U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 7
CLEAN WATER ACT
COMPLIANCE INSPECTION REPORT

for

Name of Facility: Whiteman Air Force Base
Facility Address: 509 CES CEIEC, 660 10th Street, Suite 209, Whiteman AFB, MO 65305
Mailing Address: 509 CES CEIEC, 660 10th Street, Suite 209, Whiteman AFB, MO 65305

Report Prepared on: March 18, 2025 *Date* By: Kelsey Guy Digitally signed by Kelsey Guy Date: 2025.03.18 21:11:08 -04'00' *Signature*, ERG

Report Final as of: 3/19/2025 *Date* By: JODI BRUNO Digitally signed by JODI BRUNO Date: 2025.03.19 08:18:47 -05'00' *Signature*, EPA

General Information

Type of Inspection:	Industrial Stormwater
Owner:	Whiteman Air Force Base, United States Air Force (USAF)
Operator:	Whiteman Air Force Base, USAF
GPS Coordinates:	38.725939°, -93.564645°
Permittee:	Whiteman Air Force Base, USAF
Permit/Authorization No:	MOR80F035
Permit Effective Date:	January 1, 2023
Permit Expiration Date:	November 27, 2027
Receiving Water and/or MS4:	Long Branch, Clear Fork, and Brewer Branch tributaries
Standard Industrial Classification (SIC) Code:	4581 - Airports, Flying Fields, and Airport Terminal Services

On-Site Inspection Overview

On January 22, 2025, U.S. Environmental Protection Agency (EPA) contractors from Eastern Research Group, Inc. (ERG) (EPA Inspection Team) conducted an industrial stormwater inspection of Whiteman Air Force Base (AFB) (facility or permittee).

Inspection Start: January 22, 2025 at 12:55 PM (CT) **Inspection End:** January 23, 2025 at 4:34 PM (CT)

The following personnel were involved in the facility inspection.

Name	Title/Affiliation	Telephone	Email
Inspectors:			
Kelsey Guy	Inspector – ERG	(703) 633-1103	kelsey.guy@erg.com
AJ Paige	Inspector – ERG	(703) 633-1600	aj.paige@erg.com
Facility Representatives:			
Robert Bryant	Environmental Compliance Manager – 509 CES/CEIE Environmental Element	(660) 687-3273	robert.bryant.31@us.af.mil
James Love	Environmental Supervisor – 509 CES/CEIE Environmental Element	(660) 687-6347	james.love.17@us.af.mil
Name	**Title/Affiliation**	**Telephone**	**Email**
MO DNR Representative:			
Megan Green	Environmental Specialist	(816) 789-9539	megan.green@dnr.mo.gov

Credential Presentation

Kelsey Guy of the EPA Inspection Team presented their credentials to facility representatives Robert Bryant and James Love upon arrival at the facility on January 22, 2025, at approximately 12:55 pm (CT). The EPA Inspection Team explained that the purpose of the inspection was to observe compliance with the State of Missouri Department of Natural Resources (DNR) National Pollutant Discharge Elimination System (NPDES) Permit No. MOR80F035 for stormwater discharges from air transportation facilities involved in vehicle/aircraft maintenance and/or deicing. This permit authorizes stormwater discharges from only those portions of the air transportation facility that are involved in vehicle/aircraft maintenance (including vehicle rehabilitation, mechanical repairs, painting, fueling and lubrication, or equipment cleaning operations) or deicing operations. A copy of the permit is provided in Appendix A.

Facility representatives accompanied the EPA Inspection Team around Whiteman AFB during the inspection; however, at the time of the inspection, Whiteman AFB security forces would not allow the EPA Inspection Team to access the PL2 flightline and apron areas based on insufficient clearances and facility security restrictions. Photographic documentation of restricted areas was prohibited during the inspection. The EPA Inspection Team was unable to observe all stormwater aspects due to these restrictions but was able to observe components of the deicing activities around unrestricted parts of the AFB and from outside the fencing of the PL2 flightline and apron restricted areas.

Weather and Precipitation

The weather during the inspection consisted of clear skies and temperatures averaging approximately 27˚F. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data prior to the inspection are provided in the table below.

