department of Public Works (DPW) was notified by the Maryland Department of the Environment (MDE) of alleged permit violations at the Back River and Patapsco Wastewater Treatment Plants, DPW has implemented significant improvements at each plant resulting in the Back River plant meeting permit compliance with effluent limitations since June of 2022 (with the exception of a de minimis phosphorous excursion in April 2023 and a minor chlorine excursion in January 2024), and the Patapsco plant meeting its daily, weekly, and monthly effluent limitations since September 2022 and all effluent limits since January 2023 (with the exception two minor weekly excursions in April 2024, one of total suspended solids and one of biochemical oxygen demand).

Since 2022, DPW has made the following improvements:

- Created the Environmental Regulatory Compliance and Safety (ERCS) division – a team of multi-disciplined environmental compliance professionals who troubleshoot and execute timely compliance actions.
- Updated human resource hiring practices to improve hiring and recruiting new staff.
- Modernized and executed preventative maintenance programs, including the repair and rehabilitation of critical assets at both plants.
- Returned the solids processing operations at both plants to full service and removed the excess solids inventory.

The City continues to make improvements to operations at the Back River and Patapsco Wastewater Treatment Plants and has implemented or continued a number of corrective actions during the reporting period, which are summarized in this document and cumulatively in the attachment.

2.0 WORK TO BE PERFORMED – CURRENT QUARTER PROGRESS SUMMARY

A summary of Consent Decree (CD) work completed, or scheduled to be completed, during this reporting quarter is provided in the table below. Cumulative progress is included in Appendix 1.

Table 1: Progress Tracking Summary

CD Paragraph Reference - Treatment Plant ¹	Activity	CD Deadline	Actual Completion Date	Compliance Status
146-BR	Implement Asset Management Plan	2/13/2025	2/6/2025	Complete
158-PAT	Automate Timed Scum Logs at CCT	1/31/2025	Mod. Letter Sent	In Progress
162-PAT	Complete PCB source tracking desktop evaluation	11/30/2024	11/30/2024	Complete
164-PAT	Annual FOG Mitigation Report	12/31/2024	12/31/2024	Complete
169-PAT	Implement Asset Management Plan	2/13/2025	2/6/2025	Complete
174-TEA	Baltimore City shall consult with the Plaintiffs and retain or engage a qualified, independent third-party engineer, to conduct an update to the comprehensive assessment of the Back River and Patapsco WWTPs prepared by Greeley and Hansen ("G&H") in June 2022, and to submit a report, signed and sealed by the licensed professional engineer, summarizing the findings simultaneously and directly to all Parties within 90 days of the Effective Date.	2/13/2025	2/13/2025	Complete

¹ BR = Back River WWTP; PAT = Patapsco WWTP; TEA = Third-Party Engineering Assessment

3.0 STIPULATED PENALTIES

3.1 CURRENT QUARTER

Table 2: Current Quarter Potential Stipulated Penalties Due to Project Delays

Back River WWTP							
CD Paragraph Ref.	CD Deadline	Beginning of Quarter	Date of Completion	Potential Stipulated Penalty Amount	Relief Granted	Extension Date	Actual Penalties
Total							\$0
Patapsco WWTP							
158	1/31/2025	11/15/2024	N/A	\$16000			
Total				\$16000			\$0

3.2 CUMULATIVE

Table 3: Cumulative Potential Stipulated Penalties Due to Project Delays

Back River WWTP							
CD Paragraph Ref.	CD Deadline	Requested CD Deadline	Date of Time Extension Request Submittal	Potential Stipulated Penalty Amount	Relief Granted	Extension Date	Actual Penalties
Total				\$0			\$0
Patapsco WWTP							
158	1/31/2025	5/1/2025	1/10/2025	\$16000			
Total				\$16000			\$0

