

STORAGE TANKS MANAGEMENT
(Aboveground Storage Tanks (ASTs),
Underground Storage Tanks (USTs))

ENVIRONMENTAL MANAGEMENT PROCEDURE (EMP) 4.4.6.14

JBLE-EUSTIS



25 June 2020

(Revised 08 July 2022)

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DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 633D AIR BASE WING
JOINT BASE LANGLEY-EUSTIS VA

OFFICE OF THE COMMANDER

MEMORANDUM FOR ALL 733 MSG UNITS AND FEVA ORGS

SUBJECT: JBLE-Eustis Environmental Management Procedures (EMPs)

1. EMPs apply to all JBLE-Eustis activities (including tenants, associated units, and contractors) that impact any environmental resource area on the installation, to include, but not limited to Air Quality, Water Quality, Hazardous Waste, Hazardous Materials, Natural Resources, Cultural Resources, Solid Waste and Recycling, Inspections, Training, Tanks, Spill Prevention, Pollution Prevention, and Pest Management.
 - a. EMPs enable our compliance with Federal, State, Department of Defense, and Air Force regulations, directives, instructions, and manuals, and are specific to JBLE-Eustis.
 - b. EMPs assign responsibilities, provide instruction and guidance for appropriate management of environmental programs to ensure the installations regulatory compliance.
2. JBLE-Eustis personnel may access these EMPs electronically via the Environmental Management Procedures section of the JBLE-Eustis Environmental website at: <https://www.jble.af.mil/Units/Army/Eustis-Enviromental/> under Environmental Management Procedures (EMPs), EMP Library.
3. The Office of Primary Responsibility for this document is 733d Civil Engineer Squadron Environmental Element (733 CES/CEIE), and will review all EMPs annually, and update as appropriate. Major revisions require concurrence from the JBLE-Eustis Environmental Management System (EMS) Cross-Functional Team (CFT) and approval by the Environmental Safety and Occupational Health Council (ESOHC).
4. All EMPs are unclassified and will be posted in "Read Only" .pdf format, reviewed, revised and rescinded IAW current directives.

COL HUNG

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HARRY D. HUNG, Colonel, USA
Vice Commander

Table of Contents

Environmental Management Procedure (EMP) 4.4.6.14.....	1
SECTION: 4.4.6.14.....	1
SUBJECT: Storage Tanks Management (Aboveground Storage Tanks (ASTs) and Underground Storage Tanks (USTs))	1
PURPOSE AND POLICY:.....	1
DOCUMENT CONTROL:.....	1
REFERENCES:	1
SCOPE: This EMP applies to all activities and personnel, including military, civilians, vendors, suppliers, and contractor personnel who enter JBLE-Eustis.	1
ROLES AND RESPONSIBILITIES:.....	1
SECTION: 4.4.6.14.1.....	3
SUBJECT: Storage Tank (ST) Cross-Functional Team (CFT).....	3
PURPOSE: This section applies to all Activities and personnel who are standing or requested members of the ST CFT.....	3
ROLES AND RESPONSIBILITIES:.....	3
PROCEDURES:	3
SECTION: 4.4.6.14.2.....	6
SUBJECT: Aboveground Storage Tanks (ASTs) Management.....	6
PURPOSE: This section outlines and ensures compliance with the regulatory requirements for daily and weekly ASTs inspections.	6
ROLES AND RESPONSIBILITIES:.....	6
PROCEDURES:	6
SECTION: 4.4.6.14.3.....	11
SUBJECT: Underground Storage Tanks (UST) Management	11
PURPOSE: This section outlines and ensures compliance with the regulatory requirements for daily and weekly underground storage tank (UST) inspections for USTs.	11
ROLES AND RESPONSIBILITIES:.....	11
PROCEDURES:	11

Environmental Management Procedure (EMP) 4.4.6.14

SECTION: 4.4.6.14

SUBJECT: Storage Tanks Management (Aboveground Storage Tanks (ASTs) and Underground Storage Tanks (USTs))

PURPOSE AND POLICY:

- A. Purpose: This policy outlines and ensures compliance with the regulatory requirements for ASTs and USTs.
- B. Policy: Comply with legally applicable Federal, State, and Local regulations, substantive and procedural, for both AST and UST management, by ensuring all regulated and unregulated storage tanks are properly constructed, maintained, and monitored.

