

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	08/10-11/2022	
Media Program:	RCRA Compliance Evaluation Inspection	
Regulatory Program(s)	RCRA Large Quantity Generator	
Company Name:	Choctaw Manufacturing and Defense Contractors	
Facility Name:	Choctaw Manufacturing and Defense Contractors Hugo	
Facility Physical Location:	203 Choctaw Industrial Drive	
(city, state, zip code)	Hugo, OK - 74501	
Mailing address:	203 Choctaw Industrial Drive	
(city, state, zip code)	Hugo, OK - 74501	
County/Parish:	Choctaw	
Facility Phone Number	918-426-2781	
Facility Contact:	Kevin Martin	Site HSE Manager
	Kmartin@choctawdefense.com	
FRS Number:	NA	
Identification/Permit Number:	NA	
Media Identifier Number:	OKR000018416	
NAICS:	336992- Military Armored Vehicle, Tank and Tank Component Manufacturing 332313 – Plate work Manufacturing 332999 – All other miscellaneous fabricated metal product manufacturing	
SIC:	NA	
Personnel participating in inspection:		
John Penland	EPA Region 6 (ECDSR)	Inspector
Angela Hays	EPA Region 6 (ECDSR)	Lead Inspector
Elizabeth Pham	EPA Region 6 (ECDSR)	Inspector
Sandesh Thapa	EPA Region 6 (ECDSR)	Inspector
Kevin Martin	Choctaw Defense Manufacturing	Environmental Health and Safety Manager
Mark T. Smith, PG	Choctaw Nation of Oklahoma – Environmental Compliance	Compliance Officer
Jonathon Shufeldt	Choctaw Defense Manufacturing	Operation Manager- Hugo Facility
EPA Lead Inspector Signature/Date		11/2/2022
	Angela Hays – Lead Inspector	Date
Supervisor Signature/Date		
	Jeffrey Yurk – Waste Section Chief	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

During the week of August 10, 2022, I, Angela Hays, conducted an unannounced inspection of the Choctaw Manufacturing and Defense Contractors facility (Choctaw) located at 203 Choctaw Industrial Drive, Oklahoma for compliance with the Resource Conservation and Recovery Act (RCRA). I was assisted on this inspection by Environmental Protection Agency (EPA) inspectors John Penland, Sandesh Thapa and Elizabeth Pham. The inspection included a walkthrough of the facility's production, waste generation, and management units and a review of the facility records related to hazardous waste management.

The Choctaw facility was targeted for inspection as part of facilities located in Environmental Justice communities and Regional and National investigation initiatives to evaluate facilities subject to RCRA Subpart AA, BB, CC regulations related to air emissions from hazardous waste management units.

We concluded the inspection of the Choctaw facility on August 11, 2022, with a closing conference where we presented our provisional areas of concern.

This report serves as documentation of all onsite activities and observations during the inspection of the Choctaw Hugo facility. Photographs taken during the inspection to document onsite observations are included in Appendix 1. A summary of all areas of concern identified during the inspection is provided in Section III.

FACILITY DESCRIPTION

Choctaw Manufacturing and Defense Contractor's Hugo facility is located at 203 Choctaw Industrial Drive, Hugo, Oklahoma. Choctaw operates Monday through Friday from 6:00 AM-4:30 PM. There are eight production employees employed at the facility. Choctaw manufactures aviation components, fuel and water systems, military ground support systems, ordinance shipping containers and tactical trailers. Choctaw services range from metal fabrication and forming, welding, computer numerical control machining, mechanical and electric assembly and painting to chemical finishing.

A general map of the plant and process flow diagram are included in Appendices 2 and 3.

The Choctaw Hugo facility was issued the EPA ID# OKR000018416. Choctaw has been operating as a Large Quantity Generator (LQG) of hazardous waste since March 2003.