Precipitation Data Prior to Inspection of Whiteman Air Force Base

Station Name	Date	Precipitation Amount (inches)[a]
WARRENSBURG 1.1 NNE, MO US US1M0FSA101	January 17, 2025	0.00
WARRENSBURG 1.1 NNE, MO US US1M0FSA101	January 18, 2025	0.00
WARRENSBURG 1.1 NNE, MO US US1M0FSA101	January 19, 2025	0.00
WARRENSBURG 1.1 NNE, MO US US1M0FSA101	January 20, 2025	0.00
WARRENSBURG 1.1 NNE, MO US US1M0FSA101	January 21, 2025	0.00
WARRENSBURG 1.1 NNE, MO US US1M0FSA101	January 22, 2025	0.00
WARRENSBURG 1.1 NNE, MO US US1M0FSA101	January 23, 2025	0.00

[a] Source: NOAA National Climatic Data Center (http://www.ncdc.noaa.gov/).

Documentation

The EPA Inspection Team provided for reference the following appendices to this report: Permit no. MOR80F035 (Master General Permit) in Appendix A, photographs taken by the EPA Inspection Team during the inspection in Appendix B, the facility's Stormwater Pollution Prevention Plan (SWPPP) in Appendix C, facility mappings in Appendix D, and facility submitted spill response photographs, as well as a stormwater sampling procedures in Appendices E and F, respectively.

Prior to the inspection, the EPA Inspection team sent a Request for Information to facility representatives on January 16, 2023. The EPA Inspection Team obtained and reviewed documentation and other supporting evidence regarding compliance with the permit and implementation of the permittee's SWPPP (refer to Appendix C).

At the time of inspection, facility representatives presented their onsite SWPPP to the EPA Inspection Team. The EPA Team reviewed the SWPPP and found it to contain the following permitted requirements: facility associated discharges; minimum control measures and best management practices (BMPs); wash water containment; multiple site maps (i.e., overall site mapping, boundaries, significant structure and surface locations, drainage areas and flow paths, locations of run-on to the site, permitted features, MS4 and sanitary systems, and areas exposed to precipitation); run on locations, monitoring, sampling, and inspection schedules; and personnel trainings. During the inspection, the EPA Inspection Team evaluated the SWPPP's implementation onsite through interviews with facility representatives, as well as field observations. All deficiencies found by the EPA Inspection Team are detailed in the Facility Field and Records Areas of Concern section of this report.

The EPA Inspection Team reviewed all provided materials for the permitted term, including mapping documents, discharge monitoring reports, inspection records, and annual deicing reports. This evaluation aimed to verify the completeness and accuracy of the information while also assessing compliance with regulatory requirements and identifying any potential discrepancies or areas for improvement.

Permit MOR80F035 designates five Outfall Sampling Points—01S, 02S, 03S, 04S, and 05S—associated with Table A - Limit Set JD for sampling and reporting requirements (refer to Appendix A). Permit feature 0AR is also included for annual deicing report submittal purposes. The facility's SWPPP references Outfalls #001, #002, #003, and #004, which are facility boundary conveyances allowing offsite flow (refer to Appendix C). However, these SWPPP outfalls are not permitted under MOR80F035. Facility representatives provided the EPA Inspection Team, via email on January 24, 2025, a map specifying the facility's understanding of where their outfalls and sampling points are located (refer to Appendix D, Stormwater Sampling Point Map).

Permit MOR80F035 states: "The facility is authorized to discharge from outfall(s) with serial number(s) as specified in the application for this permit. These final effluent limitations shall be effective at the issuance of the master general permit and remain in effect for the duration of the permit." The permit further specifies sampling requirements, stating that one sample must be collected monthly if the facility has conducted deicing operations within the past 60 days during the designated months of January, February, and March, provided that a discharge occurs. Permit MOR80F035 Table A - Sample Frequency denotes that a discharge includes runoff resulting from precipitation, sleet, or freezing rain, as well as runoff from melting frozen precipitation.

Following the inspection, facility representatives provided the EPA Inspection Team with additional documents requested during the inspection on January 22, 23, 24, and February 3, 2025. The SWPPP provided to the EPA Inspection Team during the inspection was signed/certified by the permittee.

Description of the Facility and Industrial Activity

The facility's Heavy Equipment Operations team conducts snow removal activities. Facility representatives stated that for facility roads and walkways, physical removal via plows is the primary method for removal of winter precipitation, along with applications of street salt from their yard's salt pile and applications of sodium formate stored within their garage in 55-pound bags.

