



**Fort Gordon
FY08 Miscellaneous Clean Water Act
Contract No. W912P8-06-D-0029, Task Order, CK02**

Spill Prevention, Control, and Countermeasures Plan (SPCCP)

TABLE OF CONTENTS

1.0	GENERAL APPLICABILITY - 40 CFR §112.1	1-1
2.0	EXCEPTIONS TO THE GENERAL APPLICABILITY - 40 CFR §112.1(D).....	2-1
3.0	PLAN DEVELOPMENT AND IMPLEMENTATION – 40 CFR §112.3(A).....	3-1
4.0	PROFESSIONAL ENGINEER CERTIFICATION – 40 CFR §112.3(D).....	4-1
5.0	MANAGEMENT APPROVAL	5-1
6.0	PLAN PREPARATION	6-1
7.0	RECOMMENDATIONS.....	7-1
8.0	TECHNICAL REQUIREMENTS	8-1
8.1	Technical Requirements – 112.7(a).....	8-1
8.1.1	<i>Requirement 112.7(a)(1).....</i>	<i>8-1</i>
8.1.2	<i>Requirement 112.7(a)(2).....</i>	<i>8-1</i>
8.1.3	<i>Requirement 112.7(a)(3).....</i>	<i>8-2</i>
8.1.4	<i>Surface Water Drainage</i>	<i>8-2</i>
8.1.5	<i>Requirement 112.7(a)(3)(i)</i>	<i>8-3</i>
8.1.6	<i>Requirement 112.7(a)(3)(ii).....</i>	<i>8-20</i>
8.1.7	<i>Requirement 112.7(a)(3)(iii).....</i>	<i>8-35</i>
8.1.8	<i>Requirement 112.7(a)(3)(iv).....</i>	<i>8-36</i>
8.1.9	<i>Requirement 112.7(a)(3)(v)</i>	<i>8-36</i>
8.1.10	<i>Requirement 112.7(a)(3)(vi)</i>	<i>8-36</i>
8.1.11	<i>Requirement 112.7(a)(4)</i>	<i>8-37</i>
8.1.12	<i>Requirement 112.7(a)(5)</i>	<i>8-37</i>
8.2	Predictions - 112.7(b)	8-37



8.3	Containment and Diversionary Structures - 112.7(c)	8-47
8.4	Alternatives - 112.7(d)	8-48
8.5	Inspections, Tests, and Records - 112.7(e)	8-48
8.5.1	<i>Inspections</i>	8-49
8.5.2	<i>Tests</i>	8-49
8.6	Personnel Training and Discharge Prevention Procedures - 112.7(f)	8-49
8.6.1	<i>Training - 112.7(f)(1)</i>	8-49
8.6.2	<i>Accountable Personnel - 112.7(f)(2)</i>	8-50
8.6.3	<i>Annual Discharge Prevention Briefing -112.7(f)(3)</i>	8-50
8.7	Security - 112.7(g) (Excluding Oil Production Facilities)	8-51
8.7.1	<i>Requirement 112.7(g)(1)</i>	8-51
8.7.2	<i>Requirement 112.7(g)(2)</i>	8-51
8.7.3	<i>Requirement 112.7(g)(3)</i>	8-51
8.7.4	<i>Requirement 112.7(g)(4)</i>	8-51
8.7.5	<i>Requirement 112.7(g)(5)</i>	8-52
8.8	Facility Tank Car and Tank Truck Loading/Unloading Rack – 112.7(h) (Excluding Offshore Facilities)	8-52
8.8.1	<i>Requirement 112.7(h)(1)</i>	8-52
8.8.2	<i>Requirement 112.7(h)(2)</i>	8-52
8.8.3	<i>Requirement 112.7(h)(3)</i>	8-53
8.9	Brittle Fracture Failures - 112.7(i)	8-53
8.10	State Rules, Regulations, and Guidelines - 112.7(j)	8-53
9.0	ADDITIONAL FORT GORDON-SPECIFIC DISCHARGE PREVENTION AND CONTAINMENT PROCEDURAL REQUIREMENTS	9-1
9.1	General - 112.8(a)	9-1
9.1.1	<i>Facility Drainage - 112.8(b)</i>	9-1
9.1.1.1	<i>Requirement 112.8(b)(1)</i>	9-1
9.1.1.2	<i>Requirement 112.8(b)(2)</i>	9-1
9.1.1.3	<i>Requirement 112.8(b)(3)</i>	9-2
9.1.1.4	<i>Requirement 112.8(b)(4)</i>	9-2
9.1.1.5	<i>Requirement 112.8(b)(5)</i>	9-3
9.1.2	<i>Bulk Storage Containers - 112.8(c)</i>	9-3
9.1.2.1	<i>Physical Construction - 112.8(c)(1)</i>	9-3



9.1.2.2	Secondary Containment - 112.8(c)(2)	9-3
9.1.2.3	Containment Discharge - 112.8(c)(3)	9-4
9.1.3	Buried Metal Storage Tanks	9-4
9.1.3.1	Requirement 112.8(c)(4)	9-4
9.1.3.2	Requirement 112.8(c)(5)	9-4
9.1.4	Integrity Evaluations	9-5
9.1.4.1	Requirement 112.8(c)(6)	9-5
9.1.4.2	Requirement 112.8(c)(7)	9-5
9.1.5	Engineering Controls - 112.8(c)(8)	9-6
9.1.6	Visual Observations	9-6
9.1.6.1	Requirement 112.8(c)(9)	9-6
9.1.6.2	Requirement 112.8(c)(10)	9-6
9.1.7	Mobile Equipment - 112.8(c)(11)	9-7
9.2	Facility Transfer Operations, Pumping, & Facility Process - 112.8(d)	9-7
9.2.1	Requirement 112.8(d)(1)	9-7
9.2.2	Requirement 112.8(d)(2)	9-8
9.2.3	Requirement 112.8(d)(3)	9-8
9.2.4	Requirement 112.8(d)(4)	9-15
9.2.5	Requirement 112.8(d)(5)	9-15



LIST OF TABLES

SPCC Table No.	Table Title	Page No.
7-1	Recommendations	7-3
8-1	Regulated ASTs (40 CFR 112)	8-5
8-2	Regulated ASTs (40 CFR 112)	8-11
8-3	Regulated Generators (40 CFR 112)	8-13
8-4	Regulated Mobile Fueling (40 CFR 112)	8-15
8-5	Regulated Used Cooking Oil (40 CFR 112)	8-17
8-6	Regulated POL Storage (40 CFR 112)	8-19
8-7	PST Discharge Prevention Measures	8-21
8-8	Used Cooking Oil Discharge Prevention Measures	8-33
8-9	PST Failure Discharge	8-39
9-1	Regulated PST Corrosion Protection Upgrades	9-9



LIST OF ACRONYMS

AAFES	Army & Air Force Exchange Service
AST	Aboveground Storage Tank
ATG	Automatic Tank Gauge
BFCUST	Bulk Field Constructed Underground Storage Tank
BOSS	Better Opportunities for Single Soldiers
CFR	Code of Federal Regulations
DMWR M&A	Directorate Morale, Welfare, and Recreation Marketing and Advertising
DOIM	Directorate Of Information Management
DPWL	Directorate of Public Works and Logistics
DW	Double Walled
DW AST	Double Walled Aboveground Storage Tank
DW UST	Double Walled Underground Storage Tank
FRP	Facility Response Plan
HLA	High-Level Alarm
HMCC	Hazardous Materials Collection Center
ISCP	Installation Spill Contingency Plan
NSA	National Security Agency
OPA	Oil Pollution Act
OSHA	Occupational Safety and Health Administration
OWS	Oil Water Separator
OWS-SAN-003	Oil Water Separator used for spill containment
PCBs	Polychlorinated biphenyls
PODS	Portable On Demand Storage
POL	Petroleum, Oil and Lubricants
PST	Petroleum Storage Tanks
PSTMP	Petroleum Storage Tank Management Plan
RCRA	Resource Conservation and Recovery Act
RTS Med	Regional Training Sites - Medical
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency
UST	Underground Storage Tank
SOP	Standard Operating Procedure
SPCCP	Spill Prevention, Control, and Countermeasures Plan
STMP	Storage Tank Management Plan
TMP	Transportation Motor Pool
WWTP	Waste Water Treatment Plant



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1.0 General Applicability - 40 CFR §112.1

The United States Environmental Protection Agency's (USEPA's) Spill Prevention, Control & Countermeasures (SPCC) regulations apply to non-transportation-related onshore or offshore facilities engaged in drilling, producing gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products. U.S. Army Garrison Fort Gordon in Augusta, Georgia (Fort Gordon) is a non-transportation-related facility that stores and uses oil and oil products, and has a total aboveground oil storage capacity greater than the 1,320 gallon threshold referenced in §112.1(d)(2)(ii).

Furthermore, facilities are regulated if, due to their location, the facility could reasonably be expected to discharge oil into navigable waters of the United States or adjoining shorelines. Fort Gordon is located within portions of Richmond, Jefferson, McDuffie, and Columbia counties and is hydraulically connected to the Savannah River via a number of smaller watersheds.

As such, the following Subparts of 40 CFR 112 apply to the development of this SPCC Plan:

- § 112.7 General Requirements for SPCC Plans
- § 112.8 SPCC Plan Requirements for On-Shore Facilities

In addition, Fort Gordon stores greater than the 1-million gallon regulatory threshold for petroleum products on site and meets the substantial harm criteria as defined under 40 CFR 112.20. The Certification of the Applicability of the Substantial Harm Criteria follows.



Certification of the Applicability of the Substantial Harm Criteria

Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

Yes _____ No X

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

Yes _____ No X

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

Yes X No _____

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?

Yes _____ No X

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil discharge in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes _____ No X

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature: _____ **Date:** _____

Name (please print or type): _____

Title: _____



2.0 Exceptions to the General Applicability - 40 CFR §112.1(d)

Fort Gordon utilizes various containers of oil with a storage capacity of less than 55 gallons. As per §112.1(d)(5) these containers are not specifically addressed in this SPCC Plan.

In addition, Fort Gordon may own /operate oil-water separators for addressing potential issues associated with tank farm storm water drainage. As per §112.1(d)(6), oil separation process equipment associated with treatment operations are not required to be covered in the facility SPCC Plan. Although these units have integral oil storage capacity, they have not been included herein as under normal operation they will contain oil or fuel material in quantities substantially less than the 55 gallons threshold.

Any completely buried storage tank, as defined in §112.2, and connected underground piping, underground ancillary equipment, and containment systems, at any facility, that is subject to all of the technical requirements of Part 280 of this chapter or a State program approved under Part 281 of this chapter, except that such a tank must be marked on the facility diagram as provided in § 112.7(a)(3), if the facility is otherwise subject to this part.

Since the National Security Agency (NSA) facilities are located in a secured facility, Baker was unable to examine or even obtain drawings/photos of the NSA tanks. In the event of a spill at the NSA facilities, SPCC procedures will be implemented.

The Facility Response Plan, which addresses spill response, is being updated under separate contract.



3.0 Plan Development and Implementation – 40 CFR §112.3(a)

Approved for construction in July 1941, the facility was originally called Camp Gordon. On March 21, 1956, the post was renamed Fort Gordon. An SPCC Plan for the facility has existed in some form since around 1991, when the SPCC proposed rule was first put forth by USEPA. Updates to the SPCC Plan have been authorized as material changes and regulatory advances have dictated. The facility utilizes environmental contractors to prepare and update the SPCC Plan. Day-to-day implementation of the SPCC program, as a whole, is the responsibility of base environmental personnel.



4.0 Professional Engineer Certification – 40 CFR §112.3(d)

It is recognized that Fort Gordon is subject to the Oil Pollution Prevention Regulation and a Professional Engineer's review and certification of the SPCC Plan is required under 40 CFR § 112.3(d). By means of this certification, the Professional Engineer attests that:

- (i) She is familiar with the requirements of the SPCC rule;
- (ii) She or her agent has visited and examined the facility;
- (iii) The SPCC Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of the SPCC rule;
- (iv) Procedures for required inspections and testing have been established; and,
- (v) The SPCC Plan is adequate for the facility.

Therefore, I, Jessica Bellas, certify that I am familiar with the July 17, 2002 Final SPCC Rule and subsequent Amendments, that I (and/or my representative) have visited and examined relevant installations at Fort Gordon, and that the provisions of this SPCC Plan, have been prepared in accordance with good engineering practices. I attest that the information provided by the facility and contained herein is, to the best of my knowledge and belief, true, accurate, and complete.

This certification shall in no way relieve Fort Gordon of its duty to prepare, revise, and fully implement the SPCC Plan in accordance with 40 CFR Part 112 and all other applicable requirements of the State of Georgia.

