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 18 January 2024)

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

25-Oct-24

MEMORANDUM FOR ALL 733 MSG UNITS AND FEVA ORGS

FROM: 633 ABW/CD

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 JBLE-Eustis Environmental website at: https://www.jble.af.mil/Units/Army/Eustis-Enviromental/.

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 All EMPs are unclassified and will be posted in "Read Only" .pdf format, reviewed, revised and rescinded IAW current directives.

DILLENBURGER.STEVEN.P.1239615100
Digitally signed by DILLENBURGER.STEVEN.P.1239615100
Date: 2024.10.25 13:15:19 -04'00'

STEVEN P. DILLENBURGER, Colonel, USAF
Deputy Installation Commander

INTENTIONALLY LEFT BLANK

Table of Contents

ATTACHMENTS

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 is to outline and ensure compliance with the regulatory requirements for ASTs and USTs.

B. Policy: Comply with legally applicable Federal, State, and Local regulations, both 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-Enviromental/

REFERENCES:

A. AFI 23-201, *Fuels Management*
B. AFI 32-1001, *Civil Engineer Operations*
C. AFI 32-7001, *Environmental Management*
D. AFI 32-7044, *Storage Tank Environmental Compliance*
E. DAFMAN32-1067, *Water and Fuels System*
F. UFC 3-460-03, *Petroleum Fuels Systems Maintenance*
G. AFCEC POL Tank Management Playbook
H. 40 CFR 110, Discharge of Oil
I. 40 CFR 112, Oil Pollution Prevention
J. 40 CFR 280-282, UST Regulations
K. 9 VAC 25-580, Virginia UST Regulations
L. 9 VAC 25-91, Virginia AST Regulations
M. OSHA 1910.106 Flammable Liquids
N. NFPA 30 Flammable and Combustible Liquids
O. API 653 Aboveground Storage Tank Inspections
P. API 570 Piping Inspections
Q. STI SP001: Standards for Inspection of Aboveground Storage Tanks

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, contractors, and tenants' storage tanks are compliant with applicable federal, state, and local regulations.

(2) Establish a Storage Tank (ST) Cross-Functional Team (CFT) working group to coordinate inspection responsibilities for all installation units, tenant units, and non-appropriated funds units with storage tanks.

(3) The ST CFT working group 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 Squadron(CES):

(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): Operations Element (CEOE) will:

(1) Conduct inspections of ASTs and USTs not assigned to contractors or units on base at the frequency required by federal, state, and local laws and regulations.

(2) Enter monthly tank inspections into the STAR Module completed by contractors and operations in accordance with AFI-32-1001 and DAFMAN 32-1067.

(3) Schedule maintenance and repairs for ASTs and USTs.

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

(1) Ensure storage tank management programs comply with all applicable 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.

E. 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 working group before procuring storage tanks.

SECTION: 4.4.6.14.1

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

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

ROLES AND RESPONSIBILITIES:

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

(1) Establish the ST CFT Working Group.

(2) Provide oversight for the ST CFT Working Group.

B. The ST CFT Working Group Membership:

(1) Mandatory Standing Membership:

(a) CES:

i. Environmental Element (CEIE) will: Appoint the Storage Tank Program Manager as the ST CFT Working Group Lead.

ii. CES Operations Flight (CEO) will: Designate a member.

iii. CES Installation Management Flight (CEI) Real Property will: Designate a member as needed.

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

(c) Safety Office: Designate a member.

(d) Commanders and Directors who are owners, operators, or inspectors of tanks will: Designate a member.

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

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

(b) Public Affairs: Designate a member.

PROCEDURES:

A. Will meet 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 Working Group 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, contractors 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 installations SPCC, ICP and ERAPplan 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 are 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 and 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 DAFI 23-201.

(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 applicable 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 Fire Department and 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 VDEQ registered ASTs (over 660 gallons).

ROLES AND RESPONSIBILITIES:

A. Operator:

(1) Responsible for compliance with regulations.

(2) Conduct daily, weekly and monthly inspections and request testing. Testing will be conducted IAW:
   a. 40 CFR 112
   b. 9 VAC 25-91
   c. UFC 3-460-03
   d. API 653
   e. API 570
   f. STI SP001

(3) Notify Environmental Division of Discrepancies.

(4) Maintain secondary containment/berm.

(5) Establish Standard Operating Procedures.

(6) Establish Inventory Control as needed.

(7) Maintain all records on ASTs.

