

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	12/10/2024 – 12/11/2024	
Media Program:	Water	
Regulatory Program(s)	NPDES Stormwater/CWA 402	
Company Name:	U.S. Department of The Air Force	
Facility Name:	Tinker Air Force Base	
Facility Physical Location:	7535 5 th Street	
(city, state, zip code)	Oklahoma City, OK 73145	
Mailing address:	7535 5 th Street	
(city, state, zip code)	Oklahoma City, OK 73145	
County/Parish:	Oklahoma	
Facility Phone Number	(405)734-1228	
Facility Contact:	Mr. John Truong	Water Quality Program Manager
	john.truong@us.af.mil	
FRS Number:	N/A	
Identification/Permit Number(s):	OKR040006	
Media Identifier Number:	N/A	
NAICS:	928110	
SIC:	9711	
Personnel participating in inspection:		
Sharron A. Crayton	6EN-WS	Inspector/Enforcement Officer
EPA Lead Inspector	<i>Sharron A. Crayton</i>	
Signature/Date	Sharron A. Crayton	01/30/2025
		Date
Supervisor		
Signature/Date	Ruben Alayon-Gonzalez	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

U.S. EPA Region 6 inspectors Sharron Crayton and Carol Johnson arrived at the Tinker Air Force Base (AFB) facility located in Oklahoma City, OK, on December 10, 2024, at approximately 8:00 AM for an announced Compliance Evaluation Inspection (CEI). This site visit served as a multi-media inspection of the Tinker AFB's Public Water Systems and Stormwater Systems in coordination with the Oklahoma Department of Environmental Quality (ODEQ) and the U.S. EPA Headquarters. The inspectors initially met with the Water Quality Program Manager for the U.S. Department of the Air Force, Tinker AFB, Mr. John Truong. During a joint opening conference, the stormwater inspectors presented their credentials and informed Mr. Truong (and other attendees in-person) that the stormwater portion of this inspection was part of a National Enforcement Initiative focusing on Federal facilities' compliance with the Oklahoma Pollutant Discharge Elimination System (OPDES) Municipal Separate Storm Sewer System (MS4) Phase II Permit [specifically, applicable minimum control measures (MCMs) and measurable goals] and the Clean Water Act (CWA). In addition, Mr. Truong and attendees were informed that the inspection would also focus on the facility's compliance with the OPDES Multi-Sector General Permit (MSGP), and OPDES Construction General Permit (CGP) requirements regarding Best Management Practices (BMPs), including good housekeeping on active construction sites (see Attachments A and B Combined Opening and Media-Specific Conference Attendee Rosters).

In lieu of an MS4 Self-Assessment, prior to the inspection, the Tinker AFB provided the EPA, via an informal email request for information, applicable documents to the inspector (S. Crayton) for review. This inspection also included on-site reviews of the Tinker AFB's small MS4 storm water management plan (SWMP) and relevant files, MSGP and CGP stormwater pollution prevention plans (SWPPPs) and associated recordkeeping requirements, as well as an on-site inspection of the drainage area(s) under the MS4, MSGP, and CGP. Various environmental staff members and/or contractors for the Tinker AFB, accompanied the EPA inspectors during the on-site MS4, MSGP, and construction site inspection(s). In addition, staff with the ODEQ Water Quality Division participated with EPA's inspection efforts. Mr. Mark Thibodeau, Environmental Program Specialist participated with the MS4 inspection efforts, and Mr. Jason Ma, Environmental Investigator participated with the MSGP and CGP evaluation efforts. The inspectors conducted a closing conference with Mr. Truong, Tinker AFB Management, and ODEQ (see Attachments C and D - Combined Closing Conference and Media-Specific Attendee Rosters) to discuss the documents reviewed on-site, additional requests for information, and subsequent efforts of the on-site inspection(s). In addition, during the closing conference, the inspectors discussed pending areas of concern (AOCs) noted during the inspection(s) and items further detailed in this report. Mr. Truong was contacted via email on December 18, 2024, regarding the requests for additional documents (as detailed in Section IV of this report).

The generation of this report is based on information supplied by Tinker AFB (the permittee), observations made by the inspectors, and review of records and reports maintained by the permittee, the state of Oklahoma, and the U.S. EPA.

