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Prepared For:

**US Army Corps of Engineers
Mobile District**

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**US Army Fort George G. Meade
Maryland**

**Oil and Hazardous Substance Spill Prevention
and Response Plan**

December 29, 2006

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Executive Summary

The US Army and US Army Fort George G. Meade (FGGM) are concerned about the impact day-to-day operations may have on the environment. Pollution caused by oil and hazardous substance spills may have adverse affects on the environment if proper steps are not taken to prevent, contain, and effectively clean up such incidents in a timely and efficient manner. FGGM is dedicated to the prevention of oil and hazardous substance spills. It is the policy of this Installation to minimize the discharge or release of oil or hazardous substances from storage tanks, piping, transfer systems and equipment, and work spaces on Base and to provide efficient and prompt containment and cleanup procedures if a spill occurs.

A number of Federal and State agencies have regulations pertaining to pollution prevention and emergency response requirements for oil and hazardous substance storage and transfer facilities. The *US Army Fort George G. Meade Oil and Hazardous Substance Spill Prevention and Response Plan* has been developed to address the issues of spill prevention, discharge containment and cleanup, and emergency response actions. This Plan combines all of the Federal and State regulatory requirements regarding the development of response plans into a single document. Included in this Plan is a regulatory compliance and cross-reference index that allows the user to locate information required by applicable regulatory cites.

The *US Army Fort George G. Meade Oil and Hazardous Substance Spill Prevention and Response Plan* incorporates the requirements for a *Spill Prevention Control and Countermeasure Plan* (SPCC) and an *Installation Spill Contingency Plan* (ISCP). This Plan addresses the emergency planning, notification, and response actions required by the US Environmental Protection Agency (EPA). Similar requirements directed by the *Resource Conservation and Recovery Act* (RCRA), the *Comprehensive Environmental Response, Compensation and Liability Act* (CERCLA), the *Emergency Planning and Community Right-to-Know Act* (EPCRA), and the Occupational Safety and Health Administration (OSHA) are also included in this integrated plan. The comprehensive planning, spill prevention measures, and response actions provided in this plan make it an operational, single-source document to be used and referenced by Base personnel should a spill occur. The *US Army Fort George G. Meade Oil and Hazardous Substance Spill Prevention and Response Plan* also serves as a statement of policy and intent for those concerned with the prevention and control of spills.

Kenneth O. McCreedy
COL, USA
Commander
US Army Fort George G. Meade
Date: _____

Mr. Clyde W. Reynolds
Director
Directorate of Public Works
US Army Fort George G. Meade
Date: _____

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PROFESSIONAL ENGINEER CERTIFICATION *

Having myself (or an agent) visited and examined Fort George G. Meade (FGGM), MD and being familiar with the provisions of 40 CFR Part 112, Oil Pollution Prevention, I certify that this Plan is adequate for the facility having been prepared in accordance with 40 CFR Part 112, good engineering practices, including consideration of applicable industry standards, and that procedures for required inspections and testing have been established.

This certification does not relieve the owner or operator of FGGM of his/her duty to fully implement the Plan in accordance with the provisions of 40 CFR Part 112, Oil Pollution Prevention.

C. Flint Webb, P.E.



Signature of Registered
Professional Engineer



Name of Registered
Professional Engineer

December 21, 2006

Date

32901

Registration Number

Maryland

State

* This Certification does not constitute a "Tank Inspection" as defined by American Petroleum Institute Standard 653 or a seismic inspection.

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US Army Fort George G. Meade
Oil and Hazardous Substance
Spill Prevention and Response Plan

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OIL AND HAZARDOUS SUBSTANCE SPILL PREVENTION AND RESPONSE PLAN

US ARMY FORT GEORGE G. MEADE, MARYLAND

This *Oil and Hazardous Substance Spill Prevention and Response Plan* is a single, operational source document designed to meet the combined regulatory requirements for an Environmental Protection Agency (EPA) *Spill Prevention, Control, and Countermeasure (SPCC) Plan*, and a US Army *Installation Spill Contingency Plan (ISCP)*. Further, this plan addresses the emergency planning, notification and response actions directed by the *Resource Conservation and Recovery Act (RCRA)*, the *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)*, and the *Emergency Planning and Community Right-to-Know Act (EPCRA)* and is consistent with the *National Contingency Plan (NCP)* and the *Area Contingency Plan (ACP)*.

1.0 Planning Requirements

1.1 The National Contingency Plan

The Clean Water Act (CWA) and the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), as amended, require that Federal agencies make plans for emergency response to spills of oil and hazardous substances for which they are responsible. To comply with these acts, the Environmental Protection Agency (EPA) has published Title 40, Code of Federal Regulations (CFR) Part 300, *The National Oil and Hazardous Substances Pollution Contingency Plan*, commonly referred to as the National Contingency Plan. The Final Rule for 40 CFR Part 300 was published on August 15, 1994 with an effective date of October 17, 1994.

1.2 Area Contingency Plan

The Oil Pollution Act of 1990 and Executive Order 12777 require that Area Spill Contingency Plans be developed in accordance with the National Response Policy. The policy also requires that a pre-designated Federal On-Scene Coordinator (FOSC) be assigned to ensure effective and immediate removal of a discharge of oil or hazardous substances. The United States Coast Guard (USCG) designates FOSCs for the coastal zone of the US, and the EPA designates FOSCs for the inland zone.

The US EPA Region III, has been predesignated to carry out the duties of the FOSC for the area. In the event of a spill that reaches or threatens to reach navigable waters, the EPA may send personnel to represent the FOSC and provide advice and assistance to FGGM, as required. In such an instance, it will be the FOSC's intent to fully support FGGM's efforts and not to assume responsibility for the response itself, unless absolutely necessary.

Response procedures during an oil spill incident generally include the following phases: discovery and notification; preliminary assessment and initiation of action; containment, countermeasures, cleanup and disposal; and documentation and cost recovery. While these phases remain much the same for hazardous substance spills, greater emphasis is placed on hazard identification, vulnerability and risk in order to minimize the danger to public and response personnel, to avoid escalation of the incident and to stabilize the situation. The FOSC has the ultimate authority in a response operation and will exert this authority if spill response actions are not performed in a timely manner, in accordance with the ACP or the appropriate response plan.

This Oil and Hazardous Substance Spill Prevention and Response Plan is consistent with the National Contingency Plan (NCP).

1.3 Spill Prevention, Control, and Countermeasure Plan

The EPA's oil pollution prevention regulations found in 40 CFR Part 112, address requirements for non-transportation related facilities to prepare and implement a plan to prevent any discharge of oil into waters of the United States. Non-transportation-related facilities include all fixed facilities and support equipment, but exclude interstate pipelines, railroad tank cars enroute, transport trucks enroute and terminals associated with the transfer of bulk oil to or from a water transportation vessel. US Army Fort George G. Meade (FGGM) qualifies as a non-transportation-related facility.

- 40 CFR Part 112 and Revisions - Regulations were originally promulgated in 1973. Amendments to 40 CFR Part 112 for SPCC requirements were proposed and published in the *Federal Register* on October 22, 1991, as the result of a Task Force recommendations stemming from an Ashland Oil Company storage tank collapse and a spill of 3.8 million gallons in 1988. In 1989 the *Exxon Valdez* spill occurred, with over 11 million gallons of heavy crude oil discharged into Prince William Sound, Alaska. This event led to the enactment of the Oil Pollution Act of 1990 (OPA 90). The Act mandated new requirements and regulations associated with emergency response to oil spills to establish and clarify: (1) lines of responsibility, (2) response planning and capability, and (3) readiness training. A Final Rule implementing OPA 90 requirements for facility response planning was published in the *Federal Register* on July 1, 1994.

SPCC requirements were also amended and proposed in 1993 as a result of the OPA 90 legislation. Regulations were again proposed in 1997. Additional requirements to facility response planning were proposed in 1999 and became final in July 2000. The various SPCC Plan proposals and amendments were clarified and issued as a Final Rule In the *Federal Register* on July 17, 2002 becoming effective August 16, 2002.

- SPCC Plan Requirement Criteria - 40 CFR Part 112 establishes spill prevention procedures, methods, and equipment requirements for non-transportation-related facilities with aggregate aboveground (non-buried) oil storage capacity greater than 1,320 gallons or underground (buried) oil storage capacity greater than 42,000

gallons. Facilities meeting these criteria and that have discharged or, due to their location, could reasonably be expected to discharge oil into navigable* waters of the United States or adjoining shorelines, shall prepare a SPCC plan.

US Army Fort George G. Meade (FGGM), because of its location and its aboveground oil storage capacities exceeding regulatory thresholds, qualifies as a non-transportation-related facility requiring an SPCC plan. This Plan has been prepared and the facility has installed equipment and implemented procedures to conform to the requirements of 40 CFR Part 112.7.

* Navigable waters of the United States include territorial seas, all interstate waters, intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes or natural ponds.

1.4 Facility Response Plan

In response to the Oil Pollution Act of 1990 (OPA 90), the EPA has issued 40 CFR Part 112, *Oil Pollution Prevention; Non-Transportation-Related Onshore Facilities*, that governs the development of Facility Response Plans (FRP) for oil storage and transfer facilities.

Facility Response Plans must be prepared and submitted to EPA's Regional Administrator for those facilities that, because of the volume of oil stored, could reasonably be expected to cause substantial harm to the environment should a spill occur. **Because FGGM does not meet the EPA's oil storage threshold nor is considered a potential substantial harm facility, the FRP requirement does NOT apply to FGGM and the installation is NOT required to submit a response plan to the EPA Regional Administrator.** However, FGGM is dedicated to protecting the environment and will follow the requirements of OPA 90, by including strong spill response guidelines in this plan.

1.5 State of Maryland Oil Pollution and Tank Management

Code of Maryland Title 26 subtitle 10, *Oil Pollution and Tank Management*, outlines pollution prevention requirements, notification procedures, and removal procedures for oil contaminated materials within the State of Maryland.

1.6 US Army Installation Spill Contingency Pan

Army Regulation 200-1, *Environmental Protection and Enhancement*, dated April 21, 1997, Chapter 3, Oil and Hazardous Substances Spill Contingency Planning, Control and Emergency Response, requires all installations, within specific parameters, to maintain an Installation Spill Contingency Plan to identify resources for cleaning up spills at their installations and activities.

The Army's regulation implements and expands the requirements of Federal law and regulations. AR-200-1 requires the SPCC plan to include potential releases, spills, or discharges to air, land, and groundwater. It also requires that the guidelines for the SPCC plan apply to hazardous materials stored at the installation in amounts greater than listed reportable quantities or in any quantity that may present a threat to human health or the environment. By addressing spill prevention and response procedures for hazardous materials, the installation meets requirements of the Comprehensive Environmental Resources Compensation and Liability Act (CERCLA) and its implementing regulations.