Section II – OBSERVATIONS

We conducted the onsite inspection during normal business hours from August 10 - 11, 2022. During the inspection, the facility was conducting normal operations and all areas of the facility were in use. Throughout the week, we visited the facility's waste generation, accumulation, and management areas. We also reviewed the facility's operating records pertaining to its RCRA applicability and compliance requirements.

This section provides an abbreviated description of our daily activities. Appendix 1 provides photographs of our observations. Unless otherwise specified, the statements cited in this section reflect those claims made by facility personnel or documents reviewed during the inspection.

August 10, 2022

Sandesh Thapa, Elizabeth Pham and I entered the facility at 1054 hrs. where we presented our credentials to Kevin Martin and informed him that we were there to conduct an inspection of the facility under Section 3007 of the Resource Conservation and Recovery Act (RCRA). I also explained the right of Choctaw to assert a Confidential Business Information claim for records requested by EPA. The discussion was followed by a presentation of EPA Region 6's Confidentiality Notice (40 CFR Section 2.203). Following the introduction, we conducted an inspection opening briefing with Kevin Martin and Johnathon Shufeldt which included our daily inspection schedule and a request for compliance records. Following the opening briefing, we conducted a safety brief and a walkthrough of Choctaw's production and associated waste management areas. The walkthrough began from Building 105 of Choctaw's facility. Choctaw representatives Kevin Martin and Johnathon Shufeldt accompanied us on the walkthrough.

Building 105:

Production Line

The primary operation of this location is the production of wooden boxes dipped with copper naphthalene. There was no hazardous waste generated from this process.

Paint Booth

We observed the paint booth at the site. According to the facility personnel, it has been unused for over 10 years.

Aerosol Can

We noticed aerosol cans being disposed in a container without a label. The facility labeled the container during the walkthrough.

Mercury Light Bulbs

We saw unsecured mercury bulbs inside building 105. See Appendix 1. The facility contained the bulbs inside the boxes during the walkthrough.

Building 203:

Paint Booth

We observed the paint booth at the site. According to the facility personnel, it was used a year ago.

Production Line

We found two existing processes in the production line- the passivation process and the chromium conversion process.

- Passivation Process

The facility conducts stainless steel passivation. We saw three tanks being used for the process- Nitric Sodium Dichromate, Nitric and Rinse tanks. Every few months, the facility runs this process based on received orders. The most recent waste generated from this process was in July 2022. See Appendix 1.

- Chromium Conversion Process

We observed the chromium conversion process includes six tanks- Oaklite 61 B aluminum cleaner, first rinse tank, deoxidizer LNC, second rinse tank, Chromicoat L25 and a post rinse tank. According to Jonathon Shufeldt, the deoxidizer has a pH of less than 2 which is neutralized before feeding into the system. The most recent waste generated from this process was in November 2022.

Less than 90 Days Central Accumulation Area (CAA)

The CAA is located outside Building 203 and it contained 22 drums. There were 19 empty drums, 1 used oil drum, 1 hazardous waste drum and 1 drum of antifreeze staged at CAA. The drums were tightly stacked next to each other. We noticed a corrosion on top of the antifreeze drum. See Appendix 1. Facility representatives cleaned the corrosion on top of the antifreeze drum and corrected the aisle spacing inside the CAA.

We departed the Choctaw facility at 1340 hrs.

August 11, 2022

John Penland, Sandesh Thapa, Elizabeth Pham and I entered the facility at 1015 hrs. We were accompanied by Kevin Martin, Mark Smith and Jonathon Shufeldt. We started our initial discussion and review of the documents submitted by the facility. As a Large Quantity Generator, Choctaw is subject to comply with training standards and requirements listed in 40 CFR 262.17(a)(7). We requested Kevin Martin's training records specific to the handling of hazardous waste. In addition, we reviewed manifests and LDRs submitted by the facility. All manifest and LDR issue were resolved during inspection.