Most deicing chemicals are stored at the Heavy Equipment Operations hangar and yard, not including a new deicing chemical reservoir inside Hangar 52. Facility representatives stated that along the flightline and apron, physical ice removal is the primary and most used method for clearing winter precipitation. Chemical application is rarely necessary, but when needed the process takes approximately two to three hours to apply and dry. There is no removal process following the chemical application and application is avoided when rain is expected. A third-party contractor (i.e., Transient Authority), not the facility, is responsible for deicing product application and deicing equipment maintenance.

Facility representatives stated that vehicle fluids are only topped off within the hangar's bays of the Heavy Equipment Operations hangar. Any other vehicle fluids work is done at other buildings, garages, and hangars. At the Heavy Equipment Operations hangar, a third-party hazardous waste contractor is retained for waste removal. Vehicle maintenance staff maintain the maintenance schedules and service records outside of Heavy Equipment Operations.

Firefighting activities on-site used fluorine-free foam. For historical aqueous film-forming foam (AFFF) firefighting use, a lock-out tag-out system was in place for foam storage on-site, preventing use of the AFFF.

Heavy Expanded Mobile Tactical Trucks (HEMTTs) were on-site during the inspection and utilized for transporting materials, typically fuel. Facility representatives stated that the entire HEMTT parking lot acts as a controlled spill pallet with a collection system, featuring two drainage grates that collect stormwater and any other collected fluids from the lot. To release stormwater, a valve is manually opened after a check is run to ensure there are no potential contaminants being released with the stormwater. According to facility representatives, the valve remains closed and is opened as needed. HEMTT refueling takes place at the eastern end of the spill pad using bulk storage fueling containers.

All maintenance and repairs to the stormwater infrastructure and operating equipment as well as stormwater effluent permit exceedance corrective actions taken are documented in the internal data management system (i.e., EASIER). All Whiteman AFB stormwater staff use this system, but administrative permission must be granted before staff are able to enter information.

The facility had a separate NPDES construction stormwater permit, Missouri State Operating Permit MORA20637 (refer to Appendix A), which was issued to the permittee on March 10, 2022, and expires on February 7, 2027. This permit "authorizes the discharge of stormwater and certain non-stormwater discharges from land disturbance sites that disturb one or more acres, or disturb less than one acre when part of a larger common plan of development or sale that will disturb a cumulative total of one or more acres over the life of the project. A permit must be issued before any disturbance of root zone of the existing vegetation or other land disturbance activities may begin."

During the inspection, the EPA Inspection Team observed the permitted anticipated construction area (refer to Appendix B, Photographs 1 and 2). The EPA Inspection Team observed an inactive site with no evidence of clearing, grubbing, excavating, grading, filling, and other activities that result in the destruction of the root zone and/or land disturbance activity that is reasonably certain to cause pollution to waters of the state. Facility representatives stated that the stormwater construction permit was obtained for a planned recreational vehicle area development and that no work had started but the permit was applied for to assist with funding needs for the project.

Facility Drainage Systems and Discharges

The facility is bounded by rural land and commercial businesses to the east and south, public land to the west, and residential housing to the north. The facility grounds consist of concrete and asphalt surfaces, along with areas of open vegetated land. At the time of the inspection, there was no precipitation; however, snow and ice remained on-site due to the previous week's winter storm. The facility developed maps to depict stormwater flow and drainage. The facility provided their mapping depicting the site's drainage system and flow paths with the EPA Inspection Team via email on January 24, 2025 (refer to Appendix D, Base Delineation Map). The map shows drainage areas, water bodies (i.e., waters of the state, surface waters, and streams), observation points, and outfalls. Long Branch Creek crosses the southern portion of the facility horizontally, crossing the facility's southern and southeastern boundaries near the intersection of Southeast 350th Road and Southeast 23 Highway to the west and near the southeast corner of the facility's weapons storage area (WSA), crossing Southeast State Highway D.