1.7 Additional Emergency Response Planning

Facilities that handle or store hazardous substances, the release of which could endanger health and human safety and adversely impact the environment, must comply with additional Federal regulations that govern emergency planning, notification and response. These requirements are part of RCRA, CERCLA, and EPCRA contained in 40 CFR Part 262, 40 CFR Part 302, and 40 CFR Part 355, respectively.

2.0 Administration and Policy

2.1 General

As a major operational military installation, FGGM includes facilities whose operations have the potential for spills of oil on land and water. Operational efficiency and safety of personnel and equipment, as well as Federal, State, and Army regulations, all require that a plan exist to effectively respond to oil and hazardous substance spills at the installation. This **Oil and Hazardous Substance (OHS) Spill Prevention and Response Plan** serves as the single operational document for responding to oil and hazardous substance spills occurring on the FGGM Military Reservation.

The OHS Spill Prevention and Response Plan satisfies the Environmental Protection Agency (EPA) requirement for a Spill Prevention, Control, and Countermeasure (SPCC) Plan. It also satisfies the State requirement from the Maryland Department of the Environment for an Oil Pollution and Tank Management (COMAR 26.10). This OHS Spill Prevention and Response Plan is purposely designed to combine Federal, State and Army response plan requirements into one operational document that can be used by responsible officials at FGGM. Additionally, it satisfies emergency planning requirements identified by RCRA, CERCLA, and EPCRA, and when followed will ensure required notifications are given to all appropriate agencies and that FGGM's response actions are timely and complete. **A detailed cross-reference is provided on the green pages at the front of the OHS Spill Prevention and Response Plan for use by the regulatory agencies.**

2.2 Army Policy

Army policy is to comply with Federal and State regulations.

2.3 Effective Date

The FGGM OHS Spill Prevention and Response Plan is effective December 15, 2006 and supersedes all previous FGGM spill prevention and response plans.

2.4 Plan Submission

This Plan will be submitted to the Maryland Department of the Environment Oil Control Program Office.

2.5 Plan Review and Resubmission

The OHS Spill Prevention and Response Plan will be reviewed at least annually by the Garrison Commander, FGGM or his/her designated representative (the Director, Directorate of Public Works), to incorporate changes in the listings of economically important or environmentally sensitive areas, to address changes at the facility (design, construction, operation or maintenance that materially affects the facility's potential for discharge into navigable waters), and to ensure compliance with any applicable changes to the National or Area Contingency Plans. The annual review is to be made within one month of the anniversary date of the approval of the original plan. If there are no changes to the OHS Spill Prevention and Response Plan, the Record of Changes should be so annotated. If there are changes, the resulting plan amendments must be noted on the Record of Changes page and provided to all plan holders.

SPCC Plan requirements provide that the owner or operator will conduct a complete review of the SPCC Plan at least once every five years. The review must be documented. The Plan will be amended within six months following a review to incorporate more effective control and prevention technologies if the technology will significantly reduce the likelihood of a new release, and the technology has been field proven at the time of the review. Materiel changes resulting in amendments to the SPCC Plan, e.g., new construction or operational procedures, must be certified by a registered professional engineer in accordance with §112.3 (d) of 40 CFR 112.

2.6 Proponency

The responsible office for the OHS Spill Prevention and Response Plan is the:

Director
Directorate of Public Works
2212 Chisholm Avenue
Fort George G. Meade, Maryland 20755-5115
Phone: (301) 677-9141

2.7 FGGM Policy for Responding to Oil and Hazardous Substance Spills

- In the event of an oil or hazardous substance spill, persons discovering the discharge shall notify FGGM Fire and Emergency Services (Fire, Military Police and Medical) by calling the following number:

FGGM Fire and Emergency Services - 911

- Supervisors and/or personnel responsible for petroleum or hazardous substance storage or handling at FGGM, who discover a spill, are required to take action **to stop the flow, contain the spill and cleanup the discharge within the limits of their training and capability**. If they are unable to safely and completely take these initial actions, they shall **notify the FGGM Fire Department immediately**.

- The fire department serves as the initial responder to all reported spills and notifies the Director, Directorate of Public Works (DPW) of the circumstances. The Senior Fire Officer (fire department) responding to a spill assumes duties as the acting Installation On-Scene Coordinator (**IOSC**), until such time as DPW assumes these responsibilities or designates another individual.
- The Director, DPW serves as FGGM's predesignated **IOSC**, and has full authority to direct and coordinate all control and cleanup efforts at the scene of an oil or hazardous substance discharge. The DPW also serves as the FGGM "Qualified Individual," defined by EPA as an individual with authority, including contracting authority, to implement spill removal actions. (See Section 6.0 for further discussion of the **IOSC** and Qualified Individual.)
- The DPW, upon arrival at the spill site, may assume the duties as **IOSC**, leave the Senior Fire Officer as the acting **IOSC**, or appoint others, as appropriate, to assume **IOSC** duties. See Annex D, Spill Response Organization and Duties.
- The DPW makes all required notifications to Federal, Army, State and local officials as a result of an oil or hazardous substance spill at FGGM. However, when the time sensitivity of an emergency requires immediate notification of these agencies, the Senior Fire Officer will initiate this notification process and ensure that the **IOSC** is informed.
- Additional members of the Incident Management Team (IMT) are alerted by the **IOSC** as needed to assist with the management of a spill. The IMT is the installation-wide structure utilized to manage spills or the threat of a spill at FGGM. It includes personnel with emergency operations skills, e.g., public affairs and safety. Other FGGM personnel and equipment are available from military units and post support organizations and may, under some circumstances, be safely used in some cleanup capacity with little or no additional training, protective equipment, etc.
- The IMT is directed by the **IOSC**, who is responsible for local planning, training and the execution of the FGGM OHS Spill Prevention and Response Plan.
- Depending upon the size and effects of the spill, the **IOSC** can activate the entire IMT structure or selected portions. See Annex D, Spill Response Organization and Duties.
- If the spill incident is beyond the Fire Department and IMT capabilities, **IOSC** initiates action to obtain appropriate spill response contractor and other outside support.
- The Garrison Commander, FGGM, can direct the full support of **IOSC** requirements with augmentation personnel and equipment from military organizations assigned to the installation. If necessary, additional military specialists and equipment from other

Department of Defense (DoD) installations can also be requested. The **IOSC** requests additional DoD assistance through the Garrison Commander.

3.0 Plan Organization

The FGGM Oil and Hazardous Substance (OHS) Spill Prevention and Response Plan is organized into three basic sections (listed below):

3.1 Emergency Response Action Plan (THE RED PLAN)

This is an abbreviated, critical action plan that defines key procedures that must be taken in the early stages of a response to an oil or hazardous substance spill. This plan, which functions as a concise, separate, stand-alone document for spills of any kind, addresses essential and time-sensitive procedures that must be followed. **THE RED PLAN'S** primary purpose is to minimize confusion, simplify and guide initial response procedures, and ensure proper organization of the installation's response effort. In following **THE RED PLAN**, once appropriate notifications and response are underway, transition to the more detailed OHS Spill Prevention and Response Plan is directed. **THE RED PLAN** is printed on red-bordered paper and is the first section in the FGGM OHS Spill Prevention and Response Plan.

3.2 FGGM Oil and Hazardous Substance Spill Prevention and Response Plan

This is the FGGM in-depth response plan that addresses all aspects of the response, organization, assessment, establishment of priorities, environmental considerations, recommended cleanup techniques, training, preventive maintenance, etc. The OHS Spill Prevention and Response Plan provides essential guidance in addressing wide-ranging response actions and specific Federal, State, and Army planning requirements. After key actions in **THE RED PLAN** have been initiated, the Director, DPW, serving as the IOSC and Qualified Individual (QI), in coordination with the IMT and the primary spill response contractor, develops a coordinated strategy for the response and begins a thorough organization of the response, recovery and mitigation efforts, following the OHS Spill Prevention and Response Plan.

3.3 The Supporting Annexes

The supporting annexes at the gold tabs are for use with both of the above plans, and provide more detailed information, guidance and supporting data that is important to the overall management of spill response operations.

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4.0 Mission and Location

This section outlines general background information at FGGM, including; the geographical location, general description, access, and fuel transfer operations.

4.1 Mission and Organization

FGGM is part of the U.S. Army Installation Management Agency (IMA) under the command of the Northeast Regional Office (NERO). The primary mission of FGGM is to provide base operations support for facilities and infrastructure, quality of life and protective services in support of DoD activities and Federal agencies. In support of this mission, FGGM is home to numerous DoD activities and Federal Agency functions including:

- 311th Theater Signal Command
- 3rd Training Support Battalion
- 48th Combat Hospital
- 55th Signal Company (Combat Camera)
- 694th Intelligence Group Family Support Services
- 704th Military Intelligence Brigade
- 902nd Military Intelligence Group
- 308th MI Battalion Fort Meade Detachment
- Army Public Affairs Center
- Asymmetric Warfare Group
- Defense Courier Service
- Defense Information School
- Headquarters Company, Marine Support Battalion
- Kimbrough Ambulatory Care Center
- Kimbrough Ambulatory Care Center
- National Security Agency
- Navel Security Group
- NCO Academy Detachment
- Northeast Region Defense Commissary Agency
- US Army Claims Service
- US Army Field Band
- US Army Recruiting Battalion – Baltimore
- US Army Test Measurement and Diagnostic Equipment Support Lab
- US Army Center for the Health Promotion and Preventative Medicine
- Environmental Protection Agency

4.2 Facility Location

FGGM is located in southeastern Maryland almost midway between the cities of Baltimore, MD to the north and Washington, DC to the south. The installation is completely contained within the borders of Anne Arundel County, MD. FGGM occupies approximately 5,415 acres and is bordered to the south by the Patuxent National Wildlife Research Refuge. Refer to Figure 4-1 for the facility location. The installation is accessed from the following major entry points:

*Oil and Hazardous Substance Spill Prevention and Response Plan
US Army Fort George G. Meade, Maryland*



- From the north through the Rockenbach Road Gate
- From the west through the Mapes Gate (western)
- From the east through the Mapes Gate (eastern)
- From the east through the Reece Road Gate
- From the east through the Llewellyn Gate

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5.0 Facility Owner/Operators - FGGM

The Code of Federal Regulations, Title 40, *Protection of the Environment*, defines an owner or operator as “any person owning or operating and onshore facility or an offshore facility...”.

5.1 Facility Owner

Commander
US Army Fort George G. Meade
Building 4550 Parade Field Lane
Fort Meade, MD 20755

5.2 Facility Operators

Directorate of Public Works
2212 Chisholm Avenue
Fort George G. Meade, Maryland
(301)-677-9141

Army and Air Force Exchange Service Service Station
ATTN: Store Manager
Car Care Center, Building 4587
(410) 672-3238 or (410) 674-7672.