We requested the following documents with Choctaw's representatives:

- Contingency Plan with arrangements with local authorities
- Standard operating Procedure (SOP)
 - Passivation Process
 - Chromate Conversion Process
- Training
 - RCRA training for employees managing hazardous waste.
 - DOT training for employees certifying manifest
- Safety Data Sheet (SDS)
 - Powder Coat SDS
 - McLube SDS

I facilitated a closing meeting with facility representatives at 1300 hrs. We discussed the areas of concern, outstanding document requests and established a timeline for document submittal.

Section III – AREAS OF CONCERN

The following is a list of potential areas of concern discussed with the facility representatives. See Appendix 4 for details of EPA observations.

- Based on our observation, the contingency plan which was revised in January 2020 did not update its list of personnel, despite the change in personnel and operations. The facility needs to provide proof of arrangements with authorities.
- Facility training records requires further review. Initial assessment of the facility training records and interviews with facility personnel was unable to provide documents related to hazardous waste management training 40 CFR 262.17(a)(7).
- Based on our inspection, the facility lacks proper management of waste containers. We observed a waste drum without a label with aerosol cans and aisle space concerns in CAA.

Section IV – FOLLOW UP

Actions taken by Choctaw to resolve any areas of concern were documented by Choctaw with photographs or other documentation and submitted to the EPA via the electronic secure online drive. Any information received from Choctaw after the inspection was also received via the secure online drive. These documents are accessible by the EPA Enforcement Officer, as applicable.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 5 photos taken 8/10/22

Appendix 2 – Facility Diagram

Appendix 3 – Process Flow Diagram

Appendix 4 – EPA Daily Summary E-mails

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 1

Location: Choctaw Manufacturing and Defense Contractors, 203 Choctaw Industrial Drive		
City: Hugo	County/Parish: Choctaw	State: Oklahoma



Photo #:	WIN_20220810_10_53_02_Pro
Date:	8/10/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Angela Hays, Sandesh Thapa, Elizabeth Pham, John Penland
Description: Hugo Building 105- Front Entrance	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 2

Location: Choctaw Manufacturing and Defense Contractors, 203 Choctaw Industrial Drive		
City: Hugo	County/Parish: Choctaw	State: Oklahoma



Photo #:	WIN_20220810_11_11_38_Pro
Date:	8/10/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Angela Hays, Sandesh Thapa, Elizabeth Pham, John Penland
Description:	Aerosol cans disposed in trash bin without label. Inside Building 105



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 3

Location: Choctaw Manufacturing and Defense Contractors, 203 Choctaw Industrial Drive		
City: Hugo	County/Parish: Choctaw	State: Oklahoma



Photo #:	WIN_20220810_11_38_57_Pro
Date:	8/10/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Angela Hays, Sandesh Thapa, Elizabeth Pham, John Penland
Description:	SAA with open drum dated 9/2/2020 inside Building 203



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Photograph Log

Photo No. 4

Location: Choctaw Manufacturing and Defense Contractors, 203 Choctaw Industrial Drive		
City: Hugo	County/Parish: Choctaw	State: Oklahoma



Photo #:	WIN_20220810_11_39_06_Pro
Date:	8/10/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Angela Hays, Sandesh Thapa, Elizabeth Pham, John Penland
Description: SAA with open drum dated 9/2/2020 inside Building 203	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 5

Location: Choctaw Manufacturing and Defense Contractors, 203 Choctaw Industrial Drive		
City: Hugo	County/Parish: Choctaw	State: Oklahoma



Photo #:	WIN_20220810_11_39_58_Pro
Date:	8/10/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Angela Hays, Sandesh Thapa, Elizabeth Pham, John Penland
Description: Close view of open latch on funnel in SAA area inside Building 203	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 6

Location: Choctaw Manufacturing and Defense Contractors, 203 Choctaw Industrial Drive		
City: Hugo	County/Parish: Choctaw	State: Oklahoma



Photo #:	WIN_20220810_12_11_08_Pro
Date:	8/10/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Angela Hays, Sandesh Thapa, Elizabeth Pham, John Penland
Description:	Nitric passivation with Na dichromate inside Building 203 last used on Nov 2022.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 7

