

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	10/22/2024 – 10/23/2024	
Media Program:	Water	
Regulatory Program(s)	NPDES Stormwater/CWA 402	
Company Name:	U.S. Department of The Air Force	
Facility Name:	Joint Base San Antonio (JBSA) Fort Sam Houston	
Facility Physical Location:	2202 15 th St.	
(city, state, zip code)	Fort Sam Houston, TX 78234	
Mailing address:	2250 Engineer St.	
(city, state, zip code)	Fort Sam Houston, TX 78234	
County/Parish:	Bexar	
Facility Phone Number	(210) 671-0355	
Facility Contact:	Ms. Sharon Jones sharon.jones.13@us.af.mil	Acting Chief, Environmental Compliance
FRS Number:	N/A	
Identification/Permit Number(s):	TXR040409 and TXR05DB57	
Media Identifier Number:	N/A	
NAICS:	928110	
SIC:	9711	
Personnel participating in inspection:		
Sharron A. Crayton	6EN-WS	Inspector/Enforcement Officer
EPA Lead Inspector Signature/Date	<i>Sharron A. Crayton</i> Sharron A. Crayton	12/16/2024 Date
Supervisor Signature/Date	 Ruben Alayon-Gonzalez	 Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

U.S. EPA Region 6 inspector Sharron Crayton arrived at the Joint Base San Antonio (JBSA) Fort Sam Houston facility on October 22, 2024, at approximately 8:00 AM for an announced Compliance Evaluation Inspection (CEI). This site visit served as a multi-media inspection of the JBSA Fort Sam Houston's Public Water Systems and Stormwater Systems in coordination with the Texas Commission on Environmental Quality (TCEQ) and the U.S. EPA Headquarters. The inspector initially met with the Environmental Compliance Chief for the U.S. Department of the Air Force, JBSA Fort Sam Houston, Ms. Sharon Jones. During a joint opening conference, the stormwater inspector presented her credentials and informed Ms. Jones (and other attendees in-person and virtually) that the stormwater portion of this inspection was part of a National Enforcement Initiative focusing on Federal facilities' compliance with the Texas Pollutant Discharge Elimination System (TPDES) 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, Ms. Jones and attendees were informed that the inspection would also focus on the facility's compliance with the TPDES Multi-Sector General Permit, and TPDES Construction General Permit (CGP) requirements regarding Best Management Practices (BMPs) on active construction sites (see Attachments A and B for combined in-person attendee roster and site-specific attendee rosters).

In lieu of an MS4 Self-Assessment, prior to the inspection, the JBSA Fort Sam Houston provided, via an informal email request for information, applicable documents to the inspector for review. This inspection also included on-site reviews of the JBSA Fort Sam Houston'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 members of the global/combined Installation (environmental) Water Quality Program for JBSA Fort Sam Houston, JSBA Lackland, and JSBA Randolph accompanied the inspector during the on-site MS4, MSGP, and construction site inspection(s). The inspector conducted a closing conference with Ms. Jones, JSBA Management, members of the Installation Water Quality Program, and Ms. Rhonda Reza, Environmental Investigator with the TCEQ (see Attachment C – Combined Closing Conference Roster) to discuss the documents reviewed on-site, additional requests for information, and subsequent efforts of the on-site inspection. In addition, during the closing conference, the inspector discussed pending areas of concern (AOCs) noted during the inspection and items further detailed in this report. Ms. Jones was contacted via email on October 30th and November 12th, 2024, regarding the requests for additional documents (as detailed in Section III of this report).

The generation of this report is based on information supplied by JBSA Fort Sam Houston (the permittee), observations made by the inspector, and review of records and reports maintained by the permittee, the state of Texas, and the U.S. EPA.

FACILITY DESCRIPTION

As noted in the facility's SWMP, JBSA Fort Sam Houston is a United States Department of Defense (DoD) installation encompassing a total land area of 3,265 acres, whose mission is to command, operate, administer resources, and provide support to assigned, attached, satellite, and tenant units. Diverse base processes include the operation and maintenance of roads, sanitary and storm sewers, buildings, offices, hospitals, housing, dormitories, medical research and training facilities, golf courses, and other military training and operations. The facility is a Phase II (small) MS4 that discharges to surface waters of the United States, via TXR040409 issued by the TCEQ on August 8, 2023. The facility is also authorized to discharge stormwater associated with industrial activity under TPDES MSGP TXR05DB57, issued on November 9, 2021. Discharges associated with stormwater from construction projects are authorized under TXR150000.