FACILITY DESCRIPTION

The Tinker AFB is a Phase II MS4 United States Air Force installations facility, which is the worldwide manager for a wide range of aircraft, engines, missiles, software and avionics and accessory components that discharges to surface waters of the United States. Tinker AFB is responsible for compliance with permit conditions relating to discharges from portions of the MS4 for which it operates, and applicable SWMP implementation, via OKR040006, effective September 29, 2021, and will expire at midnight, May 31, 2026. The facility is also authorized to discharge stormwater associated with industrial activity under OPDES MSGP OKR051575, issued on September 7, 2023. Discharges associated with stormwater from construction projects are authorized under OKR106450, effective June 23, 2023.

Section II - OBSERVATIONS

Inspection of the MS4 Program evaluated how Tinker AFB has implemented the six (6) Minimum Control Measures of its SWMP: 1) Public Education and Outreach; 2) Public Involvement/Participation; 3) Illicit Discharge Detection and Elimination (IDDE); 4) Construction Site Stormwater Runoff Control; 5) Post Construction Stormwater Management in New Development and Redevelopment; and 6) Pollution Prevention and Good Housekeeping for Municipal Operations, including other subjects such as data management, inspection schedules, citizen complaints, legal authority, and measurable goals.

The EPA inspectors also conducted a review of Tinker AFB's MSGP compliance requirements for the following seven (7) Sectors: K - Hazardous Waste Treatment, Storage or Disposal Facilities; L - Landfills and Land Application Sites and Open Dumps; N - Scrap Recycling and Waste Recycling Facilities; P - Land Transportation and Warehousing; S-Air Transportation; AA - Fabricated Metal Products; and AB - Transportation Equipment, Industrial or Commercial Machinery. Additionally, the inspectors conducted a walk-through of the KC-46A 3-Bag Hanger construction project operating under CGP Permit OKR1034347 (see Section III of this report for additional details regarding the condition of the project site).

Section III – AREAS OF CONCERN

Areas of concern (AOCs) are derived from on-site observations and/or review from the December 10th & December 11th Compliance Evaluation Inspection (CEI) and from subsequent documents provided electronically by the environmental staff via email prior to, during, and/or after the inspection efforts.

The following AOCs are specific to the MS4 Program:

1. Globally, the site was not in compliance with the MS4 Program at the time of inspection. More specifically, several program deficiencies were noted, which included, but were not limited to:
 - a. Inaccurate reporting of meeting compliance with various modules in the sites annual MS4 reports;

- b. Deficiencies with not achieving measurable goals of the SWMP and/or not providing the details to substantiate achievement of various goals;
- c. Deficiencies with training and accountability of trained individuals;
- d. Lacking systems to accurately track and quantify measurable goals;
- e. Lacking tracking data and/or tools to document calls to the environmental hotline, nature of calls, and/or date of resolution;
- f. The facility was unable to accurately identify and provide the total number of associated outfalls covered under the MS4 Program. Specifically, the facility included “high priority outfalls” and other outfalls covered under their wastewater industrial permit and/or non-industrial (all stormwater) outfalls in the final count, which was depicted as approximately 125 total outfalls (29: industrial and 96: non-industrial outfalls); and
- g. Other items were not being met as per the current SWMP, such as:
 - i. Failure to confirm that the SWMP was reviewed and/or revised, if applicable, on an annual basis as required by the MS4 permit. The associated Record of Review section on Page viii of the February 2022 SWMP provided to the inspectors for review was blank;
 - ii. Section 4.2 of the February 2022 SWMP failed to provide general roles and responsibilities for the Storm Water Pollution Prevention Team, Unit Environmental Coordinator (UEC), and Installation Personnel; and
 - iii. As per Section 6.a.iii.(c) of the February 2022 SWMP, the facility failed to verify and/or maintain documentation confirming stabilization measures were implemented within 14 calendar days of completion of maintenance activities/projects associated with line breaks, emergency repairs, and routine maintenance.

