

#### UNITED STATES MARINE CORPS

MARINE CORPS INSTALLATIONS EAST-MARINE CORPS BASE PSC BOX 20005 CAMP LEJEUNE NC 28542-0005

> MCIEAST-MCB CAMLEJO 5090.18 G-F/BEMD

JAN 2 4 2018

## MARINE CORPS INSTALLATIONS EAST-MARINE CORPS BASE CAMP LEJEUNE ORDER 5090.18

From: Commanding General

To:

Distribution List

Subj: MANAGEMENT OF UNDERGROUND STORAGE TANKS ABOARD MARINE CORPS

BASE CAMP LEJEUNE AND MARINE CORPS AIR STATION NEW RIVER

Ref:

- (a) Petroleum Storage Tank Management Plan
- (b) 15A NCAC 2D
- (c) 15A NCAC 20
- 1. Situation. The Marine Corps Underground Storage Tank (UST) Program establishes Marine Corps policy and responsibilities for compliance with statutory requirements for USTs (any combination of tank and associated underground pipes in which 10 percent or more of the volume of the tank is beneath the ground surface). Additionally, Marine Corps Installations must develop long-term management plans to establish procedures for achieving and maintaining regulatory compliance, as well as prioritizing corrective actions against environmental risks. This Order adheres to this policy and promulgates information concerning the operating requirements of USTs aboard Marine Corps Base Camp Lejeune (MCB CAMLEJ) and Marine Corps Air Station New River (MCAS NR), hereafter referred to collectively as "the Installation" unless otherwise noted. This Order establishes policy and procedures for the Installation UST Management Program, which includes release detection, record-keeping and reporting, inventory control, release response, corrective actions, and closure for USTs.
- Cancellation. BO 11162.1A.

### 3. Mission

a. The Installation operates several USTs for the purpose of storing petroleum products. The 1984 Hazardous and Solid Waste Amendments mandated the Environmental Protection Agency (EPA) develop standards to regulate USTs containing petroleum products and hazardous substances. States with an EPA approved UST regulatory program have authority to operate in lieu of the federal program. The North Carolina Department of Environmental Quality (NCDEQ) has the primary enforcement responsibility for the operation and management of USTs in North Carolina. References (a) through (c) establish the technical standards (e.g. design, construction, and installation), operating standards, and corrective action requirements of the owners and

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operators of USTs located in North Carolina. These regulations are fully applicable to USTs aboard the Installation.

- b. The Commanding General (CG), Marine Corps Installations East (MCIEAST) MCB CAMLEJ, is the designated owner of all USTs aboard the Installation. The UST regulatory requirements are applicable to all organizations aboard the Installation to include any command, active or reserve component, staff organization, or supporting agency that is affiliated with the United States Marine Corps, Department of the Navy, Department of Defense, or Department of Homeland Security. This section also applies to organizations organic to or tenanted aboard the Installation, contractors, and those in transit or otherwise temporarily resident due to training or mobilization commitments. These organizations will hereafter be referred to collectively as "Installation Organizations" unless otherwise noted.
- c. The only authorized use of USTs aboard the Installation is for the storage of petroleum products for use by Marine Corps Community Services (MCCS) retail gas stations and the MCAS NR airport hydrant fuel distribution system.
- d. All regulated USTs aboard the Installation have been upgraded to provide full compliance with state and Federal regulations, industry standards, and the manufacturer's instructions, in order to minimize the risk of releases of petroleum products to the environment and associated cleanup costs.
- e. Independent of this Order, a Petroleum Storage Tank Management Plan (PSTMP) was developed and implemented in accordance with state and Federal regulations by the Installation Environmental Management Division (EMD) outlined in reference (a). This Order implements reference (a) to primarily serve as a reference tool for continuously achieving and maintaining compliance with Federal, state, and Marine Corps regulations, policies, and directives. The secondary purpose of the PSTMP is to allow the Installation to utilize USTs as efficiently as possible, thereby reducing environmental risks and minimizing costs associated with compliance.
- f. The Clean Air Act mandated the EPA to develop standards to regulate air emissions from new and modified sources. References (b) and (c) establish vapor control system requirements for storage vessels containing volatile organic liquids to include petroleum products. The Installation's USTs are subject to these regulations based on the size of the tank and type of product stored. Air quality requirements applicable to USTs to include permitting, operation, maintenance, testing, monitoring, recordkeeping, and reporting are included in the procedures established by this Order.