Table 3: Potential Stipulated Penalties Due to Excursion/Discharge

Back River WWTP				
Date	Excursion/Discharge	FM Requested	Potential Amount	Amount Applied by MDE
12/1/2023	Flushing Water Spill		\$10,000	\$1,000.00
12/18/2023	SSO	2/5/2024	\$10,000	\$1,000.00
1/5/2024	Flushing Water Spill	2/5/2024	\$10,000	\$1,000.00
1/9/2024	SSO	2/5/2024	\$10,000	\$10,000.00
1/18/2024	Chlorine - 0.23-0.9 mg/l		\$100.00	\$100.00
1/22/2024	Flushing Water Spill	2/5/2024	\$10,000	\$1,000.00
2/2/2024	SSO		\$10,000	\$1,000.00
2/20/2024	Flushing Water/Ferric Chloride Spill		\$10,000	\$1,000.00
3/1/2024	PST 5 Pump Failure		\$10,000	\$1,000.00
3/13/2024	SSO		\$10,000	\$10,000.00
3/15/2024	SSO		\$10,000	\$1,000.00
3/26/2024	SSO		\$10,000	\$1,000.00
Q1 2024	Outfall 001 WET Test Violation		\$750.00	\$750.00
Q1 2024	Outfall 002 PCBs Sampling Violation		\$250.00	\$250.00
4/3/2024	MLSS SSO		\$10,000	\$1,000.00
4/9/2024	SSO		\$10,000	\$1,000.00
4/14/2024	SSO		\$10,000	\$10,000.00
4/30/2024	SSO		\$10,000	\$1,000.00
6/9/2024	SSO		\$10,000	\$1,000.00
6/22/2024	Flushing Water Spill		\$10,000	\$1,000.00
7/8/2024	Potable Water Spill		\$10,000	\$1,000.00
7/10/2024	Flushing Water Spill		\$10,000	\$1,000.00
7/21/2024	SSO		\$10,000	\$10,000.00
Q3 2024	Outfall 001 WET Test Violation		\$750.00	
12/30/2024	pH Excursion		\$100.00	
1/28/2025	Flushing Water Spill		\$10,000	
2/3/2025	Sludge Line Break SSO		\$10,000	
2/8/2025	Belt Press SSO		\$10,000	
Total			\$241,950	\$58,850.00

Patapsco WWTP				
12/18/2023	SSO	2/5/2024	\$10,000	\$1,000.00
12/25/2023	Invalid OP Test		\$250.00	\$250.00
1/9/2024	SSO	2/5/2024	\$10,000	\$1,000.00
1/9/2024	SSO	2/5/2024	\$10,000	\$10,000.00
2/21/2024	Invalid cyanide sample		\$250.00	\$250.00
4/16/2024	BOD weekly limit excursion		\$250.00	\$250.00
4/16/2024	TSS weekly limit excursion		\$250.00	\$250.00
5/23/2024	Invalid cyanide sample		\$250.00	\$250.00
8/30/2024	Lost nutrient sample		\$250.00	\$250.00
11/30/2024	pH Excursion		\$100.00	\$100.00
Total			\$31,450	\$13,250.00
Both Plants			\$273,400	\$72,100.00

3.3 FORCE MAJEURE/MODIFICATION REQUESTS

Par. 133(a) – PST Repairs:

On December 20, 2023, the City submitted a time extension request to complete repairs of two primary settling tanks (PSTs) at Back River, which have a Consent Decree deadline of January 1, 2024. The delay was due to project delays by Maryland Environmental Services, resulting PST activation/deactivation sequencing, and unforeseen additional repair work for RSPS A and miscellaneous damaged concrete. The requested deadline was March 31, 2024. On February 29, 2024, MDE sent a letter to the City advising it that it did not consider the unforeseen site conditions and contractor delays to be force majeure but invited the City to submit a request for modification. The City did so on March 11, 2024. As of March 1, 2024, Back River had eight PSTs in service and available to operate as designed. On May 29, 2024, MDE granted the City’s request to modify the completion deadline to March 1, 2024.