Army and Air Force Exchange Service Shoppette
Building 4706
ATTN: Store Manager
(410)-672-1183

IAP World Services, Inc
301-677-1106 (24-hour)

5.3 Operator for Environmental Oversight and Compliance

Director
Directorate of Public Works
2212 Chisholm Avenue
Fort George G. Meade, Maryland, 20755-5115
(301) 677-9141

5.4 Department of Emergency Services

Director
Department of Emergency Services
6619 Mapes Road
Fort Meade, Maryland 20755-5045
301-677-6622

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6.0 Authorities

This section identifies the primary oil and hazardous material spill response personnel identified under US Army and Federal regulations.

6.1 “Qualified Individual”

Federal pollution prevention and response plan regulations require that a "Qualified Individual" and at least one alternate "Qualified Individual" be designated in all petroleum-handling facility response plans. Further, these regulations require that the "Qualified Individual" and alternates must:

- Speak fluent English;
- Be available on a 24-hour basis and be able to arrive at the facility within a reasonable time;
- Be familiar with the implementation of the facility response plan;
- Be trained in their responsibilities in the response plan; and
- Have written authority to activate and engage in contracting with oil spill removal organizations, act as liaison with the predesignated Federal On-Scene Coordinator, and obligate funds to carry out response activities.

In compliance with EPA regulations, the Director, Directorate of Public Works (DPW) is designated as the “Qualified Individual” and has full authority, including contracting authority, to implement spill removal and ensure compliance with all applicable waste disposal requirements.

Mr. Clyde W. Reynolds
Director
Directorate of Public Works
2212 Chisholm Avenue
Fort George G. Meade, Maryland, 20755-5115
(301) 677-9141

6.2 “Alternate Qualified Individual”

In the absence of the Director, DPW, the Chief, Environmental Division serves as the Alternate Qualified Individual. The Alternate QI has full authority to implement spill removal and ensure compliance with all applicable waste disposal requirements.

Mr. Michael Butler
Chief, Environmental Division
239 Ross Road at 2 ½ Street
Fort George G. Meade, Maryland 20755-5115
(Day) (301) 677-9188 (24 Hour) (301) 787-6309

6.3 Installation On-Scene Coordinator

The Director, DPW, representing the Commander at FGGM, serves as the principal operational point of contact for installation queries concerning environmental matters pertaining to petroleum and hazardous materials storage and spill prevention and response. The DPW is responsible for mandatory notifications to Federal, State and local authorities. However, when the time sensitivity of an emergency requires immediate notification of these agencies, the Senior Fire Officer will initiate this notification process and ensure that the IOSC is informed. The Senior Fire Officer responding to a spill serves as the acting IOSC, until such time as DPW assumes these responsibilities or designates another individual. During spill events, the DPW heads the Incident Management Team and serves as the predesignated Installation On-Scene Coordinator. Army regulations define the Installation On-Scene Coordinator as that official whose responsibility it is to coordinate and direct Army control and cleanup efforts at the scene of an oil or hazardous substance spill due to Army activities. The Chief, Environmental Division, serves as the Alternate Installation On-Scene Coordinator.

6.4 Acting Installation On-Scene Coordinator

In the absence of the DPW, the Chief, Environmental Division or the Senior Fire Officer (fire department) serves as the acting IOSC, and alerts needed members of the Installation Management Team.

6.5 Emergency Coordinator/Emergency Response Coordinator

The Emergency Coordinator's duties under RCRA and Emergency Response Coordinator's duties under EPCRA for reporting, planning and responding to hazardous waste and hazardous substance releases are the responsibility of the DPW. The Chief, Environmental Division, serves as the Alternate Emergency Coordinator and Alternate Emergency Response Coordinator.

7.0 Petroleum and Hazardous Substances Stored at FGGM

FGGM stores oil and hazardous substances in various quantities throughout the installation. Most of these petroleum products are stored in ASTs; however, large quantities of fuel for distribution are stored in USTs. Hazardous substances are stored in appropriate containers at the individual activities.

7.1 Petroleum Storage

The following petroleum or petroleum-related liquid products are stored in bulk at FGGM:

- Gasoline (unleaded regular, mid and premium grades);
- Diesel Fuel;
- Fuel Oil #2; and
- Used Oil

Refer to Figure A-1 (Annex A) for the locations of major oil storage and handling sites.

7.2 Hazardous Substance Storage

An inventory of hazardous substances stored at FGGM is maintained by the Directorate of Public Works. This inventory is updated annually and is used to provide information to the FGGM Fire Department and the Local Emergency Planning Committee for areas that could be affected by a release. Site-specific spill response plans have been developed for each storage location that could require responders to assume the highest levels of personnel protection in the event of a release, i.e., the Water Treatment Plant (Building 8688) and DPW Hazardous Waste Turn-in Facility (Building 2250). Known hazardous substances stored in bulk on FGGM are listed in Table 7-1 with the Reportable Quantity (RQ) for each substance.

Table 7-1: Known Hazardous Substances Stored at FGGM

Hazardous Substance	Reportable Quantity (lbs.)
Chlorine	10
Hydrofluosilicic Acid	100
Methanol	5,000

7.3 Material Safety Data Sheets

Material Safety Data Sheet (MSDS) information for petroleum products and for those hazardous substances that are stored in bulk, transferred or handled at FGGM, is located at Annex J.

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8.0 Maximum Petroleum Storage and Handling Capacities

8.1 Aboveground Storage

The maximum aboveground petroleum storage capacity at FGGM is 73,962 gallons. See Annex A for a detail listing of ASTs on FGGM.

8.2 Underground Storage

The maximum underground petroleum storage capacity at FGGM is 130,150 gallons. See Annex A for a detail listing of USTs on FGGM.

8.3 Oil-Containing Electronic Transformers

The total oil capacity of electrical transformers on FGGM which contain 55-gallons or greater of dielectric oil is 12,776 gallons.

8.4 Non Petroleum Oils

The only non petroleum oils (NPO) on FGGM are used cooking oils generated at the dining facility, the Food Court, the Golf Course Club House, Club Meade, and the Burger King. The dining facility currently stores NPO in 55-gallon drums. However, a new dining facility with an underground used oil tank has been constructed and is scheduled to open in the spring of 2006. The other NPO generators use 100 gallon grease storage containers. The estimated total NPO storage capacity for all four of these facilities is 450 gallons

8.5 Drums (55-gallon)

Drums (55-gallon) are used for storage of petroleum products and used oil at various locations throughout the installation. Approximately 100 55-gallon containers are in use. The total estimated oil storage capacity of these containers is 5,500 gallons.

8.6 Total Storage Capacity

The total petroleum storage capacity at FGGM is 244,338 gallons. A breakout of all tanks to include the capacity and other characteristics can be found in Annex E, Tab 1. See Annex A for more detailed information about the major FGGM fuel handling and storage facilities.

AST Storage	=	73,962	gallons
UST Storage	=	130,150	gallons
Transformers	=	12,776	gallons
Non Petroleum Oil	=	450	gallons
Drums		<u>5,500</u>	<u>gallons</u>
Total Storage		222,838	gallons

9.0 Spill Prevention

An outline of the FGGM spill prevention perspective can be found in Annex E, Tab 1 (Tank Hazard Identification). Included here are all ASTs and USTs, detailing the type of product stored, construction type and year installed, location, and current status in terms of selected spill prevention characteristics.

As a means of insuring that the latest spill prevention techniques are used and practiced, training requirements from the various regulatory agencies and the US Army are highlighted at Annex M (Training, Drills, Exercises and Records). These include a summation of FGGM's annual training requirements, and the drill and exercise program at various levels of the Incident Management Team organization.

Spill prevention also requires a set of inspection procedures which are systematic, conducted on a periodic basis, and can be incorporated into the various activities of the installation. At Annex N (Facility/Equipment Inspection and Records) are the inspection forms FGGM uses to insure the proper measures are taken to sustain an effective spill prevention program.

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10.0 Discovery, Notification, and Response Countermeasures

This section deals with discovery, notification, and response countermeasures procedures that occur when a responsible FGGM employee becomes aware of an oil or hazardous substance discharge or the threat of a discharge.

10.1 Discovery

Spills during operational hours will likely be discovered quickly because of the number of military and civilian workers in the area. If the spill occurs during training, fuel servicing or maintenance operations, these activities will be shut down immediately to stop the flow and isolate the spill. If necessary, personnel can activate any available fire extinguisher systems, but the source of the spill should be secured as soon as possible without endangering the health and safety of personnel involved.

Spills during non-duty hours will probably be detected by a military police patrol or a passerby. In this instance, the individual discovering the spill should immediately notify the fire department. No attempt should be made by the discovering individual to stop the flow, unless the source is obvious and that person is familiar with the facility and/or equipment.

10.2 Notification

This sections covers notification requirements to Emergency Services, The Directorate of Public Works, and Federal, State, and Local agencies, which are required after a spill event.

10.2.1 Emergency Services

When a spill or the threat of a spill occurs, the FGGM Emergency Services (Fire, Military Police and Medical) will be notified immediately.

FGGM Fire and Emergency Services - 911

The Senior Fire Officer responding to a spill will immediately assume the duties as acting IOSC and will relinquish these duties only when relived by the DPW.

10.2.2 Director, Directorate of Public Works

The fire department will immediately notify the Director, Directorate of Public Works

Director, Directorate of Public Works
(301) 677-9141

10.2.3 Federal, State, and Local Notification Requirements

The EPA regards any petroleum spill into navigable waters that causes a film or sheen upon or discoloration of the surface of the water or adjoining shorelines as a discharge of harmful quantities and requires that persons in charge to immediately notify the **National Response Center (NRC) (1-800-424-8802)** and the emergency coordinators of all local communities that could be affected as soon as they have knowledge of a discharge of oil or a hazardous substance. All spills onto surface waters or into wetlands must be reported to the NRC and State authorities. In addition, any discharge onto the ground surface must be reported to the Maryland Department of the Environment. All mandatory notifications are addressed in **THE RED PLAN** and in Annex B. There are criminal and civil penalties for not notifying the appropriate Federal or State agencies immediately when a discharge occurs. **Mandatory notifications to Federal, State and local authorities are made by the Director, Directorate of Public Works if the spill occurs during normal duty hours.** During off duty hours or, when the time sensitivity of an emergency requires immediate notification of these agencies, the Senior Fire Officer will initiate this notification process and will ensure that the **IOSC** and the Environmental Division is informed. In compliance with Federal regulations and in order to facilitate coordination with local authorities, DPW personnel participate in the Local Emergency Planning Committee meetings.

