

REPORT OF COMPLIANCE EVALUATION INSPECTION

AT

United States Air Force
509 CES/CEIE; 660 10th Street, Suite 209
Whiteman Air Force Base, Missouri 65305,

United States Air Force
Water Treatment Plant; 719 Mitchell Avenue,
Whiteman Airforce Base, Missouri 65305
(NPDES # MOG640090), and

United States Air Force
Wastewater Treatment Plant; 174 SE 23 Highway
Whiteman Airforce Base, Missouri 65305
(NPDES Permit # MO0029378)

ON

January 21-22, 2025

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Enforcement and Compliance Assurance Division

INTRODUCTION

Arrival Time:	9:18 am (CT), January 21, 2025
Departure Time:	11:15 am (CT), January 22, 2025
Weather:	Mid-10s (°F) with mostly clear skies
Purpose:	To assess facility compliance with their National Pollutant Discharge Elimination System (NPDES) permit and the Clean Water Act.

This was an announced compliance evaluation inspection (CEI) by EPA Region 7 and Eastern Research Group, Inc. (ERG), an EPA contractor. At 9:21 am (CT) on January 21, 2025, Mike Beck and Kelsey Guy (EPA Inspection Team) presented their credentials to the Whiteman Air Force Base's (AFB) Civil Engineer Squadron (CES)/ Civil, Environmental, and Infrastructure

Whiteman Air Force Base Water Treatment Plant and Wastewater Treatment Plant
NPDES # MOG640090 and NPDES # MO0029378

Engineering (CEIE) staff (facility representatives) during the opening conference of the inspection. During the opening conference, the EPA Inspection Team discussed the scope of the inspection with facility representatives, including the facility's NPDES permit and information pertaining to the facility's operations.

PARTICIPANTS

Name	Agency	Position	Contact Information
James Love	USAF 509 CES	Environmental Supervisor	james.love.17@us.af.mil
Robert Bryant	USAF 509 CES	Water Program Manager	robert.bryant.31@us.af.mil
Paul Tracy	USAF 509 CES	Plant Foreman	paul.tracy@us.af.mil
David Neuman	USAF 509 CES	PB Shop Foreman	david.neuman.3@us.af.mil
Megan Green	MDNR	Inspector	megan.geen@dnr.mo.gov
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Mike Beck	ERG	Inspector	mike.beck@erg.com

FACILITY DESCRIPTIONS

The information presented in this section for the Whiteman AFB Water Treatment Plant (WTP) and the Whiteman AFB Wastewater Treatment Plant (WWTP) was discussed during the inspection's opening conference, interviews with facility representatives, the inspection walkthrough, and onsite and offsite document reviews. This information is organized to provide a detailed description of Whiteman AFB's WTP and WWTP processes and does not reflect a chronological overview of the inspection.

At the time of inspection, the Whiteman AFB 509 CES/CEIE chain of command consisted of the 509 Bomb Wing Installation Commander (Colonel Butler), followed by the CES Commanding Officer (Lieutenant Colonel Khary Davis), the Environmental Element Supervisor (James Love), the Water Program Manager (Robert Bryant), and then the Environmental staff heads and supports. Paul Tracy was the acting Superintendent for Whiteman AFB's water and wastewater departments.

Whiteman AFB WTP

The Whiteman AFB WTP is located at 719 Mitchell Avenue, Whiteman Airforce Base, Missouri, in Johnson County. The facility's NPDES permit, MOG640090 (Attachment A), was issued on February 25, 2024, and expires on February 24, 2029.