The following AOCs are specific to the MSGP Program:

The facility was unable to accurately identify and provide the total number of associated outfalls covered under the MSGP Program, as well as confirm that the outfalls were completely representative of the industrial activity without commingling with other discharges. Specifically, during interviews with Mr. Truong, six (6) outfalls (005, 007, 008, 009, 011, and 012) were initially communicated as MSGP outfalls; however, discussion in the SWPPP indicated there were seven (7) stormwater (only) outfalls, but they were not identified numerically. However, during continued discussions and review of various maps, including those contained in the November 2023 SWPPP, the facility was unable to affirmably identify and confirm the total number of MSGP outfalls located at the facility. As referenced in the November 2023 MSGP SWPPP (under the Tinker AFB OKR05 Sampling Summary discussion), the plan referenced that since the facility’s wastewater individual permit OK0000809 stormwater discharge sampling program was more stringent than the MSGP Program, analytical monitoring data from this program and the addition of ammonia monitoring would be used in lieu of MSGP parameters for Outfalls 005, 007, 008, 009, 011, and 012. However, Table 3 – Summary of Stormwater Monitoring Requirements and the SWPPP’s Significant Spills and Leaks 2019-2022 Map, the map contained seven (7) OPDES outfalls and 19 industrial outfalls. Mr. Truong was challenged with providing clarity with respect to accurate designation of the MSGP outfalls.

The following AOCs are specific to the CGP Program:

1. Via interviews with Mr. Truong, he informed the inspectors that in 2024, he inspected a total of 24 construction areas with authority to discharge stormwater. However, via additional discussions, it was revealed by the inspectors that:
 - a. The facility lacked a tracking system and/or tools to verify when Notice of Intents (NOIs), SWPPPs, CGP Permit Coverage, and/or Notice for Construction postings were provided and/or completed, prior to disturbance of soil;
 - b. The facility lacked a tracking system and/or tools to document the number of construction outfalls located on site. Application information such as NOIs, construction site notices, inspection records, *etc.*, as per Section 1.5.4 of the JBSA Environmental Specification document are not consistently provided to installation by contractors, prior to construction projects commencing; and
2. Poor housekeeping conditions were observed at the KC-46A 3-Bag Hanger construction project. Specifically, discarded concrete on the ground and comingled with sediment/soil, and other construction debris was noted in the project area (see Appendix 1, Photographs #1 and #2).

Section IV – FOLLOW UP

No follow-up efforts are needed as of the completion of this inspection report. Via email communication on December 18, 2024, the EPA received 19 documents, per the inspector's request. Information contained in these 19 documents were also reviewed and utilized for completion of this report.

Section V – LIST OF APPENDICES AND ATTACHMENTS

Appendix 1: Photograph Log - Two (2) photos taken 12/11/2024

Attachment A: 12/10/2024 Combined Opening Meeting Attendee Roster

Attachment B: 12/10/2024 Tinker AFB Media-Specific Opening Meeting Attendee Roster

Attachment C: 12/11/2024 Combined Closing Meeting Attendee Roster

Attachment D: 12/11/2024 Tinker AFB Media-Specific Closing Meeting Attendee Roster

Appendix 1

Photograph Log



U.S. Department of The Air Force
Tinker Air Force Base
ODEQ MS4 #: OKR040006
Inspection Date(s): 12/10&11/2024

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 1

Location: Tinker AFB KC-46A 3-Bag Hanger Construction Project

City: Oklahoma City

County: Oklahoma

State: OK



Description: View, of poor housekeeping conditions at the KC-46A 3-Bag Hanger construction project are, with discarded concrete on the ground and comingled with sediment/soil (as noted by red arrows), and other construction debris (such as plastic, boxes, insulation, etc.).

Date of Photo: 12/11/2024 Photographer: John Truong for Sharron Crayton



U.S. Department of The Air Force
Tinker Air Force Base
ODEQ MS4 #: OKR040006
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 2

Location: Tinker AFB KC-46A 3-Bag Hanger Construction Project

City: Oklahoma City

County: Oklahoma

State: OK



Description: Additional view, of poor housekeeping conditions at the KC-46A 3-Bag Hanger construction project area, with discarded concrete on the ground and comingled with sediment/soil and other construction debris (such as plastic, boxes, insulation, etc.).