****Note: This PE certification addresses spill prevention (as described by the SPCC rule) as it applies to Fort Gordon. The Facility Response Plan, which addresses spill response, is being updated under separate contract.**

(SEAL)

Jessica Bellas, PE

Date

PE License Number



5.0 Management Approval

Requirement

The plan must have the full approval of management at a level of authority to commit the necessary resources to fully implement the Plan.

Response

Fort Gordon is concerned about the impact that day-to-day operations have on the environment. Pollution caused by fuel and oil spills can have detrimental effects on the environment if proper steps are not taken to prevent and contain such occurrences.

To address this issue, this installation is dedicated to the prevention of fuel and oil spills. It is the policy of this command to minimize to the maximum extent possible the release of fuel and oil from storage tanks, piping, valves, and transfer areas and provide expeditious and efficient containment and cleanup procedures if spills do occur.

Acknowledgement of Plan Approval

This Spill Prevention, Control, and Countermeasures (SPCC) Plan has been developed for Fort Gordon to address the issue of spill prevention, response actions, and containment. The plan has been prepared in compliance with applicable Federal regulatory requirements under 40 CFR Part 112. It serves as a statement of command policy and intent, as well as a working document for those concerned with the prevention and control of spills.

Signature: _____

Printed Name: _____

Title: _____



6.0 Plan Preparation

Requirement

You must prepare the plan in writing. If you do not follow the sequence specified in this section for the Plan, you must prepare an equivalent Plan acceptable to the Regional Administrator that meets all of the applicable requirements listed in this part, and you must supplement it with a section cross-referencing the location of requirements listed in this part and the equivalent requirements in the other prevention plan.

Response

See all sections of this plan; this SPCC plan directly follows the sequence of 40 CFR 112 in order to assure compliance with the regulations. Transformers and oil circuit breakers located on Fort Gordon which are regulated by 40 CFR 112 are not included in this plan because they are addressed separately by Georgia Power Company. The response to Section 112.7(a)(3)(i) addresses this issue in greater detail.



7.0 Recommendations

Requirement

If the Plan calls for additional facilities or procedures, methods, or equipment not yet fully operational, you must discuss these items in separate paragraphs, and must explain separately the details of installation and operational start-up.

Response

SPCC Table 7-1 summarizes general recommendations to facilities and operations at Fort Gordon. These general comments identify additional facilities that are planned for or recommended for construction; additional procedures that should be implemented as well as additional equipment necessary in order to comply with the requirement. It should be noted that recommendations are stated throughout this document that are required to be implemented for compliance with 40 CFR 112.



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SPCC Table 7-1 Recommendations

ITEM	RECOMMENDATION
Additional Facilities	<ul style="list-style-type: none"> • Additional containment for refueling operations near Buildings 49300, 25330, 310, 25910 and 410 have been designed and should be constructed. • Several locations require additional secondary containment areas be designed and constructed. One location is the Marina which is in close proximity to surface water. The other two locations are associated with fuel piping secondary containment. These projects require pipeline reconfiguration. Preliminary conceptual designs for these three locations are included in Appendix G of the associated STMP. • AST located at the Gibson Road sanitary landfill should be removed and replaced with a new double walled AST & dispenser. • Secondary containment structures are required for all used cooking oil containers.
Additional Procedures	<ul style="list-style-type: none"> • Confirmation that consistent procedures for the proper documentation of all testing and inspections for Petroleum Storage Tanks (PSTs) are conducted and maintained. • Discharge prevention measures and procedures for routine handling of products (loading, unloading and facility transfer) must be developed and implemented for all fuel transfer operations. • Confirmation that a strong contingency plan be implemented. • Confirm identity of accountable personnel at each location where a PST is located who will be responsible for PST inspections and testing and record keeping.
Additional Equipment	<ul style="list-style-type: none"> • The installation of outside lighting where required, bollards or other collision barriers devices, and various equipment upgrades/modifications as specified in the Storage Tank Management Plan and/or the SPCC Plan be implemented. • Provide spill kits at all fuel transfer locations as a contingency and a form of general secondary containment. • Confirmation from operations personnel that spill kits have been provided in all vehicles used for fuel transfer operations. • Confirmation from operations personnel that wheel chocks are being used.



8.0 Technical Requirements

8.1 Technical Requirements – 112.7(a)

8.1.1 Requirement 112.7(a)(1)

Include a discussion of your facility's conformance with the requirements listed in this part.

Response

Fort Gordon is in general conformance with SPCC regulations. However, specific deficiencies were observed with regard to certain sections of the regulations that need to be corrected. These deficiencies, once corrected, will bring the facility into full compliance with requirements and the intent of the law. Recommendations stated in this document need to be implemented in a timely manner.

A review of the previous SPCC Plan indicated that a reportable spill occurred on March 2, 2007, at the Wastewater Treatment Plant on North Range Road. An oil/water separator was evidently overloaded due to a storm event and was discharged to the wastewater treatment system. Trace quantities of oil reached Spirit Creek from the wastewater treatment effluent. The spill was contained and both Federal and State authorities were contacted.

8.1.2 Requirement 112.7(a)(2)

Comply with all applicable requirements listed in this part. Your Plan may deviate from the requirements in paragraphs (g), (h)(2) and (3), and (i) of this section and the requirements in subparts B and C of this part, except the secondary containment requirements in paragraphs (c) and (h)(1) of this section, and 112.8(c)(2), 112.8(c)(11), 112.9(c)(2), 112.10(c), 112.12(c)(2), 112.12(c)(11), 112.13(c)(2), and 112.14(c), where applicable to a specific facility, if you provide equivalent environmental protection by some other means of spill prevention, control, or countermeasure. Where your Plan does not conform to the applicable requirements in paragraphs (g), (h)(2) and (3), and (i) of this section, or the requirements of subparts B and C of this part, except the secondary containment requirements in paragraphs (c) and (h)(1) of this section, and 112.8(c)(2), 112.8(c)(11), 112.9(c)(2), 112.10(c), 112.12(c)(2), 112.12(c)(11), 112.13(c)(2), and 112.14(c), you must state the reasons for nonconformance in your Plan and describe in detail alternate methods and how you will achieve equivalent environmental protection. If the Regional Administrator determines that the measures described in your Plan do not provide equivalent environmental protection, he may require that you amend your Plan, following the procedures in 112.4(d) and (e).

Response

Non-conformance with any part of CFR 112.7 and/or the respective Subparts is discussed in the response to that specific requirement in the remainder of this document.



8.1.3 Requirement 112.7(a)(3)

Describe in your plan the physical layout of the facility and include a facility diagram, which must mark the location and contents of each container. The facility diagram must include completely buried tanks that are otherwise exempted from the requirements of this part under 112.1(d)(4). The facility diagram must also include all transfer stations and connecting pipes.

Response

The physical layout of the facility includes a facility map that identifies the location of all containers (ASTs/USTs) as well as oil water separators (OWSs), generators, mobile refueler, portable on demand storage (PODS), used cooking oil containers, drums and fuel transfer stations. In addition, non regulated buried tanks are also included in the facility map as required for compliance with this section. This facility map is provided in the Appendix B of STMP which is to be incorporated into this document by reference. Also, site diagrams are included in the Appendix C of the STMP that include detailed information for each site. The information includes but is not limited to drain inlets, flow directions, pipe location if known and other pertinent site specific information.

Fort Gordon is situated in the Coastal Plain physiographic province adjacent to the Fall Line that marks the transition zone between the Coastal Plain and the Piedmont physiographic provinces. The base is underlain by upper Cretaceous and middle Tertiary sediments. These sediments uncomfortably overlie Paleozoic igneous and metamorphic rocks (Chowns and Williams, 1983). The upper Cretaceous undifferentiated sediments are the basal Coastal Plain unit in the area and consist of unconsolidated, moderately to poorly sorted, fine to very coarse sand with interblended sandy clay. The Cretaceous sediments can be micaceous and have granules and pebbles within the sand or as layers. In Richmond County, the Upper Cretaceous sediments range from 100 feet to 150 feet thick.

The Huber Formation uncomfortably overlies the Upper Cretaceous sediments. The Huber Formation is composed of Kaolinitic sand, sandy kaolin, and kaolin and the sands are coarse and poorly sorted. Mica and heavy minerals are present in the upper portions of the Huber Formation and the upper sandy kaolin is cemented by silica. The Huber Formation is less than 50 feet thick in Richmond County.

According to the Draft Stormwater Prevention Plan Summary Report completed by AMEC Earth & Environmental (October 2007), the Barnwell Group uncomfortably overlies the Huber Formation and consists of poorly sorted to moderately well sorted medium to very coarse quartz sand with minor interstitial clay.

8.1.4 Surface Water Drainage

The major drainage features on Fort Gordon include Butler, Spirit, South Prong, Sandy Run, Boggy Gut, and Brier Creeks. The streams are small and bordered by heavy swamps (USACE, 2005, USACE, 2001b). There are 28 lakes, ponds and reservoirs on the installation (Maxwell and Scout lakes are no longer impounded). Butler Creek originates north of the installation boundary and drains to the southeast into the Savannah River. The portion of the Butler Creek Watershed that lies north of Fort Gordon covers approximately 13 square miles in Richmond and Columbia Counties. Fort Gordon owns approximately 5 to 10 percent of this portion of the watershed with the remainder owned by state and local governments and private landowners.



Fort Gordon obtains its drinking water from Augusta-Richmond County Utilities Department (2822 Central Avenue, Augusta, Georgia, 30909). Augusta-Richmond County utilizes both surface and groundwater as water sources.

8.1.5 Requirement 112.7(a)(3)(i)

You must also address in your plan the type of oil in each container and its storage capacity.

Response

All 40 CFR 112 regulated POL storage tanks (ASTs & USTs), drums, generators, used cooking oil storage containers, PODS, and mobile refueler are presented in tables within the SPCC Plan. It should be noted that a complete list of POL storage tanks are identified in tables within the STMP. These tables also include similar data collected during the site visits in 2007 and 2008 and follow-up interviews in 2010.

With the exception of one OWS (OWS-SAN-003) which is used for spill containment, all other OWSs at Fort Gordon are used for wastewater treatment. Because all the other OWS are used exclusively for wastewater treatment they are not regulated by 40 CFR 112.

Also, transformers located on Fort Gordon which are regulated by 40 CFR 112 are not included in this plan because they are addressed separately by Georgia Power Company. Georgia Power Company located in Atlanta Georgia, completed an SPCC plan dated February 28, 2006 that includes the transformers at Fort Gordon. Georgia Power Company SPCC plan addresses specific issues with regard to transformers and other oil filled electrical equipment. In addition, POL tanks and drum storage containers are included in their plan. The SPCC plan prepared by Georgia Power is located in Appendix H of the STMP. Out of service transformers pending removal by Georgia Power are located at Building 2401. These transformers must be removed and properly disposed of in accordance with appropriate regulations.



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SPCC Table 8-1 Regulated ASTs (40 CFR 112)

Tank ID	Tank Type	Capacity (gallons)	Contents	Status	Nearest Building	Facility	Installation Year	Construction Type	Tank Construction Material
14600A	AST	275	#2 Fuel Oil	Active	14600	DPWL/Maintenance	1996	Double Walled	Steel
14602A	AST	495	Used Oil	Active	14602	Centralized Maintenance Facility	1995	Double Walled	Steel
14602B	AST	495	Used Oil	Active	14602	Centralized Maintenance Facility	1995	Double Walled	Steel
14603A	AST	10000	#2 Fuel Oil	Active	14603	Centralized Maintenance Facility	1998	Double Walled	Steel
14605C	AST	120	#2 Fuel Oil	Active	14605	Centralized Maintenance Facility	Unknown	Single Walled	Steel
14A	AST	4000	Gasoline	Active	Marina	Fort Gordon Marina	Unknown	Double Walled	Steel
200C	AST	1495	Diesel	Active	200	WTP	1996	Double Walled	Steel
202A	AST	1000	Diesel	Active	202	Dorsey Rd. Pumping Station	1970	Double Walled	Steel
2068A	AST	1000	Used Oil	Active	2068	Old Rds/Grnds (near Pesticide)	2001	Double Walled	Steel
214A	AST	264	Used Oil	Active	71204	214th Signal Battalion	Unknown	Double Walled	Steel
21801A	AST	396	Used Oil	Active	21801	Army National Guard Motorpool	2009	Double Walled	Steel
25305A	AST	250	Used Oil	Out of Service	25305	442 Signal BN Motor Pool	Unknown	Single Walled	Steel
25330A	AST	495	Diesel	Active	25330	H/C Plant - South	Unknown	Double Walled	Steel
25910A	AST	15000	Diesel	Active	25910	H/C Plant (Generator Yard)	2001	Double Walled	Steel
25910B	AST	15000	Diesel	Active	25910	H/C Plant (Generator Yard)	2001	Double Walled	Steel



SPCC Table 8-1 Regulated ASTs (40 CFR 112)