Facility Name: Whiteman AFB WTP

Facility Owner: U.S. Air Force

Whiteman Air Force Base Water Treatment Plant and Wastewater Treatment Plant
NPDES # MOG640090 and NPDES # MO0029378

Facility Operator:	Paul Tracy
Physical Address:	719 Mitchell Avenue, Whiteman AFB, Missouri 65305
Mailing Address:	509 CES/CEIE, 660 10 th Street, Suite 209, Whiteman AFB, Missouri 65305
Lat/Long:	38.7298026, -93.575032
SIC Code:	4941 – Water Supply
Permit Number:	MOG640090
Receiving Water:	Clear Creek

Whiteman AFB's WTP is a federal facility that was constructed in 1957. The facility treats drinking water for potable consumption. The treatment process observed consists of a lime sludge tank, two water tanks with overflow grates, a decanting mechanism that connects to the Whiteman AFB WWTP, four pumps, chlorine disinfection, a windsor tower, and a softening basin.

Permit MOG640090 authorizes Whiteman AFB's WTP to discharge process wastewater to waters of the state of Missouri from filter backwash and treated sludge blowdown. Whiteman AFB WTP is able to discharge filter backwash and sludge blowdown but will typically recirculate backwash and decant liquids to the head of the plant and reprocess. The sludge is either removed by sludge hauler/vac truck or sent to Whiteman AFB's WWTP depending on where it accumulates in the plant. The permit authorizes the operation of settling basins, holding basins, sludge lagoons, and land application sites for water treatment sludge and residuals, including, but not limited to, facilities with the primary Standard Industrial Classification (SIC) Codes 4941 or facilities permitted by the Missouri Department of Natural Resources.

Whiteman AFB's WTP currently has a total of 16 certified staff members, comprising nine civilians and seven military personnel. The majority of the staff follow a monthly schedule rotation, excluding two staff members that work on the afternoon and midnight shifts. All staff are shared between Whiteman AFB's WTP and WWTP. Facility representatives sent the EPA Inspection Team a copy of the Public Drinking Water Program Certificate of Competency for 'DS III – Water Distribution Level – III' and the 'A – Drinking Water Treatment – A' certifications for Paul Tracey, the operator in charge of Whiteman AFB's WTP and the WWTP at the time of the inspection (Attachment B).

Whiteman AFB's WTP replaced their actuators and valves across the plant within the last three years. The lime sludge holding tank was refurbished within the last four years. Additional completed updates included the Whiteman AFB WTP lab, valves and piping in the clear well, a new roof, and replacement of valves around the Whiteman AFB WTP's yard. No significant

Whiteman Air Force Base Water Treatment Plant and Wastewater Treatment Plant
NPDES # MOG640090 and NPDES # MO0029378

footprint changes have occurred in the last few years.

Whiteman AFB WWTP

The Whiteman AFB WWTP is located at 174 SE 23 Highway, Whiteman AFB, Missouri. The legal description is Section 32, Township 46 N, Range 24W, Johnson County. The facility's NPDES permit, MO0029378 (Attachment A), was last issued on November 1, 2023, and expires on October 31, 2028.

Facility Name:	Whiteman AFB WWTP
Facility Owner:	U.S. Air Force
Facility Operator:	Paul Tracy
Physical Address:	174 SE 23 Highway, Whiteman AFB, Missouri 65305
Mailing Address:	509 CES/CEIE, 660 10 th Street, Suite 209, Whiteman AFB, Missouri 65305
Lat/Long:	38.723754, -93.565117
SIC Code:	9711 – National Security
Permit Number:	MO0029378
Receiving Water:	Clear Creek and Brewer Branch

The Whiteman AFB WWTP is a federal facility that was constructed in 1957. Whiteman AFB WWTP is comprised of the following elements: a mechanical bar screen, a manual bar screen, an aerated grit chamber, a comminutor, two primary clarifiers, two flow equalization basins, two trickling filters, two final clarifiers, two Lemna tertiary treatment basins, a UV disinfection system, three anaerobic digesters, a sludge belt press, two sludge drying beds, and a sludge storage pad. Biosolids generated from the facility's processes are either applied to land or hauled to a permitted landfill for disposal.