Par. 141 – Centrifuge 4 Repair:

On December 20, 2023, and February 14, 2024, the City submitted time extension requests to complete installation of Centrifuge 4 at Back River. The delay was due to more extensive repair work than originally anticipated. Additionally, the centrifuge was returned to the plant, and some of the parts were still not in a condition to be installed and required additional refurbishment and repair. On February 29, 2024, MDE sent a letter to the City advising it that it did not consider the contractor and supply chain delays to be force majeure but invited the City to submit a request for modification. The City did so on March 8, 2024. On March 11, 2024, the City submitted an additional extension/modification request as neither the City nor their third-party vendor received the necessary parts from the centrifuge manufacturer. Accordingly, the City extended its modification request until July 31, 2024. On May 29, 2024, MDE granted the City’s request to modify the completion deadline to July 31, 2024. On July 25, 2024, the City requested additional

time to complete this item due to the failure of necessary parts being delivered on time. On September 30, 2024, MDE approved the City's requested modification until October 31, 2024, and on October 1, 2024, the City completed reinstallation of Centrifuge #4 and placed it into service.

Par. 173 – Patapsco Sign and Buoy

On October 22, 2024, the City submitted a time extension request for additional time to install the buoy with light and sign to mark the location of the Patapsco outfall. Paragraph 173 of the CD requires installation of the light, sign, and buoy within 90 days of permit approval. The City received approval on August 9, 2024. As a result, the CD deadline for installation is November 7, 2024. Since receiving the approval, the City has been working diligently to acquire the necessary materials for installation of the required fixture. The size and type of buoy needed is not readily available and will require custom fabrication. The City has requested quotes from multiple vendors, as required by its procurement regulations. The first quote received by the City was \$26,500, not including installation, and noted a 6–8-week time frame to manufacture the buoy. The second quote was \$37,000. If the City cannot find an option under \$25,000, the purchase of the buoy will need to be approved by the Board of Estimates, which will also require additional time to complete. Based on current information, and due to the uncertainty involved in estimating how long it will take for the buoy to be delivered, the City is requesting until April 1, 2025, to install the buoy.

Par. 158 – Patapsco Automated Scum Logs at Chlorine Contact Tank

On January 10, 2025, the City submitted a time extension request for additional time to install the timed scum logs at the chlorine contact tank at the Patapsco Wastewater Treatment Plant. The need for extra time is due primarily to delays associated with receiving the necessary parts to complete the installation. Based on current information, and due to the uncertainty involved in estimating how long it will take for the necessary parts to be delivered, the City requested to have until May 1, 2025, to complete this item. Manual skimming of any FOG and floating solids remains in place until such time as all the scum logs have been automated.

4.0 PROJECT EXPENDITURES FOR QUARTER

The quarterly report includes all funds expended to comply with the CD and prior to entering the CD and funds encumbered to meet future CD deadlines. As projects progress, the City will provide more granular information on project expenditures.

4.1 CURRENT EXPENDITURES

Expenditures this quarter include:

Paragraph 133(a) & (b): \$32.5M

Paragraph 139: \$5M

Paragraph 142: \$4.1M

Paragraph 155: \$2M

Paragraph 159: \$67k

Staff Augmentation/PMT: \$4.2M

4.2 CUMULATIVE EXPENDITURES

Cumulative investments include:

Back River WWTP = \$167M

Patapsco WWTP = \$92.25M¹

Paragraph 174: \$200k

Other expenditures the City has incurred in support of both WWTPs include:

Maryland Environmental Service = \$7M

Staff Augmentation = \$40M

Salary Increases (pursuant to staffing plan): \$5.6 million

Maintenance support over 5 years = \$50M

Program Management Team to support compliance = \$14M

Plant Operations Efforts = \$16.2M

¹ A previous version of this report identified Patapsco's cumulative expenses as \$408.5 million – this was a typographical error. At that time the correct number was \$48.5 million

5.0 ACCOUNTING OF MAINTENANCE INADEQUACIES

DPW completes daily maintenance work at both the Back River and Patapsco wastewater treatment plants. Over the course of the past quarter, Patapsco has performed routine maintenance on several of its Primary Settling Tanks, due to excessive high flows coming to the plant during the frequent rain events that have occurred in 2024. Pursuant to Paragraph 131 of the CD, all maintenance is done in a way that does “not render the equipment inoperable or unavailable for use for the purposes of this Consent Decree so long as compliance with effluent limitations can be maintained and the equipment is returned to operational service promptly.”