Tank ID	Tank Type	Capacity (gallons)	Contents	Status	Nearest Building	Facility	Installation Year	Construction Type	Tank Construction Material
25910C	AST	15000	Diesel	Active	25910	H/C Plant (Generator Yard)	1999	Double Walled	Steel
25910D	AST	15000	Diesel	Active	25910	H/C Plant (Generator Yard)	1999	Double Walled	Steel
25910F	AST	3000	40-W Engine Oil	Active	25910	H/C Plant (Generator Yard)	Unknown	Single Walled	Steel
25910G	AST	500	Diesel Overflow	Active	25910	H/C Plant (Generator Yard)	Unknown	Double Walled	Steel
25910H	AST	1495	Diesel	Active	25910	H/C Plant - North	2007	Double Walled	Steel
29300A	AST	495	Used Oil	Active	29300	Car Care Facility (Auto Self Help Shop)	1995	Double Walled	Steel
29808A	AST	275	Diesel	Active	29808	Signal Towers	Unknown	Double Walled	Steel
300A	AST	6000	Diesel	Active	300	Eisenhower Army Medical Center	1996	Double Walled	Steel
310A	AST	12000	Diesel	Active	310	H/C Plant - Medical Center	1998	Double Walled	Steel
310B	AST	12000	Diesel	Active	310	H/C Plant - Medical Center	1998	Double Walled	Steel
33720A	AST	275	Diesel	Active	33720	Darling Hall	1996	Double Walled	Steel
34500A	AST	1500	Diesel	Active	34500	DOIM	2004	Double Walled	Concrete/Steel
410A	AST	1500/500	Diesel/Gas	Active	410	Forestry	1995	Double Walled	Steel
47A	AST	275	Diesel	Active	47006	Lift Station	1995	Double Walled	Steel
49300A	AST	6000	Gasoline	Active	49300	AAFES-Gate 5	1993	Single Walled	Steel
49300B	AST	6000	Gasoline	Active	49300	AAFES-Gate 5	1993	Single Walled	Steel
49300C	AST	6000	Gasoline	Active	49300	AAFES-Gate 5	1993	Single Walled	Steel



SPCC Table 8-1 Regulated ASTs (40 CFR 112)

Tank ID	Tank Type	Capacity (gallons)	Contents	Status	Nearest Building	Facility	Installation Year	Construction Type	Tank Construction Material
49300D	AST	6000	Gasoline	Active	49300	AAFES-Gate 5	1993	Single Walled	Steel
537A	AST	530	Diesel	Active	533	Gordon Lakes	Unknown	Double Walled	Steel
537B	AST	530	Gasoline	Active	533	Gordon Lakes	Unknown	Double Walled	Steel
560A	AST	495	Diesel	Active	560	WWTP	1996	Double Walled	Steel
61500A	AST	30000	Fuel Oil	Active	61500	NSA area	2009	Double Walled	Steel
61500B	AST	30000	Fuel Oil	Active	61500	NSA area	2009	Double Walled	Steel
61500C	AST	30000	Fuel Oil	Active	61500	NSA area	2009	Double Walled	Steel
61500D	AST	30000	Fuel Oil	Active	61500	NSA area	2009	Double Walled	Steel
61500E	AST	30000	Fuel Oil	Active	61500	NSA area	2009	Double Walled	Steel
61500F	AST	30000	Fuel Oil	Active	61500	NSA area	2009	Double Walled	Steel
61500G	AST	30000	Fuel Oil	Active	61500	NSA area	2009	Double Walled	Steel
61500H	AST	30000	Fuel Oil	Active	61500	NSA area	2009	Double Walled	Steel
61500I	AST	30000	Fuel Oil	Active	61500	NSA area	2009	Double Walled	Steel
685A	AST	750	Diesel	Active	576	Gibson Road Sanitary Landfill	1985	Unknown	Steel
81204A	AST	500	Used Oil	Active	81204	63rd Signal Battalion	Unknown	Double Walled	Steel



SPCC Table 8-1 Regulated ASTs (40 CFR 112)

Tank ID	Tank Type	Capacity (gallons)	Contents	Status	Nearest Building	Facility	Installation Year	Construction Type	Tank Construction Material
GEN-14600B	Integral AST	75	Diesel	Active	14600	DPWL/Maintenance	1987	Double Walled	Steel
GEN-15500	Integral AST	450	Diesel	Active	15500	Bingo Palace	Unknown	Unknown	Steel
GEN-21721	Integral AST	1000	Diesel	Active	21721	Back Hall	2006	Double Walled	Steel
GEN-24701A	Integral AST	800	Diesel	Active	24701	Back Hall	Unknown	Double Walled	Steel
GEN-24701B	Integral AST	1500	Diesel	Active	24701	Back Hall	Unknown	Unknown	Steel
GEN-24705	Integral AST	5500	Diesel	Active	24705	Back Hall	Unknown	Unknown	Steel
GEN-25910E (PP1-1)	Integral AST	80	Diesel	Active	25910	H/C Plant (Generator Yard)	1994	Single Walled	Steel
GEN-25910E (PP1-2)	Integral AST	80	Diesel	Active	25910	H/C Plant (Generator Yard)	1994	Single Walled	Steel
GEN-25910E (PP1-3)	Integral AST	80	Diesel	Active	25910	H/C Plant (Generator Yard)	1994	Single Walled	Steel
GEN-25910E (PP2-1)	Integral AST	80	Diesel	Active	25910	H/C Plant (Generator Yard)	1994	Single Walled	Steel
GEN-25910E (PP2-2)	Integral AST	80	Diesel	Active	25910	H/C Plant (Generator Yard)	1994	Single Walled	Steel
GEN-25910E (PP2-3)	Integral AST	80	Diesel	Active	25910	H/C Plant (Generator Yard)	1994	Single Walled	Steel



SPCC Table 8-1 Regulated ASTs (40 CFR 112)

Tank ID	Tank Type	Capacity (gallons)	Contents	Status	Nearest Building	Facility	Installation Year	Construction Type	Tank Construction Material
GEN-25910E (PP3-1)	Integral AST	80	Diesel	Active	25910	H/C Plant (Generator Yard)	1994	Single Walled	Steel
GEN-25910E (PP3-2)	Integral AST	80	Diesel	Active	25910	H/C Plant (Generator Yard)	1994	Single Walled	Steel
GEN-25910E (PP3-3)	Integral AST	80	Diesel	Active	25910	H/C Plant (Generator Yard)	1994	Single Walled	Steel
GEN-25910H	Integral AST	1495	Diesel	Active	25910	H/C Plant - North	Unknown	Unknown	Steel
GEN-29808	Integral AST	275	Diesel	Active	29808	Signal Towers	Unknown	Double Walled	Steel
GEN-300-1	Integral AST	200	Diesel	Active	300	Eisenhower Army Medical Center	Unknown	Unknown	Steel
GEN-300-2	Integral AST	200	Diesel	Active	300	Eisenhower Army Medical Center	Unknown	Unknown	Steel
GEN-300-3	Integral AST	200	Diesel	Active	300	Eisenhower Army Medical Center	Unknown	Unknown	Steel
GEN-33720	Integral AST	Unknown	Diesel	Active	33720	Darling Hall	1996	Single Walled	Steel
GEN-34500	Integral AST	1500	Diesel	Active	34500	DOIM	Unknown	Unknown	Steel
GEN-37200A	Integral AST	100	Diesel	Active	37200	Commissary	Unknown	Single Walled	Steel
MOD-1	AST	500	Diesel	Active	T-1000 (MOD-1)	Back Hall	Unknown	Double Walled	Steel



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SPCC Table 8-2 Regulated USTs (40 CFR 112)

Tank ID	Tank Type	Capacity (gallons)	Contents	Status	Nearest Building	Facility	Installation Year	Construction Type	Tank Construction Material
14600C	UST	8000	#2 Fuel Oil	Active	14600	DPWL/Maintenance	1976	Double Walled	Steel
25501A	UST	5000	#2 Fuel Oil	Inactive	25501	Dental Clinic	1986	Unknown	Steel
25600A	UST	2000	#2 Fuel Oil	Out of Service	25600	Unknown	1979	Unknown	Unknown
28320A	UST	10000	#2 Fuel Oil	Inactive	28320	DMWR M&A / BOSS Hdqtrs.	1974	Unknown	Unknown
310C	BFCUST	200000	#2 Fuel Oil	Active	310	H/C Plant - Medical Center	1976	Single Walled	Concrete
310D	UST	30000	#2 Fuel Oil	Active	310	H/C Plant - Medical Center	1975	Unknown	Steel
35200A	UST	8000	#2 Fuel Oil	Inactive	35200	P-Xtra	1965	Unknown	Unknown
35200B	UST	10000	#2 Fuel Oil	Inactive	35200	P-Xtra	1965	Unknown	Unknown
36700A	UST	8000	#2 Fuel Oil	Active	36700	Ring Hall	1972	Unknown	Unknown
36700B	UST	8000	#2 Fuel Oil	Active	36700	Ring Hall	1972	Unknown	Unknown



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SPCC Table 8-3 Regulated Generators (40 CFR 112)

Generator ID	Facility	Nearest Building	Contents	Fueled By
14600	DPWL	14600	Diesel	GEN-14600B (Integral AST - 75 gallons)
15500	Bingo Palace	15500	Diesel	GEN-15500 (Integral AST - 450 gallons)
200	WTP	200	Diesel	200C (AST - 1495 gallons)
202	Dorsey Rd. Pumping Station	202	Diesel	202A (AST - 1000 gallons)
21721	Back Hall	21721	Diesel	GEN-21721 (Integral AST - 1000 gallons)
24701A	Back Hall	24701	Diesel	GEN-24701A (Integral AST - 800 gallons)
24701B	Back Hall	24701	Diesel	GEN-24701B (Integral AST - 1500 gallons)
24705	Back Hall	24705	Diesel	GEN-24705 (Integral AST - 5500 gallons)
25330	H/C Plant - South	25330	Diesel	25330A (AST - 495 gallons)
25910E (PP1-1)	H/C Plant (Generator Yard)	25910	Diesel	GEN-25910E (PP1-1) (Integral AST - 80 gallons) & 25910A-D (ASTs - 15000 gallons each)
25910E (PP1-2)	H/C Plant (Generator Yard)	25910	Diesel	GEN-25910E (PP1-2) (Integral AST - 80 gallons) & 25910A-D (ASTs - 15000 gallons each)
25910E (PP1-3)	H/C Plant (Generator Yard)	25910	Diesel	GEN-25910E (PP1-3) (Integral AST - 80 gallons) & 25910A-D (ASTs - 15000 gallons each)
25910E (PP2-1)	H/C Plant (Generator Yard)	25910	Diesel	GEN-25910E (PP2-1) (Integral AST - 80 gallons) & 25910A-D (ASTs - 15000 gallons each)
25910E (PP2-2)	H/C Plant (Generator Yard)	25910	Diesel	GEN-25910E (PP2-2) (Integral AST - 80 gallons) & 25910A-D (ASTs - 15000 gallons each)
25910E (PP2-3)	H/C Plant (Generator Yard)	25910	Diesel	GEN-25910E (PP2-3) (Integral AST - 80 gallons) & 25910A-D (ASTs - 15000 gallons each)



SPCC Table 8-3 Regulated Generators (40 CFR 112)

Generator ID	Facility	Nearest Building	Contents	Fueled By
25910E (PP3-1)	H/C Plant (Generator Yard)	25910	Diesel	GEN-25910E (PP3-1) (Integral AST - 80 gallons) & 25910A-D (ASTs - 15000 gallons each)
25910E (PP3-2)	H/C Plant (Generator Yard)	25910	Diesel	GEN-25910E (PP3-2) (Integral AST - 80 gallons) & 25910A-D (ASTs - 15000 gallons each)
25910E (PP3-3)	H/C Plant (Generator Yard)	25910	Diesel	GEN-25910E (PP3-3) (Integral AST - 80 gallons) & 25910A-D (ASTs - 15000 gallons each)
25910H	H/C Plant - North	25910	Diesel	GEN-25910H (Integral AST - unknown) & 25910H (AST - 1495 gallons)
29808	Signal Towers	29808	Diesel	GEN-29808 (Integral AST - unknown) & 29808A (AST - 275 gallons)
300-1	Eisenhower Army Medical Center	300	Diesel	GEN-300-1 (Integral AST - 200 gallons) & 300A (AST- 6000 gallons)
300-2	Eisenhower Army Medical Center	300	Diesel	GEN-300-2 (Integral AST - 200 gallons) & 300A (AST- 6000 gallons)
300-3	Eisenhower Army Medical Center	300	Diesel	GEN-300-3 (Integral AST - 200 gallons) & 300A (AST- 6000 gallons)
310	H/C Plant - Medical Center	310	Diesel	310A (AST - 12000 gallons) & 310B (AST - 12000 gallons)
33720	Darling Hall	33720	Diesel	GEN-33720 (Integral AST - unknown) & 33720A (AST - 275 gallons)
34500	DOIM	34500	Diesel	GEN-34500 (Integral AST - unknown) & 34500A (AST - 1500 gallons)
37200A	Commissary	37200	Diesel	GEN-37200A (Integral AST - 100 gallons)
47006	Lift Station	47006	Diesel	47A (AST - 275 gallons)
560	WWTP	560	Diesel	560A (AST - 495 gallons)
T-1000	Back Hall	T-1000 (MOD-1)	Diesel	MOD-1 (AST - 500 gallons)