Location: Choctaw Manufacturing and Defense Contractors, 203 Choctaw Industrial Drive		
City: Hugo	County/Parish: Choctaw	State: Oklahoma



Photo #:	WIN_20220810_13_04_33_Pro
Date:	8/10/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Angela Hays, Sandesh Thapa, Elizabeth Pham, John Penland
Description:	Used antifreeze drum with rust on top inside CAA located outside Building 203.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 8

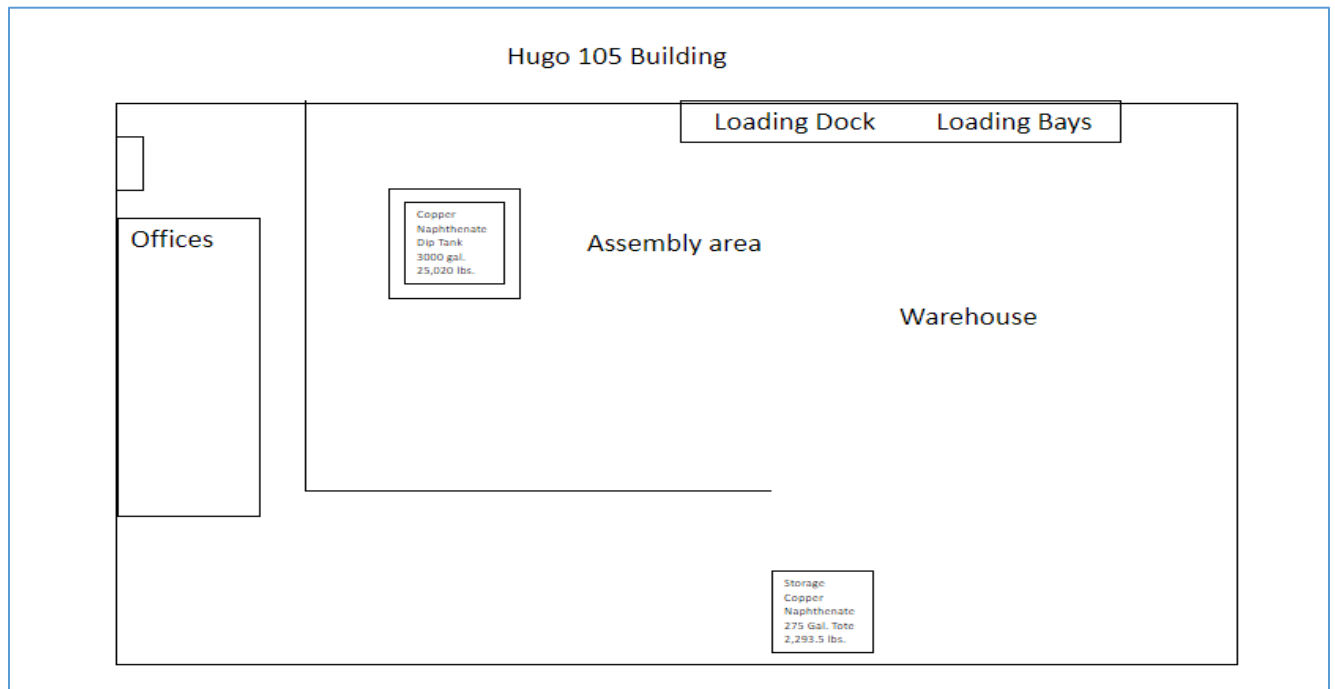
Location: Choctaw Manufacturing and Defense Contractors, 203 Choctaw Industrial Drive		
City: Hugo	County/Parish: Choctaw	State: Oklahoma



