U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 7
CLEAN WATER ACT
COMPLIANCE INSPECTION REPORT

for

Name of Facility: Air National Guard Army Aviation Support Facility #3
Facility Address: 9650 Harrison Street, Davenport, Iowa 52804
Mailing Address: 9650 Harrison Street, Davenport, Iowa 52804

Report Prepared on: November 18, 2024 *Date* By: Kelsey Guy Digitally signed by Kelsey Guy Date: 2024.11.18 18:45:01 -05'00' *Signature*, ERG

Report Final as of: 11/19/24 *Date* By: NICOLE MORAN Digitally signed by NICOLE MORAN Date: 2024.11.19 17:04:30 -06'00' *Signature*, EPA

General Information

Type of Inspection:	Industrial Storm Water
Owner:	Air National Guard
Operator:	Air National Guard
GPS Coordinates:	41.617075°, -90.581360°
Permittee:	Air National Guard Army Aviation Support Facility #3
Permit/Authorization No:	0575 – 0421
Permit Effective Date:	October 1, 1992
Permit Expiration Date:	September 30, 2024
Receiving Water and/or MS4:	Mississippi River – directly adjacent to the facility
Standard Industrial Classification (SIC) Code:	4581 – airports, flying fields, airport terminal services

On-Site Inspection Overview

On September 24, 2024, U.S. Environmental Protection Agency (EPA) contractors from Eastern Research Group, Inc. (hereinafter, EPA Inspection Team) conducted an industrial storm water inspection of the Air National Guard (ANG) Army Aviation Support Facility (AASF) #3 (hereinafter, facility or permittee).

Inspection Date: September 24, 2024 **Entry Time:** 1:00 PM (CT) **Exit Time:** 3:12 PM (CT)

The following personnel were involved in the facility inspection.

Name	Title/Affiliation	Telephone	Email	Signature of Inspector
Inspectors:				
Taylor Fontaine	Inspector – Eastern Research Group, Inc.	(703) 956-1977	taylor.fontaine@erg.com	
Kelsey Guy	Inspector – Eastern Research Group, Inc.	(703) 633-1103	kelsey.guy@erg.com	
Facility Representative(s):				
James A. Weyant	Environmental Compliance Manager, Environmental Branch	(515) 252-4396	james.a.weyant.nfg@army.mil	
Name	**Title/Affiliation**	**Telephone**	**Email**	**Signature of Inspector**
EPA Responsible Official:				
Nicole Moran	Acting Branch Chief – Water Branch of ECAD	(913) 551-7641	moran.nicole@epa.gov	

Credential Presentation

Kelsey Guy and Taylor Fontaine with Eastern Research Group, Inc. (EPA Inspection Team) presented their credentials to James Weyant upon arrival at the facility on September 24, 2024, at approximately 1:04 PM. The EPA Inspection Team explained that the purpose of the inspection was to observe compliance with State of Iowa Department of Natural Resources (DNR) National Pollutant Discharge Elimination System (NPDES) Permit No. 1 for Storm Water Discharges Associated with Industrial Activities (hereinafter, the permit). A copy of the permit is provided in Appendix A. James Weyant acknowledged that they were an appropriate representative for the facility.

Weather and Precipitation

The weather during the inspection was clear skies with temperatures averaging approximately 65 degrees Fahrenheit. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data prior to the inspection are provided in the table below.

Precipitation Data Prior to Inspection of the Air National Guard Army Aviation Support Facility #3

Station Name	Date	Precipitation Amount (inches)[a]
DAVENPORT 4.3 NE, IA US US1IAST0065	September 20, 2024	0.02
DAVENPORT 4.3 NE, IA US US1IAST0065	September 21, 2024	0.00
DAVENPORT 4.3 NE, IA US US1IAST0065	September 22, 2024	0.05
DAVENPORT 4.3 NE, IA US US1IAST0065	September 23, 2024	Trace
DAVENPORT 4.3 NE, IA US US1IAST0065	September 24, 2024	0.54

[a] Source: NOAA National Climatic Data Center (http://www.ncdc.noaa.gov/).

