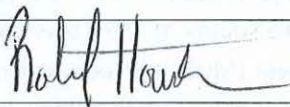


**Region 6 Compliance Assurance and Enforcement Division
Inspection Report**

Inspection Date(s):	06/12/2018		
Media:	Water		
Regulatory Program(s)	CWA Storm Water		
Company Name:	Contrack Watts/Garney Federal JV #77560		
Facility Name:	FY 15 KC-46A DMCSIP		
Facility Physical Location:	3001 S. Douglas Blvd.		
(city, state, zip code)	Oklahoma City, OK 73145		
Mailing address:	1333 NW Vivon Rd.		
(city, state, zip code)	Kansas City, MO 64118		
County/Parish:	Oklahoma County		
Facility Contact:	Alex Miller	Project Manager	
	(405) 471-7667		
FRS Number:	N/A		
Identification/Permit Number:	OKR1026926		
Media Number:	N/A		
NAICS:	238910		
SIC:	1629		
Personnel participating in inspection:			
Carol Johnson	US EPA/6EN-WS	Life Scientist	214-665-8471
Michelle Chao	ODEQ	Storm Water Inspector	(405) 702-8112
John Truong	Tinker AFB	Storm Water Program Manager	(405) 734-1228
Jarred Britton	Contrack Watts/Garney Federal JV	Inspector	(405) 471-7667
EPA Lead Inspector Signature/Date	CAROL JOHNSON Digitally signed by CAROL JOHNSON DN: c=US, o=U.S. Government, ou=USEPA, ou=Staff, cn=CAROL JOHNSON, dnQualifier=0000085232 Date: 2018.07.12 11:30:50 -05'00'		
	Carol Johnson		Date
Supervisor Signature/Date	 Robert Houston		7/18/2018 Date

Section I – INTRODUCTION

A Storm Water inspection was conducted by Carol Johnson of the Environmental Protection Agency (EPA) at 9:00AM, on June 12, 2018, at a construction site on Tinker Air Force Base (Tinker), located in Oklahoma City, Oklahoma. Tinker is a federally owned facility. The Contractor and Permittee for the project is Contract Watts/Garney Federal JV (CW/GF). Michelle Chao, Storm Water Inspector with Oklahoma Department of Environmental Quality, accompanied EPA on the inspection. The inspection was conducted under the guidelines established by the EPA under the National Pollutant Discharge Elimination System (NPDES) for storm water associated with construction activities.

PURPOSE OF THE PRE-ASSESSMENT

This inspection is part of a National Enforcement Initiative focusing on Federal facilities' compliance with the Oklahoma Pollutant Discharge Elimination System (OPDES) Construction General Permit (CGP) requirements regarding Best Management Practices on active construction sites.

FACILITY DESCRIPTION

This project is a 159-acre clearing and grading project, of which 46.7 acres will be disturbed, to prepare the site for a multi-purpose aircraft hangar and adjacent infrastructure for the KC-46A campus within the Air Force Base. Major soil-disturbing activities associated with the project include site clearing, ditching, backfilling, grading and vehicular traffic.

Section II - OBSERVATIONS

At the time of the inspection, construction activities were ongoing (See Appendix 2). The entire site had been cleared and graded, with no temporary stabilization, and insufficient Best Management Practices to minimize erosion of the exposed soil. There were sand bags and silt fence around the various storm inlets, but they were insufficient to control such large amounts of sediment. A sediment pond was installed, but did not meet the design requirements for size per acre being drained, nor was it being properly maintained. As the sediment pond was insufficient to address such a large area, sediment was discharging to the outfall that the pond discharged to. While sediment was observed discharging out past the outfall into the Municipal Separate Storm Sewer System (MS4), no sediment discharge was observed entering Waters of The U.S. The receiving stream, the North Canadian River (which is a 303(d)-listed stream), looked clear with no visible appearance of sediment accumulation along the stream bed.