The facility provided additional maps to the EPA Inspection Team on February 3, 2025, specifically showing all stormwater and wastewater connections specific to the facility's PL2 areas (i.e., flightline and apron, oil water separator (OWS), and fields) (refer to Appendix D, GIS Mapping). Per the provided mapping, as well as the facility representatives at the time of the inspection, stormwater within the permitted PL2 flightline and apron areas either enters the stormwater conveyance system or is redirected into the OWS near the middle of the permitted area, which is then directed to Whiteman AFB's wastewater treatment plant for processing. Deicing chemicals are only applied on the PL2 flightline as a preventative measure when winter conditions are anticipated. Maintenance of the deicing equipment does not occur on the PL2 flightline area.

Stormwater samples are collected by facility staff using containers provided by a third-party contracted laboratory. Samples are delivered via courier to the laboratory for analysis. Facility representatives stated that Whiteman AFB's wastewater treatment plant laboratory may be used to run additional total suspended solids (TSS) analysis if the initial sample exceeds the permitted limit for the monthly average. Samples are collected only when facility representatives determine that an adequate representative flow is present. Facility representatives provided the EPA Inspection Team with sampling standard operating procedures via email on February 3, 2025 (refer to Appendix F, Stormwater Sampling Procedures).

Permit Requirements and Potential Noncompliance Items

During the inspection, the EPA Inspection Team observed accessible facility sites pertaining to deicing activities, maintenance areas, and stormwater drainage and conveyance areas. Upon completion of the field inspection, the EPA Inspection Team reviewed facility records. The following observations and areas of concern were documented pursuant to provisions of the permit.

Facility Field Observations

1. The facility representative pointed out the planned land disturbance site for a recreational vehicle area. The EPA Inspection team observed undisturbed land at the time of the inspection (refer to Appendix B, Photographs 1 and 2).
2. Stormwater Outfall Sampling Point 01S had snow, ice, and water present in the channel (refer to Appendix B, Photograph 3). Outfall Sampling Point 01S was not clearly marked in the field. The facility representative stated that samples are collected from the culvert inlet opening when flow is adequate, and that ultimately the flow leaves the facility's boundaries through Outfall #001, which is not an outfall covered under permit MOR80F035. No flow was observed at the time of the inspection. The EPA Inspection Team observed the culvert's outlet, across Perimeter Road, to the receiving tributary west of the stormwater outfall sampling point (refer to Appendix B, Photograph 4). The facility representative stated the tributary feeds to Long Branch Creek. The EPA Inspection Team observed a concrete culvert, with a closed lid preventing flow, in the receiving tributary (refer to Appendix B, Photographs 5 and 6).
3. Outfall #001, which is not an outfall covered under permit MOR80F035, is located along the southern border of the facility's airfield, had signage identifying it as "stormwater outfall #001," and the outfall was comprised of security grating and riprap (refer to Appendix B, Photograph 7). Long Branch Creek was partially frozen at the time of the inspection (refer to Appendix B, Photograph 8).
4. Stormwater Outfall Sampling Point 02S was within Whiteman's WSA, at the northwesternmost corner, where photography was not allowed. Outfall Sampling Point 02S was not clearly marked in the field. The facility representative stated outlets from the northeastern headwall, which contained four pipes, and the southeastern headwall, which contained one pipe, converged at the sampling point and discharged through a grated inlet in the southwestern corner.
5. A drainage culvert led towards Stormwater Outfall Sampling Point 05S (refer to Appendix B, Photographs 9 and 10). Outfall Sampling Point 05S was not clearly marked in the field. The facility representative stated that the stormwater outfall sampling point collects flow from the adjacent fields, access road, and drainage culvert before passing through the stormwater outfall sampling point and the flow ultimately discharges through Outfall #002 to Brewers Branch Creek. Outfall #002 is not an outfall covered under MOR80F035. The facility representative indicated that the primary flow source originates from the air control tower area, extending east to south of the aircraft runway. During the inspection, the EPA Inspection Team observed a petroleum odor and visible sheening on the water surface from the inlet at Sample Point 05S that continued further downstream (refer to Appendix B, Photographs 11 through 14). The EPA Inspection Team observed facility representatives promptly deploying booms and mats in the tributary to contain and mitigate the sheening. Approximately 50–100 feet downstream, the EPA Inspection Team assessed the stream and did not detect any additional odors or visual impairments (refer to Appendix E, Spill Response Photographs).
6. North Lake acts as a primary spill containment measure for anything from the northwestern half of the airfield, including the north bulk storage tanks, leading to the secondary containment measure of Northwest Lake. Northwest Lake connects to Outfall #004 and Outfall Sampling Point 04S (refer to Appendix B, Photographs 15 through 18). Flow to Outfall Sampling Point 04S can be shut off by raising galvanized metal covers and placement of wooden boards (refer to Appendix B, Photographs 18 through 20). Protective grating covered the outlet end of