The Maryland Department of the Environment must be notified **immediately** of an oil discharge, but no later than **2 hours** after detection of the spill. A written report shall be submitted to the State, within **10 working days**, after removal and clean-up work is completed.

Refer to Annex A (Facility Information and Site Diagrams) for critical facility sites and transfer site locations, and **THE RED PLAN** or Annex B (Notification Checklist) for contact information.

10.2.4 US Army Northeast Regional Office Notification Requirements

If an oil or hazardous substance spill or release occurs on FGGM, the IOSC must contact the US Army Northeast Regional Office (NERO). NERO memo IMNE-PWD-E, dated December 5, 2005, provides an outline of reporting requirements as well as a notification form (Annex B).

US Army Northeast Regional Office
787-788-5340

10.3 Specific Spill Response Countermeasures

At a minimum, the following specific spill response countermeasures shall be taken at FGGM in the event of a spill. A more detailed outline of specific responsibilities is provided at Annex D, Spill Response Organization and Duties.

10.3.1 Responsible Unit/Activity

This is the organization responsible for the operation, area, or equipment that caused the spill. If work is in progress and a spill is observed, the responsible unit/activity should report the spill to the nearest supervisor immediately available. The unit/activity notifies the fire department, controls and contains the spread of the spilled material and provides cleanup without risk to life or health. They should attempt to remain on location to guide the response team, fire department or work crews to the spill area.

10.3.2 FGGM Fire Department

The fire department is the initial responder to spills that present a fire hazard, reach a waterway, or any spill in which the responsible unit/activity does not feel capable of containing in a safe manner. The Senior Fire Officer may notify the DPW when additional assistance is needed or can request immediate support directly from appropriate agencies, e.g., Public Works. As the designated acting Installation On-Scene Coordinator, the Senior Fire Officer will provide emergency assistance to injured or exposed personnel, take actions to minimize the chance of fire or explosion, and make the official estimate on the quantity of the spill. The fire department will attempt to contain and control a spill and ensure it does not enter stormwater drainage or navigable/State waters.

10.3.3 Director, Directorate of Public Works

After being alerted to a spill, the DPW assumes the duties of **Installation On-Scene Coordinator (IOSC)**. The DPW also becomes the "**Qualified Individual**" capable of making key decisions concerning the spill, initiating and executing the OHS Spill Prevention and Response Plan, and committing resources to address the emergency situation.

The initial response effort is directed by the **IOSC** and is composed of trained and capable assets on-hand at FGGM. These assets include, but are not limited to, installation employees who handle various quantities of fuel, the Installation Support Services Contractor, and Directorate of Public Works organizations. Every effort is made to confine the spill on land, to prevent it from entering creeks or stormwater and sewer drains, and keep it from otherwise spreading beyond the installation. The Garrison Commander is alerted by the **IOSC**, as required, of the spill discovery and advised on any available information on the magnitude of the spill, the type product spilled, whether the spill threatens any waterway or sensitive environment areas, and whether additional assistance will be required. From this information, the requirements for boom and water recovery devices, pumps, hoses, skimmers, vacuum recovery equipment, etc., are determined and associated trained FGGM employees and outside resources are alerted for movement to the spill site or other critical areas.

For the local responders, the **IOSC**, or the fire chief (if so designated), becomes the focal point on the nature of the emergency, what the conditions are at the facility, the type and amount of spilled product, the cause of the spill, what cleanup services are en route, and what the cleanup priorities will be.

Site-specific cleanup priorities are then determined from assessing the conditions at the spill site and referring to the preestablished priorities listed in Paragraph 13.0 (Protection and Cleanup Priorities, Methods and Techniques) of the OHS Spill Prevention and Response Plan. The **IOSC** develops a cleanup plan tailored to the requirements at the spill site and allocates cleanup assets to these tasks and priorities.

While immediate emergency actions are being taken, the DPW will gather information required to complete the "Initial Incident Oil Spill Report" form (located in **THE RED PLAN** and Annex B, Notification Checklist), and begin making and recording all applicable mandatory notifications listed on the notification page of **THE RED PLAN**. The Environmental Division will assess the environmental impact of the spill and complete the written report as required. (See Annex B)

10.3.4 Public Affairs Officer

The liaison between FGGM, other Federal activities, and the media is conducted by the Public Affairs Officer (PAO) at FGGM. The PAO coordinates statements about the oil spill incident to interested personnel outside of FGGM. Refer to Annex L, Public Affairs, for further details.

10.3.5 Garrison Commander, FGGM

As noted in paragraph 6.2, the Garrison Commander, FGGM has designated the DPW as the **IOSC** and to serve as the principal point of contact for FGGM spill response actions. The **IOSC** responds to the scene upon notification of the spill. As an authorized QI, the DPW may take charge of the scene or provide command support to a designated QI on the scene. The **IOSC** is responsible for notifying the Commander whether the spill constitutes a threat to human health or welfare, endangers critical water areas, receives major coverage in the public press, or becomes the focus for an enforcement action. The DPW will submit situation reports to the Commander and the EPA (and other interested Federal agencies) or the Maryland Department of the Environment, as applicable and provide personnel, materials, training, and equipment as required.

10.3.6 Incident Management Team

In addition to the key personnel listed above, other members of the installation staff, who can provide management oversight of specific areas, may be included in the Incident Management Team (IMT) to ensure full support to the spill operation, e.g., Safety Officer; Provost Marshal; and the Post Judge Advocate. Annex D, Spill Response Organization and Duties, discusses the IMT.

10.3.7 Additional Spill Response Support

Once the magnitude of the cleanup requirement is more visible, additional resources and cleanup capability may be required. The **IOSC** has the option of continuing with an expansion of the primary spill response support from FGGM assets, or obtaining additional spill response resources from other military commands or from commercial Oil Spill Removal Organizations (OSRO).

10.4 Response Countermeasures at Potential Spill Sites

There are two sites on FGGM where large amounts of petroleum products are stored In ASTs. These include the following:

- DPW Controlled Hazardous Substance Storage Facility (Building 2250)
- AAFES Gas Station (Building 4680)

10.4.1 DPW Controlled Hazardous Substance Storage Facility

Building No: 2250
Operating Hours: Monday through Friday 0700 to 1530

A discharge at the DPW Controlled Hazardous Substance Storage Facility would be discovered by one of the civilian personnel who operate the storage system if it occurred during normal operational hours. A discharge from one of the aboveground storage tanks may result from failure of a tank wall/shell, tank bottom, piping, or a control valve. Accidental overfilling of a tank would also cause a discharge. The tanks are designed to contain the entire contents of each tank. Should a spill be detected during transfer operations to or from a storage tank, emergency shutdown is accomplished by manually closing control valves to isolate the transfer system. Spill response and cleanup procedures would be instituted as previously discussed. Removal of large amounts of contaminated soils and debris would be performed by a competent remediation contractor.

10.4.2 AAFES Gas Station

Building No. 4680
Operation Hours: Monday through Friday 0700 to 1800
 Saturday 0900 to 1600
 Sunday 1100 to 1600

The AAFES Service Station provides retail fueling services to military and civilian personnel authorized military exchange privileges. During normal operating hours, supervisory, maintenance and sales personnel are present throughout the facility and would quickly detect any surface discharge should it occur. Such a discharge could happen during bulk resupply operations or automotive fueling (all pumps are self-service). During vendor resupply operations, tank truck operators are required to remain

with the trucks during the fuel transfer and would stop refueling should a spill occur. In addition, all fuel trucks are escorted by security for the entire time they are on the Installation. Therefore, any spill during resupply would immediately be reported to the Post Dispatch Center. Access to the fill pipe for each tank is within a loading pit that is able to contain small spills. These pits are closed and the covers locked except during resupply operations.

Emergency shutoff switches are located at the cashier's window (Gas Station) and outside the main building (Shoppette) should a spill occur during automotive fueling operations. Additionally, leak detectors installed on the fuel lines from the ASTs to the pumps automatically shut down all pumps if a leak is detected on a line.

10.4.3 Spills in Other Areas

Routine, day-to-day operations may present risks of discharging oil or releasing hazardous substances. In addition to the mobility fuel storage areas, spills might also occur at other locations that store oil for emergency generators or heating systems, or that use petroleum products during routine maintenance and repair or replacement operations, etc. The method of responding to these spills would be generally similar to those methods discussed above. Refer to Annex O.

11.0 Response

Also see Annex D, Spill Response Organization and Duties; Annex F, Facility Response Equipment and Annex G, Spill Response Contract Support.

11.1 Actions by the Initial Responders

After being notified of a spill, the DPW assesses the situation and, if necessary, assumes the duties of **IOSC**. Immediate actions are taken by the facility supervisor discovering and reporting the spill, as outlined in Paragraph 10.0 (Discovery, Notifications and Response Countermeasures). Following guidelines in **THE RED PLAN**, the DPW alerts and assembles the IMT, briefs the IMT members on the situation, then initiates the FGGM OHS Spill Prevention and Response Plan.

11.2 Incident Command System

FGGM uses the Incident Command Management System in the event of a spill or mishap. This method of management outlines the responsibilities of certain personnel and establishes the chain of command to respond to an emergency situation. The Incident Command System (ICS) chain of command specifies the following responsibilities:

- Personnel observing an emergency situation or an imminent spill threat can call the Department of Emergency Services (DES) (911) and provide the fire department personnel with the information required.
- Once the information is obtained by the Fire Department concerning the spill, the Duty Fire Chief (who assumes the role of IOSC) will be fully informed. The IOSC will decide on the required equipment and response team necessary to control the oil or hazardous substance spill. If deemed necessary, the IOSC will notify the FGGM Hazardous Materials Response Team (HMRT). The HMRT is supervised by the DES Incident Commander.
- During the assessment and containment phases and while mitigation efforts are in progress, the Emergency Operation Center would be used to coordinate large mitigation operations. Once the threat to life, property, and the environment is controlled or eliminated, the Chief, Environmental Division assumes the responsibility of the IOSC.

11.3 Installation On-Scene Coordinator Duties (See Annex D)

After being notified of the spill and determining its impact, the DPW may assume responsibilities as the Installation On-Scene Coordinator (**IOSC**) or may move to the spill site for a firsthand assessment before assuming these responsibilities. In a large spill, the

DPW uses the facility employees and supervisory personnel at the spill site, the IMT, and the FGGM emergency services (Fire, Police and Medical) to further contain the spill, minimize the risk of fire and to initiate cleanup. As additional information arrives on the effects of the spill, the **IOSC** adjusts the installation response strategy to new priorities and requirements. If additional assets are required, the DPW requests assistance from other contractual resources and the Garrison Commander, who can obtain assistance from other nearby military installations.