Section III – AREAS OF CONCERN

Upon reviewing the Storm Water Pollution Prevention Plan (SWPPP) it was noted that the permittee did not have Storm Water permit coverage. While an OPDES CGP was obtained before the project began, the permit expired in October 2017. OPDES rules allow 90 days from the date of permit expiration for a permittee to submit a Notice of Intent (NOI) to renew their authorization. At the time of this inspection, six months past the expiration of the old permit, CW/GF had not yet submitted an NOI to renew CGP coverage, and was therefore operating without a permit. The SWPPP also was not updated; it did not reflect who was responsible for implementing the SWPPP requirements, it did not include a corrective action log or reflect if or when corrective action was taken, and it did not include inspector training records or certification.

Section IV – FOLLOW UP

On June 19, 2018, EPA received pictures taken during the inspection by John Truong, Storm Water Program Manager with Tinker, who was the only one cleared to take photos of the project due to security issues regarding the proximity of the project to military aircraft.

Section V – LIST OF APPENDICES

Appendix 1 – EPA Form 3560-3 (Rev. 9-94)

Appendix 2 – Photo log

Appendix 1: EPA Form 3560-3 (Rev. 9-94)

NPDES CONSTRUCTION STORM WATER INSPECTION WORKSHEET

United States Environmental Protection Agency
Dallas, Texas 75202-2733

NPDES CONSTRUCTION STORM WATER INSPECTION REPORT**Section A: Coding**

NPDES Permit Number												Inspection Date: yr/mo/day												SIC Code			
O	K	R	1	0	2	6	9	2	6					2	0	1	8	0	6	1	2			1	6	2	9

Latitude

Longitude

35 24'6.69" N**97 23'24.62" W****Section B: Facility Data**

Name and Location of Facility Inspected FY 15 KC-46A DMCSIP, Tinker Air Force Base 3001 S. Douglas Blvd. Oklahoma City, Oklahoma 73145		Entry Time/Date 0900/06/12/2018	Permit Effective Date October 18, 2017
		Exit Time/Date 1100/06/13/2018	Permit Expiration Date October 17, 2022
Name(s) of On-Site Representatives Alex Miller		Title(s) Project Manager	
Name, Address of Responsible Official Alex Miller P.O. Box 45859 Tinker AFB, OK 73145		Title Project Manager	
		Phone Number (405) 471-7667	Contacted: YES <u>X</u> NO <u> </u>

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

U	Permit	S	Storm Water
S	Records/Reports	M	Inspections
U	Facility Site Review	M	SWPPP
S	Receiving Waters	S	Operations & Maintenance

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Upon reviewing the Storm Water Pollution Prevention Plan (SWPPP) it was noted that the permittee did not have Storm Water permit coverage. While an OPDES CGP was obtained before the project began, the permit expired in October 2017. OPDES rules allow 90 days from the date of permit expiration for a Permittee to submit a Notice of Intent (NOI) to renew their authorization. At the time of this inspection, six months past the expiration of the old permit, CW/GF had not yet submitted an NOI to renew CGP coverage, and was therefore operating without a Permit. The SWPPP also was not updated; it did not reflect who was responsible for implementing the SWPPP requirements, it did not include a corrective action log or reflect if or when corrective action was taken, and it did not include Inspector training records or certification.

Inspector(s) Name (Please Print) Carol Johnson	Agency/Office/Telephone USEPA, Region 6, 214-665-8471	Date July 10, 2018
Signature of Lead Inspector		
Signature of Reviewer	Agency/Office USEPA, Region 6	Date