the culvert at Outfall #004, there was minor vegetation within the concrete culvert chamber and proper outfall signage (refer to Appendix B, Photographs 16, and 21 through 23). Outfall #004 ultimately flows to a tributary of Clear Fork and is not an outfall permitted under MOR80F035.

7. Stormwater Outfall Sampling Point 04S was west of the northern third of the airfield (refer to Appendix B, Photographs 24 through 27). Outfall Sampling Point 04S was not clearly marked in the field. The site ultimately drains through a culvert situated south of the access road (refer to Appendix B, Photographs 28 and 29). Flow from this point would go to North Lake and eventually to Clear Fork. The facility representative stated that a culvert and earthen bridge were installed during a historical spill and the culvert outlet acts as the stormwater outfall sampling point (refer to Appendix B, Photograph 25). The earthen bridge had erosion and there was channelization further downgradient from the outfall sampling point prior to entering the culvert under the roadway.
8. Outfall #003 and stormwater Outfall Sampling Point 03S were co-located along the western border of the facility (refer to Appendix B, Photographs 30 through 33). The outfall had proper signage. The inlet to the outfall was obstructed with small wood and leaf debris. During the inspection the facility representative documented the accumulated debris at the inlet to Outfall Sampling Point 03S into their internal management system (i.e., EASIER) for maintenance needs. The receiving tributary was partially frozen at the time of the inspection.
9. Whiteman AFB's HEMTT storage and parking pad, located at the southeastern corner of 12th Street and Arnold Avenue, contained two drainage grates and a control valve, and provided secondary containment to the entire lot (refer to Appendix B, Photographs 34 through 36). Facility representatives stated that the valve had been replaced the previous fiscal year. The facility representative stated all Whiteman AFB HEMTTs refuel at the north bulk storage tanks and that the lot's current valve, replaced around 2020, always remains shut with facility staff checking for any sheen prior to opening the valve.
10. Two aboveground storage tanks (ASTs), each with approximately 1.2-million-gallon capacities for jet fuel, were located at the northwestern corner of the intersection of Vandenberg Avenue and 1st Street. The facility representative referred to them as north bulk storage. The ASTs were within containment berms. The EPA Inspection Team observed the berms in good condition, with no visible cracks, gaps, or deterioration (refer to Appendix B, Photograph 37). A 2,500-gallon jet fuel AST for jet fuel (i.e., Jet A F-24) was also present and the facility representative stated that the 2,500-gallon AST has never been in use and only one of the 1.2-million-gallon ASTs was in use as the other was undergoing repairs.
11. The Heavy Equipment Operations storage yard stored road salt/sand, aggregates, heavy equipment, and an approximately 20,000-gallon double-walled AST of E36 (i.e., potassium acetate) used for deicing activities. Facility representatives stated no drainage grates existed in the storage yard. The aggregate storage and yard were in good general condition with no signs of migration or discharge of contaminants (refer to Appendix B, Photographs 38 through 41) and would sheetflow into the vegetated grounds to the north of the facility and within the drainage basin for Sampling Point 04S (refer to Appendix D, Base Delineation Map).
12. The EPA Inspection Team observed the Heavy Equipment Operations hangar where deicing equipment maintenance activities occurred. The hangar had sliding doors on its east and west

sides, with trench floor drains running the length of each doorway. The EPA Inspection Team observed the grates to be in good condition with little liquid present (refer to Appendix B, Photograph 42). The facility representative stated the reservoir was installed in May 2022 and that the new reservoir has yet to be used. Pallets of unused IceCare SF Solids Deicer were observed within the hangar (refer to Appendix B, Photograph 43). A deicing reservoir containing potassium acetate was observed within the bay (refer to Appendix B, Photograph 44).