12.0 Petroleum Discharge and Spill Scenarios

12.1 Response Planning Scenarios

The EPA regulations in 40 CFR Part 112 require a scenario discussion of response planning levels for Small, Medium, and Worst Case Discharges. FGGM is not required to provide a discussion of these discharge scenarios because the Installation is not a “substantial harm” facility. These scenarios have been provided as part of this document for environmental planning and hazardous response training purposes.

12.2 EPA Discharge Scenarios

- **Small Discharge** - a discharge of 2,100 gallons or less;

- **Medium Discharge** - a discharge of 36,000 gallons or 10% of the capacity of the largest aboveground tank at the facility (10% X 180,000 gallons = 18,000 gallons) at RSA), whichever is less, provided that this amount is less than the worst case discharge; and

- **Worst Case Discharge** - a discharge of the full capacity of the largest aboveground oil storage tank within a common secondary containment area, or the largest aboveground oil storage tank within a single secondary containment area, whichever is greater. For RSA, the largest tank is 180,000 gallons.

12.3 Federal Worst Case Planning Factors

Federal worst case planning factors are addressed in 40 CFR Part 112. Although FGGM is not required to do so, these planning factors and required calculations are discussed in Annex I, Federal Worst Case Planning Volumes.

12.3.1 EPA Discharge Determinations

The EPA defines the worst case discharge for Non-Transportation-Related Onshore Facilities as the largest foreseeable discharge in adverse weather. For multiple tank facilities, each with separate secondary containment, the worst case discharge is established by determining 100% of the capacity of the largest single aboveground storage tank. The EPA worst case discharge for FGGM is 12,000 gallons.

12.4 FGGM Response Planning Scenarios

A total of three possible oil spill scenarios at FGGM are presented in this subparagraph. These scenarios do not indicate an order of probability, nor are they inclusive of all possible types of mishaps. They simply serve to comply with regulatory guidance by illustrating possible incidents, and stressing the procedures and methodology for effective planning, and execution of the plans. The scenarios selected are listed in Table 12-1.

Table 12-1: EPA Discharge Scenarios

Scenario	Type	Quantity	Location
Case #1	EPA Small Discharge	Less than or equal to 2,100 gallons	Government Gas Station
Case #2	EPA Medium Discharge	7,000 gallons	Overturned commercial tanker truck
Case #3	EPA Worst Case Discharge	Capacity of the largest above-ground storage tank within a single secondary containment area (12,000 gallons)	DPW Recycling Center

12.4.1 Case #1: EPA Small Discharge Scenario

The EPA small discharge for FGGM involves the release of approximately 400 gallons during the off-loading of a tanker truck at the Government Gas Station.

On a weekday morning, a tanker truck arrives at the Government Gas Station to deliver fuel. After checking with the Fuels Manager, the driver begins off-loading gasoline, first stick-gauging each tank. Initially, the off-loading proceeds normally until the driver sees fuel leaking from around one of the couplings. As he attempts to re-seat and re-adjust the coupling, the connection separates releasing a large quantity of gasoline. The driver is soaked with fuel, stunned and momentarily disoriented. The Fuels Manager rushes over and helps the driver move away from the spilling fuel. The driver revives enough to return to the tanker and activate the emergency shut-off lever which stops the flow. The Fuels Manager calls 911.

The spilled fuel rapidly spreads out and can not be contained by absorbents on the tanker truck or in the spill kit at the service station. The spill quickly flows toward the storm drain before the fire department arrives on the scene. (See Figure 12-1 for a diagram of the discharge scenario).

The Senior Fire Officer, as the Incident Commander and **Acting IOSC**, assesses the situation. Military police and medical support are requested while firefighters secure the site and move non-essential personnel away from the spill. The SFO determines that no further fuel is leaking and directs firefighters to work to attempt to block-off the drains with absorbents. The SFO contacts the Chief, Environmental Division, to report the spill and requests that appropriate notifications be made and cleanup resources be mobilized.

The Chief, Environmental Division, goes to the spill site and, after talking with the driver and SFO, estimates that 400 gallons of gasoline have been released.

12.4.2 Case #2: EPA Medium Discharge Scenario

The EPA medium discharge for FGGM involves the release of approximately 7,000 gallons of gasoline from an overturned commercial tanker truck.

A fully loaded commercial tanker truck is making a routine delivery to the AAFES Shoppette (Building 4706). After clearing through the Security checkpoint, the tanker is under Security escort to the AAFES Shoppette. A personally operated vehicle (POV) is disregarding the posted speed limit and does not see an upcoming stop sign. The Security and tanker truck make their way through a four-way stop intersection. In the middle of the intersection the POV collides with the tanker trailer and shears off the manifolds. All vehicles come to stop and fuel immediately begins to drain from the tanker. (See Figure 12-2 for a diagram of the discharge scenario).

The driver jumps from the cab to assess the damage and is unable to stop the flow. The Security Officer immediately radios to the FGGM Dispatch Center.

Within minutes, the fire department arrives and the Senior Fire Officer assumes the role of **Acting IOSC**. By that time, a large volume of fuel has spilled from the tanker onto the ground and migrated into a nearby storm drain. Realizing that the spill could reach Midway Branch and the Patuxent Wildlife Refuge, the **Acting IOSC** directs firefighters to use dirt and sorbent materials to build dams well downgradient from the spill in an effort to prevent additional fuel from reaching the water. The **Acting IOSC** also coordinates with the military police to establish traffic control in the vicinity of the storage yard and notifies the DPW of the spill.

12.4.3 Case #3: EPA Worst Case Scenario

This EPA worst case discharge for FGGM involves the release of the entire contents of Tank 2250B (12,000 gallons of Used Oil) at the DPW Recycling Center.

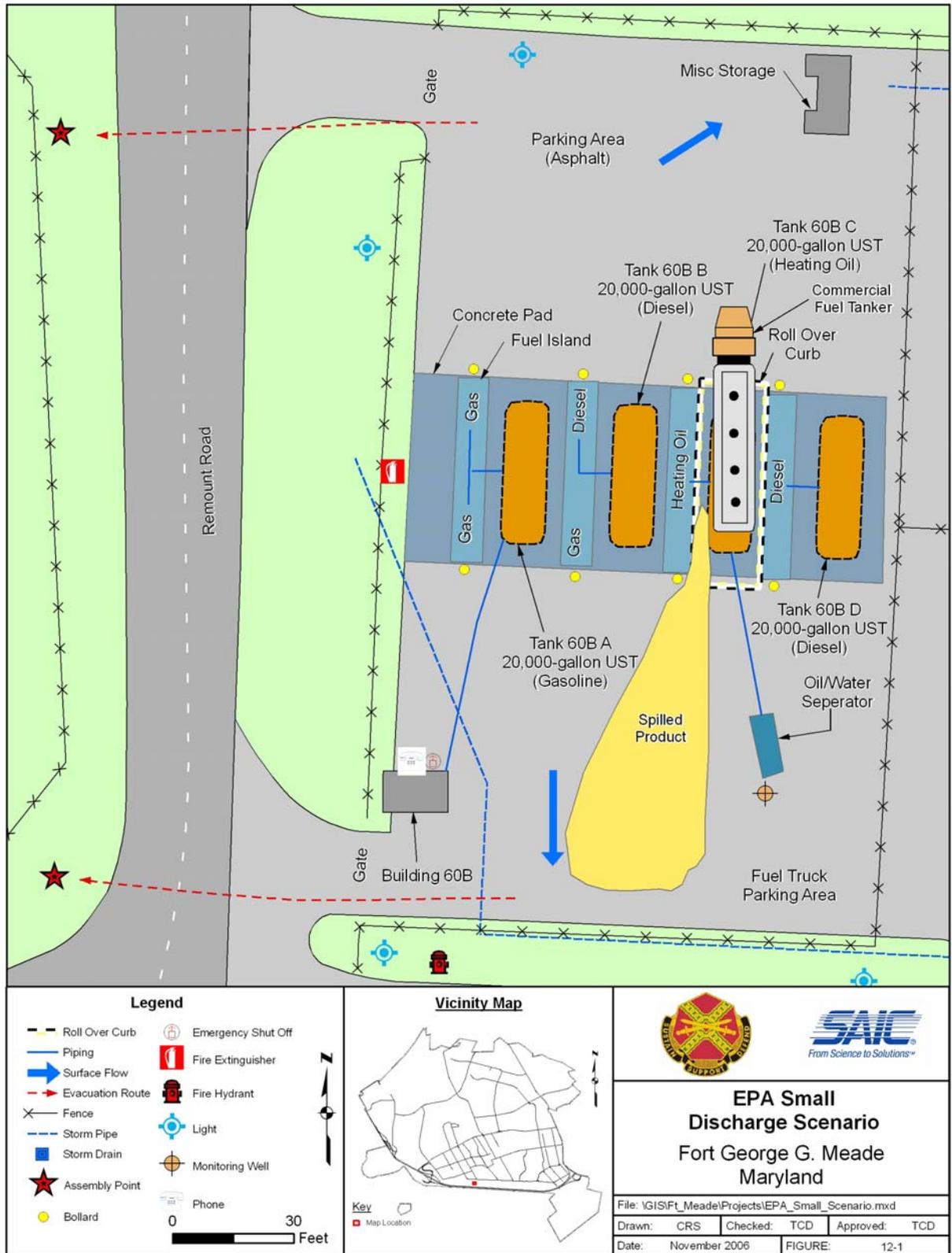
The used oil tanks at the DPW recycling center are filled and scheduled to be pumped out by the recycling contractor the next day. It begins to snow and the forecast is 6" to 8" accumulation. A contractor is in the process of plowing snow in the Recycling Center parking lot. The contractor swings the snow plow up the hill behind tank 2250 B to clear the snow. At that moment the driver experiences a heat attack and involuntarily jerks the wheel to the right. The plow drives over the hill, picks up some more speed, crashes through the bollard and fence into Tank 2250B. The blade of the plow ruptures the tank and the oil runs out of the tank and down the parking lot. (See Figure 12-3 for a diagram of the discharge scenario).