SPCC Table 8-4 Regulated Mobile Fueling (40 CFR 112)

Tank ID	Tank Type	Amount	Capacity (gallons)	Contents	Status	Nearest Building	Facility
13407	Fuel PODS	3	600	JP-8	Active	13407	359th Sig. Brigade (Reserve Ctr)
13700	Fuel PODS	12	500	JP-8	Active	13700	513th MI Brigade
13804	Mobile Refueler	1	2500	Diesel	Active	13804	TMP Motorpool
14304A	Fuel PODS	2	500	JP-8	Active	14304	Unknown
14304B	Fuel PODS	4	600	Gasoline	Active	14304	RTS Med
81204	Fuel PODS	2	600	Gasoline	Active	81204	35th Signal Brigade



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SPCC Table 8-5 Regulated Used Cooking Oil (40 CFR 112)

Tank ID	Capacity (gallons)	Contents	Status	Nearest Building	Facility
15500A	300	Used Cooking Oil	Active	15500	Bingo Palace
18402A	300	Used Cooking Oil	Active	18402	Gordon Club
21709A	300	Used Cooking Oil	Active	21709	Dining Facility #11
24414A	300	Used Cooking Oil	Active	24414	Dining Facility #13 (93rd Signal)
25704A	300	Used Cooking Oil	Active	25704	Dining Facility #8
25717A	300	Used Cooking Oil	Active	25717	Dining Facility #6
25717B	300	Used Cooking Oil	Active	25717	Dining Facility #6
300D	300	Used Cooking Oil	Active	300	Eisenhower Army Medical Center
33200A	300	Used Cooking Oil	Active	33200	Bowling Center
35300A	300	Used Cooking Oil	Active	35300	Huddle House
36200A	300	Used Cooking Oil	Active	36200	MeMe's & BoBo's-Bowling Ctr.
38200	300	Used Cooking Oil	Active	38200	PX
40127A	300	Used Cooking Oil	Active	40127	Brim's Barracks Mess Hall
531C	300	Used Cooking Oil	Active	533	Gordon Lakes



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SPCC Table 8-6 Regulated POL Storage (40 CFR 112)

ID	Type	Amount	Capacity (gallons)	Contents	Status	Nearest Building	Facility
10604A	Drums	2	55	Various POL	Active	10604	HMCC
12702	Drums	2-4	55	Various POL	Active	12702	Unknown
13700A	Drums	6	55	Used Oil	Active	13700	513th MI Brigade
13710	Drums	6	55	Diesel Oil	Active	13710	Unknown
14602	Drums	2-4	55	Lube Oil	Active	14602	Unknown
14603B	Drums	15-20	55	Various POL	Active	14603	Centralized Maintenance Facility
2401A	Drums	7	55	Pine Oil	Active	2401	Roads & Grounds Maint./Storage
2401D	Drums	3	55	Motor Oil	Active	2401	Roads & Grounds Maint./Storage
25330D	Drums	1	55	WF-68 Refrigeration Oil	Active	25330	H/C Plant
25330E	Drums	1	55	Used Oil	Active	25330	H/C Plant
29300B	Drums	2	55	Motor Oil	Active	29300	Car Care Facility
310E	Drums	1	55	Used Oil	Active	310	H/C Plant
531A	Drums	2	55	Used Oil	Active	533	Gordon Lakes
531B	Drums	1	55	Diesel Oil	Active	533	Gordon Lakes
997	Drums	2	55	Lube Oil	Active	997	Recycle Center
T513A	Drums	2	55	Used Oil	Active	81204	63rd Signal Battalion
T513B	Drums	2	55	Used Mogas	Active	81204	63rd Signal Battalion
T513C	Drums	2	55	Used Kerosene	Active	81204	63rd Signal Battalion
T513D	Drums	2	55	Used Diesel	Active	81204	63rd Signal Battalion
T513E	Drums	2	55	Motor Oil	Active	81204	63rd Signal Battalion
T513F	Drums	2	55	Lube Oil	Active	81204	63rd Signal Battalion



8.1.6 Requirement 112.7(a)(3)(ii)

Discharge prevention measures including procedures for routine handling of products (loading, unloading, and facility transfers, etc.).

Response

Discharge prevention measures and procedures (SOPs) for routine handling of products (loading, unloading and facility transfer) must be developed for all fuel transfer operations. These procedures **should be** readily available for review by employees and contractors. **It is assumed** that fuel contractors at the facility have SOPs that are required to be adhered to during fuel loading and unloading operations. A copy of these SOPs **should be** obtained and reviewed by management and facility personnel to ensure adherence to the specific procedures identified. Also, specific relevant training **should be** implemented to ensure that the procedures identified can be followed. These training exercises are required to be documented.

All storage tanks are equipped with, or will be required to be upgraded with, level gauges and/or high level alarms, and secondary containment structures. In addition, all 40 CFR 112 regulated USTs have or will be upgraded to have spill catchment buckets at the tank fill port. Discharge prevention measures associated with regulated POL tanks are identified in SPCC Table 8-7 and SPCC Table 8-8. A complete list of POL tank discharge prevention measures is located in Section 4.0 of the STMP. It is recommended that all upgrades be implemented as quickly as possible.



SPCC Table 8-7 PST Discharge Prevention Measures

Tank ID	Tank Type	Capacity (gallons)	Contents	Facility	Tank Secondary Containment	Overfill Protection	Spill Catchment	Tank Leak Detection	40 CFR 112 Required Upgrades
14600A	AST	275	#2 Fuel Oil	DPWL/Maintenance	DW Steel	Visible Gauge	Spill Bucket	Interstitial w/ Audible/ Visual (Sight Glass)	Install area lighting and collision barrier. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
14600C	UST	8000	#2 Fuel Oil	DPWL/Maintenance	Unknown	Unknown	None	Unknown	Install area lighting, collision barrier, HLA and spill bucket. Verify secondary containment. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
14602A	AST	495	Used Oil	Centralized Maintenance Facility	DW Steel	Visible Gauge	None	Interstitial w/ Audible/ Visual (Sight Glass)	Install spill bucket.
14602B	AST	495	Used Oil	Centralized Maintenance Facility	DW Steel	Visible Gauge	None	Interstitial w/ Audible/ Visual (Sight Glass)	Install spill bucket.
14603A	AST	10000	#2 Fuel Oil	Centralized Maintenance Facility	DW Steel	Visible Gauge	None	Interstitial w/ Audible/ Visual (Gauge)	Install area lighting. Remove rust and repaint. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
14605C	AST	120	#2 Fuel Oil	Centralized Maintenance Facility	Concrete and block	Visible Gauge	Inside Dike	Visual Inspection	N/A



SPCC Table 8-7 PST Discharge Prevention Measures

Tank ID	Tank Type	Capacity (gallons)	Contents	Facility	Tank Secondary Containment	Overfill Protection	Spill Catchment	Tank Leak Detection	40 CFR 112 Required Upgrades
14A	AST	4000	Gasoline	Fort Gordon Marina	DW Steel	Visible Gauge	Spill Bucket	Visual Inspection	Install area lighting, collision barrier, valve surface security, drain security, and HLA. Remove rust and repaint.
200C	AST	1495	Diesel	WTP	DW Steel	Visible Gauge	Spill Bucket	Interstitial w/ Audible/ Visual (Gauge)	Install collision barrier and drain security.
202A	AST	1000	Diesel	Dorsey Rd. Pumping Station	DW Steel	None	None	Interstitial w/ Audible/ Visual (Gauge)	Install spill bucket and HLA. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
2068A	AST	1000	Used Oil	Old Rds/Grnds (near Pesticide)	DW Steel	None	Spill Bucket	Visual Inspection	Install area lighting and HLA.
21801A	AST	396	Used Oil	Army National Guard Motor Pool	DW Steel	Visible Gauge	Spill Bucket	Visual inspection	Install area lighting and collision barriers
214A	AST	264	Used Oil	214th Signal Battalion	DW Steel	Visible Gauge	Spill Bucket	Visual Inspection	Install area lighting and collision barriers.
25305A	AST	250	Used Oil	442 Signal BN Motor Pool	DW Steel	None	None	Visual Inspection	Remove.
25330A	AST	495	Diesel	H/C Plant - South	DW Steel	Visible Gauge	None	Interstitial w/ Audible/ Visual (Sight Glass)	Install area lighting, collision barrier, and spill bucket.
25501A	UST	5000	#2 Fuel Oil	Dental Clinic	Unknown	None	None	None	Install collision barrier and drain security. Verify secondary containment. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.



SPCC Table 8-7 PST Discharge Prevention Measures

Tank ID	Tank Type	Capacity (gallons)	Contents	Facility	Tank Secondary Containment	Overfill Protection	Spill Catchment	Tank Leak Detection	40 CFR 112 Required Upgrades
25600A	UST	2000	#2 Fuel Oil	Unknown	Unknown	None	None	None	Remove.
25910A	AST	15000	Diesel	H/C Plant (Generator Yard)	DW	High-Level Alarm	Spill Bucket	Visual Inspection	Install area lighting. Remove rust and repaint.
25910B	AST	15000	Diesel	H/C Plant (Generator Yard)	DW	High-Level Alarm	Spill Bucket	Visual Inspection	Install area lighting. Remove rust and repaint.
25910C	AST	15000	Diesel	H/C Plant (Generator Yard)	DW	High-Level Alarm	Spill Bucket	Visual Inspection	Install area lighting. Remove rust and repaint.
25910D	AST	15000	Diesel	H/C Plant (Generator Yard)	DW	High-Level Alarm	Spill Bucket	Visual Inspection	Install area lighting. Remove rust and repaint.
25910F	AST	3000	40-W Engine Oil	H/C Plant (Generator Yard)	DW	None	Spill Bucket	Visual Inspection	Install area lighting and HLA.
25910G	AST	500	Diesel Overflow	H/C Plant (Generator Yard)	DW	None	N/A	Visual Inspection	Remove rust and repaint. Install HLA.
25910H	AST	1495	Diesel	H/C Plant - North	DW Steel	None	Spill Bucket	Visual Inspection	Install HLA.
28320A	UST	10000	#2 Fuel Oil	DMWR M&A / BOSS Hdqtrs.	Unknown	None	None	Visual Inspection	Install area lighting, collision barrier, drain security, spill bucket, and HLA. Verify secondary containment. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
29300A	AST	495	Used Oil	Car Care Facility (Auto Self Help Shop)	DW Steel	None	None	Visual Inspection	Install area lighting, collision barrier, drain security, spill bucket, and HLA.



SPCC Table 8-7 PST Discharge Prevention Measures

Tank ID	Tank Type	Capacity (gallons)	Contents	Facility	Tank Secondary Containment	Overfill Protection	Spill Catchment	Tank Leak Detection	40 CFR 112 Required Upgrades
29808A	AST	275	Diesel	Signal Towers	DW	Visible Gauge	None	Interstitial w/ Audible/ Visual (Gauge)	Install area lighting, valve surface security, and spill bucket. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
300A	AST	6000	Diesel	Eisenhower Army Medical Center	DW Steel	Visible Gauge/High-Level Alarm	Spill Bucket	Interstitial w/ Audible/ Visual (Gauge)	N/A
310A	AST	12000	Diesel	H/C Plant - Medical Center	DW Steel	High-Level Alarm	Spill Bucket	Interstitial w/ Audible/ Visual (Sight Glass)	Remove rust and repaint.
310B	AST	12000	Diesel	H/C Plant - Medical Center	DW Steel	High-Level Alarm	Integral Loading Funnel/Sink	Interstitial w/ Audible/ Visual (Gauge)	Remove rust and repaint.
310C	BFCUST	200000	#2 Fuel Oil	H/C Plant - Medical Center	No Chance of Discharge (112.1 (b))	None	None	None	Install HLA and spill bucket. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
310D	UST	30000	#2 Fuel Oil	H/C Plant - Medical Center	None	Auto shut off	Filled from 310C	None	Replace with DW UST. Install HLA. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
33720A	AST	275	Diesel	Darling Hall	DW Steel	None	Spill Bucket	Visual Inspection	Install HLA, valve surface security, and drain security.