Section II - OBSERVATIONS

Inspection of the MS4 Program evaluated how JBSA Fort Sam Houston 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 inspector also conducted a review of JBSA Fort Sam Houston's MSGP compliance requirements for Sector L: Landfills and Land Application Sites, and Sector P: Land Transportation and Warehousing. Additionally, the inspector conducted a walk-through of the Wilson Way Construction Project located at the base on Wilson Way Rd., between the intersection of Engineer Way and Shafter Rd. for stormwater from construction activities, via CGP Permit TXR150000. The EPA Inspector also observed the inspection techniques of Mr. Scott Hunter Washburn, member of the collective JSBA Installation Water Quality Program, as he demonstrated how he conducts construction storm water inspections. Overall, the JBSA Inspector's techniques appeared to be thorough and detailed (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 October 22nd & October 23rd Compliance Evaluation Inspection (CEI) and from subsequent documents provided electronically by the installation 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 and associated Best Management Practices (BMPs) in the site's annual MS4 report(s);
 - b. Deficiencies with not achieving measurable goals of the SWMP but indicating in the annual report that goals had been achieved or not providing the details to substantiate achievement of various goals;
 - c. Lacking systems to accurately track measurable goals;
 - d. Deficiencies with training and accountability of trained individuals;
 - e. Referencing an affirmative/compliant use of design and environmental specifications to support BMP compliance requirements in the annual report, however, interviews with site personnel disclosed these efforts were not consistent and/or did not exist as reported;
 - f. Various logs and/or tracking data tools could not be provided during the inspection and/or did not exist (i.e., street weeping logs; calls to the environmental hotline, nature of calls, and date of resolution; signature documentation (vs typed names) for training provided, etc.);
 - g. Trainees were not engaged/present in on-line training modules for an adequate period of time to absorb and become familiar with the training topic (i.e., log showed 4, 7, 11, 21 minutes of attendee times for a training that lasted just over one (1) hour);
 - h. A prolonged unauthorized discharge of chlorinated water from an outdoor swimming pool, into the MS4 conveyance system. Specifically, as noted in a work task (maintenance requisition) dated May 5, 2020, and Requisition Package for Work Task Number: WT7721923 – Outdoor Pool Liner, B3300, dated June 7, 2023, the outdoor pool, which supports other Military Mission Partners such as deep-sea diving medical technicians, is losing approximately 90,000 gallons of water every three (3) days and drains to the MS4 conveyance system; and
 - i. During the on-site evaluation, the EPA Inspector identified a Sanitary Sewer Overflow (SSO) into the MS4 conveyance (see Appendix 1, Photograph # 1). Verbal requests from EPA on October 23rd and October 25th, and via email on October 30th and November 12th for additional details regarding the event (including a copy of the SSO notification(s) provided to the TCEQ, a copy of JBSA's incident investigation regarding this matter and any additional information associated with the incident) have gone unaddressed. As of the date of this inspection report, the request(s) remain outstanding.

The following AOCs are specific to the MSGP Program:

1. Via interviews with members of the Installation Water Quality Program, specifically Ms. Jones and Mr. Gerald Johnson, the current MSGP Sectors are not applicable and/or accurate. Specifically, via the Industrial Notice of Intent (NOI) Renewal submitted on November 9, 2021, for authorization under TXR05DB57, Sector L (Landfills) and Sector P (Vehicle Maintenance/Refueling Facilities) were provided as the Sectors applicable to the site. However, as communicated to the inspector during interviews, Sector P is not applicable, and a Notice of Change (NOC) is needed to remove Sector P and include Sector N (Scrap Recycling and Waste Recycling Facilities). It was further noted that the site has been aware of the needed changes since 2021; however, to date a NOC has not been submitted to the TCEQ; and

2. MSGP outfall destinations are incorrect at the facility. Via a PowerPoint presentation shared during the inspection and associated interviews, it was noted that on or about October 2022, the facility engaged in discussions with the TCEQ to inform the agency that current MSGP outfalls are located at installation MS4 boundaries instead of at individual facilities – this practice is not authorized by the MSGP permit. Specifically, the facility communicated to the TCEQ that designated outfalls for JBSA Fort Sam Houston were observed to be not representative of the runoff from the individually permitted areas of industrial activity. Current outfalls are located in areas that received runoff from mixed sources including urbanized areas which were part of the MS4 and undeveloped area(s), and therefore could result in inaccurate water quality monitoring data. As such, the facility communicated to the TCEQ that it would reevaluate and re-designate the locations of its MSGP storm water outfalls. However, as of the date of this inspection report these efforts have not been completed, and the associated MSGP Storm Water Pollution Prevention Plan (SWPPP) has not been revised.