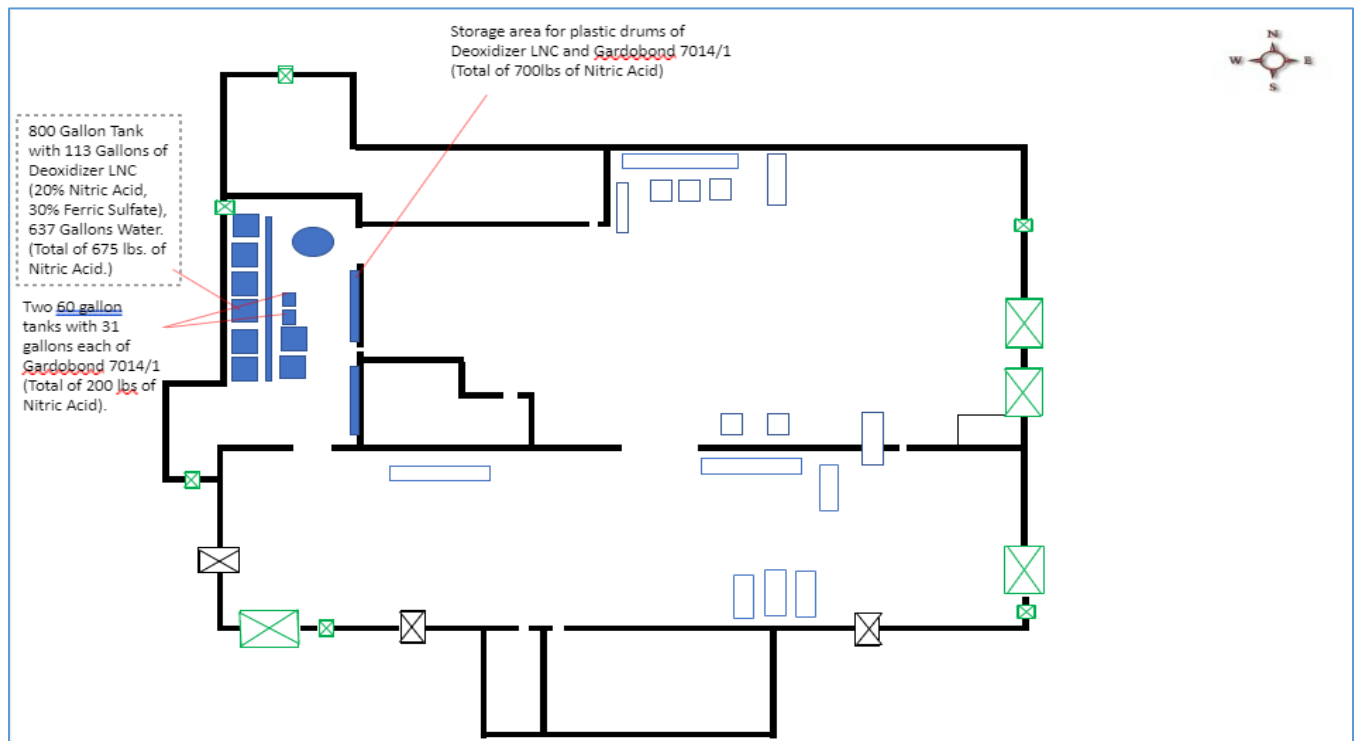
Photo #:	WIN_20220810_13_05_05_Pro
Date:	8/10/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Angela Hays, Sandesh Thapa, Elizabeth Pham, John Penland
Description: View of CAA containing 22 drums. CAA is located outside Building 203. Note lack of aisle spacing.	

