

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	10/23/2024 – 10/24/2024	
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) Lackland	
Facility Physical Location:	1555 Gott St.	
(city, state, zip code)	JBSA Lackland, TX 78236	
Mailing address:	1555 Gott St.	
(city, state, zip code)	JBSA Lackland, TX 78236	
County/Parish:	Bexar	
Facility Phone Number	(210) 671-0355	
Facility Contact:	Ms. Sharon Jones	Acting Chief, Environmental Compliance
	sharon.jones.13@us.af.mil	
FRS Number:	N/A	
Identification/Permit Number(s):	TXR00068 and TXR05DB56	
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	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) Lackland 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 Lackland'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 Lackland, 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 (MSGP), 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 Lackland 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 Lackland'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 Lackland, JSBA Fort Sam Houston, and JSBA Randolph accompanied the inspector during the on-site MS4, MSGP, and construction site inspection(s). Upon completion of inspection efforts for the JBSA Fort Sam Houston facility, site-specific inspection efforts for JBSA Lackland commenced the afternoon of October 23, 2024, and ended on October 24, 2024. 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 (as detailed in Section III of this report).

The generation of this report is based on information supplied by JBSA Lackland (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 Lackland is a United States Department of Defense (DoD) installation encompassing a total land area of 8,881 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, and other military training and operations. The facility is a Phase II (small) MS4 that discharges to surface waters of the United States, via TXR040068 issued by the TCEQ, via authorization that was administratively continued, as of March 26, 2024. Specifically, per the March 24th TCEQ correspondence, the facility submitted a Notice of Intent (NOI) seeking coverage under MS4 General Permit (TXR040000), which expired on January 24, 2024. However, the application process was not completed prior to the expiration date of the permit. Accordingly, the TCEQ's Executive Director converted the facility's NOI under the 2019 general permit into an application for an individual permit. In the interim, the TCEQ administratively continued the facility's MS4 Permit TX040068 until: 1) an individual permit is issued or denied, or 2) the facility submits an NOI and obtains coverage under the renewed 2024 Phase II MS4 General Permit. The facility is also authorized to discharge stormwater associated with industrial activity under TPDES Multi-Sector General Permit (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 Lackland 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 Lackland'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 Dunn Dental Clinic Construction Project located at the base at the corner of McGuire St. and Hughes Ave., for stormwater from construction activities, via CGP Permit TXR1571RS, effective August 8, 2024. The EPA Inspector also observed the inspection techniques of Ms. Samantha Bartholomew, member of the collective JSBA Installation Water Quality Program, as she demonstrated how she 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 23rd & October 24th 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 the 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 sweeping logs; calls to the environmental hotline, nature of calls, and date of resolution; signature documentation (vs typed names) for training provided, etc.);
 - g. As of the date of this inspection, the facility has not finalized efforts with submitting a completed MS4 NOI and obtaining coverage under the renewed 2024 Phase II MS4 General Permit. Per interviews with members of the Installation Water Quality Program, specifically Ms. Jones and Ms. Bartholomew, these efforts would be completed by the end of November/December 2024.

The following AOCs are specific to the MSGP Program:

1. Via interviews with members of the Installation Water Quality Program, specifically Ms. Jones, Ms. Bartholomew, and Mr. Gerald Johnson, the current five (5) 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 Lackland 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. The TCEQ Large Construction Site Notice for the Dunn Dental Clinic Project Site (TXR1571RS) was posted, but the details of the notice were illegible (see Appendix 1, Photograph #1).

Section IV – FOLLOW UP

Please provide the EPA with a status update of the MS4 NOI and MSGP outfall reevaluation efforts.

Section V – LIST OF APPENDICES AND ATTACHMENTS

Appendix 1: Photograph Log – One (1) photo taken 10/24/2024

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

Attachment B: 10/23/2024 JSBA Lackland Site-Specific Opening Meeting Attendee Roster

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

U.S. Department of The Air Force
JBSA Lackland
TPDES MS4 #: TXR040068
TPDES MSGP #: TXR05DB56
Inspection Dates: 10/23&24/2024

Appendix 1

Photograph Log



U.S. Department of The Air Force
JBSA Lackland
TPDES MS4 #: TXR040068
TPDES MSGP #: TXR05DB56
Inspection Dates: 10/23&24/2024