The following AOCs are specific to the CGP Program:

1. 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;
2. A certified copy of the SWPPP is not being provided to members of the Installation Water Quality Program (environmental), as per the Section 1.6.f of the JBSA Environmental Specification document, prior to construction projects commencing; and
3. Contractors (specific projects) do not have BMPs in place and/or the measures in place are deficient (see Appendix 1, Photographs #2-7 for the Wilson Way Construction Project).

Section IV – FOLLOW UP

As of the date of this inspection report, requested information regarding the October 23rd SSO incident remains outstanding.

Section V – LIST OF APPENDICES AND ATTACHMENTS

Appendix 1: Photograph Log – Seven (7) photos taken 10/23/2024

Attachment A: 10/22/2024 Combined Opening Meeting Attendee Roster

Attachment B: 10/22/2024 Fort Sam Houston Site-Specific Opening Meeting Attendee Roster

Attachment C: 10/25/2024 Combined Closing Meeting Attendee Roster

U.S. Department of The Air Force
JBSA Fort Sam Houston
TPDES MS4 #: TXR040409
TPDES MSGP #: TXR05DB57
Inspection Date: 10/22/2024

Appendix 1

Photograph Log



U.S. Department of The Air Force
JBSA Fort Sam Houston
TPDES MS4 #: TXR040409
TPDES MSGP #: TXR05DB57
Inspection Date: 10/22/2024

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 1

Location: JSBA Fort Sam Houston

City: Fort Sam Houston

County: Bexar

State: TX



Description: View, of MS4 conveyance located in wooded area with noted turbid (grayish) water from unknown sanitary sewer overflow (SSO). In addition, the area contained a pungent odor indicative of raw sewerage.

Date of Photo: 10/23/2024 Photographer: Sharron Crayton



U.S. Department of The Air Force
JBSA Fort Sam Houston
TPDES MS4 #: TXR040409
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 2

Location: JSBA Fort Sam Houston

City: Fort Sam Houston

County: Bexar

State: TX



Description: View, of Wilson Way Construction Project area, with sediment carry over observed in the in the access street (red arrow).

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



U.S. Department of The Air Force
JBSA Fort Sam Houston
TPDES MS4 #: TXR040409
TPDES MSGP #: TXR05DB57
Inspection Date: 10/22/2024

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 3

Location: JSBA Fort Sam Houston

City: Fort Sam Houston

County: Bexar

State: TX



Description: View, of Wilson Way Construction Project area, with sediment carry over observed in the in the access street (red arrow) and poor housekeeping.

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



U.S. Department of The Air Force
JBSA Fort Sam Houston
TPDES MS4 #: TXR040409
TPDES MSGP #: TXR05DB57
Inspection Date: 10/22/2024

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 4

Location: JSBA Fort Sam Houston

City: Fort Sam Houston

County: Bexar

State: TX



Description: View, of Wilson Way Construction Project area, with ineffective BMPs indicated by red arrow (i.e., no silt fencing around accumulated sediment and stored concrete/construction debris).

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



U.S. Department of The Air Force
JBSA Fort Sam Houston
TPDES MS4 #: TXR040409
TPDES MSGP #: TXR05DB57
Inspection Date: 10/22/2024

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 5

Location: JSBA Fort Sam Houston

City: Fort Sam Houston

County: Bexar

State: TX



Description: View, of heavy equipment stored in laydown area associated with the Wilson Way Construction Project (closer view of leaking equipment noted in following photographs).

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



U.S. Department of The Air Force
JBSA Fort Sam Houston
TPDES MS4 #: TXR040409
TPDES MSGP #: TXR05DB57
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 6

Location: JSBA Fort Sam Houston

City: Fort Sam Houston

County: Bexar

State: TX



Description: Closer view, of heavy equipment stored in laydown area associated with the Wilson Way Construction Project, with leaking and/or oil-stained equipment.