Documentation

During the inspection, the EPA Inspection Team obtained and reviewed documentation and other supporting evidence regarding compliance with the permit and implementation of the permittee's Storm Water Pollution Prevention Plan (SWPPP). During the inspection, the EPA Inspection Team requested to review the onsite SWPPP and the previous year's self-inspection report. The copy of the SWPPP provided to the EPA Inspection Team during the inspection was signed/certified by the permittee. The facility representative provided an unsigned electronic copy of the SWPPP to the EPA Inspection Team post-inspection on September 25, 2024 (refer to Appendix C, Exhibit 1).

Photographs taken by Kelsey Guy, Eastern Research Group, Inc., during the inspection, are provided in Appendix B, and supporting documentation (i.e., exhibits) are provided in Appendix C. An aerial diagram of the facility is provided in Appendix D.

Description of the Facility and Industrial Activity

The ANG AASF #3 is a maintenance and storage center for eight Chinook helicopters. The primary mission of the facility is to provide maintenance support and conduct test flights. Tools, equipment, and fluids are kept onsite.

The facility fuels helicopters onsite with F24 fuel, as well as allows the Readiness Center on Kimberly Avenue to fuel their 2,500-gallon heavy expanded mobility tactical trucks (HEMTTs). The facility representative stated the Readiness Center fuels their vehicles four or five times per year. HEMTTs are parked and stored onsite along the south side of the tarmac within secondary containment.

The facility washes their helicopters onsite, outside on the eastern area of the tarmac. There is a dedicated wash rack with a drain. The facility representative stated that the wash rack connects to an oil/water separator and a valve is present to manually open or close to release the accumulated wash water in the drain to the oil/water separator. The EPA Inspection Team confirmed this information in the facility's SWPPP, "is fitted with an oil/water separator and during washing operations the process water discharges to the Davenport sanitary system." The facility representative stated the detergent

they call "aircraft soap," that is environmentally friendly, is used for washings. The facility representative stated that if any painting occurs onsite, it would only be spot painting.

The facility does not store aggregate materials onsite. If needed, a work order is placed through Camp Dodge in Johnston, IA. The facility does not use deicing compounds for the helicopters and there is no salt storage onsite. The facility representative stated snow removal is a contracted service.

The facility has two 280-gallon waste oil tanks located inside the facility's hangar. Each end of the hangar had trench drains that ran the length of the hangar. Inside the drain was a capped pipe end with an unknown connection (refer to Appendix B, Photograph 5). There are also five double-walled aboveground storage tanks (ASTs) of jet fuel outdoors, each with 10,000-gallon capacities. The tanks are part of the facility's fueling station which has secondary containment and an oil/water separator. Per the facility's SWPPP, the oil/water separator connects to the Davenport sanitary system. The facility also has an emergency generator onsite within secondary containment that is outdoors and has a 1,700-gallon capacity.

All loading and unloading of materials and equipment occurs indoors. Fueling is the only operation that occurs outdoors, at the fueling station.

The facility representative stated their storm water system connects to the local Davenport Municipal Separate Storm Sewer System (MS4). Storm water runoff from the facility generally flows overland to the south and collects in the onsite storm water conveyance structure, connecting to the Davenport MS4, which ultimately discharges to Crow Creek.

Facility Drainage Systems and Discharges

The facility is bordered to the west and south by Davenport Municipal Airport, and to the north and east by commercial businesses; Crow Creek is approximately half a mile east of the facility. The entire facility grounds, except for a few grassy areas, were surfaced with concrete. There was no precipitation during the inspection and pooled water was observed at the south end of the facility at the end of a culvert pipe. Additionally, the facility had developed a facility map identifying the facility's drainage system and flow paths (refer to Appendix C, Exhibit 1). The facility representative was unaware of any designated outfalls or drainage structures.