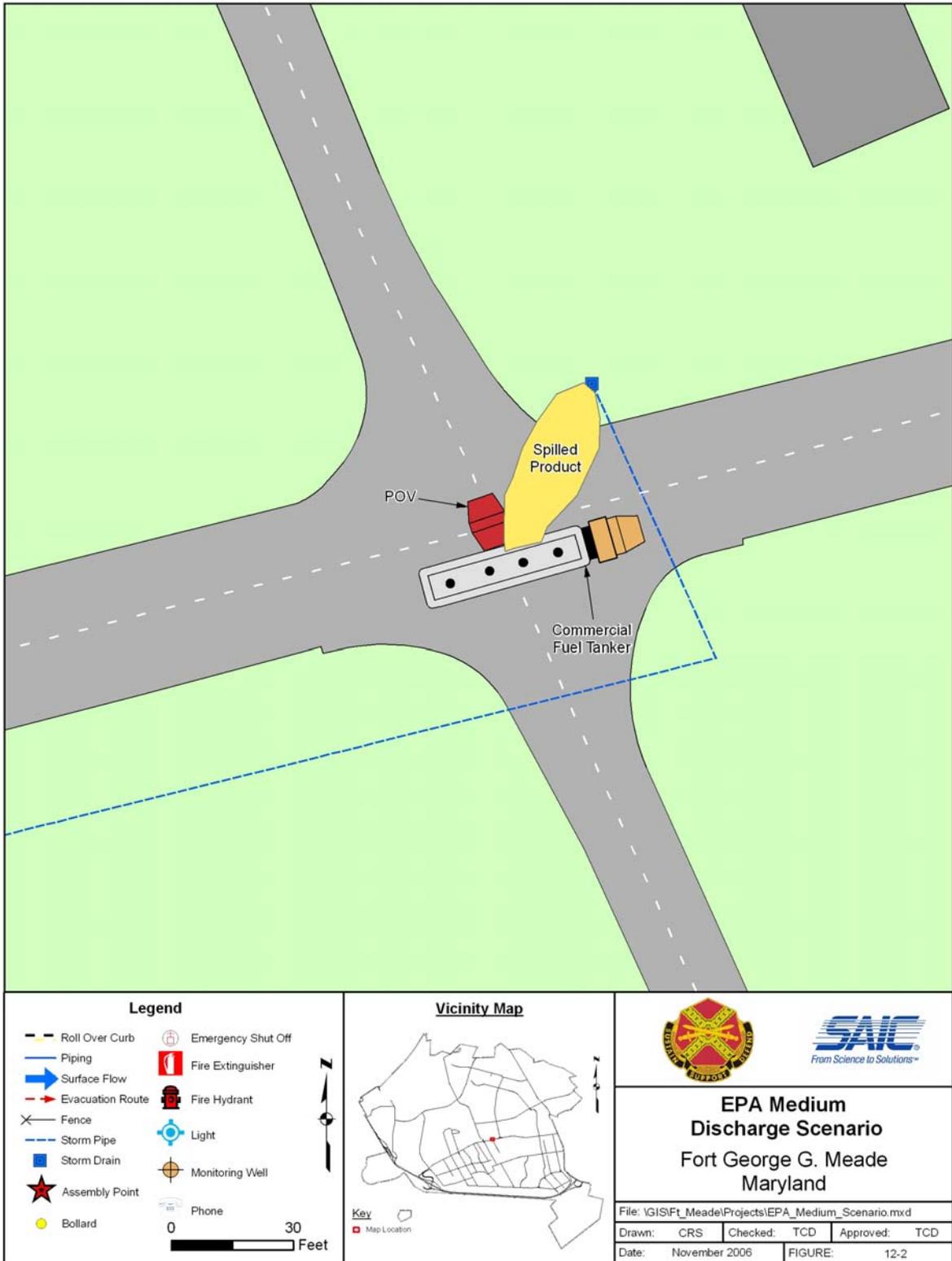
Staff at the Recycling Center hear the crash and run outside to observe what happened. They immediately call 911.

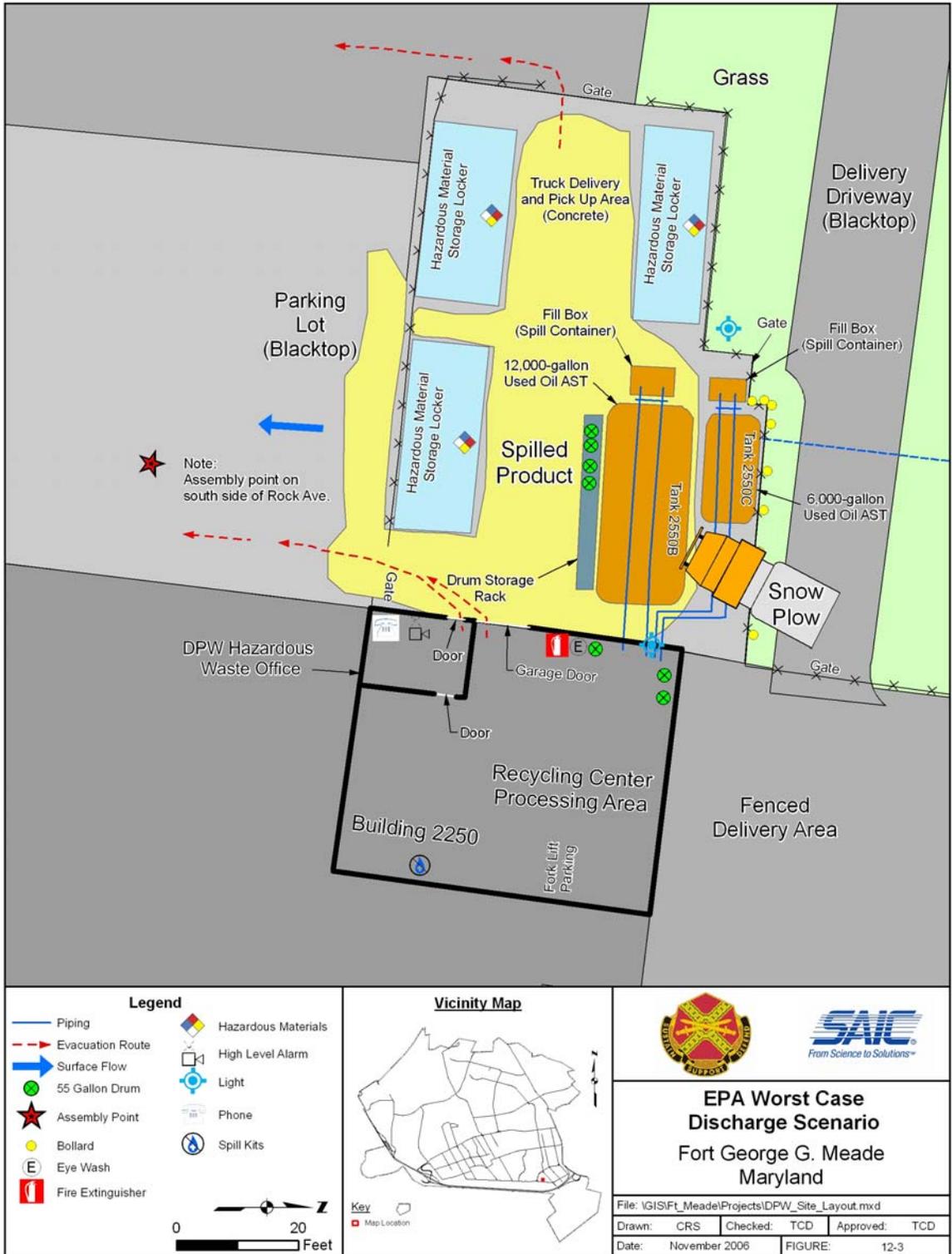
Within minutes, the fire department arrives and the Senior Fire Officer assumes the role of **Acting IOSC**. By that time, a large volume of oil has spilled from the tank and

migrated onto parking lot and into a nearby storm drain. Realizing that the spill could reach Midway Branch and the Patuxent Wildlife Refuge, the **Acting IOSC** directs firefighters to use dirt and sorbent materials to build dams well downgradient from the spill in an effort to prevent additional fuel from reaching the water. The **Acting IOSC** also coordinates with the military police to establish traffic control in the vicinity of the storage yard and notifies the DPW of the spill.

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13.0 Protection and Cleanup Priorities, Methods, and Techniques

13.1 Recovery Strategy for Spills

The recovery strategy for spills at FGGM is driven by both policy and practicality. Army policy and regulatory guidance direct that spills will be contained and mechanically recovered, as appropriate. Provisions are included that allow for other methods (dispersants, bioremediation, etc.) to be considered and/or used under certain conditions, provided that prior approval has been granted by the appropriate regulatory agencies.

FGGM's initial response strategy for a spill of any type of oil or hazardous substance is to contain the spill in a defined area and focus initial spill response assets on the protection of priority sensitive areas near the spill site. The FGGM Hazardous Materials Response Team is trained and equipped to respond to and mitigate any potential oil spill and will respond to all hazardous material spills. FGGM has response capability to contain and recover most discharges (using resources from the Federal Fire Department and Public Works Department). Other resources will be required for larger spills or in situations where additional support personnel and equipment are needed. FGGM can obtain additional resources through mutual aid agreements with nearby local emergency response organizations. Other resources include the Maryland Department of Environment's Emergency Response Division and commercial oil spill response organizations. Once the fuel or hazardous substance is contained, skimmers, vacuum trucks, pumps or other appropriate equipment will be deployed to recover the oil or hazardous substances.

The basic group of fuels stored at FGGM consists of non-persistent oils (diesel, fuel oil, and gasoline). During a spill incident, these materials will have a tendency to spread over the water and volatilize faster than heavier, more viscous oils. Gasoline can readily produce explosions and fire hazards during recovery operations and only the spill response contractor should attempt to recover this product.

See Annex J, Material Safety Data Sheets

If fuel has seeped into the ground beneath a dike basin, it may be recovered through trenches and recovery wells. When a large spill occurs outside diked areas and may have seeped into the ground, the DPW will develop a plan to contain and recover the fuel. The extent of the spill can usually be determined by digging a network of trenches until the contaminated zone has been bracketed.

Pooled fuel in large amounts, confined to land, will be recovered only by spill response personnel trained and equipped to safely recover volatile fuel. Contractors have explosion proof vacuum trucks, pumps, and large quantities of connecting hose that can be used in recovery operations. Assigned personnel are specially trained in the use of this equipment. The recovered fuel is normally transferred to tank trucks and hauled directly

to a waste oil contractor. When significant quantities of pooled fuel are being recovered, the fire department should be present during the recovery operations.

Gasoline that enters the waterways on FGGM, in general, may not be recovered. Gasoline presents dangers and unacceptable risks in water recovery operations. Booming is normally used with volatile fuels to protect sensitive environmental areas or municipal facilities near the spill site. The boom is put out in front of a spill to deflect the contaminating fuel from the sites, guiding the product away from sensitive areas and keeping the fuel away from the shoreline. The lighter fuels tend to breakup, evaporate, and disperse rather quickly and more frequently the best mitigation strategy initially is to let the fuel evaporate and not try to recover it in the water. Diesel fuel is less volatile than gasoline, and, in general, should be recovered. A decision to attempt any recovery of fuel off the water would be dependent on a site-specific hazard evaluation by the FGGM DPW, the Safety Officer, and other expert personnel.