FACILITY INFORMATION			
Permit Number	OKR1026926	Facility Name	FY 15 KC-46A DMCSIP, Tinker Air Force Base
Receiving Water(s) or MS4	North Canadian River		
STORM WATER POLLUTION PREVENTION PLAN (The SWPPP describes the following components)			
STAFF AND RESPONSIBILITIES		RECEIVING WATERS	
Pollution Prevention Team	☐ YES ☒ NO	Are there impaired waters within 5 miles of the facility?	☒ YES ☐ NO
Identify Specific Individuals	☐ YES ☒ NO	Does the facility discharge into an MS4?	☒ YES ☐ NO
Outlines Responsibilities	☐ YES ☒ NO	If discharging into an MS4, is there compliance with the MS4 program?	☐ YES ☒ NO
SITE MAP		MEASURES AND CONTROLS	
Drainage areas	☒ YES ☐ NO	Good housekeeping procedures	☐ YES ☒ NO
Drainage patterns/outfalls	☒ YES ☐ NO	Preventive maintenance procedures	☐ YES ☒ NO
Structural and non-structural controls	☒ YES ☐ NO	Spill prevention and response procedures	☐ YES ☒ NO
Surface waters	☒ YES ☐ NO	Inspection procedures	☐ YES ☒ NO
Significant materials exposed to precipitation	☐ YES ☒ NO	Employee training program	☐ YES ☒ NO
Location of leaks or spills that have occurred in the last 3 years	☐ YES ☒ NO	Recordkeeping and internal reporting procedures	☐ YES ☒ NO
Location of industrial activities exposed to precipitation including:	☐ YES ☒ NO	Description of Non-storm water discharges	☒ YES ☐ NO
Fueling stations	☐ YES ☒ NO	Description of controls for non-storm water discharges	☒ YES ☐ NO
Vehicle/equipment maintenance or cleaning areas	☐ YES ☒ NO	Description of erosion and sediment controls for areas with a high erosion potential	☒ YES ☐ NO
Loading/unloading areas	☐ YES ☒ NO	Narrative of traditional storm water management practices	☒ YES ☐ NO
Waste treatment, storage, or disposal areas	☐ YES ☒ NO	REPORTS	
Liquid storage tanks	☐ YES ☒ NO	Is the facility inspected?	☒ YES ☐ NO
Processing areas	☐ YES ☒ NO	Is a summary of the scope of the inspection developed?	☒ YES ☐ NO
Storage areas	☐ YES ☒ NO	Are inspection reports retained on site?	☒ YES ☐ NO
List of pollutants likely to be present in discharges?	☐ YES ☒ NO	Are problems found during inspections resolved within 7 days?	☐ YES ☒ NO
Description of significant materials handled, treated, stored, or disposed of such that exposure to storm water occurred in the last 3 years	☐ YES ☒ NO	Is the SWPPP updated to reflect the current operation and maintenance of the facility?	☐ YES ☒ NO
Description of the method and location of storage or disposal	☐ YES ☒ NO	Is an Annual Site Compliance Evaluation Report prepared?	☐ YES ☐ NO
Description of all material management practices	☐ YES ☒ NO	STORAGE	
Description and location of existing structural and non-structural controls	☐ YES ☒ NO	Does the facility store salt piles?	☐ YES ☒ NO
List of significant spills and leaks that occurred in the 3 years prior to the effective date of the permit	☐ YES ☒ NO	Are salt piles covered or enclosed?	☐ YES ☐ NO
Summary of existing storm water sampling data	☐ YES ☒ NO	Does the facility store hazardous chemicals?	☐ YES ☒ NO
Description of areas with a high potential for significant soil erosion?	☐ YES ☒ NO	Are these chemicals properly coverage or enclosed?	☐ YES ☐ NO

Appendix 2: Photo Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log
Photo no. 1

Location: Tinker Air Force Base – FY 15 KC-46A DMCSIP

City: Oklahoma City

County: Oklahoma

State: OK



Date of Photo: 06/12/2018 Photographer: John Truong, Tinker AFB Storm Water Program Manager

Description: Sediment pond installed, but insufficient due to not meeting the design requirements for size per acre being drained.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo no. 2

Location: Tinker Air Force Base – FY 15 KC-46A DMCSIP

City: Oklahoma City

County: Oklahoma

State: OK



Date of Photo: 06/12/2018 Photographer: John Truong, Tinker AFB Storm Water Program Manager

Description: Sediment discharging past Outfall due to inadequate controls.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log
Photo no. 3

Location: Tinker Air Force Base – FY 15 KC-46A DMCSIP

City: Oklahoma City

County: Oklahoma

State: OK



Date of Photo: 06/12/2018 Photographer: John Truong, Tinker AFB Storm Water Program Manager

Description: Sediment discharging past Outfall due to inadequate controls. Sediment filled water flowing into MS4.