Permit Requirements and Potential Noncompliance Items

During the inspection the EPA Inspection Team observed materials handling and storage areas, maintenance areas, and storm water drainage and conveyance areas at the facility. The following observations were made by the EPA Inspection Team pursuant to provisions of the permit.

Records Observations

Permit Part III.C.4.a (Contents of the SWPPP)

"Each SWPPP shall provide a description of potential sources which may reasonably be expected to add significant amounts of pollutants to storm water discharges or which may result in the discharge of pollutants during dry weather from separate storm sewers draining the facility. Each SWPPP shall identify all activities and significant materials which may potentially be significant pollutant sources. Each SWPP shall include, at a minimum:

a.(1). A site map showing an outline of the drainage area of each storm water outfall; each existing structural control measure to reduce pollutants in storm water runoff; and each surface water body."

Observation 1: The facility representative provided the EPA Inspection Team with a copy of their SWPPP, revised September 17, 2024 (refer to Appendix C, Exhibit 1). The EPA Inspection Team observed that the SWPPP did not outline all drainage areas and showed no outfalls. The EPA Inspection Team observed a previously unidentified outfall that connected to the facility's storm water conveyance system and ultimately led offsite (refer to Appendix B, Photographs 13 through 15). The storm water conveyance system was located at the southeast corner of the facility's property and connected a series of basins and pipes (refer to Appendix B, Photographs 13 through 22). The conveyance ultimately led offsite via an unidentified outfall. The EPA Inspection Team observed slopes that indicated storm water would flow west to east along the facility's southern grassy property (refer to Appendix B, Photographs 13, 17, 19, and 21).

Observation 2: The provided SWPPP did not include a site map depicting the proximity to the local surface water body of Crow Creek (refer to Appendix C, Exhibit 1).

Permit Part III.C.4.b (Contents of the SWPPP)

"b.(2). Risk Identification and Assessment/Material Inventory. The SWPPP shall assess the potential of various sources at the plant to contribute pollutants to storm water discharges associated with industrial activity. The SWPPP shall include an inventory of the types of materials handled. Facilities subject to SARA Title III, Section 313 shall include in the SWPPP a description of releases to land or water of SARA Title III water priority chemicals that have occurred during the three years prior to the discharge authorization date of this permit. Each of the following shall be evaluated for the reasonable potential for contributing pollutants to runoff: b.(2).i. loading and unloading operations;

- b.(2).ii. outdoor storage activities;
- b.(2).iii. outdoor manufacturing or processing activities;
- b.(2).iv. dust or particulate generating processes; and
- b.(2).v. on-site waste disposal practices. Factors to consider include the toxicity of chemicals; quantity of chemicals used, produced, or discharged; the likelihood of contact with storm water; and history of hazardous condition reporting."

Observation 3: The facility's SWPPP indicated in Section 8.C.1 that the facility maintains a generator with a 1,500-gallon capacity (refer to Appendix C, Exhibit 1). The facility's SWPPP contradicted this in the Materials Inventory Table, indicating the generator had a

1,200-gallon capacity (refer to Appendix C, Exhibit 1). At the time of the inspection, the facility representative stated the generator had a 1,700-gallon capacity. The facility's inventory quantities were inconsistent.

Facility Field Observations

At the time of the inspection, the EPA Inspection Team made the following observations at the facility:

1. The EPA Inspection Team observed a hangar at the facility where all maintenance activities occurred (refer to Appendix B, Photograph 1). This area included a 280-gallon used oil tank in the northeast most corner with an adjacent spill kit (refer to Appendix B, Photograph 2). The hangar had sliding doors on its east and west sides, with trench floor drains running the length of each doorway (refer to Appendix B, Photographs 3 and 4). The EPA Inspection Team observed a capped pipe end in the trench along the hangar's western side (refer to Appendix B, Photograph 5). Neither the facility representative nor the EPA Inspection Team could identify where the capped pipe connected.
2. The wash rack was located along the eastern border of the facility's tarmac (refer to Appendix B, Photograph 6). The EPA Inspection Team observed that the wash rack graded downwards to a grate at the middle to collect wash water (refer to Appendix B, Photograph 7). At the time of the inspection, the EPA Inspection Team observed liquid and a solid gray substance inside the drain (refer to Appendix B, Photograph 8). At the time of the inspection, the facility representative stated the drain could be opened but could not find the access point that opens and drains the wash water; the EPA Inspection Team could not determine where the drain connected. The facility representative emailed three photographs to the EPA Inspection Team on October 1, 2024, that displayed the whereabouts of the manually controlled wash water release valve. The valve releases accumulated wash water from the wash rack to an oil/water separator. The valve is opened on an as needed basis.
3. The EPA Inspection Team observed two locked hazardous materials storage sheds along the eastern border of the facility's tarmac, south of the wash rack (refer to Appendix B, Photograph 9).
4. The EPA Inspection Team observed a monitoring well several feet southeast of the two hazardous materials storage (refer to Appendix B, Photographs 10 and 11).
5. The EPA Inspection Team observed two garages at the southeast corner of the tarmac that the facility used to store motor vehicles (refer to Appendix B, Photograph 12). The facility representative stated there was not enough storage space within the hangar for all eight of the helicopters and that the facility used their "cold storage," a large garage at the south of the facility's tarmac to store helicopters.
6. The EPA Inspection Team observed a storm water conveyance at the southeast corner of the facility's property that was connected to a series of basins and piped conveyances (refer to Appendix B, Photographs 13 through 22). The conveyance ultimately led offsite via an unidentified outfall (refer to Appendix B, Photographs 14 and 15). Central and southern areas of the facility would drain to the unidentified outfall, which conveyed offsite and connected to the Davenport MS4. Based on observations of slope, storm water would flow west to east along the facility's southern grassy property. Storm water flow would originate from the west

(refer to Appendix B, Photograph 21) before conveying storm water to the east (refer to Appendix B, Photographs 17 and 19).

7. The EPA Inspection Team observed the facility's fueling station (refer to Appendix B, Photographs 23 through 26). The fueling station contained five double-walled ASTs, each with 10,000-gallon capacities that contained F24 jet fuel. The EPA Inspection Team observed a concrete berm surrounding the area where fuel pumped into the tanks for refill (refer to Appendix B, Photographs 23 through 25). The fueling pumps were under cover and had a concrete berm for secondary containment (refer to Appendix B, Photograph 26). To the east of the fueling pumps was the storage area for HEMTTs. The EPA Inspection Team observed the HEMTT storage area comprised of concrete slabs graded downward towards the south, with a concrete berm around three sides (refer to Appendix B, Photographs 28 through 32). A manual drain valve allowed release of any accumulated storm water to the field to the south. Plastic drip pans were under the parked HEMTTs.
8. At the time of the inspection, the EPA Inspection Team observed the drain valve of the HEMTT parking area was closed but had a slow drip occurring with no sheen (refer to Appendix B, Photograph 31). The facility representative stated it had rained the night before and they had opened the valve to release the accumulated rainwater to the basin to the south.
9. The EPA Inspection Team observed the facility's emergency generator along the south wall of the hangar (refer to Appendix B, Photograph 32). The generator had a 1,700-gallon capacity.
10. Prior to leaving the facility, the EPA Inspection Team observed the facility's general waste storage in the southwest corner of the facility's parking lot. Two dumpsters were present, both with lids (refer to Appendix B, Photograph 33).

Field Areas of Concern

At the time of the inspection, the EPA Inspection Team did not observe any field specific areas of concern.

Closing

At the conclusion of the inspection, the EPA Inspection Team held a closing conference with the facility representative and discussed the preliminary findings and observations of the inspection. The EPA Inspection Team reiterated that all observations were preliminary and not compliance determinations. The closing conference began at 3:04 PM (CT) and concluded at approximately 3:12 PM (CT).