SPCC Table 8-7 PST Discharge Prevention Measures

Tank ID	Tank Type	Capacity (gallons)	Contents	Facility	Tank Secondary Containment	Overfill Protection	Spill Catchment	Tank Leak Detection	40 CFR 112 Required Upgrades
34500A	AST	1500	Diesel	DOIM	DW	Visible Gauge	Spill Bucket	Interstitial w/ Audible/ Visual (Gauge)	N/A
35200A	UST	8000	#2 Fuel Oil	P-Xtra	Unknown	None	None	None	Confirm status of UST. Remove UST if no longer in service. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
35200B	UST	10000	#2 Fuel Oil	P-Xtra	Unknown	None	None	None	Confirm status of UST. Remove UST if no longer in service. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
36700A	UST	8000	#2 Fuel Oil	Ring Hall	Unknown	Unknown	None	None	Install area lighting, drain security, HLA, and spill bucket. Verify secondary containment. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.



SPCC Table 8-7 PST Discharge Prevention Measures

Tank ID	Tank Type	Capacity (gallons)	Contents	Facility	Tank Secondary Containment	Overfill Protection	Spill Catchment	Tank Leak Detection	40 CFR 112 Required Upgrades
36700B	UST	8000	#2 Fuel Oil	Ring Hall	Unknown	Unknown	None	None	Install area lighting, drain security, HLA, and spill bucket. Verify secondary containment. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
410A	AST	1500/500	Diesel/Gas	Forestry	DW Steel	High-Level Alarm	Spill Bucket	Visual Inspection	N/A
47A	AST	275	Diesel	Lift Station	DW Steel	Visible Gauge	Spill Bucket	Interstitial w/ Audible/ Visual (Gauge)	Install area lighting and collision barrier. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
49300A	AST	6000	Gasoline	AAFES-Gate 5	Concrete and block	High-Level Alarm	Inside Dike	Interstitial w/ Audible/Visual Alarm	Install area lighting. Remove rust and repaint. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
49300B	AST	6000	Gasoline	AAFES-Gate 5	Concrete and block	High-Level Alarm	Inside Dike	Interstitial w/ Audible/Visual Alarm	Install area lighting. Remove rust and repaint. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.



SPCC Table 8-7 PST Discharge Prevention Measures

Tank ID	Tank Type	Capacity (gallons)	Contents	Facility	Tank Secondary Containment	Overfill Protection	Spill Catchment	Tank Leak Detection	40 CFR 112 Required Upgrades
49300C	AST	6000	Gasoline	AAFES-Gate 5	Concrete and block	High-Level Alarm	Inside Dike	Interstitial w/ Audible/Visual Alarm	Install area lighting. Remove rust and repaint. Verify cathodic protection- if necessary provide cathodic protection for piping or move aboveground.
49300D	AST	6000	Gasoline	AAFES-Gate 5	Concrete and block	High-Level Alarm	Inside Dike	Interstitial w/ Audible/Visual Alarm	Install area lighting. Remove rust and repaint. Verify cathodic protection- if necessary provide cathodic protection for piping or move aboveground.
537A	AST	530	Diesel	Gordon Lakes	DW Steel	Visible Gauge	Spill Bucket	Visual Inspection	Remove rust and repaint. Install HLA.
537B	AST	530	Gasoline	Gordon Lakes	DW Steel	None	Spill Bucket	Visual Inspection	Remove rust and repaint. Install HLA.
560A	AST	495	Diesel	WWTP	DW Steel	Visible Gauge	Spill Bucket	Interstitial w/ Audible/ Visual (Gauge)	Install collision barrier and drain security. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
61500A	AST	30,000	Fuel Oil	NSA site	DW Steel	Unknown	Unknown	Interstitial	Unknown – Unwavering NSA security precautions prevent contractors from entering premises for tank inspection



SPCC Table 8-7 PST Discharge Prevention Measures

Tank ID	Tank Type	Capacity (gallons)	Contents	Facility	Tank Secondary Containment	Overfill Protection	Spill Catchment	Tank Leak Detection	40 CFR 112 Required Upgrades
61500B	AST	30,000	Fuel Oil	NSA site	DW Steel	Unknown	Unknown	Interstitial	Unknown – Unwavering NSA security precautions prevent contractors from entering premises for tank inspection
61500C	AST	30,000	Fuel Oil	NSA site	DW Steel	Unknown	Unknown	Interstitial	Unknown – Unwavering NSA security precautions prevent contractors from entering premises for tank inspection
61500D	AST	30,000	Fuel Oil	NSA site	DW Steel	Unknown	Unknown	Interstitial	Unknown – Unwavering NSA security precautions prevent contractors from entering premises for tank inspection
61500E	AST	30,000	Fuel Oil	NSA site	DW Steel	Unknown	Unknown	Interstitial	Unknown – Unwavering NSA security precautions prevent contractors from entering premises for tank inspection
61500F	AST	30,000	Fuel Oil	NSA site	DW Steel	Unknown	Unknown	Interstitial	Unknown – Unwavering NSA security precautions prevent contractors from entering premises for tank inspection
61500G	AST	30,000	Fuel Oil	NSA site	DW Steel	Unknown	Unknown	Interstitial	Unknown – Unwavering NSA security precautions prevent contractors from entering premises for tank inspection



SPCC Table 8-7 PST Discharge Prevention Measures

Tank ID	Tank Type	Capacity (gallons)	Contents	Facility	Tank Secondary Containment	Overfill Protection	Spill Catchment	Tank Leak Detection	40 CFR 112 Required Upgrades
61500H	AST	30,000	Fuel Oil	NSA site	DW Steel	Unknown	Unknown	Interstitial	Unknown – Unwavering NSA security precautions prevent contractors from entering premises for tank inspection
61500I	AST	30,000	Fuel Oil	NSA site	DW Steel	Unknown	Unknown	Interstitial	Unknown – Unwavering NSA security precautions prevent contractors from entering premises for tank inspection
685A	AST	750	Diesel	Gibson Road Sanitary Landfill	None	None	None	Visual Inspection	Replace with DW AST. Install area lighting, collision barrier, HLA, and spill bucket.
81204A	AST	500	Used Oil	63rd Signal Battalion	DW Steel	None	None	Visual Inspection	Install area lighting, collision barriers, liquid level gauge, HLA, and spill bucket.
GEN-14600B	Integral AST	75	Diesel	DPWL/Maintenance	Generator Steel Wall	Visible Gauge	None	Visual Inspection	Install area lighting, collision barrier, and valve surface security. Use drip pan as spill catchment.
GEN-15500	Integral AST	450	Diesel	Bingo Palace	Generator Steel Wall	Unknown	Unknown	Visual Inspection	Install drain security and HLA. Use drip pan as spill catchment.
GEN-21721	Integral AST	1000	Diesel	Back Hall	Generator Steel Wall	High-Level Alarm	Spill Bucket	Interstitial w/ Audible/Visual Alarm	N/A
GEN-24701A	Integral AST	800	Diesel	Back Hall	Generator Steel Wall	None	None	Visual Inspection	Install HLA. Use drip pan as spill catchment.



SPCC Table 8-7 PST Discharge Prevention Measures

Tank ID	Tank Type	Capacity (gallons)	Contents	Facility	Tank Secondary Containment	Overfill Protection	Spill Catchment	Tank Leak Detection	40 CFR 112 Required Upgrades
GEN-24701B	Integral AST	1500	Diesel	Back Hall	Generator Steel Wall	None	None	Visual Inspection	Install HLA. Use drip pan as spill catchment.
GEN-24705	Integral AST	5500	Diesel	Back Hall	Generator Steel Wall	None	None	Visual Inspection	Install HLA. Use drip pan as spill catchment.
GEN-25910E (PP1-1)	Integral AST	80	Diesel	H/C Plant (Generator Yard)	Generator Steel Wall	None	None	Visual Inspection	Install HLA. Use drip pan as spill catchment.
GEN-25910E (PP1-2)	Integral AST	80	Diesel	H/C Plant (Generator Yard)	Generator Steel Wall	None	None	Visual Inspection	Install HLA. Use drip pan as spill catchment.
GEN-25910E (PP1-3)	Integral AST	80	Diesel	H/C Plant (Generator Yard)	Generator Steel Wall	None	None	Visual Inspection	Install HLA. Use drip pan as spill catchment.
GEN-25910E (PP2-1)	Integral AST	80	Diesel	H/C Plant (Generator Yard)	Generator Steel Wall	None	None	Visual Inspection	Install HLA. Use drip pan as spill catchment.
GEN-25910E (PP2-2)	Integral AST	80	Diesel	H/C Plant (Generator Yard)	Generator Steel Wall	None	None	Visual Inspection	Install HLA. Use drip pan as spill catchment.
GEN-25910E (PP2-3)	Integral AST	80	Diesel	H/C Plant (Generator Yard)	Generator Steel Wall	None	None	Visual Inspection	Install HLA. Use drip pan as spill catchment.
GEN-25910E (PP3-1)	Integral AST	80	Diesel	H/C Plant (Generator Yard)	Generator Steel Wall	None	None	Visual Inspection	Install HLA. Use drip pan as spill catchment.
GEN-25910E (PP3-2)	Integral AST	80	Diesel	H/C Plant (Generator Yard)	Generator Steel Wall	None	None	Visual Inspection	Install HLA. Use drip pan as spill catchment.
GEN-25910E (PP3-3)	Integral AST	80	Diesel	H/C Plant (Generator Yard)	Generator Steel Wall	None	None	Visual Inspection	Install HLA. Use drip pan as spill catchment.



SPCC Table 8-7 PST Discharge Prevention Measures

Tank ID	Tank Type	Capacity (gallons)	Contents	Facility	Tank Secondary Containment	Overfill Protection	Spill Catchment	Tank Leak Detection	40 CFR 112 Required Upgrades
GEN-25910H	Integral AST	Unknown	Diesel	H/C Plant - North	Generator Steel Wall	Unknown	Unknown	Unknown	Install HLA. Use drip pan as spill catchment.
GEN-29808	Integral AST	Unknown	Diesel	Signal Towers	Generator Steel Wall	Unknown	Unknown	Unknown	Install area lighting and HLA. Use drip pan as spill catchment.
GEN-300-1	Integral AST	200	Diesel	Eisenhower Army Medical Center	Generator Steel Wall	Visible Gauge	None	Interstitial w/ Audible/Visual Alarm	Install area lighting. Use drip pan as spill catchment.
GEN-300-2	Integral AST	200	Diesel	Eisenhower Army Medical Center	Generator Steel Wall	Visible Gauge	None	Interstitial w/ Audible/Visual Alarm	Install area lighting. Use drip pan as spill catchment.
GEN-300-3	Integral AST	200	Diesel	Eisenhower Army Medical Center	Generator Steel Wall	Visible Gauge	None	Interstitial w/ Audible/Visual Alarm	Install area lighting. Use drip pan as spill catchment.
GEN-33720	Integral AST	Unknown	Diesel	Darling Hall	Generator Steel Wall	Unknown	Unknown	Visual Inspection	Install HLA. Use drip pan as spill catchment.
GEN-34500	Integral AST	Unknown	Diesel	DOIM	Generator Steel Wall	Unknown	Unknown	Visual Inspection	Install HLA. Use drip pan as spill catchment.
GEN-37200A	Integral AST	100	Diesel	Commissary	Generator Steel Wall	None	None	Visual Inspection	Install collision barrier, valve surface security, and HLA. Use drip pan as spill catchment.
MOD-1	AST	500	Diesel	Back Hall	DW Steel	High-Level Alarm	Spill Bucket	Interstitial w/ Audible/ Visual (Gauge)	N/A



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SPCC Table 8-8 Used Cooking Oil Discharge Prevention Measures

Tank ID	Capacity (gallons)	Contents	Facility	Tank Secondary Containment	Spill Catchment	40 CFR 112 Required Upgrades
15500A	300	Used Cooking Oil	Bingo Palace	Inadequate	Adequate	Install secondary containment and collision barriers.
18402A	300	Used Cooking Oil	Gordon Club	Inadequate	Inadequate	Install secondary containment and collision barriers.
21709A	300	Used Cooking Oil	Dining Facility #11	Inadequate	Inadequate	Install secondary containment and collision barriers.
24414A	300	Used Cooking Oil	Dining Facility #13 (93rd Signal)	Inadequate	Inadequate	Install secondary containment, collision barriers, and area lighting.
25704A	300	Used Cooking Oil	Dining Facility #8	Inadequate	Inadequate	Install secondary containment.
25717A	300	Used Cooking Oil	Dining Facility #6	Inadequate	Inadequate	Install secondary containment and collision barriers.
25717B	300	Used Cooking Oil	Dining Facility #6	Inadequate	Inadequate	Install secondary containment and collision barriers.
300D	300	Used Cooking Oil	Eisenhower Army Medical Center	Inadequate	Inadequate	Install secondary containment.
33200A	300	Used Cooking Oil	Bowling Center	Inadequate	Adequate	Install secondary containment and collision barriers.
35300A	300	Used Cooking Oil	Huddle House	Inadequate	Inadequate	Install secondary containment and area lighting.
36200A	300	Used Cooking Oil	MeMe's & BoBo's-Bowling Ctr.	Inadequate	Inadequate	Install secondary containment, collision barriers, and area lighting.
38200	300	Used Cooking Oil	PX	Inadequate	Inadequate	Install secondary containment.
40127A	300	Used Cooking Oil	Brim's Barracks Mess Hall	Inadequate	Inadequate	Install secondary containment, collision barriers, and area lighting.
531C	300	Used Cooking Oil	Gordon Lakes	Inadequate	Inadequate	Install secondary containment, collision barriers, and area lighting.