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



U.S. Department of The Air Force
JBSA Fort Sam Houston
TPDES MS4 #: TXR040409
TPDES MSGP #: TXR05DB57
Inspection Date: 10/22/2024

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

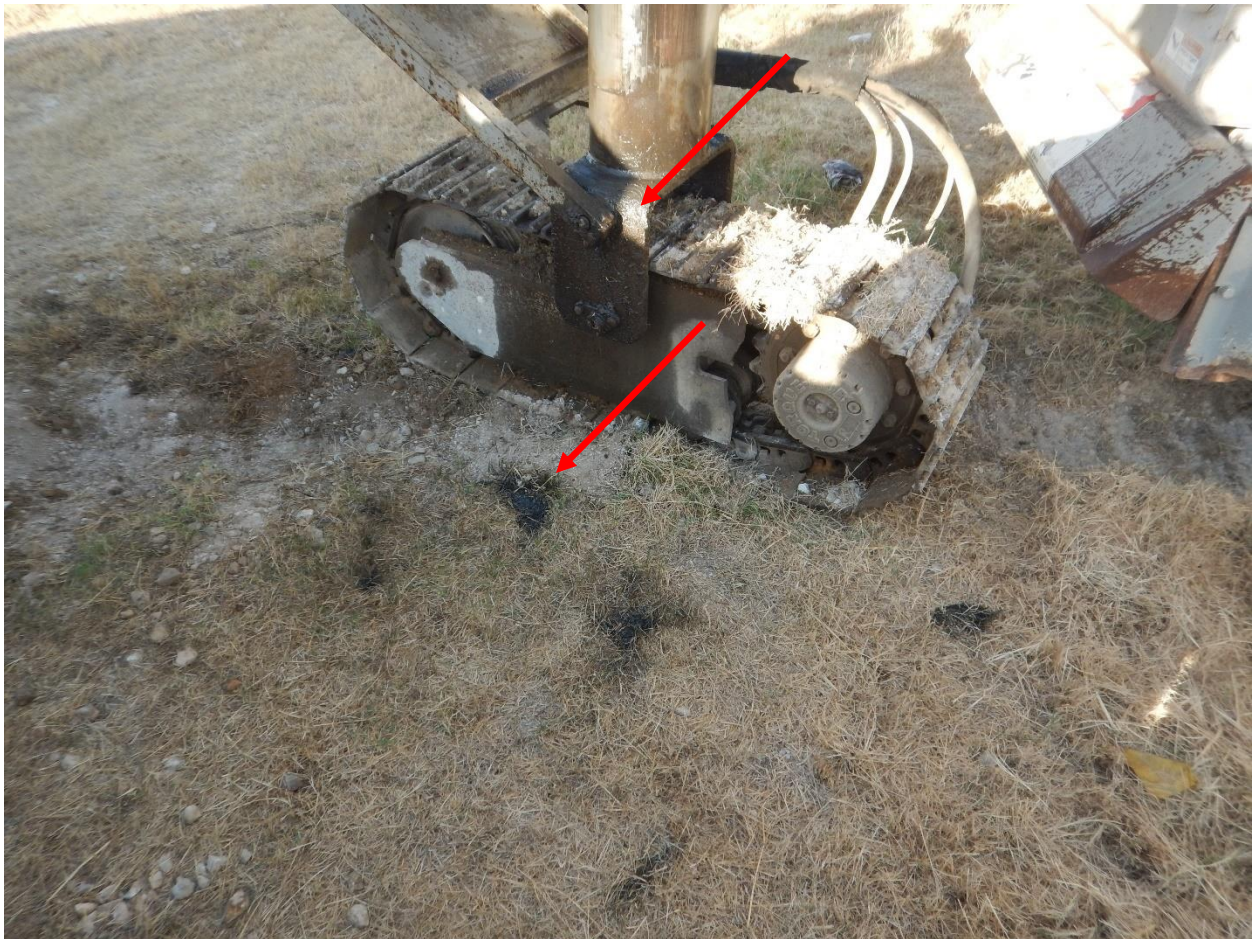
Photo No. 7

Location: JSBA Fort Sam Houston

City: Fort Sam Houston

County: Bexar

State: TX



Description: Closer view, of heavy equipment stored in laydown area associated with the Wilson Way Construction Project, with leaking and/or oil-stained equipment.