DOCUMENT CONTROL: This is a controlled document. Controlled documents are updated as required, reviewed at least annually, and re-dated if changed. Any documents to include blank forms appearing in paper form are not controlled and should be checked against the file version before use on the:

JBLE – Eustis Environmental website: <http://www.jble.af.mil/Units/Army/Eustis-Environmental/>

REFERENCES:

- A. AFI 32-7044, *Storage Tank Environmental Compliance*
- B. 40 CFR 280-282, UST Regulations

SCOPE: This EMP applies to all activities and personnel, including military, civilians, vendors, suppliers, and contractor personnel who enter JBLE-Eustis.

ROLES AND RESPONSIBILITIES:

- A. Air Base Wing Commander:
 - (1) Ensure installation units, subordinate organizations, and tenants' storage tanks are compliant with applicable federal, state, and local regulations.
 - (2) Establish a Storage Tank (ST) Cross-Functional Team (CFT) to coordinate inspection responsibilities for all installation units, tenant units, and non-appropriated funds units with storage tanks.
 - (3) The ST CFT will work under the guidance of the Environmental, Safety, and Occupational Health Committee (ESOHC).

- (4) Ensure Wing Inspector General coordinates required exercises as appropriate and as necessary to meet applicable Federal, State, and Local environmental regulations.

B. Civil Engineer Directorate (CED):

- (1) Ensure enforcement actions or notices of violations are promptly reported, tracked, and managed until closed IAW AFI 32-7047.
- (2) Ensure an accurate storage tank inventory is maintained in the real property records and the AF network-approved Storage Tank Accounting and Reporting (STAR) system.
- (3) Appoint a POL Tank Compliance Program Manager to track compliance of ASTs and USTs IAW applicable environmental regulations.

C. Civil Engineer Squadron (CES): Environmental Element (CEIE) will:

- (1) Ensure storage tank management programs comply with all federal, state, and Local requirements. Provide technical expertise about environmental regulatory storage tank requirements.
- (2) Notify the appropriate regulatory agency of all new ASTs/USTs IAW applicable agency rules and regulations.
- (3) Maintain an accurate storage tank inventory in coordination with all installation units, and provide the same to higher headquarters when requested.

D. Activities:

- (1) Activities owning, operating, or procuring any storage tanks on the installation will comply with all Federal, State, or Local requirements.
- (2) Will notify the Fuels Management Team (FMT) before procuring storage tanks.
- (3) Notification will be provided to the CFT before procuring storage tanks.

SECTION: 4.4.6.14.1

SUBJECT: Storage Tank (ST) Cross-Functional Team (CFT)

PURPOSE: This section applies to all Activities and personnel who are standing or requested members of the ST CFT.

ROLES AND RESPONSIBILITIES:

A. Environmental, Safety, and Occupational Health Committee (ESOHC) Chair will:

- (1) Establish the ST CFT.
- (2) Provide oversight for the ST CFT.

B. The ST CFT Membership:

(1) Mandatory Standing Membership:

(a) CES:

- i. Environmental Element (CEIE) will: Appoint the Storage Tank Program Manager as the ST CFT Lead.
- ii. CES Operations Flight (CEO) will: Designate a member.
- iii. CES Installation Management Flight (CEI) Real Property will: Designate a member.

(b) Logistics Readiness Squadron (LRS) will: Designate a member.

(c) Safety Office: Designate a member.

(d) Activity Facility Managers who are owners, operators, or inspectors of tanks will: Designate a member.

(2) Optional Membership: Participate in the ST CFT as necessary.

(a) Legal (JA): Designate a member.

(b) Public Affairs: Designate a member.

PROCEDURES:

A. Will meet at least quarterly. Usually, during March, June, September, and December.

- B. ST CFT is a standing Working Group to the Environmental Management System (EMS) CFT.
- C. Will report to the EMS CFT every quarter. Usually, during January, April, July, and October.
- D. The ST CFT Lead will:
 - (1) Ensure that team meetings are conducted on schedule.
 - (2) Report to the EMS CFT every quarter.
 - (3) Ensure installation units, subordinate organizations, and tenants' storage tanks are compliant with applicable Federal, State, and Local regulations.
 - (4) Ensure applicable registration, permits, and notifications are completed for all storage tanks.
 - (5) Ensure enforcement actions or notices of violations are promptly reported, tracked, and managed.
 - (6) Ensure EMS tank aspects are properly ranked for significance and develop management plans to maintain compliance and reduce burden.
 - (7) Ensure an accurate storage tank inventory is provided to the Real Property Office for recording in the installations Accountable Property System of Record (APSR), is reconciled annually, and is loaded in the Storage Tank Accounting and Reporting (STAR) system.
 - (8) Identify the proponent environmental requirements to support storage tank compliance associated with new tanks, repairs, maintenance, calibration, and removal or replacement.
 - (9) Make an appropriate update to the installations SPCC plan as required.
- E. CES Operations (CEO) Member will:
 - (1) Maintain and repair petroleum storage and dispensing systems, including appurtenances IAW all Federal, State, and Local requirements.
 - (2) Ensure cathodic protection for tank systems is operated and maintained as required.
- F. Logistics Readiness Squadron (LRS) Member will:
 - (1) Administer tank custodian and escort training IAW AFI 23-204.

- (2) Operate fuel facilities storing DLA-Energy capitalized product per the requirements prescribed by AFI 23-201. DLA contracted facilities according to DLA Energy policy and procedures and applicable federal, state, and local environmental regulations.
- (3) Report inspections conducted by LRS Quality Assurance as outlined in AFI 23-204 and AFI 20-112.
- (4) Ensure LRS maintains a Fuels Management Team (FMT)

G. Safety Office Member will:

- (1) Make recommendations to units to ensure all storage tank management procedures and storage locations comply with applicable safety requirements.
- (2) Coordinate with Fire & Emergency Services; and Industrial Hygiene as required.

J. Activities will:

- (1) Comply with all Federal, State, or Local requirements applicable to the installation per host tenant agreements.
- (2) Coordinate with the CES, Safety, IH, and FMT as required.
- (3) Notify the ST CFT and FMT before the purchase, demolition, relocation, and significant changes (e.g., change in storage material, substantial repairs or replacement, etc.) of storage tanks.
- (4) Unit Environmental Coordinators (UECs) will:
 - (a) Manage the operation of organizational tanks.
 - (b) Ensure tanks comply with security, safety, accountability, and environmental protection requirements IAW all applicable technical directives and federal, State, and Local environmental regulations.
 - (c) Monitor tanks and associated piping for leaks. The monitoring will include recurring inspections and documentation of inspections.
 - (d) Immediately report suspected leaks to the CES/CEIE Tank Program Manager upon discovery.
 - (e) Obtains and completes training as required.

SECTION: 4.4.6.14.2

SUBJECT: Aboveground Storage Tanks (ASTs) Management

PURPOSE: This section outlines and ensures compliance with the regulatory requirements for daily and weekly ASTs inspections.

ROLES AND RESPONSIBILITIES:

A. Operator:

- (1) Responsible for compliance with regulations.
- (2) Conduct Inspections
- (3) Notify Environmental Division of Discrepancies
- (4) Maintain secondary containment/berm.
- (5) Establish Standard Operating Procedures.
- (6) Establish Inventory Control.
- (7) Maintain all records on ASTs

The CES/CEIE will:

- (1) Provide installation required training for Operators.
- (2) Maintain a current list of ASTs in the Environmental Element Office.

PROCEDURES:

A. Compliance

- (1) Ensure compliance with Federal, State, and Air Force regulations.
- (2) All ASTs with a capacity of 660 gallons or above require daily and weekly inspections to be conducted, recorded, and maintained by activity personnel utilizing AST Inspection Record FEVA Form 32-630 located at <https://www.jble.af.mil/About-Us/Units/Ft-Eustis/Eustis-Environmental/EMPs/>.
- (3) All ASTs with a capacity of less than 660 gallons require a monthly inspection to be conducted, recorded, and maintained by activity personnel utilizing AST Inspection Record FEVA Form 32-630.