Whiteman AFB WWTP permit authorizes the facility to discharge wastewater to the Brewer Branch through Outfall 001 and to a tributary to Clear Creek through Outfall 004; Outfall 004 discharges to either Outfall 001 directly, or discharges to a pond on the facility's golf course. The facility is required to monitor biochemical oxygen demand (BOD), total suspended solids (TSS), E. coli, pH, ammonia (as N), chloride (amendable to chlorine), total phosphorus, total Kjeldahl nitrogen, total nitrogen, nitrate and nitrite, flow, and oil and grease. The facility conducts sampling via their in-house laboratory and equipment.

Within the past three years, Whiteman AFB has replaced and upgraded several features at their WWTP. Degraded mats in the tertiary treatment basins (Lemna cells) were replaced with

Whiteman Air Force Base Water Treatment Plant and Wastewater Treatment Plant
NPDES # MOG640090 and NPDES # MO0029378

interlocking tiles in one basin two years ago. The lime sludge holding tank was replaced. Since the original facility construction, rectangular clarifiers have all been transitioned to circular clarifiers. Whiteman AFB WWTP has two anaerobic digesters heated to (100°F).

Whiteman AFB's WTP typically recycles backwash discharges after the settling basin back to the plant but will manually discharge to Whiteman AFB's WWTP as needed by connecting a temporary line to the nearest manhole in the collection system. Whiteman AFB's WWTP discharges to Clear Creek by Brewer Branch from approximately one mile west of the waterbody. Attachment C shows a satellite view of Whiteman AFB and its WTP and WWTP, annotated by the EPA Inspection Team. At the time of the inspection, facility representatives stated that Whiteman AFB's WTP and WWTP regularly serve a population of 10,700 (residential and commuter). Typical flows to the WWTP range from 550,000 to 600,000 gallons per day, but the facility is permitted for up to 2,200,000 gallons per day. Facility effluent discharge occurs through Outfalls #001 and #004. The outfalls are accessed through private property outside of Whiteman AFB and a locked gate. Per Whiteman AFB's WWTP permit (MO0029378, effective date of November 1, 2023), Whiteman AFB's WWTP produces up to 85 dry tons of sludge per year.

The most recent NPDES permit (MOG640090, Whiteman AFB's WTP permit) was issued in February 2024. At the time of the inspection, Whiteman AFB's WTP and WWTP had 16 staff: 9 civilian employees and 7 active-duty employees, all but one with WTP and WWTP certifications. Monthly schedule rotations occur with most staff. The facility has remote monitoring and only centralized communication with inclusive Supervisory Control and Data Acquisition (SCADA) systems. All alarms are alerted through the SCADA systems, with a separate SCADA system for both Whiteman AFB's WTP and WWTP. All lift and pump stations are connected to the SCADA system. The SCADA systems both use credentials for login and have no remote access.

Whiteman AFB's WWTP collection system contains 42 lift stations with line construction consisting of polyvinyl chloride (pvc) and cast iron. Line repairs and inspections are managed by the Plumbing Shop with larger scale projects being contracted out as needed. The largest contributor to the collection system includes a Mess Hall. There are five buildings on the base that have a grease trap requiring periodic inspections.

Observations

Walkthrough of Whiteman AFB's WTP

At 11:22 am (CT), the EPA Inspection Team arrived at Whiteman AFB's WTP (719 Mitchell Avenue) and began the site walkthrough. Whiteman AFB's WTP's lime sludge storage tank, 19-foot tall by 24-foot circumference per facility representatives, is located near the WTP's entrance (Photograph 1). Facility representatives stated the tank was painted with lead paint and they are hoping to get the lead paint removed and the tank repainted. The inspectors observed a temporary generator outside Building 2005 (Photograph 2) that supplies power in case of grid power loss. Whiteman AFB is upgrading to a stationary generator that will be put online later in

2025.

Whiteman AFB's WTP site had two tanks onsite, identified as Buildings 2007 and 2008, that were frozen over at the time of the inspection (Photographs 3 through 6). The EPA Inspection Team observed an overflow grate between the two tanks that the facility representatives stated was for both tanks. Overflow from the tanks is decanted and piped to Whiteman AFB's WWTP (Photographs 5 and 6). The EPA Inspection Team then observed the sludge holding basins, OTM overflow, re-carb basin and the pH stabilization processes.