Appendix 2

Facility Diagram



Hugo Building 105 layout

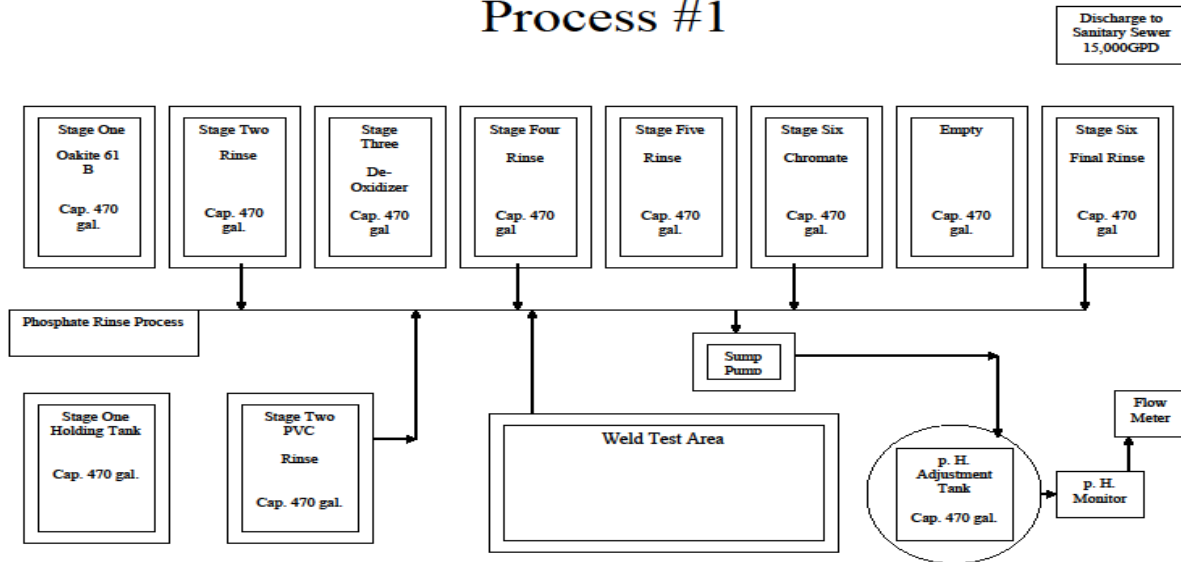


Hugo Building 203 layout

Appendix 3

Process Flow Diagram

Description of CDM Chemical Tank Line Process #1



Appendix 4

EPA Daily Summary E-mails

From: [Hays, Angela](#)

To: [Pham, Elizabeth](#); [Thapa, Sandesh](#); [Kevin Martin](#); mtsmith@choctawnation.com; tbaker@choctawnation.com; [Penland, John](#)

Subject: Daily Summary for August 10, 2022 - RCRA CEI for Choctaw Defense Manufacturing (OKD000018416)

Date: Wednesday, August 10, 2022 8:15:20 PM

Hello, here is the summary of my notes from the August 10 inspection day at Hugo. If there are any errors or omissions, please let me know.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
Angela Hays	Sr. Environmental Scientist – Lead Inspector	US EPA Region 6	214-665-2285	Hays.angela@epa.gov
Elizabeth Pham	Environmental Engineer – Asst. Inspector	US EPA Region 6	214-665-8354	Pham.Elizabeth@epa.gov
Sandesh Thapa	Environmental Scientist – Asst. Inspector	US EPA Region 6	214-665-2265	Thapa.sandesh@epa.gov
Kevin Martin	Environmental Health and Safety Manager	Choctaw Defense Manufacturing	918-426-2871 x8124	kmartin@choctawdefense.com
Mark T. Smith, PG	Compliance Officer	Choctaw Nation of Oklahoma – Environmental Compliance	580-642-7506	mtsmith@choctawnation.com
Johnathon Shufeldt	Operations Manager – Hugo facility	Choctaw Defense Manufacturing		

Daily Summary

- Inspection starts –
 - 10:54am Enter Building 105
 - Eight production employees. Operation hours 6:00 to 4:30 Monday – Thursday