There have been no additional maintenance issues from November 15, 2024, to February 15, 2025, that impacted plant functioning.

6.0 STAFFING

The City submitted a Staffing Report and Plan on December 22, 2023, in compliance with paragraphs 142 and 165. A summary of recommendations and steps taken by the City to implement those recommendations was included in the Staffing Report.

The tables below summarize the City's current staffing levels.

Table 4: Number of Existing and Recommended FTE Staff at BRWWTP

Staff Description	Operations†	Maintenance	Safety‡
Total Current Staff	127	103	1
Vacancies	26	21	0
Recommended Staffing Level	126	103	1

†Operations staff are responsible for process testing.

‡Safety Representatives are also Operators.

Table 5: Number of Existing and Recommended FTE Staff at PWWTP

Staff Description	Operations†	Maintenance	Safety‡
Total Current Staff	82*	66	1
Vacancies	11	12	0
Recommended Staffing Level	83	66	1

†Operations staff are responsible for process testing.

‡Safety Representatives are also Operators.

*Plant Manager Neal Jackson recently retired after over 40 years with Baltimore City. The City is currently in the process of hiring his replacement.

Attachment 1

Overall Progress Summary

Overall progress is summarized in the table below.

Overall Progress Tracking Summary

Consent Decree Paragraph Reference – Treatment Plant ¹	Activity	Consent Decree Deadline	Actual Completion Date	Compliance Status
132-BR	Replace H ₂ S 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	1/1/2024	FM Letter Sent: 12/20/2023 Modification Letter Sent: 3/11/2024 Completed: 3/1/2024	Complete
133(b)-BR	Clean and complete repairs to all 11 PSTs to ensure they are fully functional and available for use	12/31/2025	10/25/2024	Complete
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	Ongoing		Compliant
135(c)-BR	Maintain average sludge blanket depth of 2 to 4 feet in final clarifiers	Ongoing		Compliant

Consent Decree Paragraph Reference – Treatment Plant ¹	Activity	Consent Decree Deadline	Actual Completion Date	Compliance Status
135(d)-BR	Maintain manual operations until Activated Sludge PLCs are updated and set up for automatic operation	Ongoing		Complaint
136-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 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	4/30/2024 and 5/10/2024	4/11/2024 And 5/2/2024	Complete
137-BR	Repair all Gravity Belt Thickeners (GBTs) to operate as designed	6/30/2024	6/28/2024	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 with contract for rehab of the egg-shaped digesters. Complete rehabilitation of egg-shaped digesters.	8/16/2023 (NTP) 9/16/2027 (Rehabilitation)		Issued 30% Complete
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.	10/31/2024	10/1/2024	Complete
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	6/28/2024	Complete

Consent Decree Paragraph Reference – Treatment Plant ¹	Activity	Consent Decree Deadline	Actual Completion Date	Compliance Status
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) 2/13/2025 (Commence Implementation)	11/15/2024 2/6/2025	Complete Complete
147-PAT	Provide the Dryer Facility with access to, and control of, GST thickened sludge pumps to automate sludge withdrawal from the GSTs until the existing stored sludge from the SBTs is removed and the SBTs are returned to normal operating mode	11/15/2023	October 2023	Complete
148-PAT	Have and maintain contracts for on-call hauling services to serve as back-up to the Dryer Facility.	Ongoing		Compliant
149-PAT	Complete replacement or rehabilitation of the grit facility, with includes provision for odour control and proper ventilation. Workers entering the grit facility to comply with Grit Facility SOPs	4/30/2024 (Issue RFP) 12/31/2027	4/19/2024	RFP Completed