Building 2006 housed a 264,000-gallon tank with four pumps, and a concrete lip for containment (Photograph 7). Outside, the EPA Inspection Team observed an old generator fuel tank (Photograph 8). Facility representatives stated the fuel tank was for an emergency generator that had since been removed.

The facility representatives demonstrated their SCADA system for their drinking water treatment to the EPA Inspection Team. Then the EPA Inspection Team observed Whiteman AFB's WTP's softening basin, where lime is added. A vault valve opens and sends sludge to the lime sludge tank (Photographs 9 and 10).

Facility representatives indicated to the EPA Inspection Team that sludge produced at Whiteman AFB's WTP accumulates onsite until scheduled cleanings occur. The facility has a storage basin to store the lime sludge, but it is not used consistently and is instead removed weekly (approximately 12,000-gallons per week) by a contractor. Approximately every two to three years, accumulated sludge is removed from various basins by contractors and the sludge is then land applied on Whiteman AFB property as needed.

Walkthrough of Whiteman AFB's WWTP

At 1:14 pm (CT), the EPA Inspection Team arrived onsite at Whiteman AFB's WWTP (174 SE 23 Highway). Raw influent entered from Whiteman AFB at Building 5033 (Photographs 11 and 12). The WWTP flowmeter is located approximately 40-feet south of the influent entrance point (Photograph 13). The influent autosampler appeared well maintained with secondary temperature monitoring active. The influent wastewater goes through the headworks channel to a splitter box (Photograph 14). Facility representatives stated that if there are any concerns with the influent received the facility has holding cells to which the water can be diverted; this tends to occur no more than once per year.

The wastewater then enters one of the site's two primary clarifier tanks (Photographs 15 and 16). At the time of the inspection one of the primary clarifiers was not in use as the facility cycles between the two tanks as needed. Sludge from the primary clarifiers is sent to anaerobic digesters. The EPA Inspection Team observed the boilers used to heat the anaerobic digesters, which were between seven and ten years old (Photograph 17). Building 5047, an anaerobic digester, had a floating cover for the secondary digester (Photographs 18 and 19). The EPA Inspection Team observed the distribution piping between the anaerobic digesters (Photograph 20). Whiteman AFB's WWTP had two flares, but neither were in use at the time of the inspection. Facility representatives said they had been out of service for multiple years, and in

Whiteman Air Force Base Water Treatment Plant and Wastewater Treatment Plant
NPDES # MOG640090 and NPDES # MO0029378

lieu of the flares, the digesters vent unflared gas (Photograph 21).

Sludge from the anaerobic digesters is dewatered using a sludge belt press. Facility representatives stated that the sludge belt press is run approximately once per month for six-hour durations, and only from the final digester. The EPA Inspection Team observed the sludge belt press, polymer stored in 55-gallon blue plastic drums for coagulation of the sludge and more efficient operation of the press, the polymer injection pump, and a sludge conveyor for dewatered sludge disposal (Photographs 28 through 31). The facility can also use two sludge drying beds in case of press issues (Photograph 32). All dewatered sludge material is sent offsite to a landfill.

Following the primary clarifiers, the wastewater flows to trickling filters. The EPA Inspection Team observed the trickling filters within domed Buildings 5037 and 5038. The EPA Inspection Team did not observe any degradation of the rock media, there were no snails observed, and there was not any noticeable septic odor (Photographs 22 through 24). The facility representatives stated the two trickling filters, operating in parallel, were each 102-feet in diameter by 6-feet deep, comprised of only rock media, and received daily plate brushings. Facility representatives noted that the media had never been replaced nor refurbished but the drive units were replaced around 2000, at about the same time the domes were covered. No atmospheric monitoring was observed but both domes did have powered vents in their roofs.