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8.1.7 Requirement 112.7(a)(3)(iii)

Discharge or drainage controls such as secondary containment around containers and other structures, equipment, and procedures for the control of a discharge.

Response

A primary discharge control method for ASTs at Fort Gordon is secondary containment structures at each tank location. With the exception of one AST (685A) located at the Gibson Road sanitary landfill which requires replacement of both the tank and dispenser unit, all ASTs are either double walled or single walled with some form of secondary containment. Another control procedure is to confirm that SOPs are followed for all fuel transfer activities. It is important that the facility actively enforce such SOPs as an additional method and procedure for the prevention and control of an accidental release. All employees involved with fueling operations should clearly understand the SOPs and appropriate training must be documented.

For aboveground fuel piping located outside of secondary containment areas and as a form of environmental equivalence, a multifaceted approach will need to be implemented in order to adequately address this requirement. First, an active inspections program must be implemented to identify and correct problems identified with the piping system in an expeditious manner. An active inspections program would include monthly inspections of piping and related appurtenances. The second approach will include a strong contingency plan with a commitment of resources necessary to respond to a spill in lieu of providing secondary containment.

A Facility Response Plan (FRP) was developed by AMEC and included in Appendix I of the 2008 version of the STMP. The FRP is currently being updated by another consultant and will be included in Appendix I when it is finished. In addition, an Installation Spill Contingency Plan (ISCP) prepared by the U.S. Army Center for Health Promotion and Preventive Medicine identifies the procedures and response actions required by personnel on the facility to be able to report, respond, and cleanup potential spills quickly and effectively. The ISCP is included in Appendix J of the STMP.

The status of some of the SPCC regulated USTs at Fort Gordon relative to secondary containment is unknown and must be investigated. If the tanks are confirmed not to have secondary containment and it is not practical to remove and replace with a double walled UST as an environmental equivalence, these USTs will have to undergo routine integrity testing on a periodic basis. Underground piping without secondary containment must undergo routine integrity testing or have a form of leak detection also as a form of environmental equivalence. Those PST piping systems utilizing integrity testing for environmental equivalence are discussed in the STMP Section 8.3.

The final component will require the addition of secondary containment at two locations where fuel transfer lines are outside of the containment areas. These two locations include the main heating and cooling plant (Building 25910) and the hospital heating and cooling plant (Building 310). It should be noted that piping modifications will need to be made in order to address this issue.



One tank, located at the Marina, poses a significant risk of a spill reaching water during loading and unloading operations and is required to have secondary containment. The secondary containment system must be sized to encompass the entire footprint of the fuel truck and contain the volume of the largest compartment of the truck within the containment plus freeboard. A conceptual design for this location as well as the previous two secondary containments for piping is included in the STMP.

8.1.8 Requirement 112.7(a)(3)(iv)

Countermeasures for discharge discovery, response, and cleanup (both the facility's capability and those that might be required of a contractor).

Response

The ISCP prepared by the U.S. Army Center for Health Promotion and Preventive Medicine identifies the procedures and response actions required by personnel on the facility to be able to report, respond, and cleanup potential spills quickly and effectively. The ISCP is included in Appendix J of the STMP.

8.1.9 Requirement 112.7(a)(3)(v)

Provide Methods of disposal of recovered materials in accordance with applicable legal requirements.

Response

All waste materials used and/or recovered whether by base personnel or contractors hired by the government in the response and cleanup operations shall be properly disposed in accordance with all local, state and federal regulations. A copy of all disposal manifests will be kept for documentation. The ISCP prepared by the U.S. Army Center for Health Promotion and Preventive Medicine identifies the required disposal requirements of contaminated petroleum laden wastes.

8.1.10 Requirement 112.7(a)(3)(vi)

Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with whom you have an agreement for response, and all appropriate Federal, State, and local agencies who must be contacted in case of a discharge as described in 112.1(b).

Response

A contact list which includes phone numbers is provided in FRP located in Appendix I of the STMP. The contact list includes all agencies that are required to be contacted in the event an emergency response is required.



8.1.11 Requirement 112.7(a)(4)

Unless you have submitted a response plan under 112.20, provide information and procedures in your Plan to enable a person reporting a discharge as described in 112.1(b) to relate information on the exact address or location and phone number of the facility; the date and time of the discharge, the type of material discharged; estimates of the total quantity discharged; estimates of the quantity discharged as described in 112.1(b); the source of the discharge; a description of all affected media; the cause of the discharge; any damages or injuries caused by the discharge; actions being used to stop, remove, and mitigate the effects of the discharge; whether an evacuation may be needed; and, the names of individuals and/or organizations who also have been contacted.

Response

The response plan procedure in the event of a discharge is identified in the FRP and ISCP; both plans are located in Appendix I and J of the STMP respectively. In addition to identifying specific agency contact numbers, the FRP also has a Spill Response Notification Form in section 1-3 of the report. The ISCP provides detailed actions required in the event of an incident.

8.1.12 Requirement 112.7(a)(5)

Unless you have submitted a response plan under 112.20, organize portions of the Plan describing procedures you will use when a discharge occurs in a way that will make them readily usable in an emergency, and include appropriate supporting material as appendices.

Response

The FRP and ISCP included in Appendix I and J of the STMP describes the procedures that must be followed in the event of a discharge.

8.2 Predictions - 112.7(b)

Requirement

Where experience indicates a reasonable potential for equipment failure (such as loading or unloading equipment, tank overflow, rupture, or leakage, or any other equipment known to be a source of a discharge), include in your Plan a prediction of the direction, rate of flow, and total quantity of oil which could be discharged from the facility as a result of each type of major equipment failure.

Response

Information on the potential for equipment failures (such as loading or unloading equipment, tank overflow, rupture, or leakage, or any other equipment known to be a source of a discharge), resulting in a spill or other spill scenarios is provided in SPCC Table 8-9.



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SPCC Table 8-9 PST Failure Discharge

Tank ID	Tank Type	Capacity (gallons)	Contents	Nearest Building	Facility	Initial Spill Direction	Initial Receptor	Initial Conveyance	Ultimate Discharge	Probability of Reaching Water
100A	UST	12000	Gasoline	100	AAFES-Gate 1	South	Storm Drain	Storm Drain	Savannah River Basin	Low
100B	UST	12000	Gasoline	100	AAFES-Gate 1	South	Storm Drain	Storm Drain	Savannah River Basin	Low
100C	UST	12000	Gasoline	100	AAFES-Gate 1	South	Storm Drain	Storm Drain	Savannah River Basin	Low
14600A	AST	275	#2 Fuel Oil	14600	DPWL/Maintenance	Northwest	Topographic Low	Topographic Low	Savannah River Basin	Low
14600C	UST	8000	#2 Fuel Oil	14600	DPWL/Maintenance	Northwest	Topographic Low	Topographic Low	Savannah River Basin	Low
14602A	AST	495	Used Oil	14602	Centralized Maintenance Facility	Inside Facility	Drain	Drain	Savannah River Basin	High
14602B	AST	495	Used Oil	14602	Centralized Maintenance Facility	Inside Facility	Drain	Drain	Savannah River Basin	High
14603A	AST	10000	#2 Fuel Oil	14603	Centralized Maintenance Facility	Northeast	Drain	Drain	Savannah River Basin	High
14605C	AST	120	#2 Fuel Oil	14605	Centralized Maintenance Facility	Inside Facility	Drain	Drain	Savannah River Basin	High
14A	AST	4000	Gasoline	Marina	Fort Gordon Marina	Northeast	Immediate Area	Clark Hill Lake	Savannah River Basin	High
200C	AST	1495	Diesel	200	WTP	South	Immediate Area	Immediate Area	Savannah River Basin	Low



SPCC Table 8-9 PST Failure Discharge

Tank ID	Tank Type	Capacity (gallons)	Contents	Nearest Building	Facility	Initial Spill Direction	Initial Receptor	Initial Conveyance	Ultimate Discharge	Probability of Reaching Water
202A	AST	1000	Diesel	202	Dorsey Rd. Pumping Station	West	Topographic Low	Topographic Low	Savannah River Basin	Low
2068A	AST	1000	Used Oil	2068	Old Rds/Grnds (near Pesticide)	East	Immediate Area	Immediate Area	Savannah River Basin	Low
214A	AST	264	Used Oil	71204	214th Signal Battalion	West	Immediate Area	Immediate Area	Savannah River Basin	Low
21801A	AST	396	Used Oil	21801	Army National Guard Motorpool	North	Immediate Area	Immediate Area	Savannah River Basin	Medium
25305A	AST	250	Used Oil	25305	442 Signal BN Motor Pool	West	Topographic Low	Topographic Low	Savannah River Basin	Low
25330A	AST	495	Diesel	25330	H/C Plant - South	North	Ditch	Ditch	Savannah River Basin	High
25330B	UST	50000	#2 Fuel Oil	25330	H/C Plant - South	South	Topographic Low	Topographic Low	Savannah River Basin	High
25330C	UST	50000	#2 Fuel Oil	25330	H/C Plant - South	South	Topographic Low	Topographic Low	Savannah River Basin	High
25501A	UST	5000	#2 Fuel Oil	25501	Dental Clinic	Northwest	Topographic Low	Topographic Low	Savannah River Basin	Low
25600A	UST	2000	#2 Fuel Oil	25600	Unknown	Southeast	Topographic Low	Topographic Low	Savannah River Basin	Low
25910A	AST	15000	Diesel	25910	H/C Plant (Generator Yard)	North	Storm Drain	Storm Drain	Savannah River Basin	High
25910B	AST	15000	Diesel	25910	H/C Plant (Generator Yard)	North	Storm Drain	Storm Drain	Savannah River Basin	High
25910C	AST	15000	Diesel	25910	H/C Plant (Generator Yard)	North	Storm Drain	Storm Drain	Savannah River Basin	High
25910D	AST	15000	Diesel	25910	H/C Plant (Generator Yard)	North	Storm Drain	Storm Drain	Savannah River Basin	High



SPCC Table 8-9 PST Failure Discharge

Tank ID	Tank Type	Capacity (gallons)	Contents	Nearest Building	Facility	Initial Spill Direction	Initial Receptor	Initial Conveyance	Ultimate Discharge	Probability of Reaching Water
25910F	AST	3000	40-W Engine Oil	25910	H/C Plant (Generator Yard)	North	Storm Drain	Storm Drain to OWS	Savannah River Basin	Low
25910G	AST	500	Diesel Overflow	25910	H/C Plant (Generator Yard)	North	Storm Drain	Storm Drain to OWS	Savannah River Basin	Low
25910H	AST	1495	Diesel	25910	H/C Plant - North	Southeast	Immediate Area	Immediate Area	Savannah River Basin	Moderate
25910I	UST	50000	#2 Fuel Oil	25910	H/C Plant - North	North	Immediate Area	Immediate Area	Savannah River Basin	Low
25910J	UST	50000	#2 Fuel Oil	25910	H/C Plant - North	North	Immediate Area	Immediate Area	Savannah River Basin	Low
25910K	UST	50000	#2 Fuel Oil	25910	H/C Plant - North	North	Immediate Area	Immediate Area	Savannah River Basin	Low
25910L	UST	50000	#2 Fuel Oil	25910	H/C Plant - North	North	Immediate Area	Immediate Area	Savannah River Basin	Low
25910M	UST	50000	#2 Fuel Oil	25910	H/C Plant - North	North	Immediate Area	Immediate Area	Savannah River Basin	Low
28320A	UST	10000	#2 Fuel Oil	28320	DMWR M&A / BOSS Hdqtrs.	South	Topographic Low	Topographic Low	Savannah River Basin	Low
29300A	AST	495	Used Oil	29300	Car Care Facility (Auto Self Help Shop)	Southeast	Topographic Low	Topographic Low	Savannah River Basin	Low
29808A	AST	275	Diesel	29808	Signal Towers	Northwest	Belowground Paved Area	Belowground Paved Area	Savannah River Basin	Low
300A	AST	6000	Diesel	300	Eisenhower Army Medical Center	Northeast	Immediate Area	Immediate Area	Savannah River Basin	Low
310A	AST	12000	Diesel	310	H/C Plant - Medical Center	East	Immediate Area	Immediate Area	Savannah River Basin	Low