Spills of less volatile products, such as used oil, will be contained and removed as quickly as possible. The danger to recovery personnel is much less, and allows relatively unrestricted recovery of the product from both land and water spills. The faster the persistent oil is recovered, the less chance there is of long term effects from oil residue becoming embedded in environmentally or health sensitive areas.

13.2 Protection Priorities

The first priority in any spill is always the protection of human life and health. This priority remains paramount throughout all phases of the response effort. Personnel protection from a spill at FGGM is achieved by timely evacuation (if required), effective containment to areas away from inhabited residences and workplaces, and prompt cleanup.

In accordance with both Army policy and the Area Contingency Plan (ACP), the next priority is to protect natural resources and minimize ecological impacts. At FGGM, the primary effort should be to contain the spill and prevent it from reaching the Water Treatment Plant intakes and the Patuxent National Wildlife Refuge.

The third priority is to minimize economic and public impact. Actions taken to achieve the first two priorities above, will also achieve this goal. The most effective immediate action to minimize public impact is by extensive booming to keep spilled oil from reaching beyond FGGM boundaries and to contain it if it does.

13.3 Cleanup, Protection and Booming

Vegetation, fish, game and wildlife within the immediate area of a spill will be exposed to high toxicity levels of oil.

Cleanup of spills reaching wetland areas will be difficult at best and most actions will be focused on protection of these areas by booming. Use of dispersants close to shore is often impractical, due to the potential environmental impact and the unlikelihood of

securing Army, EPA and State approval. Even booming will be difficult, due to the thick vegetation and the debris in the water.

Outside contracted spill response assets will be immediately focused in multiple areas, cordoning-off and booming the main drainage and wetland areas, as well as clean up on the land at the spill site. These spill response organizations have trained specialists and state of the art recovery equipment, vacuum trucks, pumps, connecting hoses and absorbent materials.

Follow-on wetlands cleanup actions may have to be initiated once the damage has been assessed. The **IOSC** must coordinate with State and Federal officials on any FGGM plan to clean up a wetlands area, before cleanup is initiated. **Some cleanup and remediation efforts can do more harm to the impacted area than the spill itself, and this must be avoided.**

The **IOSC** will normally have to rely on the primary spill response contractor to help develop and implement a proper wetlands cleanup strategy, but the **IOSC** must give the go-ahead authorization before cleanup work is initiated. The impact on wildlife may further require the establishment of bird and mammal cleaning stations and additional augmentation of environmental specialists. If bioremediation is to be employed, the **IOSC** should seek advanced approval from the Maryland Department of the Environment and the EPA before implementation.

13.4 Prioritized Response Procedures in the Event of a Spill

The following prioritized procedures are applicable to spills originating from hose failures, piping ruptures, piping leaks, pump malfunctions, tank overflow situations, a tank failure or an explosion or fire:

- Alert on-site personnel by voice, hand-held transceiver, intercom, or direct telephone.
- Shut down all pumps and on-going transfer operations in coordination with other facility personnel. Caution must be exercised when a flammable atmosphere might be present.
- Isolate the rupture (or leak) by closing valves on either side of a break.
- Activate the fire system, if appropriate and available.
- Notify the fire department.
- Evacuate non-essential personnel to safe areas.
- Eliminate sources of ignition; shut down all "hot work." If the spill involves a large amount of fuel, throw all master power switches to the "off" position.
- Continuously check for safety hazards.
- Monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment.
- Pass control at the spill site to the fire department's Senior Fire Officer (SFO).
- The SFO (Incident Commander) confirms initial containment priorities and actions and notifies the DPW of the spill.

- The DPW, upon arrival at the spill site, coordinates with the SFO; evacuation plans, if required, are agreed upon and executed.
- The SFO establishes on-site safety zones (hot, warm and cold), as required.
- The DPW alerts the IMT.
- The DPW directs emergency repairs, as necessary.
- The SFO monitors use of personnel protective equipment.
- Non-essential vehicles are evacuated from the spill site.
- Military Police establish control points.
- Containment operations are initiated with designated personnel.
- The DPW assumes **IOSC** duties or designates an acting **IOSC** and makes remaining external notifications (spill response contractors are alerted for deployment) and executes responsibilities in accordance with **THE RED PLAN**.
- The **IOSC**, working with the IMT, monitors and oversees all on-scene response operations.
- The **IOSC** works with the Federal On-Scene Coordinator, when on site.
- The **IOSC** provides required situation reports to the EPA, the State, and local authorities.
- The installation establishes and operates a shower point and decontamination station for workers who have contacted liquid fuel.
- Responders recover and remove contaminated soil to a disposal site. They recover pooled fuel through use of vacuum trucks or pumps and initiate boom deployment, as necessary.
- The **IOSC** completes spill response responsibilities outlined in **THE RED PLAN** and transitions to the broader and more detailed FGGM OHS Spill Prevention and Response Plan; the IMT develop a strategy for long term response, recovery and mitigation, following the FGGM OHS Spill Prevention and Response Plan.
- The **IOSC** initiates post discharge review procedures to include:
 - Investigation of the cause of the spill; and
 - Plans for preventing future spills.
- The **IOSC** with primary assistance from the IMT and outside spill response contractors, completes mitigation procedures.

Primary responsibility for response, recovery, cleanup, and mitigation of spills on land or water, originating from facilities and equipment at FGGM, rests with authorities at the installation, represented by the IOSC.

13.5 Disposal Procedures

It is the responsibility of the IOSC to ensure that any waste is disposed of properly once cleanup has occurred. The Resource Conservation and Recovery Act (RCRA) and its implementing regulations contained in Title 40, CFR Parts 260-279, provides specific guidance to the **IOSC** on the disposal of hazardous waste. FGGM routinely works with licensed, commercial vendors to dispose of hazardous wastes and would, in an emergency, continue to do so, or coordinate with the oil spill removal organization in

order to dispose of waste properly. The off-post transportation and disposal of all waste will be directed and coordinated by the DPW.

13.5.1 EPA Requirements: (40 CFR Part 261):

Guidance for the classification of hazardous substances is provided in 40 CFR Part 261, as set forth by the RCRA. In order to determine the appropriate disposal methodology, a sample of the recovered product may either be characterized through laboratory analysis in accordance with 40 CFR Part 261, Subpart C or by generator knowledge using the Material Safety Data Sheet for the spilled product.

13.5.2 State of Maryland Requirements

Consistent with Federal regulations, the State of Maryland does not regulate petroleum products as hazardous substances. The State of Maryland disposal requirements coincide with the EPA's guidance.

13.5.3 Waste Disposal

The policies in this response plan address the disposal of all classes of waste and apply to the small, medium and worst case scenarios discussed in paragraph 12.0 of this plan.

Following an oil spill/hazardous substance release, the responsible party, the **IOSC**, and the **OSRO** (if the size of the spill requires its involvement) will dispose of all recovered oil and hazardous substances, and contaminated debris and water in accordance with Federal (40 CFR 261, 264, 265 and 266) and State of Maryland regulations. In order to assure a well coordinated effort, collection, product sampling, analysis, staging and disposal should be assigned to a member of the **IMT**, either a representative from the **DPW** or, in the event of a large spill, the **OSRO's** Operations Manager, under **DPW** supervision.

Recycling, incineration and landfilling are the three acceptable methods of disposal, however, the land filling option should be considered as the least favorable. Recovered products will be subjected to laboratory analysis to identify potentially hazardous waste and then disposed of in accordance with the findings of that analysis. Laboratory tests will be conducted for hazardous waste constituents (to include PCBs) and, if applicable, volatile organic analysis will also be conducted. The tests on the oil phase will include a test for flash point, total halogens, and for metals such as arsenic, cadmium, and lead. The tests on the water phase will include a test for total halogens and for metals such as arsenic, barium, cadmium, chromium, copper, lead, mercury, nickel, selenium, silver, and zinc. Care will be taken to ensure that in the affected areas, no waste that may be incompatible with the released oil or hazardous substance is treated, stored or disposed of before cleanup operations are completed.

Treatment, Storage, and Disposal facilities (TSDF) regularly used by **FGGM** have been approved by Federal and State regulatory agencies. However, prior to the transfer of substantial quantities of recovered waste material to a TSDF, the Maryland Department

of the Environment will be contacted to determine if the facility is the subject of any pending investigation or litigation for any illegal activity.

13.5.4 Recovered Product

In some cases recovered petroleum products can be recycled into Army inventory. Oil that is not contaminated by hazardous waste will initially be placed in ASTs or other suitable containers at or near the spill site. Oil that is determined to be contaminated per 40 CFR 261 Subpart C will be transferred to a TSDF. The EPA provides specific guidance in 40 CFR Part 279 Subpart F and G relating to TSDF marketers who handle contaminated petroleum products for processing and re-refining, and for recycling as energy recovery through incineration, respectively. Depending on the size of the spill and the extent of committed resources, the **IOSC** may direct that the OSRO transfer recovered oil to a commercial vendor, and that the funds received by the OSRO for this transaction be credited toward the Army's financial obligation to the OSRO for supporting the cleanup response.

13.5.5 Oil Contaminated Water

A significant amount of water may be collected with the recovered product. This accumulation of water will quickly decrease the storage space designated for the recovered product. At the discretion of the appropriate regulatory agency, and depending on the potential harm that might result from a delayed collection effort, oil contaminated water may be decanted within the containment area at the site of the spill. A facility oil/water separator could also be employed as a decanting receptacle, provided the oil/fuel does not contain a constituent that will cause outfall permitting problems. Given FGGM's and the OSRO's daily recovery capability, decanting may be a viable option for all but the worst case discharge scenario.

13.5.6 Contaminated Equipment and Materials

During cleanup operations it can be expected that there may be substantial quantities of personnel protective equipment, drums, valves and components, piping and tank parts, tools, booms, etc., that will become contaminated. Personnel clothing will be decontaminated at a personnel shower point established at the spill site where showers are available for the initial decontamination/bathing of response workers. Water used for decontamination will be cycled through a catch basin and retained for later analysis and separation/recovery of product or disposal through a TSDF. The **IOSC** will also identify a location at FGM where tools, equipment, parts, etc., can be decontaminated. These items will be washed with a solution that is compatible with the items being decontaminated and rinsed with aqueous solutions such as 5% sodium carbonate and 5% trisodium phosphate. Washing and rinse waters, cleansers, and decontamination solutions will be cycled through a catch basin, a prepared holding or containment pond, or an oil/water separator and retained for later analysis and separation/recovery of product, or disposal through a TSDF. The **IOSC** will ensure that all emergency equipment used and supplies expended during the response operation are cleaned or replenished prior to normal OHS handling operations resuming. The Regional

Administrator, as well as State and local agencies, must be notified that facility response equipment is available and ready for use before operations restart.