- Main operation wooden box production with copper naphthalene dip for wood
 - preservation Wood boxes dipped and dried on racks
 - Non- Haz process
 - Paint Booths closed
 - Unused for over 10 years
 - Aerosol cans placed in container without label. Facility corrected during
 - walk-through. Bulbs not contained in box. Facility corrected during walk-through.
 - Enter Building 203
 - Paint booth not currently in use - last used over
 - one year ago Two production lines in the facility
 - Passivation process (stainless steel) and Chromium
 - Conversion Passivation process consists of three tanks
 - Nitric Sodium
 - Dichromate Nitric
 - Rinse tank
 - This process is not regularly in use - every few months the facility may receive a part to run through process. Last waste from this line was sent out in July of 2022 and consisted of one drum
 - Chromium Conversion consists of six tanks
 - Oaklite 61 B aluminum cleaner
 - First Rinse Tank
 - Deoxidizer LNC
 - Second Rinse Tank
 - Chromicoat L25
 - Post Rinse
 - This process has not been used since November 2022. Facility is expecting another project to utilize this line before shelf life of product expires.
 - 90 day storage area
 - Consisted of 19 empty drums, 1 used oil drum, 1 hazardous waste drum, and 1 drum of antifreeze.
 - AOC isle space in between drum rows.
- Departed Facility at approximately 1:40 PM

Planned activities for August 11, 2022

- Discussion of document submittal

- Training requirements
- Close Out meeting.

Small Business Information Resources: <https://www.epa.gov/resources-small-businesses>

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From: [Hays, Angela](#)

To: [Pham, Elizabeth](#); [Thapa, Sandesh](#); [Kevin Martin](#); mtsmith@choctawnation.com; tbaker@choctawnation.com; [Penland, John](#); [Yurk, Jeffrey](#)

Subject: FW: Daily Summary for August 10, 2022 - RCRA CEI for Choctaw Defense Manufacturing (OKD000018416)

Date: Thursday, August 11, 2022 8:38:11 PM

Hello, Here is the summary of my notes from the August 11 records review and closeout conference at Hugo. If there are any errors or omissions, please let me know.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
Angela Hays	Sr. Environmental Scientist – Lead Inspector	US EPA Region 6	214-665-2285	Hays.angela@epa.gov
John Penland	Sr. Environmental Scientist – Lead Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Elizabeth Pham	Environment al Engineer – Asst. Inspector	US EPA Region 6	214-665-8354	Pham.Elizabeth@epa.gov
Sandesh Thapa	Environmental Scientist – Asst. Inspector	US EPA Region 6	214-665-2265	Thapa.sandesh@epa.gov
Kevin Martin	Environmental Health and Safety Manager	Choctaw Defense Manufacturing	918-426-2871 x8124	kmartin@choctawdefense.com
Mark T. Smith, PG	Compliance Officer	Choctaw Nation of Oklahoma – Environmental Compliance	580-642-7506	mtsmith@choctawnation.com
Steven Nichols	President	Choctaw Defense Manufacturing	918-426-2871 X 8146	snichols@choctawdefence.com

Daily Summary

Facility entry at 10:15
Records review

- Manifests from 2019 to present
 - 000926267 -1/31/19- No LDR
 - 000926456 – 4/29/19 –
 - Incomplete LDR 011523571 –
 - 6/7/19 – Incomplete LDR 011523697 – 8/2/19 - Missing LDR
 - 011523900 – 9/23/19 – LDR missing manifest
 - number Manifests were corrected during site visit
 - Contingency plan for Hugo
 - Missing documentation for arrangements with local authorities Training
 - No RCRA training for employees managing hazardous waste No DOT training for employees certifying manifests
 - Powder Coat
 - SDS McLube SDS
- *Additional documents are being uploaded into SharePoint for further review
- Close out discussion for Hugo August 11, 2022, at
 - 1:00pm AOC's
 - Training requirements
 - Contingency plan requirements
 - Follow up
 - Corrected photos of
 - Aerosol can container with label
 - Adequate aisle space in 90 day storage area
 - Bulbs contained in box with proper universal waste label Cleaned corrosion from antifreeze drum
 - Requested documents
 - Electronic copy of powder coat SDS Electronic copy of McLube SDS Passivation process SOP
 - Chromate conversion SOP
 - Requested facility to review all photos for potential CBI

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