B. The CES/CEIE will:

(1) Provide installation required training for Operators, Tank Custodians (TCs) and Unit Environmental Coordinators (UECs)..

(2) Maintain a current list of ASTs in the Environmental Element Office.

PROCEDURES:

A. Compliance

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

B. Inspections

(1) All ASTs with a capacity of more than 660 gallons require both a daily and weekly inspections using the base form or equivalent. Monthly inspections are required to be conducted, recorded, and maintained by activity personnel utilizing the Monthly AST Inspection Record found in STAR or the equivalent. Monthly inspections must be recorded in STAR. Examples of inspection forms are found in Attachment A.

a. 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 that 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, and

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 used for emptying containment area is secured.

    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 and 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.

    p. All Inspections are conducted during Normal Duty Hours.

    q. If Operator is not available, an alternate operator/inspector must be available to conduct the inspection.

(2) All ASTs with a capacity over 55 gallons will require a monthly inspection to be conducted, recorded, and maintained by activity personnel utilizing AST Inspection Record found in STAR or the equivalent. Inspections must be recorded in STAR. Examples of inspection forms are found in Attachment A.

a. Inspections

1. The Monthly 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 used for emptying containment area is secured.

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 and 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.

p. All Inspections are conducted during Normal Duty Hours.

q. If Operator is not available, an alternate operator/inspector must be available to conduct the inspection.

B. AST Discrepancies

(1) Any discrepancies noted during a daily, weekly, or monthly inspection will be indicated on the inspection form found in STAR.

(2) AST repair requests shall be submitted to the Civil Engineering office within two (2) workdays of inspection unless AST is owned by the unit.

C. Secondary Containment Maintenance

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

D. 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.

E. Inventory Control

(1) Institute Inventory Control Measures as required.

(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 located within a building or structure designed to contain a discharge of oil fully.

(3) A list of ASTs on Fort Eustis which may require Inventory Control is as follows:

	Building	Size (gallons)	Regulated AST	Contents	Description

1	2451-AST-1	30,000	yes	JP8	Felker Tank Farm
2	2451-AST-2	30,000	yes	JP8	Felker Tank Farm
3	2452-AST-1	20,000	yes	JP8	Felker Tank farm
4	2452-AST-2	20,000	yes	JP8	Felker Tank Farm
5	2710-AST-1	6,000	yes	Gasoline	MVRP
6	2710-AST-2	12,000	yes	Diesel	MVRP
7	2710-AST-3	12,000	yes	JP8	MVRP

F. 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.

G. Training.

(1) Annual UEC training.

(a) Documented.

(b) Training documents maintained by Environmental Element.

(2) Daily, weekly and monthly Inspection Forms requirements review.

(3) Recognition of potential leak.

(4) Spill response procedures.

(5) Recognition and evaluation of AST condition.

H. Used Oil - Used oil generated at the various maintenance facilities are 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) 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, weekly, and monthly inspections for USTs.

ROLES AND RESPONSIBILITIES:

A. Operator:

(1) Responsible for compliance with regulations.

(2) Conduct inspections and complete testing IAW:

i. 40 CFR 112
ii. 9 VAC 25-580
iii. UFC 3-460-03
iv. API 653
v. API570.

(3) Notify Environmental Division of discrepancies.

(4) Maintain sumps and spill/overfill 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, Local and Air Force regulations.

B. Inspections

(1) All USTs with a capacity of more than 110 gallons require both a daily and weekly provided by the base or equivalent. Monthly inspections are required to be conducted, recorded, and maintained by activity personnel utilizing AST Inspection Record found in STAR or the equivalent. Inspections must be recorded in STAR. Examples of inspection forms are found in Attachment A

(2) 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 manhole (catchment basin) for excessive accumulation of water.

(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, 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 are inspected 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 a daily, weekly, or monthly inspection will be indicated on the inspection form found in STAR or applicable form.

(2) UST Discrepancy Report shall be submitted to the Environmental Element office within two (2) workdays of inspection.

(3) Maintain sumps and spill/overfill buckets.

(a) Remove any water or fuel, and

(b) Remove any debris.

(4) 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.

(5) 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, and

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.

(6) Training.

(a) All operators of regulated UST's 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. Annual refresher training is required annually. Upon competition, 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 potential leak.

(e) Spill response procedures.

(f) Recognition and evaluation of UST condition.

ATTACHMENT A

ATTACHMENT B

ATTACHMENT C