After the trickling filters, wastewater flows to the secondary clarifiers, which the facility representatives stated were center fed, 50 feet in diameter each, and covered as of the early 2000s (Photographs 25 through 27). Only one of the secondary clarifiers was in use at the time of inspection.

Effluent from the secondary clarifiers flows to two Lemna cells located on the WWTP's northwestern corner of property. The facility representatives stated each cell was 300-feet long by 200-feet wide by 12-feet deep. The EPA Inspection Team observed Lemna cell #1 contained interlocking tiles and Lemna cell #2 contained floating mats (Photographs 33 through 36). Facility representatives stated that both the cells were clay lined and that the interlocking tiles Lemna cell were installed in the last few years to replace damaged floating mats. The EPA Inspection Team observed significant vegetation growing between the interlocking tiles. The facility representatives explained that maintenance of this cell was more challenging since staff could not just walk across it like the matted cell, a boat was required (Photographs 35 and 36). The cell berms were maintained and retained structural integrity around the perimeter. The site perimeter was secured by a chain-link fence.

The facility also has two holding cells in the same area as the Lemna cells. The facility representatives stated each cell was 300-feet long by 200-feet wide by 12-feet deep, and clay lined like the Lemna cells. The two holding cells (northernmost cells) are available for Whiteman AFB WTP and WWTP to divert excess drinking water, wastewater, or potentially contaminated waters to for storage (Photograph 37 and 38). The holding cells are drained back to the WWTP headworks for treatment. The cell berms were maintained and retained structural integrity around the perimeter. These cells are located inside the same fenced area as the Lemna

Whiteman Air Force Base Water Treatment Plant and Wastewater Treatment Plant
NPDES # MOG640090 and NPDES # MO0029378

cells.

Effluent from the Lemna cells is either sent to the UV treatment in Building 50010 or directly to Outfall #001 depending on the time of year. Per the NPDES permit the facility is only required to disinfect April through October. Facility representatives stated the UV treatment system was installed approximately 14 years ago. Whiteman AFB's WWTP has two UV treatment trains, each able to process 750-gallons per minute. The UV system has a backup generator outside the building which requires a manual switchover in case of a power outage (Photographs 39 through 42).

The Outfall #001 sampling point is directly after UV treatment when in use. Facility representatives stated that staff sample on a weekly basis for a 24-hour period (e.g., Wednesday 0800 through Thursday 0800) via the effluent auto sampler (Photographs 43 through 45). The EPA Inspection Team observed significant corrosion on the cooling system coils inside the effluent autosampler.

The EPA Inspection Team observed three outfalls onsite at Whiteman AFB's WWTP: Outfall 1B, which the facility could use if needed for emergencies, but has not been used in many years, Outfall #001, and Outfall #004 (Photographs 46 through 56). The EPA Inspection Team did not observe any unusual odors, algae growth, or foam in the vicinity of each outfall. Facility representatives stated that all flow is blocked at Outfall 1B, so flow is directed towards a tertiary pump house that connects to the Lemna cells, eventually passes through Outfall #004 which connects directly to Outfall #001. Effluent can also be diverted to Whiteman AFB's golf course main pond via a diversion basin. Whiteman AFB diverts the effluent to the golf course during summer months when golf course water needs are the highest (Photographs 50, 51, 54, and 55). Facility representatives stated they typically overflow the golf course pond through a constructed outfall a few times a year to remove duckweed growth, but no additional sampling nor monitoring occurs at the pond. All designated outfalls flow to Brewer's Branch. Facility representatives stated an internal process monitoring point was within the manhole near the main office building (Photograph 57).