13. The EPA Inspection Team observed contracted staff performing maintenance on an aircraft using a preventative drip pan to capture any leakage (refer to Appendix B, Photographs 45).
14. Heavy equipment (i.e., a contractor-owned and operated airfield mower) stored on a paved lot southeast of Outfall #003 had stains around and under it (refer to Appendix B, Photographs 45 through 49). The facility representative stated the staining appeared to be leaking hydraulic fluid. The EPA Inspection Team did not observe the fluid migrating towards Outfall #003 (refer to Appendix B, Photograph 50).

Facility Records Observations

1. In January 2023, an exceedance of permit effluent limits for total suspended solids (TSS) during the respective permitted terms of Permit No. MOR80F035 was observed within EPA's ECHO database.[1]

Facility Field and Records Areas of Concern

Permit Part III, Effluent Limitation and Monitoring Requirements specifies that the facility must control, limit, and monitor stormwater discharges as detailed in Table A, Note 1. Table A, Note 1 states, "When monitoring stormwater, a representative grab sample shall be taken during operational hours within the first 60 minutes of stormwater discharge, if possible. Samples shall be collected from an active discharge on the facility property before entering any water of the state..."

Observation 1. During the inspection, the EPA Inspection Team observed Outfall Sampling Point 04S located upstream of two additional drainage channels. All three of these drainage channels were observed to merge before flowing through a conveyance system and exiting the site. The EPA Inspection Team asked the facility representative if sampling from Outfall Sampling Point 04S was a representative sample, as further downgradient flows might not be accounted for if sampling is conducted solely at the temporary culvert outlet. If these additional flows are not captured during the sampling event, the subsequent laboratory analyses may not accurately represent all drainage entering the tributary before passing through the culvert. The facility representative stated that samples may be taken nearer to the actual outfall but could not provide any records or logs indicating such.

Permit Part V.4.e Stormwater Requirement requires "[a] schedule for monthly site inspections and a brief written report, which includes the name of the inspector, the signature of the inspector, and the date. The inspections must include observation and analysis of BMP effectiveness, deficiencies, and

[1] https://echo.epa.gov/detailed-facility-report?fid=110017985073

corrective action to be taken as well as the integrity of the containment structure(s) including but not limited to above ground tanks, secondary containment, external piping, etc." The permit continues to require that, during required routine inspections, "Facility examined for visual signs of erosion, sedimentation, or pollutants at outfalls. Such items may be due to BMP failure or insufficiency. Response to finding excessive erosion, sedimentation, or pollutants should be addressed in the inspection report."

Observation 2. The EPA Inspection Team observed at stormwater Outfall Sampling Point 04S that the earthen bridge had erosion and there was channelization further downgradient from the facility's internal stormwater monitoring point prior to entering the culvert under the roadway. The EPA Inspection Team reviewed the facility provided documentation (i.e., monthly DMRs, annual deicing reports, and monthly site inspection logs) and found no documentation of examinations for, nor findings of, erosion.

Permit Part V.5.b and Part V.5.d, Stormwater Requirements specifies that the facility must: "(b) Prevent the spillage or loss of fluids, oil, grease, fuel, etc. from vehicle/aircraft maintenance, equipment cleaning, or warehouse activities and thereby prevent the contamination of stormwater from these substances. This might include, for example, utilizing drip pans under vehicles/aircraft and equipment stored outdoors, covering fueling areas, using dry clean-up methods, use of absorbents, and cleaning pavement surfaces to remove oil and grease in a manner that ensures the removal of contaminates without discharging to waters of the state[…] (d) Provide good housekeeping practices on site to keep solid waste from entering waters of the state. For example, direct stormwater away from areas where storage, loading and unloading, and material handling occur and perform good housekeeping to prevent the discharge of discolored or otherwise impacted stormwater."

Observation 3. Heavy equipment (i.e., a contractor-owned and operated airfield mower) stored on a paved lot southeast of Outfall #003 had stains around and under it (refer to Appendix B, Photographs 46 through 49). Facility representatives stated that the equipment belongs to a third-party contractor that performs grounds maintenance, and that facility staff do not have the ability to directly address issues with the contractor's equipment. The facility representative stated the staining appeared to be leaking hydraulic fluid, but that absorbents cannot be applied to the affected area due to concerns of foreign object debris impacting the airfield. The EPA Inspection Team did not observe the fluid migrating towards Outfall Sampling Point 03S (refer to Appendix B, Photograph 50).