13.5.7 Contaminated Debris

During cleanup operations, solid oily debris including contaminated absorbents, soils, vegetation, flotsam, will be collected at a designated, centralized collection point (to be determined based on the location and size of the spill), placed in drums or heavy-duty plastic bags, sealed, and disposed of; this includes the equipment used at the decontamination site such as plastic ground cover, brushes, sponges, toweling, etc., that cannot be recycled. Substantial quantities of contaminated soil, once tested, may be transported to a TSDF for disposal as non-hazardous waste in accordance with applicable regulations. The disposal methodology used by the Incident Management Team for solid petroleum waste is determined on a case-by-case basis. However, final disposal can be accomplished by incineration, landfill, or recycling, or a combination of the three. Most often, disposal is accomplished by incineration which is conducted by a TSDF. For the worst case discharge, incineration might prove to be too costly, and an alternative means of disposal may be required. As previously mentioned, landfilling contaminated wastes is not preferable, but can be selected if all other avenues have been exhausted. Another solution, if practical, would be to decontaminate the solid waste using a facility oil/water separator as the receptacle for the effluent run-off, provided the oil/fuel does not contain a constituent that will cause outfall permitting problems.

13.5.8 Hazardous Waste Disposal

Disposal of a recovered product which is clearly regulated as a hazardous waste will be accomplished on a case-by-case basis. If it is not feasible to reintroduce the recovered product into inventory, disposal should be accomplished through a TSDF. A TSDF is regulated under 40 CFR Parts 260 through 266. Care should be taken to ensure that the selected vendor holds a current EPA permit pursuant to these regulations. This can be verified by securing a copy of the permit which will include the appropriate EPA identification number.

Hazardous waste disposal arrangements should also include the intended method of disposal and/or final destination of the recovered product. It should be made absolutely clear to prospective vendors that Army hazardous waste disposal will be handled in a manner that is not only in compliance with acceptable EPA standards, but includes the required documentation that demonstrates the same. To that end, the selected vendor will be required to provide FGGM with disposal documentation in the form of a letter or Certificate of Destruction. This documentation and the laboratory analysis detailing the hazardous characteristics of the product will be kept on file with other important documentation related to the response actions taken. Hazardous waste manifests can only be signed by a qualified representative from the DPW.

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14.0 Safety Precautions for Hazardous Substance Spills

The FGGM Hazard Communication Program provides for the safe handling and use of hazardous substances; identification of operations and activities where hazardous substances are used or stored; correct labeling and safe storage and disposition of hazardous substances; availability of appropriate Material Safety Data Sheets; and training of personnel on the safe handling and use of hazardous substances. Specific safety precautions to be followed in the event of a spill depend on the characteristics of the hazardous substance(s) involved and must be determined on a case-by-case basis. However, all operational and response personnel aware of any suspected or actual release must always emphasize on-scene safety and will follow these general procedures:

- Approach cautiously, do not rush in.
- Identify and evaluate all the hazards using all available information, i.e., shipping documents, MSDS, knowledgeable personnel, etc,
- Secure the scene without entering the immediate hazard area,
- **Obtain help:** notify responsible persons, e.g., the DPW, and request assistance from qualified personnel,
- **Determine required personnel protection equipment** before any personnel enter the affected area, and
- **Continue to act cautiously** and avoid inhalation, ingestion, injection and absorption even if no hazardous substance is known to be involved.

See Annex J, Material Safety Data Sheets and Annex O, Site-Specific Emergency Response Plans.

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15.0 Oil Inventory Control Procedures

15.1 Government Vehicle Service Station

Fuel from the Service Station Tanks is issued to authorized users and recorded automatically. Tank levels are monitored remotely using the Fuels Automated System. Access hatches and dispensing pumps are locked when not in use and key control is maintained by supervisory personnel.

15.2 AAFES Gas Station

The AAFES Gas Station tanks are equipped with an electronic tank monitoring system. This system allows the station manager to print out a report of the amount of fuel, by tank, on hand. This is normally done at the conclusion of every day and these results are recorded. Based on this report, the manager then orders additional deliveries. Typically, there are two to three deliveries per week. Delivery is made by the same transporter, who is under a one year contract with AAFES. Upon arrival, the tank truck driver presents the invoice for the day's delivery and receives a key to unlock the loading pit. The driver manually gauges the tank before and after the delivery, records this information on the invoice, and presents the invoice and the loading pit key to the station manager after the delivery is complete. The station manager reconciles receipt, issue and on hand amounts every day. A monthly report is submitted to AAFES headquarters and a discrepancy of more than the subscribed number of gallons for any grade fuel requires an investigation. Discrepancies can result from errors in delivery amounts, faulty tank and pump readings, as well as leaks (loss of fuel or infiltration of water).

15.3 AAFES Shoppette

The AAFES Shoppette Gas Station tanks are equipped with an electronic tank monitoring system. This system allows the station manager to print out a report of the amount of fuel, by tank, on hand. This is normally done at the conclusion of every day and these results are recorded. The fuel is order automatically and the Shoppette receives delivers three to four times per day. Delivery is made by the same transporter, who is under a one year contract with AAFES. Upon arrival, the tank truck driver presents the invoice for the day's delivery and receives a key to unlock the loading pit. The driver manually gauges the tank before and after the delivery, records this information on the invoice, and presents the invoice and the loading pit key to the station manager after the delivery is complete. The station manager reconciles receipt, issue and on hand amounts every day. A monthly report is submitted to AAFES headquarters and a discrepancy of more than the subscribed number of gallons for any grade fuel requires an investigation. Discrepancies can result from errors in delivery amounts, faulty tank and pump readings, as well as leaks (loss of fuel or infiltration of water).

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16.0 Security

Security at FGGM is an important part of preventing spills and acts of vandalism that can lead to spills.

16.1 Entry Control of Personnel and Vehicles

FGGM is a controlled access facility restricted by fences, gates, and military police patrols. All access gates are posted with warning signs advising those entering of restrictions and limitations placed on access to the installation. Military Police patrol the perimeter and interior of the installation continuously. The normal Post operating hours are from 7:30 AM to 4:30 PM, Monday through Friday. Essential organizations and facilities are manned on a 24-hour basis.

16.2 Physical Security

The Government Gas Station and AAFES Gas Station have personnel on duty during normal duty hours Monday through Friday. Entrance gates are open during duty hours, and these gates are monitored by individuals at work in each of the facilities. Access is prohibited during off-duty hours.

The AAFES Gas Station is open from 7:00 AM to 6:00 PM Monday through Friday, 9:00 AM to 4:00 PM on Saturday and 11:00 AM to 4:00 PM on Sunday. Employees are present throughout the area during these times and the area is checked by military police after business hours. Access to the UST loading pits and power switches for the fueling pumps is by lock and key and strictly controlled by the station manager.

The AAFES Shoppette is a 24-hour 7-day a week operation. Therefore, AAFES personnel are always on duty and the area is patrolled by Military Police.

16.3 Lighting

All major oil and hazardous substance storage and handling sites are sufficiently illuminated at night to deter acts of vandalism, and to help detect product discharges. Other sites have lighting adequate for operational purposes which will also aid in the detection of discharges.

16.4 Military Police

Military Police patrol the various fuel storage and handling facilities on a regular basis. If they are suspicious of a problem inside a locked facility, they are expected to investigate the situation. If a problem is found, the military police report to the Desk Sergeant. The Desk Sergeant contacts the appropriate building custodian or the supervisors/managers of the storage facilities or the AAFES Service Station.

All fuel trucks are inspected before entering the installation. Military Police provide and escort onto the installation, throughout the off loading process and then escort the truck off-Post.

16.5 Communications

The personnel who work at storage sites have ready access to commercial phones. Military Police have both vehicle and hand-held radios and maintain the capability at the Military Police Desk to communicate directly to fire and medical services. Operators delivering fuel have radios or cell phones for communication with supervisors.

There are several FGGM operations centers that are manned on a 24-hour basis, and possess the trained personnel and communications equipment necessary to receive and forward emergency calls concerning fuel and hazardous substance storage areas. These operations centers also have the ability to begin the notification and response procedures outlined in the OHS Spill Prevention and Response Plan. Included in this category are the fire department, and military police. See Annex D, Spill Response Organization and Duties, for a detailed discussion and additional information.

17.0 Post-Discharge Review Procedures/Plan Review and Update

This section covers the post-discharge review procedures and the process for updating this plan.

17.1 Post-Discharge Review

A formal post-discharge review will be conducted by the DPW on all oil spills. The activity responsible for an oil or hazardous substance spill shall conduct an informal review to determine preventative measure strategies and submit the report to the DPW. A notice will be issued to report the cause of the spill, effectiveness of the response effort, any follow-up measures required, and any recommended changes to this Oil and Hazardous Substance (OHS) Spill Prevention and Response Plan. As appropriate, the post-discharge review should address the following planning areas:

- Detection
- Notification
- Mobilization
- Spill Response Organization
- Response Resources Used
- Response Strategy
- Response Effectiveness
- Public Relations
- Assessment/Evaluation
- Measurement
- Follow-up Tasks
- Mitigation Results
- Effectiveness of OHS Spill prevention and Response Plan

17.2 Post-Discharge Reports

When the post-discharge review is completed, a written report concerning the circumstances, effects, notifications, response, and mitigation of the spill will be prepared and submitted to DPW. A report to the EPA Regional Administrator will also be submitted within 60 days after a single reportable oil spill event of more than 1,000 gallons or after two reportable spill events, each greater than 42 gallons, within any twelve-month period. This report shall provide information identified in 40 CFR 112.4(a). Based on this report, the EPA Regional Administrator may direct that FGGM amend its plan.

In addition, a written report is to be submitted to the Maryland Department of the Environment with 10 working days after removal and completion of clean-up activities. This report will contain the following information in accordance with COMAR 26.10.08 and 09:

1. Date, time, location, and extent of the spill; include sketches that provide information pertaining to the location of the spill and its migration in relation to other on-site/off-site entities.
2. Amount and type of product spilled.
3. A complete description of the circumstances contributing to the spill.
4. A complete description of the response actions taken as a result of the spill, including containment, removal, cleanup, and disposal procedures implemented, as well as personnel requirements and the cost of the operations.
5. A complete description of corrective actions to be implemented to prevent reoccurrence of a spill of the same nature.
6. Any other information pertinent to the spill.
7. A certification that the information contained in the report is true and correct to the best of the knowledge of the person writing and signing the report.

17.3 Plan Review and Update

The post-discharge review may lead to recommended changes in equipment or operational procedures at the facility. An *OHS Spill Prevention and Response Plan* review and update must be accomplished if significant changes are implemented or if the potential for a discharge at the facility is affected by the changes. The Chief, Environmental Division will provide a list of recommended changes to the *OHS Spill Prevention and Response Plan* to the DPW as necessary to maintain the plan and FGGM's compliance with regulatory requirements.