SPCC Table 8-9 PST Failure Discharge

Tank ID	Tank Type	Capacity (gallons)	Contents	Nearest Building	Facility	Initial Spill Direction	Initial Receptor	Initial Conveyance	Ultimate Discharge	Probability of Reaching Water
310B	AST	12000	Diesel	310	H/C Plant - Medical Center	East	Immediate Area	Immediate Area	Savannah River Basin	Low
310C	BFCUST	200000	#2 Fuel Oil	310	H/C Plant - Medical Center	North	Immediate Area	Immediate Area	Savannah River Basin	Low
310D	UST	30000	#2 Fuel Oil	310	H/C Plant - Medical Center	N/A	Immediate Area	Immediate Area	Savannah River Basin	Low
33720A	AST	275	Diesel	33720	Darling Hall	South	Immediate Area	Immediate Area	Savannah River Basin	Low
34500A	AST	1500	Diesel	34500	DOIM	North	Immediate Area	Immediate Area	Savannah River Basin	Low
35200A	UST	8000	#2 Fuel Oil	35200	P-Xtra	North	Topographic Low	Topographic Low	Savannah River Basin	Low
35200B	UST	10000	#2 Fuel Oil	35200	P-Xtra	North	Topographic Low	Topographic Low	Savannah River Basin	Low
36700A	UST	8000	#2 Fuel Oil	36700	Ring Hall	East	Topographic Low	Topographic Low	Savannah River Basin	High
36700B	UST	8000	#2 Fuel Oil	36700	Ring Hall	North	Topographic Low	Topographic Low	Savannah River Basin	High
410A	AST	1500/500	Diesel/Gas	410	Forestry	East	Immediate Area	Immediate Area	Savannah River Basin	Low
47A	AST	275	Diesel	47006	Lift Station	Southwest	Storm Drain	Storm Drain	Savannah River Basin	High
49300A	AST	6000	Gasoline	49300	AAFES-Gate 5	Northwest	Storm Drain	Storm Drain	Savannah River Basin	High
49300B	AST	6000	Gasoline	49300	AAFES-Gate 5	Northwest	Storm Drain	Storm Drain	Savannah River Basin	High
49300C	AST	6000	Gasoline	49300	AAFES-Gate 5	Northwest	Storm Drain	Storm Drain	Savannah River Basin	High



SPCC Table 8-9 PST Failure Discharge

Tank ID	Tank Type	Capacity (gallons)	Contents	Nearest Building	Facility	Initial Spill Direction	Initial Receptor	Initial Conveyance	Ultimate Discharge	Probability of Reaching Water
49300D	AST	6000	Gasoline	49300	AAFES-Gate 5	Northwest	Storm Drain	Storm Drain	Savannah River Basin	High
537A	AST	530	Diesel	533	Gordon Lakes	Northwest	Inactive wash wrack sump drain	Inactive wash wrack sump drain	Savannah River Basin	Low
537B	AST	530	Gasoline	533	Gordon Lakes	Northwest	Topographic Low	Topographic Low	Savannah River Basin	Low
560A	AST	495	Diesel	560	WWTP	East	Immediate Area	Immediate Area	Savannah River Basin	Low
61300A	UST	10000	Diesel	61300	POL Point	North	Storm Drain	Storm Drain to OWS	Savannah River Basin	Low
61300B	UST	10000	Diesel	61300	POL Point	North	Storm Drain	Storm Drain to OWS	Savannah River Basin	Low
61300C	UST	10000	Mogas	61300	POL Point	North	Storm Drain	Storm Drain to OWS	Savannah River Basin	Low
61300D	UST	10000	Mogas	61300	POL Point	North	Storm Drain	Storm Drain to OWS	Savannah River Basin	Low
61300E	UST	20000	JP-8 Fuel	61300	POL Point	North	Storm Drain	Storm Drain to OWS	Savannah River Basin	Low
61500A	AST	30,000	Fuel Oil	61500	NSA area	Unknown (security to access site)	Unknown (unable to access site)			
61500B	AST	30,000	Fuel Oil	61500	NSA area	Unknown (unable to access site)	Unknown (unable to access site)	Unknown (unable to access site)	Unknown (unable to access site)	Unknown (unable to access site)



SPCC Table 8-9 PST Failure Discharge

Tank ID	Tank Type	Capacity (gallons)	Contents	Nearest Building	Facility	Initial Spill Direction	Initial Receptor	Initial Conveyance	Ultimate Discharge	Probability of Reaching Water
61500C	AST	30,000	Fuel Oil	61500	NSA area	Unknown (unable to access site)				
61500D	AST	30,000	Fuel Oil	61500	NSA area	Unknown (unable to access site)				
61500E	AST	30,000	Fuel Oil	61500	NSA area	Unknown (unable to access site)				
61500F	AST	30,000	Fuel Oil	61500	NSA area	Unknown (unable to access site)				
61500G	AST	30,000	Fuel Oil	61500	NSA area	Unknown (unable to access site)				
61500H	AST	30,000	Fuel Oil	61500	NSA area	Unknown (unable to access site)				
61500I	AST	30,000	Fuel Oil	61500	NSA area	Unknown (unable to access site)				
685A	AST	750	Diesel	576	Gibson Road Sanitary Landfill	South	Immediate Area	Immediate Area	Savannah River Basin	Low
81204A	AST	500	Used Oil	81204	63rd Signal Battalion	North	Immediate Area	Immediate Area	Savannah River Basin	Low
GEN-14600B	Integral AST	75	Diesel	14600	DPWL/Maintenance	Northwest	Topographic Low	Topographic Low	Savannah River Basin	Low
GEN-15500	Integral AST	450	Diesel	15500	Bingo Palace	East	Immediate Area	Immediate Area	Savannah River Basin	Low



SPCC Table 8-9 PST Failure Discharge

Tank ID	Tank Type	Capacity (gallons)	Contents	Nearest Building	Facility	Initial Spill Direction	Initial Receptor	Initial Conveyance	Ultimate Discharge	Probability of Reaching Water
GEN-21721	Integral AST	1000	Diesel	21721	Back Hall	North	Immediate Area	Immediate Area	Savannah River Basin	Low
GEN-24701A	Integral AST	800	Diesel	24701	Back Hall	North	Immediate Area	Immediate Area	Savannah River Basin	Low
GEN-24701B	Integral AST	1500	Diesel	24701	Back Hall	North	Immediate Area	Immediate Area	Savannah River Basin	Low
GEN-24705	Integral AST	5500	Diesel	24705	Back Hall	Southwest	Immediate Area	Immediate Area	Savannah River Basin	Low
GEN-25910E (PP1-1)	Integral AST	80	Diesel	25910	H/C Plant (Generator Yard)	North	Storm Drain	Storm Drain to OWS	Savannah River Basin	Low
GEN-25910E (PP1-2)	Integral AST	80	Diesel	25910	H/C Plant (Generator Yard)	North	Storm Drain	Storm Drain to OWS	Savannah River Basin	Low
GEN-25910E (PP1-3)	Integral AST	80	Diesel	25910	H/C Plant (Generator Yard)	North	Storm Drain	Storm Drain to OWS	Savannah River Basin	Low
GEN-25910E (PP2-1)	Integral AST	80	Diesel	25910	H/C Plant (Generator Yard)	North	Storm Drain	Storm Drain to OWS	Savannah River Basin	Low
GEN-25910E (PP2-2)	Integral AST	80	Diesel	25910	H/C Plant (Generator Yard)	North	Storm Drain	Storm Drain to OWS	Savannah River Basin	Low
GEN-25910E (PP2-3)	Integral AST	80	Diesel	25910	H/C Plant (Generator Yard)	North	Storm Drain	Storm Drain to OWS	Savannah River Basin	Low



SPCC Table 8-9 PST Failure Discharge

Tank ID	Tank Type	Capacity (gallons)	Contents	Nearest Building	Facility	Initial Spill Direction	Initial Receptor	Initial Conveyance	Ultimate Discharge	Probability of Reaching Water
GEN-25910E (PP3-1)	Integral AST	80	Diesel	25910	H/C Plant (Generator Yard)	North	Storm Drain	Storm Drain to OWS	Savannah River Basin	Low
GEN-25910E (PP3-2)	Integral AST	80	Diesel	25910	H/C Plant (Generator Yard)	North	Storm Drain	Storm Drain to OWS	Savannah River Basin	Low
GEN-25910E (PP3-3)	Integral AST	80	Diesel	25910	H/C Plant (Generator Yard)	North	Storm Drain	Storm Drain to OWS	Savannah River Basin	Low
GEN-25910H	Integral AST	Unknown	Diesel	25910	H/C Plant - North	East	Immediate Area	Immediate Area	Savannah River Basin	Low
GEN-29808	Integral AST	Unknown	Diesel	29808	Signal Towers	Northwest	Belowground Paved Area	Belowground Paved Area	Savannah River Basin	Low
GEN-300-1	Integral AST	200	Diesel	300	Eisenhower Army Medical Center	North	Drain	Drain	Savannah River Basin	High
GEN-300-2	Integral AST	200	Diesel	300	Eisenhower Army Medical Center	North	Drain	Drain	Savannah River Basin	High
GEN-300-3	Integral AST	200	Diesel	300	Eisenhower Army Medical Center	North	Drain	Drain	Savannah River Basin	High
GEN-33720	Integral AST	Unknown	Diesel	33720	Darling Hall	South	Immediate Area	Immediate Area	Savannah River Basin	Low
GEN-34500	Integral AST	Unknown	Diesel	34500	DOIM	North	Immediate Area	Immediate Area	Savannah River Basin	Low
GEN-37200A	Integral AST	100	Diesel	37200	Commissary	South	Topographic Low	Topographic Low	Savannah River Basin	Moderate
MOD-1	AST	500	Diesel	T-1000 (MOD-1)	Back Hall	South	Ditch	Ditch	Savannah River Basin	Low



8.3 Containment and Diversionary Structures - 112.7(c)

Requirement

Provide appropriate containment and/or diversionary structures or equipment to prevent a discharge as described in 112.1(b). The entire containment system, including walls and floor, must be capable of containing oil and must be constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before cleanup occurs. At a minimum, you must use one of the following prevention systems or its equivalent:

(1) For onshore facilities:

- Dikes, berms, or retaining walls sufficiently impervious to contain oil;
- Curbing;
- Culverts, gutters, or other drainage systems;
- Weirs, booms, or other barriers;
- Spill diversion ponds;
- Retention ponds; or
- Sorbent materials.

(2) For offshore facilities:

- Curbing or drip pans; or
- Sumps and collection systems

Response

With the exception of one AST located at the Gibson Road sanitary landfill which is recommended for replacement, all regulated ASTs at Fort Gordon are either double walled or are single walled and have a form of secondary containment. Piping and associated appurtenances located outside of secondary containment will be inspected on a regular basis. A strong contingency plan also will be implemented with a commitment from the facility to provide the necessary resources to respond to a spill. The active inspections program as well as a strong contingency plan together act as an environmental equivalence for piping outside of secondary containment. Two locations where piping is located outside of containment areas will require the construction of secondary containment. One location, the marina also will require the construction of secondary containment for fuel transfer operations due to its proximity to water.

All drums are required to be kept within containment dikes, curbs or other approved secondary containment structures. PSTs, used cooking oil containers and drums currently without (or with inadequate) secondary containment will be upgraded to prevent discharge as indicated in Section 4.0 of the STMP.



There are no offshore facilities at Fort Gordon; therefore part (2) of the requirement does not apply.

8.4 Alternatives - 112.7(d)

Requirement

If you determine that the installation of any of the structures or pieces of equipment listed in paragraphs (c) and (h)(1) of this section, and 112.8(c)(2), 112.8(c)(11), 112.9(c)(2), 112.10(c), 112.12(c)(2), 112.12(c)(11), 112.13(c)(2), and 112.14(c) to prevent a discharge as described in 112.1 (b) from any onshore or offshore facility is not practicable, you must clearly explain in your Plan why such measures are not practicable; for bulk storage containers, conduct both periodic integrity testing of the containers and periodic integrity and leak testing of the valves and piping; and, unless you have submitted a response plan under 112.20, provide in your Plan the following:

- An oil spill contingency plan following the provisions of part 109 of this chapter; and
- A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.

Response

The Fort Gordon spill response procedure is discussed in the FRP located in Appendix I of the STMP. In addition, the ISCP main purpose is to provide Fort Gordon personnel with sufficient information and direction to be able to respond to potential spills quickly and effectively. The ISCP is located in Appendix J of the STMP.