The EPA Inspection Team observed Whiteman AFB's WWTP's onsite laboratory, located within the WWTP's main pump house, Building 5034. The EPA Inspection Team observed laboratory documentation onsite, including an information folder, a WWTP lab results clipboard, daily log sheets, inhouse calibration logs, a probe log/replacement for dissolved oxygen (DO), and samplers. The EPA Inspection Team observed corrections made to the daily log sheets with white out and that the probe log/replacement for DO was not updated (Photographs 58 through 60). Facility representatives stated extra lab equipment and items are kept in small quantities as large quantities tend to expire before used. The EPA Inspection Team observed certificates of instrument performance, as well as the laboratory's DO and pH meters (Photographs 61 and 62). Samplers were present inside the lab (Photograph 63). The EPA Inspection Team opened and observed the final effluent sampler and the plant influent samplers (Photographs 64 through 66). Facility representatives demonstrated their SCADA system for their wastewater treatment process to the EPA Inspection Team including a page that indicated the active status of each auto sampler (Photograph 67).

Whiteman Air Force Base Water Treatment Plant and Wastewater Treatment Plant
NPDES # MOG640090 and NPDES # MO0029378

For Whiteman AFB's WWTP collection system, the EPA Inspection Team observed Carswell lift station at Building 6506 (Photographs 68 through 72). This lift station receives wastewater from base housing. It consisted of 4-inch discharge pipes and had two pumps, no debris or accumulations were observed. The control panel contained the log for weekly checks with a last entry of 23 December 2024, with the previous entry of 19 December 2024 (Photograph 73).

The EPA Inspection Team observed the HELO Sanitary lift station next (Photographs 74 through 76). The EPA Inspection Team did not locate the log for weekly checks. Adjacent to this lift station was the HELO Industrial lift station (Photographs 77 through 79). The last entry in the weekly checks log was 14 January 2024. The EPA Inspection Team requested any additional information showing weekly check logs tracking for all three observed lift stations.

The EPA Inspection Team and facility representatives returned to 660 10th Street, Suite 209, for the closing conference and discussed preliminary observations. The inspection concluded at 11:15 am (CT).

Records Review

The facility is required to submit several documents to the permitting authority over the course of the permit. Table 2 outlines the documents reviewed by the inspection team and date of the documents. The EPA Inspection Team also recorded whether the documents had specific deficiencies.

Table 1. Documents Reviewed During the Inspection

Document	Year	Comments
Water Treatment Plant Documentation		
Operators Log	17 October 2023 - Present	Contained daily comments
CL2 Daily Log		
WTP Procedures	No date	Contained table of contents and specific section on returning spent wash water
WTP Emergency Operating Plan	No date	No index; contained WTP Emergency Response Plan
Updates Log		Out of date
Water and Wastewater Plants (CEOIA/B)	14 January 2025	Water and wastewater plants' staffing
WTP Maintenance Program Folder	No date	Monthly maintenance checklist for 2025, January items all complete and initialed
Staff Certifications		
Wastewater Treatment Plant Documentation		
Lab Folder	No date	Had a table of contents

Whiteman Air Force Base Water Treatment Plant and Wastewater Treatment Plant
NPDES # MOG640090 and NPDES # MO0029378

Document	Year	Comments
Weekly Lab Test Results	16 Jan 2025 – 21 Jan 2025	Dated and completed
1462 Daily Log Sheet	No date	Multiple written over white out marks
WWTP Daily Log Sheet	20 January 2025	Completed
WWTP Daily Log Sheet	31 December 2024	Completed
RWP Maintenance Sheet	2024	Final quarterly trickling filters and final biannual Parshall flume meter check missing initials
Sanitary Sewer Infiltration and Inflow Evaluation and Rehabilitation Plan	October 2009	Contained both Work Procedure: Sewer (Insp Manhole/Sewer and Flush Sewer), and manhole inspection reports

Findings for Whiteman AFB WTP

A. Exceedances of Permit Effluent Limits

No exceedances of permit effluent limits during the respective permitted terms of Permit No. MOG640090 were observed within EPA's ECHO database¹.

B. Late DMR Submittals

No late nor missing DMR submittals during the permitted terms of Permit No. MOG640090 were observed within EPA's ECHO database¹.