Date of Photo: 12/11/2024 Photographer: John Truong for Sharron Crayton

Attachment A
12/10/2024 Combined Opening Meeting Attendee Roster

Meeting: Combined Kick-Off Session for PWS and Stormwater Multi-Media Inspection Date: 10 December 2024

Name	Organization/Company	Telephone
Jeff Kindschuh	72 ABW/CENPE, Tinker AFB	405-734-1114
Stephen Clark	ERG (EPA Contractor)	720-789-8046
Kevin Sarmiento	ERB (EPA Contractor)	8 (703) 633-1642
Jason Aron	CE/ALCO	405-734-3114
Mark Thibodeau	PER	405-702-8108
LARRY BLADES	INFRAMARK	405-585-1951
Josh Morgan	OKC	405-906-5717
Jeremy Brush	INFRAMARK	580 275 8017
TREY PERDUE	OCWUT	405-205-7607
Mike Taber	72 ABW/JAV	739-8025
Leigh Ann Kimmiller	OCWUT	405 482 4649
Lauren Kreutz	GUERNEY	479 806 2973
Marc Owen	72 ABW/CENPE	405-734-5902
Paul Bjelkbo	GUERNEY / OCWUT	405 535 4393
Racheal Pierce	OCWUT/ENG	405 297 3843
Chad Ashworth	72 ABW/CE	405 734 9852
John Fowler	72 ABW/CE/IC	405-734-1229
Douglas Woods	72 OMRS/SGXB	405-582-6788
Theodore Wikeman	72 OMRS/SGXB	405-582-6777
Stephanie Wilson	72 ABW/CE	405 734-3451
Andrew Shaw	DEQ	703-966-7316

Brandt Fleharty 72 ABW/CE 405 734-2941
ARONA A. 72 ABW/CEO 405-820-8404
Eddie Anguiano OK DEQ/ECL 570-206-9478
Stephen Henry ORDER 405-413-7743

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<u>NAME</u>	<u>ORG</u>	<u>PHONE</u>
CAMERON TWYFORD	72 ADW/CE	405 734 5319
SARROW & CANYON	EPA/Region 6	(214) 883-5415
Jared Johnston-Cox	OKC	405 323 8113
Carol Johnson	EPA/RL	214-404-8276
Scott Hooker	72 ADW/CE/M	405-734-3515
FRANKIE CROUCH	72 ADW/CE/M	405-734 3513

Attachment B
12/10/2024 Tinker AFB Media-Specific
Opening Meeting Attendee Roster

Opening/Pre-Inspection Meeting

Commence opening/pre-inspection meeting.....Time: 8:25 am

[illegible]

Conclude opening/pre-inspection meeting Time: 8:47 am

Initials / Date: SAC / 12/10/24

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Attachment C
12/11/2024 Combined Closing Meeting Attendee Roster

Meeting: EPA Inspection Outbrief/Closing Conference Date: 11 December 2024

Name	Organization/Company	Telephone
Jeff Kindschuh	72 ABW/CENPE, Tinker AFB	405-734-1114
Leigh Ann Miller	OCWUT	405 782 4649
Rachael Pierce	"	405 297 3843
Lauren Creutz	OCWUT / GUERNSEY	419 806 2975
Paul Ryckholt	OCWUT / GUERNSEY	405 535 9393
TREY PERDUE	OCWUT	405-205-7607
Jeremy Brush	In Framark	580 275 8017
Stephen Clark	ERG (EPA Contractor)	720-789-8046
Andrew Shaw	DEQ	703-966-7316
Kevin Sarmiento	ERG (EPA Contractor)	703-633-1642
JOEY HUNTER	72 ABW/CENPE	405-734-7213
Jason Amy	AKCO	405-734-3114
Jason ma	OK DEQ	(405) 702-8126
SHARON A. CRAYTON	EPA/Region 6	(214) 883-5415
John Truitt	72 ABW/CEIEC	(405) 734-7220
Chad A. Marshall	72 ABW/CEIE	405-734-9852
Scott P. Hoover	72 ABW/CEXM	405-734-3515
Frankie Rodriguez	72 ABW/CEXM	405 734 3513
Mike Taber	72 ABW/SAU	405 739-8025
Brandt Fleharty	72 ABW/CEI	405 736-2941
Carol Johnson	EPA/R6	(214) 404-8276
ARUNA ABHAYAGOOMAWARDHANA	72 ABW/CEO	(405) 820-8404
CAMERON TAYLOR	72 ABW/CEN	405 734-5319
WILLIAM WARD	72 ABW/CE	405 734 3451
Stephanie Wilson	72 ABW/CE	
Col Dismukes	72 ABW/CD	

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Attachment D
12/11/2024 Tinker AFB Media-Specific
Closing Meeting Attendee Roster

Exit interview / Out-briefing Meeting

Commenced meeting..... Time: 3:30 pm

[illegible]

Conclude meeting..... Time: 3:57 pm

Initials / Date: SPAC 1/12/11/24

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