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

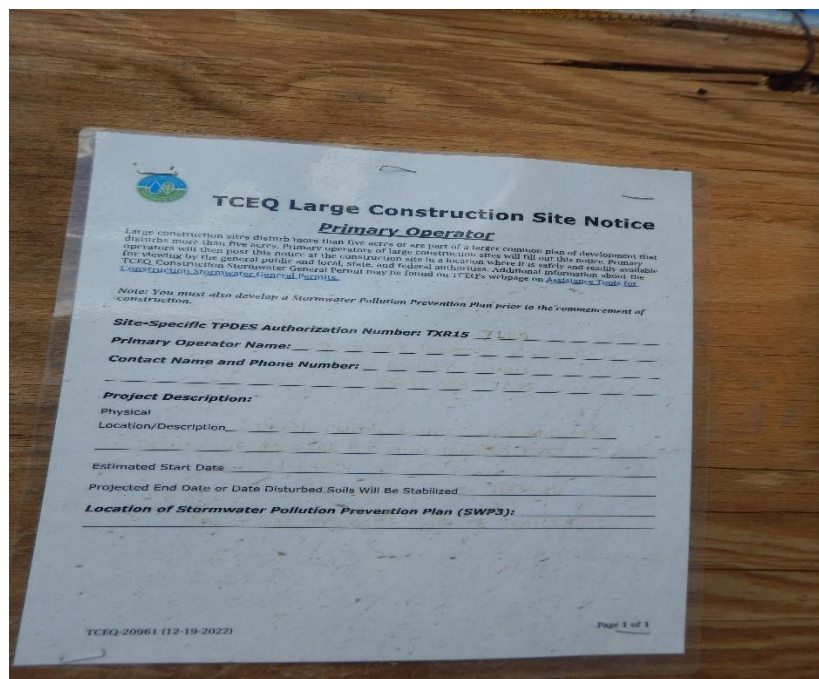
Photo No. 1

Location: JSBA Lackland

City: JSBA Lackland

County: Bexar

State: TX



Description: View, of TCEQ Large Construction Site Notice for Dunn Dental Clinic Project Site (TXR1571RS), with illegible details regarding construction notice.

Date of Photo: 10/24/2024 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
Will 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	216-765-9899	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	EPA-Region 6	(214) 283-5415	crayton.sharon@epa.gov

Rhonda Reza TCEQ R13 2104234064 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 2104136039 rebecca.ward.4@us.af.mil

Attachment B
10/23/2024 JSBA Lackland Site-Specific
Opening Meeting Attendee Roster

JBSA Lackland

Opening/Pre-Inspection Meeting

Commence opening/pre-inspection meeting Time: 1:35 PM

Name	Title	Representing	Telephone No.
Nigel L. Lano	Civil engineer	802/CES	432 448 7975
Monica Guerrero	JBSA Water Quality Program Mgr	802 CES CEIE	(361) 696-9713
Scott Hunter Washburn	JBSA Water Quality Program Mgr.	802CES/CEIEC	719-963-3963
Samantha Bartholomew	JBSA WQ/RCRA Program Manager	802 CES/CEIE	512-557-1478
Sevel Loehr	JBSA EW-PAQ Physical Scientist	802/CES/CEIE	860918-5005
Sharon Jones	JBSA Env. Compliance	802CES/CEIEC	(210) 691-0355
Sharon A. Crayton	Life Scientist	EPA/Region 6	(214) 883-5415

Conclude opening/pre-inspection meeting Time: 1:43 PM

Initials / Date: SAC / 10/23/2024

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

JBSA Lackland

*Note: Combined closing meeting w/ JBSA Fort Sam Houston

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) 221-4251
Scott H. Washburn	Water Quality Program Mgr.	JBSA	714-963-3963
Brent Larson	INSTRUCTION MGMT	JBSA	210-500-2460
Elizabeth Bays	AFCEC JBSA ISS WQ/M/Acting Chief	AFCEC	210-652-1905
Vanheng Phanthavong	^{intern} AFCEC JBSA ISS	802 CES	702-981-2909
Scott B Read	Hm/Hw/Toxics/Reg.	AFCEC/CZOW	210-901-2610
Daniel Woods	Air & Toxics Element Chief	JBSA	210-846-3633
Samantha Bartholomew	WQ/NEPA Program Manager	JBSA 802 CES ENV.	512-557-1478
Suzie Locher	Env. P&O (Intern)	JBSA 802 CES ENV.	8609185005
Rhonda Reta	Environmental Investigator	TCEQ	210 4034064
SHARON A CRAYTON	Life Scientist	EPA/Region 6	(214) 883-5415

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

Initials / Date: SAC / 10/25/2024