C. Proper Operation and Maintenance (O&M) of Site Assets

Permit No. MOG640090 Part VII subjects the permittee to comply with the **Standard Conditions Part I attachment dated August 01, 2014** which states in **Section D(5) – Proper Operation and Maintenance**: “The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit.”

Observation 1. The facility conducts limited tracking of operation and maintenance activities regarding preventative and corrective maintenance. The facility representatives described preventative and corrective action processes in

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

place (i.e., a work order system) but stated that logs are used instead of the work order system.

D. Monitoring Records

No monitoring records deficiencies were observed at the time of the inspection, during the permitted terms of Permit No. MOG640090.

Findings for Whiteman AFB WWTP

A. Exceedances of Permit Effluent Limits

No exceedances of permit effluent limits during the respective permitted terms of Permit No. MO0029378 were observed within EPA's ECHO database².

B. Late DMR Submittals

No late nor missing DMR submittals during the permitted terms of Permit No. MO0029378 were observed within EPA's ECHO database².

C. Proper Operation and Maintenance (O&M) of Site Assets

Permit No. MO0029378 5 Proper Operation and Maintenance: "The permittee shall at all times properly operate and maintain all facilities and systems of treatment can controls which are installed or used by the permit to achieve compliance with the conditions of this permit."

Observation 1. The WWTP's flares were offline at the time of the inspection. The facility representatives stated they have been offline for several years and are not used.

Permit No. MO0029378 E Special Condition 10: "An Operation and Maintenance (O&M) manual shall be maintained by the permittee and made available to the operator. The O&M manual shall include key operating procedures and a brief summary of the operation of the facility."

Permit No. MO0029378 E Special Condition 20.(b)(3): "The routine inspection reports must be kept onsite with the SWPPP and maintained for a period of five (5) years."

Observation 2. The facility conducts limited tracking of operation and maintenance activities regarding preventative and corrective maintenance. The facility representatives described preventative and corrective action processes in

² <https://echo.epa.gov/detailed-facility-report?fid=110017985073>

place (i.e., a work order system) but stated that logs are used instead of the work order system.

Permit No. MO0029378 E Special Condition 13: “The Lemna tertiary treatment basins and flow equalization basins shall be operated and maintained to ensure their structural integrity, which includes maintaining adequate freeboard and keeping the berms free of deep-rooted vegetation, animal dens, or other potential sources of damage.”

Observation 3. Excessive vegetation growth in the free floating covered Lemna treatment basin was observed (Photographs 35 and 36).

D. Monitoring Records

Permit No. MO0029378 Part III, Section K – Record Keeping and Reporting

Requirements: “The permittee shall maintain records on file at the facility for at least five years for the items listed in Standard Conditions Part III and any additional items in the Special Conditions section of this permit.”

Observation 4. At the time of the inspection, the weekly Carswell lift station checks entries since mid-December were missing (Photograph 73).

The facility provided lift station checks entries documenting checks since mid-December via email on January 22, 2025 (Attachment D).

Summary

The EPA Inspection Team held a closing conference with facility representatives. During the closing conference, the EPA Inspection Team discussed the areas of concern identified during the inspection as well as the timeline of the inspection report.

Mike Beck
 Digitally signed
by Mike Beck
Date: 2025.03.12
10:35:23 -04'00'

Mike Beck
Lead Inspector
Eastern Research Group, Inc.

JODI BRUNO
 Digitally signed by JODI
BRUNO
Date: 2025.03.17
14:19:43 -05'00'

Jodi Bruno
Chief
Water Branch

Attachments:

- Attachment A – NPDES Permit # MOG640090 and # MO0029378 (97 pages)
- Attachment B – Public Drinking Water Program Certificates of Competency (2 pages)
- Attachment C – Satellite Imagery (4 pages)
- Attachment D – Photograph Log (41 pages)

Whiteman Air Force Base Water Treatment Plant and Wastewater Treatment Plant
NPDES # MOG640090 and NPDES # MO0029378

Attachment E – Inspection Sign In Sheet (1 page)

Attachment F – Lift Station Checks, Checklist (7 pages)