Consent Decree Paragraph Reference – Treatment Plant ¹	Activity	Consent Decree Deadline	Actual Completion Date	Compliance Status
150-PAT	Repair or refurbish Industrial Plant Influent Facility (IPI) screens and pumps, and replace or fully rehab the IPI Facility to operate as designed.	6/30/2024	4/17/2024	Complete
151-PAT	Repair all non-functional screens in the Fine Screen Facility, increase screen opening size for three screens, and install new conveyors, northern screen compactors, and curtains from the screen chutes to the belt.	6/30/2024	4/17/2024	Complete
152-PAT	Repair and upgrade scum trough actuators associated with the PSTs to allow for automatic operation of the scum removal system, and upgrade mechanisms of clarifiers #1-3 to provide automatic operation	6/30/2024	10/23/2023	Complete
153-PAT	Ensure all six PSTs are fully functional and operating as designed.	12/15/2023	9/5/2023	Complete
154(a)-PAT	Repair all RAS/WAS pumps for secondary clarifier #6a to operate as designed	11/25/2023	8/16/2023	Complete
154(b)-PAT	Replace missing skimmer sections to increase scraper effectiveness.	11/25/2023	9/22/2023	Complete
154(c)-PAT	Remove BAF media from secondary clarifier influent and BAF mudwells	11/25/2023	11/18/2023	Complete
155-PAT	Complete evaluation of need for secondary clarifier #3. Within 10 days of evaluation: Request approval to discontinue or alter use of clarifier	4/1/2024 (Complete evaluation) 5/1/2024 (Request Approval to Discontinue/Alter)	3/26/2023	Complete Complete
156-PAT	Investigate Biological Aerated Filter Facility (“BAF”) media state	12/15/2023	March 2023	Complete

Consent Decree Paragraph Reference – Treatment Plant ¹	Activity	Consent Decree Deadline	Actual Completion Date	Compliance Status
157-PAT	Submit a plan and schedule to address BAF media loss and prohibit any discharge of media to waters of the State.	1/14/2024	11/25/2023	Complete
158-PAT	Automate timed scum log operation of the Chlorine Contact Tank (CCT)	1/31/2025	Mod. Letter Sent 1/10/2025	95% Complete
159-PAT	Ensure staff are present at all times during each shift to maintain manual skimming of FOGs or floating solids at the CCTs until 158-PAT is complete.	Ongoing		Compliant
160-PAT	Rehabilitate GST #4 and associated pumps	3/14/2024	2/10/2023	Complete
161-PAT	Ensure all GSTs are fully functional and operating as designed. Baltimore City shall notify Plaintiffs upon receipt of parts.	11/25/2023 or within 30 days of receipt of parts (whichever is sooner)	July 2023	Complete
162-PAT	Submit a PCB Minimization Plan	12/15/2023	11/25/2023	Complete
162-PAT	Begin implementation of PCB plan	6/30/2024	6/28/2024	Complete
162-PAT	Submit 10-year Solid Waste Management Plan	7/31/2024	6/28/2024	Complete
162-PAT	Complete historical Patapsco WWTP PBC effluent data analysis	9/30/2024	9/24/2024	Complete
162-PAT	Complete source tracking desktop evaluation	11/30/2024	11/30/2024	Complete
162-PAT	Complete sampling analysis plan for Phase I and Phase II sampling	2/28/2025		75% Complete
162-PAT	First annual PCB Plan update submission	3/31/2025		