Date of Photo: 08/13/2024 Photographer: Sharron Crayton

Attachment A
10/22/2024 Combined Opening Meeting Attendee Roster

JBSA EPA REGULATORY INSPECTION
22-25 Oct 2024

Name	Organization	Phone Nbr	E-Mail Address
Monica Guerrero	802 CES/CEIE	(361) 696-9713	monica.guerrero.2@us.af.mil
Samantha Bartholomew	802 CES/CEIEA	512-557-1478	samantha.bartholomew@us.af.mil
Scott Washburn	802 CES/CEIEC	719-963-3963	scott.washburn.1@us.af.mil
Suzanne Timmons	802 CES/CENPE	210-381-0917	suzanne.timmons@us.af.mil
William Schram	802 CES/CENPE	210-671-1537	william.schram@us.af.mil
Tierra Robinson	2025642067 USEPA	USEPA	robinson.tierra@epa.gov
Maura Harbaugh	ERG 2025642067	924-216-4579	Maura.Harbaugh@erg.com
Danny O'Connell	ERG Same	970-369-1100	Danny.O'Connell@Erg.com
Brooke Strong	American Water	418-225-7073	brooke.strong@amwater.com
A.J. Olson	amwater	254-258-5324	aj.olson@amwater.com
Mark Cadon	amwater	216-765-9889	Mark.Cadon@amwater.com
Aaron Hernandez	am water	216-240-3482	Aaron.Hernandez@amwater.com
Gerald Johnson	802 CES/CEIE (210) 221-4751		gerald.johnson.29@us.af.mil
Jessica Schkefstein	USEPA	(202) 580-9983	Schkefstein.Jessica@epa.gov
Jordan Martin	802 CES/CEOC	210-381-7059	jordan.martin.17@us.af.mil
Niguel Lozano	802 CES	432-448-7975	Niguel.lozano.2@us.af.mil
Chris Kruezel	802 CES/DD	210-307-5734	christopher.kruezel@us.af.mil
Sharon Jones	802 CES	512-364-4233	sharon.jones.113@us.af.mil
Rebecca Ward	802 CES	210-413-6039	rebecca.ward.4@us.af.mil

Rhonda Reza TCEQ R13 210-423-4064 rhonda.reza@tceq.texas.gov

Aaron Rodriguez TCEQ R13 210-739-3132 Aaron.Rodriguez@tceq.texas.gov

Sharon Jones 802 CES 512-364-4233 Sharon.jones.113@us.af.mil

Rebecca Ward 802 CES 210-413-6039 rebecca.ward.4@us.af.mil

U.S. Department of The Air Force
JBSA Fort Sam Houston
TPDES MS4 #: TXR040409
TPDES MSGP #: TXR05DB57
Inspection Date: 10/22/2024

Attachment B
10/22/2024 Fort Sam Houston Site-Specific
Opening Meeting Attendee Roster

Opening/Pre-Inspection Meeting

Commence opening/pre-inspection meeting Time: 10:03 Am

Name	Title	Representing	Telephone No.
Sharon A. Cayton	Life Scientist	EPA / Region 6	(214) 883 5415
Gerald Johnson	Water Quality Program Mgr.	802 CES	(215) 221-4251
Sharon Jones	Env. Compl. Chief	802 CES	(214) 671-0355
Monica Guerrero	Water Quality LAR	802 CES/CEIE	(361) 696-9713
Scott Washburn	Water Quality Program Manager	802 CES/CEIE/EC	719-963-5963
Samantha Bartholomew	WQ/NEPA Program Manager	802 CES/CEIE/EC	512-557-1478
Nigiel Lozano	Civil engineer	802 CES	432 448 7975
Rhonda Reza	EE Environmental Investigator	TCEQ	210 403 4064

Conclude opening/pre-inspection meeting Time: 10:21 Am

Initials / Date: SAC / 10/22/2024

Attachment C
10/25/2024 Combined Closing Meeting Attendee Roster

JBSA Fort Sam Houston

*Note: Combined closing meeting w/ JBSA Lackland.

Exit interview / Out-briefing Meeting

Commenced meeting..... Time: 10:00 Am

Name	Title	Representing	Telephone No.
Sharon Jones	Env. Comp Chief	JBSA	(210) 671-0355
Gerald Johnson	Water Quality Program Mgr.	JBSA	(210) 221-4257
Scott H. Washburn	Water Quality Program Mgr.	JBSA	719-963-3963
BRENT LARSON	INSTALLATION MGMT	JBSA	210-500-2460
Elizabeth Bays	AFCEC JBSA ISS WQ PM/Acting Chief	AFCEC	210-652-1905
Vanhseung Phanthavong	AFCEC AFCEC JBSA ISS	802 CES	702-981-2909
Scott B. Reed	Hm/Hw/Toxics/Recycling	AFCEC K20W	210-901-2610
Daniel Wood	Air & Toxics Element Chief	JBSA	210-846-3633
Symonina Bartholomew	WQ/NEPA Program Manager	802 CES JBSA ENV	512-557-1478
Suzee Loder	ENV. PAQ (Intern)	802 CES JBSA ENV	8609185005
Rhonda Reza	Environmental Investigator	TCEQ	2104034064
Sharon A. Crayton	Life Scientist	EPA/Region 6	(214) 883-5415

Conclude meeting..... Time: 10:47 Am

Initials / Date: SAC / 10/25/2024