# IAN 2 4 2018

g. <u>Summary of Revision</u>. This Order has been updated from a Base Order to MCIEAST-MCB CAMLEJ Order which has been revised in its entirety and should be thoroughly reviewed.

### 4. Execution

### a. Commander's Intent and Concept of Operations

(1) Commander's Intent. Compliance with UST regulations is not only necessary to reduce environmental liability, but results in far-reaching management and cost implications to the Installation. The goal of this Order is to enable users to not only look at the day-to-day operational requirements necessary to maintain compliance, but to look beyond these specific tasks and consider a comprehensive approach to effectively reduce the environmental risks stemming from USTs.

### (2) Concept of Operations

- (a) <u>Installation and Operation of USTs</u>. All USTs aboard the Installation must meet specifications outlined in this Order and reference (a).
- (b) <u>Inspection</u>, <u>Testing</u>, <u>and Maintenance</u>. <u>Inspection</u> and testing frequency for USTs aboard the Installation is outlined in Tables 3-1 and 3-2 of reference (a).

#### (c) Suspected Releases

- 1. UST operators must contact the UST Primary Operator or Environmental Management Division at (910) 451-5003 in the event of a suspected release. Suspected releases consist of Automatic Tank Gauge (ATG) (e.g. Veeder Root, or leak detection alarms) monitoring results indicating possible release, or unusual operating conditions.
- $\underline{2}$ . EMD will report suspected releases via phone call to the Implementing Agency and any other cognizant regulatory agency within 24 hours.
- $\underline{3}$ . All suspected releases of petroleum shall be investigated by the operator responsible for the UST system. EMD may provide assistance with the investigation as needed. Investigation results shall be reported to EMD.

### (d) Confirmed Releases

 $\underline{1}$ . In the event of a confirmed release, UST operators must take immediate action to stop further release, such as use the

## JAN 2 4 2018

emergency pump shut off switch, and immediately call the Fire and Emergency Services Division (FESD) by dialing 911.

- $\underline{2}$ . EMD will report releases via phone call to the Implementing Agency for overfill and spills of petroleum that are:
- $\underline{a}$ . 25 gallons or less that causes sheen on nearby surface water, or is 100 feet or less from a body of surface water;
- $\underline{\mathbf{b}}$ . 25 gallons or less that cannot be cleaned up within 24 hours; or
  - c. Over 25 gallons.
- $\underline{3}$ . The investigation and remediation of soil and/or groundwater contamination will be performed following guidelines from the Implementing Agency.

#### b. Tasks

(1) <u>CG</u>, <u>MCIEAST-MCB CAMLEJ shall</u>: Be held responsible for the overall compliance of the UST management program.

### (2) MCCS shall:

- (a) Ensure MCCS contracts are reviewed by EMD and the Public Works Division (PWD), and that MCCS contractors are held accountable through written contract clauses for any releases of petroleum product they may cause, to include overfills from deliveries, any damages to tanks, piping, and other ancillary equipment.
- (b) Ensure that USTs operated by MCCS are temporarily or permanently closed upon notification of releases or violation of the current state and Federal regulations.
- (c) Ensure that any fuel distributors supplying volatile organic liquids to USTs operated by MCCS comply with all vapor recovery requirements listed in reference (b).
- (d) Initiate and coordinate projects to ensure that all UST systems are removed, replaced, or upgraded to comply with UST regulations.
- (e) Ensure that any new UST system is installed in accordance with reference (a), which outlines state and Federal regulations, UST industry standards, and best management practices. In addition, ensure that the following requirements are met:

- $\underline{\textbf{1}}$ . Notify EMD of any proposed UST installation 6 months prior to project execution.
- 2. Ensure that project action sponsors complete environmental reviews and documentation. This effort includes submissions of completed requests for environmental impact reviews (REIR). The REIR should be completed through the National Environmental Policy Act-Process Automation & Management Support Module website. Contact EMD for specific web address.
- $\underline{3}$ . Complete NCDEQ form UST-6 (Application to Install or Replace UST Systems) along with all other required documents and submit them to the Implementing Agency at least 45 days prior to the expected installation date. The UST-6 form can be found on the NCDEQ website.
- (f) Designate in writing to EMD responsible persons with sufficient grade as Primary Operators and maintain a complete list of Primary Operators. Primary Operators must not be a third-party contractor and must have knowledge of UST rules. Primary Operators must complete NCDEQ approved Primary Operator training. This training is offered by NCDEQ, course offerings can be found on the NCDEQ website.
- (g) Ensure all personnel involved in daily monitoring and operation of USTs give high priority to the prevention of overfills, routine UST leak detection monitoring, record keeping, and reporting requirements of this Order.
- (h) Ensure at least one trained Emergency Response Operator is on-site during operation hours. Emergency Operator Training will be scheduled through EMD. This person is responsible for reporting confirmed releases to FESD by dialing 911 and suspected releases and unusual operating conditions to the Primary Operator.
- (i) Ensure a trained Emergency Response Operator or Primary Operator observes all fuel unloading operations and confirms the spill containment box has no water, product, or debris accumulation at the time of product delivery.
- (j) Maintain accurate and detailed records of all product transfer operations. Records are to include, at a minimum, the following information:
  - 1. Tank identification number.
  - 2. Amount and type of product transferred.
  - 3. Date and time of transfer.

# IAN 2 4 2018

- 4. Any unusual operating conditions observed.
- (k) Maintain the UST Management Binder provided by EMD. The UST Management Binder must be stored in a single location designated by EMD and be readily available for inspection by Federal, state, and local regulatory agencies. The UST Management Binder will include, at a minimum, the following:
- $\underline{\mathbf{1}}$  . Emergency contacts and primary operators' information.
- $\underline{2}$ . NCDEQ UST-26 form, Emergency Response Operator Training Log. This form shall be updated as new personnel are trained.
  - 3. A current UST facility diagram.
- $\underline{4}$ . Leak detection and inventory reports for twelve months. Leak detection records must be kept and archived for at least three years. The UST Management Binder is not required to contain the archived records; however, the location of the archived records must be documented in the UST Management Binder.
- $\underline{5}$ . A maintenance and repair log for each work request initiated by the UST facility. Certification of UST repairs must be documented as well.
- (1) Ensure that each leak detection and inventory report is collected twice monthly from the ATG system and filed in the UST Management Binder.
- (m) Provide funds for the ATG inspection and maintenance contract, which includes regular ATG inspections to ensure the ATG system is operating properly, as well as calibrated annually.
- (n) Participate in NCDEQ inspections and audits of UST systems.

## (3) G-F Department shall:

- (a) Serves as the CG, MCIEAST-MCB CAMLEJ's representative regarding ownership of all USTs aboard the Installation.
- (b) Provide resolution of conflicting and overlapping authority issues regarding UST management and compliance responsibilities.