Consent Decree Paragraph Reference – Treatment Plant ¹	Activity	Consent Decree Deadline	Actual Completion Date	Compliance Status
162-PAT	Phase I sample collection and deployment of Phase II passive samplers	5/31/2025		
162-PAT	Collection of Phase II passive samples and grab samples	8/31/2025		
162-PAT	Revise PCB Plan and update timeline based on evaluation of Phase I and Phase II results	3/31/2025		
162-PAT	Complete Phase III sampling and analysis plan	5/31/2026		
163-PAT	Complete investigation into flow meter and complete root cause analysis of the discrepancy between influent and effluent flow volume.	12/15/2023	5/29/2023	Complete
164-PAT	Submit a revised FOG Mitigation Plan	11/25/2023	11/25/2023	Complete
164-PAT	Annual FOG Mitigation Report	12/31/2024	12/31/2024	Complete
165-PAT	Submit Staffing Report and Staffing Plan	12/31/2023	12/22/2023	Complete
166-PAT	Have, maintain, and make available to the Department Patapsco WWTP SOP	6/30/2024	6/28/2024	Complete
167-PAT	Submit a report that identifies what processes at the Patapsco WWTP are currently automated, and conduct a feasibility study for the automation of additional processes, with a plan and schedule for future automation	5/13/2024	5/13/2024	Complete
168-PAT	Have, maintain, and update a Computerized Maintenance Management System (CMMS) as a functional work order system to ensure that the plant and its equipment and components operate as designed.	Ongoing		Compliant

Consent Decree Paragraph Reference – Treatment Plant ¹	Activity	Consent Decree Deadline	Actual Completion Date	Compliance Status
169-PAT	Complete a condition assessment and inventory of existing assets in order to develop an asset management program, and within 90 days of the completion of the assessment and inventory, begin implementing the asset management program.	11/15/2024 (Completion of assessment) 2/13/2025 (Commence Implementation)	11/15/2024 2/6/2025	Complete Complete
170-TPN	Every February 15, May 15, August 15, and November 15 during the pendency of the CD, Baltimore City shall submit to the Plaintiffs and post on its website quarterly progress reports detailing for the preceding calendar quarter, at a minimum, the implementation of any corrective actions and work performed under the CD, progress tracking on projects, required completion dates and actual completion dates, financial expenditures on each project, and all stipulated penalties that accrued during the quarter.	Annually 2/15 5/15 8/15 11/15	Ongoing	Compliant
171-TPN	Hold one virtual and one in-person meeting per year for each facility until completion of the CD	11/15/2025		Compliant
172-BR	Install a sign at the pier adjacent to outfall 001 that notifies the public of the presence of the submerged treatment effluent pipe	12/15/2023	12/11/2023	Complete
172-PAT	Apply for and diligently pursue all permits, licenses, or other authorizations necessary for the installation of a sign at the location of the submerged outfall pipe that notifies the public of the presence of the submerged wastewater treatment effluent pipe	2/13/2024	2/13/2024	Complete

Consent Decree Paragraph Reference – Treatment Plant ¹	Activity	Consent Decree Deadline	Actual Completion Date	Compliance Status
173-BR	Simultaneously with the installation of the signs required under Paragraph 172, Baltimore City shall install a red light next to, or on top of each sign that indicates when the plant experiences any by-pass as defined by the Discharge Permits	12/15/2023	12/11/2023	Complete
173-PAT	Simultaneously with the installation of the signs required under Paragraph 172, Baltimore City shall install a red light next to, or on top of each sign that indicates when the plant experiences any by-pass as defined by the Discharge Permits	4/1/2025		Not Yet Started Sign and Light Ready on hand
174-TEA	Baltimore City shall consult with the Plaintiffs and retain or engage a qualified, independent third-party engineer, to conduct an update to the comprehensive assessment of the Back River and Patapsco WWTPs prepared by Greeley and Hansen (“G&H”) in June 2022, and to submit a report, signed and sealed by the licensed professional engineer, summarizing the findings simultaneously and directly to all Parties within 90 days of the Effective Date.	8/13/2024	8/13/2024	Complete
175-FCR	Final confirmation report after all Work to Be Performed is complete	6/22/2027		73%

¹ BR = Back River WWTP, PAT = Patapsco WWTP, FM = Force Majeure, TEA= Third-Party Engineering Assessment, TPN= Transparency and Public Notification, FCR= Final Confirmation Report