B. Inspections

- (1) The daily visual inspection shall include the following:
 - (a) A complete walkthrough of the facility property in the areas where the AST is staged to ensure no hazardous conditions exist.
 - (b) Perform inspection of the ground surface for signs of leakage, spillage, or stained or discolored soils.
 - (c) Perform a check of the berm or dike.
 - i. Look for an accumulation of water
 - ii. Ensure the dike or berm drain valves are secured
 - iii. Ensure no cracks, holes, or breaches in the berm
 - (d) A visual inspection of the exterior tank shell to look for signs of leakage or damage.
 - (e) Evaluate the condition of the AST and appurtenances.
- (2) The Weekly AST Inspection shall include the following:
 - (a) A record shall be initialed and dated by the AST facility operator or person conducting the inspection.
 - (b) The Record shall become part of the AST facility record, maintained on-site, and available for review.
 - (c) Containment dike or berm is in satisfactory condition.
 - (d) The containment area is free of excess standing water or oil.
 - (e) The gate valve is secured for emptying the containment area.
 - (f) Containment area/base of the tank is free of high grass, weeds, and debris.
 - (g) Tank shell surface, including any peeling areas, welds, rivets/bolts, seams, and foundation, visually inspected for areas of rust and other deterioration.
 - (h) Ground surface around tanks, containment structures, and transfer areas checked for signs of leakage.
 - (i) Leak detection equipment is in satisfactory condition.

- (j) The separator or drainage tank is in satisfactory condition.
 - (k) Tank water bottom draw-offs not in use are secured.
 - (l) Tank fill valves not in use are secured.
 - (m) Valves inspected for signs of leakage or deterioration.
 - (n) Inlet and outlet piping and flanges inspected for leakage
 - (o) All tank gauges have been inspected and are operational.
- (3) The Monthly AST Inspection shall include the following:
- (a) Tank or Container surface visually inspected for areas of rust, cracks, or signs of deterioration.
 - (b) Containment area, dike, or berm free of excess standing water or oil and in satisfactory condition.
 - (c) Ensure the area around the tank is free of unexplained dead or withered vegetation.
 - (d) Ensure the ground surface is free of signs of leakage, spillage, or stained or discolored soil.
 - (e) Ensure the fill gauge is functioning properly.
 - (f) Ensure the fill cap is secure.
 - (g) Ensure the vent pipe is clear.
 - (h) Ensure the tank is properly labeled and labels legible? (contents, warning, emergency notification labels)
 - (i) Ensure all piping is secure and free of damage or wear.
- (4) All Inspections are conducted during Normal Duty Hours.
- (5) If the Operator is not available, an alternate operator/inspector must be available to conduct the inspection
- (6) Inspections must be documented utilizing AST Inspection Record FEVA Form 32-630 and available for review upon request. Located at <https://www.jble.af.mil/About-Us/Units/Ft-Eustis/Eustis-Environmental/EMPs/>

C. AST Discrepancy Report

- (1) Any discrepancies noted during a daily, weekly, or monthly inspection will be indicated on the AST Discrepancy Report FEVA Form 32-631. Located at <https://www.jble.af.mil/About-Us/Units/Ft-Eustis/Eustis-Environmental/EMPs/>
- (2) AST Discrepancy Reports shall be submitted to the Environmental Element office within two (2) workdays of inspection.

D. Secondary Containment Maintenance

- (1) All repairs to secondary containment must be reported to the Service Order Desk (757-878-4357).

E. Standard Operating Procedures

- (1) Ensure no spills, releases, or discharges during fill and shutdown operations.
 - (a) In the event of a spill, release, or discharge, contact JBLE - Eustis Fire Department (emergency: 911/nonemergency 757-878-1008).
 - (b) Provide a spill response kit.

F. Inventory Control

- (1) Institute Inventory Control Measures.
 - (a) A variance of 1% of the total capacity shall be considered significant.
- (2) Exemptions:
 - (a) AST totally off the ground with all associated piping off the ground.
 - (b) AST with a capacity of 5,000 gallons or less is located within a building or structure designed to contain oil discharge fully.
- (3) A list of ASTs on Fort Eustis which require Inventory Control is as follows:

	Building	Size (gallons)	Regulated AST	Contents	Description
1	2451	30,000	yes	JP8	Felker Tank Farm
2	2451	30,000	yes	JP8	Felker Tank Farm

G. Records

- (1) Maintain all records related to:
 - (a) All required measurements and inventory.
 - (b) The required tank/pipe testing.
 - (c) On any spill events and other petroleum discharges.
 - (d) Contingency plans.
 - (e) Individual training.
 - (f) Tank Closure.
- (2) Records must be maintained on-site for a minimum of five (5) years.
- (3) Records must be made available for review upon request.

H. Training.

- (1) Annual AEM training.
 - (a) Documented.
 - (b) Training documents maintained by Environmental Element.
- (2) Daily and Weekly Inspection Forms requirements review.
- (3) Recognition of a potential leak.
- (4) Spill response procedures.
- (5) Recognition and evaluation of AST condition.

