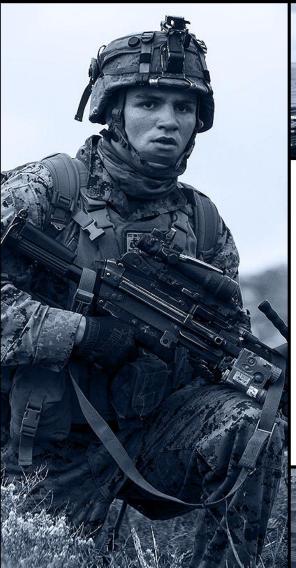


#### **DEFENSE LOGISTICS AGENCY**



THE NATION'S COMBAT LOGISTICS SUPPORT AGENCY









# Airport Hydrant Systems and Field Constructed Tanks

Donna Krupinski

Defense Logistics Agency
Installation Management Operations for
Energy, Environmental Division
September 12, 2018





# Agenda



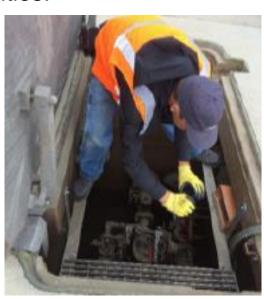
- Background
  - DLA
  - Leak Detection
  - Operator Training
- Collaborative Process
- Implementation of Revised Underground Storage Tank (UST)
   Rule
  - Applicability Study
- Challenges
- What We Learned
- Conclusion



## Background



- DLA and the Services (Air Force, Army, Navy, Marines)
- Leak Detection Program
  - Established in 2006
  - Encompasses over 260 Installations/Bases
  - Bulk storage tanks; transfer and distribution piping; hydrant systems;
     military service stations; and ground fuel facilities.
- UST Operator Training
  - Established in 2010
  - Encompasses 58 Installations operated by DLA Energy contractors
  - Services provide training for remaining sites





#### **Collaborative Process**

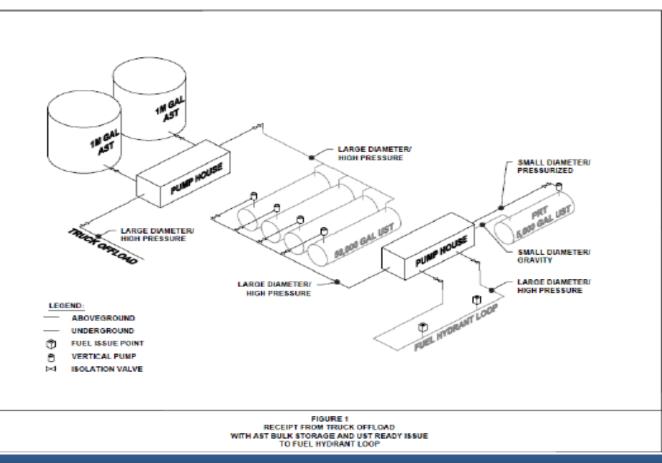


- DoD and EPA collaboration and information exchange
  - Technical Compendium: Airport Hydrant Systems related to DOD Facilities
     <a href="https://www.epa.gov/ust/underground-storage-tank-ust-technical-compendium-about-2015-ust-regulations#ahs">https://www.epa.gov/ust/underground-storage-tank-ust-technical-compendium-about-2015-ust-regulations#ahs</a>

Aboveground Capacity: 2 Million Gallons

Underground (UG) Capacity: 50,000 x 4 = 200,000 gallons 5,000 gallon UG PRT tank 100,000 UG piping capacity 305,000 Gallons Total UG capacity

10% capacity is underground, therefore system is regulated under 40 CFR 280





## Implementation of Revised UST Rule



- Conducted Regulatory Applicability Study
  - 216 Sites (multiple fuel systems) over 3-Year Period
  - 323 Systems Reviewed
  - 26 Regulated by UST Rule
- Owners/Operators Make One Time Notification
  - If unchanged status; verify notification
- UST Operator Training



# Challenges



- Implementing UST Calculation
- Increased Resources
  - Manpower (Inspections, Training, Recordkeeping)
- Increased Testing Frequency
  - Coordination with Mission
- Repair of FCTs and Appropriate Post Repair Testing
  - https://www.epa.gov/ust/underground-storage-tank-ust-technicalcompendium-about-2015-ust-regulations



### What We Learned



- Additional Training
- Fewer Systems/Pipeline Sections
- Availability of Testing and Repair Contractors
  - Sump/Secondary Containment



## Conclusion



- Less Impact on DLA Sites
- Overseas Environmental Baseline Guidance Document
  - Incorporating 40 CFR 280
- Continue Collaboration with Regulators
- Continue Leak Detection Program
  - Continual Facility Support