Permit Part IX.6 Permit Requirements requires "[a]ny spills, overflows, or discharges not explicitly authorized by this permit are considered unauthorized. If such a discharge results in contaminants entering state waters, it must be reported to the regional office as soon as practicable, but no later than 24 hours after discovery. In cases where reporting is required, additional details and documentation may be necessary to ensure compliance with regulatory requirements."

Permit Part IX.19 Permit Requirements authorizes specific discharges, including those from emergency or unplanned fire-fighting activities, dechlorinated fire hydrant or water line flushing

(testing) managed to prevent instream water quality impacts, and uncontaminated condensate from air conditioners, coolers, compressors, and the outside storage of refrigerated gases or liquids. It also permits landscape watering, provided all pesticides, herbicides, and fertilizers are applied according to manufacturer instructions. Additionally, uncontaminated groundwater or spring water that has not come into contact with industrial materials or processes, foundation or footing drains with flows not contaminated by process materials, and incidental windblown mist from cooling towers that collects on rooftops or adjacent areas are allowed.

Permit Part IX.20 Permit Requirements states that, "Any non-stormwater discharges other than those explicitly authorized in condition #19 above and #21 below are prohibited."

Permit Part IX.21 Permit Requirements authorizes, "[t]he operation of oil-water separators for treating process wastewater and stormwater. These separators must be properly operated and sized according to manufacturer or engineering specifications. The facility is required to maintain oil-water separator sludge removal records for at least five years and provide them to the Department upon request. These records may be stored in a searchable electronic format. Additionally, sludge from the oil-water separator is classified as used oil under 10 CSR 25-11.279 and must be disposed of in compliance with applicable regulations."

Observation 4. During the inspection, the EPA Inspection Team observed a petroleum odor and visible sheening on the water surface from the inlet at Sample Point 05S that continued further downstream (refer to Appendix B, Photographs 9 through 14).

Permit Part IX.11.a, Permit Requirements specifies that "…outfalls must be clearly marked in the field, made accessible for sampling and monthly site inspection purposes, located above the normal high-water mark of the waterbody to which they discharge, and maintained so that a sample of the discharge can be obtained at a point after the final treatment process but before mixing with receiving waters.".

Observation 5. During the inspection, the EPA Inspection Team observed Outfall Sampling Points 01S, 02S, 04S, and 05S without clearly marked signage in the field. Signage was present in the field for the previously permitted Outfalls #001, #002, #003, and #004.

Permit Part V.4.g Stormwater Requirement requires "a provision for training all personnel engaged in material handling, storage, and housekeeping in areas where materials are exposed to stormwater. Documentation of this training must be available to the Department upon request."

Observation 6. During the inspection, the facility representative reviewed existing practices for the industrial stormwater training program. The facility representative stated the program relied on staff with institutional or historical knowledge to address topics and issues as they arise on an as-needed basis and that the knowledge is passed onto additional staff through discussion and practical experience. The facility was unable to provide documentation of training sessions or other training activities as required by the permit.

Permit Part III. Effluent Limitation and Monitoring Requirements - Table A states that, "The facility is authorized to discharge from outfall(s) with serial number(s) as specified in the application for this permit. These final effluent limitations shall be effective at the issuance of the master general permit and remain in effect for the duration of the permit." The permit further clarifies that, "Effluent limitations in Table A are considered necessary to protect existing water quality and should not be exceeded during discharges resulting from a precipitation event up to and including the 10-year 365-day rainfall event (chronic) or the 25 year 24-hour rainfall event (catastrophic) according to National Weather Service data."

Observation 7. In January 2023, an exceedance of permit effluent limits for total suspended solids (TSS) during the respective permitted terms of Permit No. MOR80F035 was observed within EPA's ECHO database. The facility's DMR value for TSS in January 2023 from Outfall Sampling Point 05S was 202 mg/L, exceeding the DMR limit value of 70 mg/L by 189 percent.

Closing

At the conclusion of the inspection, the EPA Inspection Team held a closing conference with the facility representatives and discussed the inspection preliminary findings and observations. The EPA Inspection Team reiterated that all observations were preliminary and not compliance determinations. The closing conference began at 4:15 PM (CT) and concluded at approximately 4:34 PM (CT).