I. Used Oil - Used oil generated at the various maintenance facilities is handled as recyclable materials:

- (1) All Used Oil containers and tanks MUST be clearly labeled with “Used Oil” Labels.
- (2) Containers and tanks must be secured to ensure no unauthorized dumping of other wastes.

- (3) It May not be stored in TSSs or SASs. It may be stored in the NHS.
- (4) Turn-ins will be coordinated with the Hazard Waste Accumulation Facility, Bldg. 1207 Taylor Ave or at 757-878-3915.

SECTION: 4.4.6.14.3

SUBJECT: Underground Storage Tanks (UST) Management

PURPOSE: This section outlines and ensures compliance with the regulatory requirements for daily and weekly inspections for USTs.

ROLES AND RESPONSIBILITIES:

A. Operator:

- (1) Responsible for compliance with regulations.
- (2) Conduct Inspections.
- (3) Notify Environmental Division of Discrepancies.
- (4) Maintain sumps and spill/overflow buckets.
- (5) Establish Standard Operating Procedures.
- (6) Establish Inventory Control.
- (7) Maintain all records on USTs.

B. The CES/CEIE will:

- (1) Provide installation required training of Operators.
- (2) Maintain a current list of USTs in the Environmental Element Office.

PROCEDURES:

A. Compliance

- (1) Ensure compliance with Federal, State, and Air Force regulations.

B. Inspections

- (1) A monthly inspection shall include the following:

- (a) A complete walkthrough of the facility property in the area where the UST is staged to ensure that no hazardous conditions exist.
- (b) Perform an inspection of the ground surface for signs of leakage, spillage, or stained or discolored soils.
- (c) Conduct a check of the spill containment maintenance hole (catchment basin) for excessive water accumulation.
- (d) A visual inspection of the fill pipe and surrounding areas to look for signs of leakage or damage.
- (e) Evaluate the condition of the UST and appurtenances.
- (f) Ensure the Automatic Tank Gauging System (ATGS) for the tank and piping is operating correctly.
- (g) Ensure spill Buckets are clean and empty.
- (h) The overfill alarm is operating correctly.
- (i) Fill and monitoring port covers, and caps are tightly sealed and locked.
- (j) Ground surface around fill ports checked for signs of leakage.
- (k) Spill and overfill response supplies are available and adequate, with no visible indication of deterioration or improper functioning.
- (l) Check dispenser hoses, nozzles, and breakaways for loose fittings, deterioration, apparent signs of leakage, and damage.
- (m) Inspect dispenser and dispenser sump piping, fittings, and couplings for signs of leakage or deterioration.
- (n) Piping sumps are inspected for signs of leakage or deterioration.
- (o) Inspect all tank gauges to ensure they are operational.

C. UST Discrepancy Report

- (1) Any discrepancies noted during daily and weekly inspections will be indicated on the UST Discrepancy Report
 - (a) UST Discrepancy Report shall be submitted to the Environmental Element office within two (2) workdays of inspection.

(2) Maintain sumps and spill/overflow buckets.

- (a) Remove any water or fuel.
- (b) Remove any debris.

(3) Standard Operating Procedures

- (a) Ensure no spills, releases, or discharges during fill and shutdown operations.
 - i. In the event of a spill, release, or discharge, contact JBLE-Eustis Fire Department (emergency: 911/nonemergency 757-878-1008).
 - ii. Provide a spill response kit.

(4) Records

- (a) Maintain all records related to:
 - i. All required measurements and inventory.
 - ii. Required tank/pipe testing.
 - iii. Spill events and other petroleum discharges.
 - iv. Contingency plans.
 - v. Individual training.
 - vi. Tank Closure.
- (b) Records must be maintained on-site for a minimum of five (5) years.
- (c) Records must be made available for review upon request.

(5) Training.

- (a) All operators of regulated USTs must obtain Virginia-certified training as either a Class “A,” “B,” or “C” operator. Training must be completed before assuming duties as a class “C” operator or within 60 days of assuming responsibilities as a class “A” or “B” operator. Upon completion, certificates must be provided to the CES-CEIE UST program manager.
- (b) Annual AEM training.
 - i. Documented.

- ii. Training documents maintained by the Environmental Element.
 - (c) Inspection Form requirements review.
 - (d) Recognition of a potential leak.
 - (e) Spill response procedures.
 - (f) Recognition and evaluation of UST condition.