# JAN 2 4 2018

## (4) Head, Environmental Quality Branch, EMD shall:

- (a) Provide Emergency Response Operator training to MCCS employees.
- (b) Provide MCCS retail gas stations with a UST Management Binder.
- (c) Identify UST system upgrades and maintenance requirements to MCCS to ensure compliance with UST regulations.
- (d) Initiate projects to perform testing and inspections as defined in reference (a), and identify these projects to the appropriate contracting vehicle, i.e., PWD, Navy Facilities Engineering Command, or Defense Logistics Agency Energy (DLA-E).
- (e) Initiate projects to ensure that the airport hydrant system is upgraded, replaced, removed, or maintained to comply with UST regulations, and identify these projects to DLA-E.
- (f) Act as an official liaison between Federal, state, and local environmental regulatory agencies and the Installation and its tenant commands.
- (g) Notify the Implementing Agency of any petroleum product release as required by this Order.
- (h) Conduct follow-on assessments and remediation in compliance with state and Federal regulations at any site where a release has been documented.
- (i) Participate in NCDEQ inspections and audits of UST systems.
- (j) Annually submit the required applications to renew UST operating permits with the Implementing Agency for all registered UST systems aboard the Installation and distribute permits to Primary Operators.
- (k) Evaluate the Installation's USTs for air permitting purposes and apply for a modification of the Installation Title V permit accordingly.
- (5)  $\underline{\text{Head}}$ ,  $\underline{\text{Environmental Compliance Branch, EMD shall}}$ : Perform annual overfill prevention equipment operability check, leak detection equipment operability check, and sump visual inspections as defined in reference (a) and document inspections on the respective NCDEQ UST form.

## JAN 2 4 2018

### (6) Director, PWD shall:

- (a) Provide a contracting mechanism to perform routine and emergency maintenance at all installation UST systems.
- (b) Provide a contracting mechanism to inspect and maintain all ATG systems. The contract shall ensure that these systems are able to automatically monitor product levels within the tank, detect leaks from tanks and piping, and are in good operating condition. This contract shall also include annual calibration of the ATG systems.
- (7) Commanding Officer, MCAS NR shall: Be held responsible for the overall compliance of USTs aboard MCAS NR.

### (8) Officer in Charge, MCAS NR (Station Fuels) shall:

- (a) Ensure the airport hydrant system is inspected in accordance with inspection requirements outlined in reference (a).
- (b) Ensure that an ATG Release Detection Test Report is printed monthly and kept on file for three years as defined in reference (a).
- (c) Designate in writing responsible persons with sufficient grade as Primary Operators and maintain a complete list of Primary Operators. Primary Operators must not be a third-party contractor and must have knowledge of UST rules.
- $\underline{\textbf{1}}$ . Primary Operators must complete NCDEQ approved Primary Operator training.
- $\underline{2}$ . At least one trained Primary Operator shall provide Emergency Response Operator training to personnel and maintain the NCDEQ UST-26 form, Emergency Response Operator Training Log.
- (d) Ensure at least one trained Emergency Response Operator is on-site during operation hours. This operator is responsible for reporting confirmed releases to FESD by dialing 911 and suspected releases and unusual operating conditions to the Primary Operator.
- (e) Ensure all personnel involved in daily monitoring and operation of USTs give high priority to the prevention of overfills, routine UST leak detection monitoring, record keeping, and reporting requirements of this Order.
- (f) Participate in NCDEQ inspections and audits of UST systems.

(g) In addition to notification requirements outlined in this Order, report fuel spills involving DLA-E owned product of more than 25 gallons on land or any waterway discharges that create a sheen to DLA-E as outlined in reference (a).

#### (9) DLA-E:

- (a) Fund and/or provide contract assistant for projects to ensure that the airport hydrant system inspection schedule is met as identified by the Installation.
- (b) Fund and/or provide contract assistant for projects to ensure that the airport hydrant system is upgraded, replaced, removed, or maintained as identified by the Installation.

### (10) FESD shall:

- (a) Initiate response action upon receiving notification of a spill or a release from a UST system on board the Installation.
- $\,$  (b) Notify EMD of any spill or release reported immediately.
- 5. Administration and Logistics. The point of contact is the UST Program Manager at (910) 451-9017.

### 6. Command and Signal

a.  $\underline{\text{Command}}$ . This Order is applicable to MCIEAST-MCB CAMLEJ staff departments, MCAS NR, MCB CAMLEJ, and all tenant and subordinate commands, contractors, and staff sections.

b. Signal. This Order is effective the date signed.

Deputy Commander

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