8.5 Inspections, Tests, and Records - 112.7(e)

Requirement

Conduct inspections and tests required by this part in accordance with written procedures that you or the certifying Engineer develops for the facility. You must keep these written procedures and a record of the inspections and tests, signed by the appropriate supervisor or inspector, with the SPCC Plan for a period of three years. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph.

Response

The following sections detail the inspection, testing and record keeping requirements for the systems at Fort Gordon. In general, Fort Gordon has implemented an inspection program to minimize the potential of spills and discharges. The inspection program has improved greatly in scope and frequency since the 2008 version of the SPCCP. However, a few tanks are still not being inspected and these need to be added to program to ensure compliance with the intent of 40 CFR112. In addition, records are required to be kept of such inspections at the site location for a minimum period of three years.



8.5.1 Inspections

All SPCC regulated storage tanks will undergo the inspections detailed in Section 3.0 of the STMP and utilize the forms in Appendix F of the STMP.

8.5.2 Tests

All SPCC-regulated storage tanks will undergo the tests detailed in Section 3.0 of the STMP. It is the intention of this plan that oil-filled equipment and drums need not be formally evaluated for integrity and corrosion. It is assumed that all drums are single-use bulk containers that do not require testing due to their retention time on site. All oil-filled equipment is not considered bulk storage, and therefore is not subject to the testing requirements of this part.

Liquid Level-Sensing Devices Test Schedule

All liquid level sensing devices and discharge control devices (ATGs, High Level Alarms, mechanical gauges, etc.) associated with bulk storage equipment shall be tested annually. Records and other type of documentation for such testing are required to be maintained at the facility location for a minimum period of three years. This is detailed in Section 3.4 of the STMP.

8.6 Personnel Training and Discharge Prevention Procedures - 112.7(f)

8.6.1 Training - 112.7(f)(1)

Requirement

At a minimum, train your oil-handling personnel in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility SPCC Plan.

Response

Facility personnel have been instructed in the operations and maintenance of oil pollution prevention equipment and pollution prevention control laws and regulations. In addition, specific training commensurate with job requirements also occurs. Personnel who work in POL storage affected areas are instructed in:

1. SPCC plan contents and procedures to prevent spills
2. Equipment existence, location, equipment operations, storage, transfer
3. Inspection requirements and record requirements
4. Pertinent pollution prevention laws, rules and regulations
5. Occupational Safety and Health Administration (OSHA) , 29 CFR 1910.120
6. OSHA Hazard Communication Standard, 29 CFR 1910.1200
7. OSHA Process Safety Standard, 29 CFR 1910.119
8. Resource Conservation and Recovery Act (RCRA) 40 CFR 265.16
9. RCRA Waste handling/ Emergency Procedures, 40 CFR 262.34



10. Department of Transportation Hazardous Materials Training, 40 CFR 172 Subpart H.

In addition, spill briefings are scheduled for handling personnel at least once a year to ensure an understanding of the Fort Gordon SPCC Plan.

While some personnel did have some knowledge of the above requirements, further development and education of personnel is required in a number of areas stated above. It is recommended that each department on the facility actively ensure that the above training for personnel occurs as stated. In addition to the above training program, it is also recommended that the FRP be utilized in the training program.

8.6.2 Accountable Personnel - 112.7(f)(2)

Requirement

Designate a person at each applicable facility who is accountable for discharge prevention and who reports to facility management.

Response

Fort Gordon will need to identify and designate persons at each facility location who will be accountable for discharge prevention in order to comply with this requirement.

8.6.3 Annual Discharge Prevention Briefing - 112.7(f)(3)

Requirement

Schedule and conduct discharge prevention briefings for your oil-handling personnel at least once a year to assure adequate understanding of the SPCC Plan for that facility. Such briefings must highlight and describe known discharges as described in 112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures.

Response

Discharge prevention briefings do occur at least once a year to assure an adequate understanding of the SPCC. However, documentation of such briefings at all facilities is required according to SPCC requirements. Fort Gordon will need to implement a more assertive training program to ensure that SPCC training and briefings do occur at all facilities. As stated in the requirement, this training program must highlight and describe failures, malfunctions and other precautionary measures required. All briefings must be documented and recorded.



8.7 Security - 112.7(g) (Excluding Oil Production Facilities)

8.7.1 Requirement 112.7(g)(1)

Fully fence each facility handling, processing, or storing oil, and lock and/or guard entrance gates when the facility is not in production or is unattended.

Response

Although Fort Gordon is an open post, gate guards are present at access points to the installation. Facilities where POL or hazardous materials are stored were generally fenced and access to such locations is restricted to authorized personnel. The facility is patrolled by Military Police on a continuous basis to detect and deter any incidents.

8.7.2 Requirement 112.7(g)(2)

Ensure that the master flow and drain valves and any other valves permitting direct outward flow of the container's contents to the surface have adequate security measures so that they remain in the closed position when in non-operating or non-standby status.

Response

Master flow and drain valves were either locked or in the closed position when in non-operating or non-standby status at the time of the site visit. Upgrades are required for those tanks considered inadequate and are listed in Table 4-1 of Section 4.0 of the STMP.

8.7.3 Requirement 112.7(g)(3)

Lock the starter control on each oil pump in the *off* position and locate it at a site accessible only to authorized personnel when the pump is in a non-operating or non-standby status.

Response

The electrical starter controls for pumps are locked when not in use. The controls for fuel transfer are within a control building where the pumps are located. Locations where fuel is dispensed to vehicles have pumps that are locked.

8.7.4 Requirement 112.7(g)(4)

Securely cap or blank-flange the loading/unloading connections of oil pipelines or facility piping when not in service or when in standby service for an extended time. This security practice also applies to piping that is emptied of liquid content either by draining or by inert gas pressure.



Response

All facility piping is emptied/inerted and securely capped when taken out of service for extended periods.

8.7.5 Requirement 112.7(g)(5)

Provide facility lighting commensurate with the type and location of the facility that will assist in the:

- Discovery of discharges occurring during hours of darkness, both by operating personnel, if present, and by non-operating personnel (the general public, local police, etc.); and
- Prevention of discharges occurring through acts of vandalism.

Response

All storage tank locations are equipped with adequate lighting except those listed in Table 4-1 of the STMP. All of these areas must have adequate area lighting installed as discussed in Section 4.0 of the STMP.

8.8 Facility Tank Car and Tank Truck Loading/Unloading Rack – 112.7(h) (Excluding Offshore Facilities)

8.8.1 Requirement 112.7(h)(I)

Where loading/unloading area drainage does not flow into a catchment basin or treatment facility designed to handle discharges, use a quick drainage system for tank car or tank truck loading and unloading areas. You must design any containment system to hold at least the maximum capacity of any single compartment of a tank car or tank truck loaded or unloaded at the facility.

Response

Fort Gordon does not have any tank truck loading/unloading racks located at the facility.

8.8.2 Requirement 112.7(h)(2)

Provide an interlocked warning light or physical barrier system, warning signs, wheel chocks, or vehicle break interlock system in loading/unloading areas to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines.



Response

All trucks transferring SPCC regulated material to or from Fort Gordon are required to use wheel chocks to secure the trucks during transfer and prevent premature departure causing a spill.

8.8.3 Requirement 112.7(h)(3)

Prior to filling and departure of any tank car or tank truck, closely inspect for discharges the lowermost drain and all outlets of such vehicles, and if necessary, ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit.

Response

All tank cars are closely inspected for discharges prior to filling and departure. Delivery personnel are required to fully inspect tankers after delivery of product.

8.9 Brittle Fracture Failures - 112.7(i)

Requirement

If a field-constructed aboveground container undergoes a repair, alteration, reconstruction, or a change in service that might affect the risk of a discharge or failure due to brittle fracture or other catastrophe, or has discharged oil or failed due to brittle fracture failure or other catastrophe, evaluate the container for risk of discharge or failure due to brittle fracture or other catastrophe, and as necessary, take appropriate action.

Response

No field-constructed aboveground container is located at Fort Gordon.

8.10 State Rules, Regulations, and Guidelines - 112.7(j)

Requirement

In addition to the minimal prevention standards listed under this section, include in your Plan a complete discussion of conformance with the applicable requirements and other effective discharge prevention and containment procedures listed in this part or any applicable more stringent State rules, regulations, and guidelines.

Response

Fort Gordon is subject to the State of Georgia rules, regulations, and guidelines relative to above ground storage tanks. Fort Gordon also is subject to the Department of the Army regulations. Specifically, AR-200-1 requires that spill prevention planning include hazardous materials, PCBs and hazardous wastes. A copy of these regulations is located in Appendix A.



9.0 Additional Fort Gordon-Specific Discharge Prevention and Containment Procedural Requirements

9.1 General - 112.8(a)

Requirement

Meet the general requirements for the Plan listed under 40 CFR 112.7 and the specific discharge prevention and containment procedures listed in this section.

Response

The tanks that do not meet the general requirements for the Plan listed under 40 CFR 112.7 are listed in Section 4.0 of the STMP with required upgrades.

9.1.1 Facility Drainage - 112.8(b)

9.1.1.1 Requirement 112.8(b)(1)

Restrain drainage from diked storage areas by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge. You may empty diked areas by pumps or ejectors; however, you must manually activate these pumps or ejectors and must inspect the condition of the accumulation before starting, to ensure no oil will be discharged.

Response

All diked storage areas containing liquid shall be inspected prior to discharge and documented. Records shall be maintained. Control of discharge from all diked areas is through manually controlled valves. A checklist that must be followed as a procedure prior to discharge of a diked storage area is located in Appendix F. As previously stated, a copy of this inspection form must be maintained for documentation.

9.1.1.2 Requirement 112.8(b)(2)

Use valves of manual, open-and-closed design, for the drainage of diked areas. You may not use flapper-type drain valves to drain diked areas. If your facility drains directly into a watercourse and not into an on-site wastewater treatment plant, you must inspect and may drain uncontaminated retained stormwater, as provided in paragraphs (c)(3)(ii), (iii), and (iv) of this section.



Response

All diked storage areas will be inspected prior to discharge. A checklist that must be followed as a procedure prior to discharge of diked storage area is located in Appendix F. A copy of this inspection must be maintained for documentation. Control of discharge of all the diked areas are through manually controlled valves. Flapper type valves are not used at Fort Gordon.

9.1.1.3 Requirement 112.8(b)(3)

Design facility drainage systems from undiked areas with a potential for a discharge (such as where piping is located outside containment walls or where tank truck discharges may occur outside the loading area) to flow into ponds, lagoons, or catchment basins designed to retain oil or return it to the facility. You must not locate catchment basins in areas subject to periodic flooding.

Response

As a form of environmental equivalence to the above requirement, Fort Gordon will use a multifaceted approach to prevent discharges to the environment for piping located outside of containment walls. Specifically, an aggressive inspections program, including monthly inspections of the piping will be performed and documented as described in Section 3.2.1 of the STMP. Spill kits shall be at all locations where fuel transfer activities occur. Also, a strong contingency plan shall be implemented with a commitment of resources necessary to respond to a spill in an expeditious and safe manner. It should be noted that two locations were identified where secondary containment of piping is recommended and must be constructed. Conceptual designs for these two locations where containment is recommended are included in Appendix G of the STMP.

At truck loading/unloading locations where secondary containment is not addressed, the location and/or the delivery truck shall have spill kits immediately available. These spill kits shall be of sufficient quantity to address the specific nature of the spill. In addition, a conceptual design for the Fort Gordon Marina where a containment area is recommended is included in Appendix G of the STMP.

9.1.1.4 Requirement 112.8(b)(4)

If facility drainage is not engineered as in paragraph (b)(3) of this section, equip the final discharge of all ditches inside the facility with a diversion system that would, in the event of an uncontrolled discharge, retain oil in the facility.

Response

All locations with reasonable potential for discharge are either contained or will be contained in order to reduce the potential of a discharge to the environment. Also, additional containment for refueling operations near Buildings 49300, 25330, 310, 25910 and 410 has been designed (Appendix O) and should be constructed.



9.1.1.5 Requirement 112.8(b)(5)

Where drainage waters are treated in more than one treatment unit and such treatment is continuous, and pump transfer is needed, provide two "lift" pumps and permanently install at least one of the pumps. Whatever techniques you use, you must engineer facility drainage systems to prevent a discharge as described in 112.7(b) in case there is an equipment failure or human error at the facility.

Response

This requirement does not apply to Fort Gordon since no treatment of drained waters is performed.

9.1.2 Bulk Storage Containers - 112.8(c)

9.1.2.1 Physical Construction - 112.8(c)(I)

Requirement

Not use a container for the storage of oil unless its material and construction are compatible with the material stored and conditions of storage such as pressure and temperature.

Response

ASTs are specifically designed for the intended use of oil storage. Fort Gordon personnel shall ensure that the storage of all oil is in drums or containers specifically designed for the storage of the individual materials.

9.1.2.2 Secondary Containment - 112.8(c)(2)

Requirement

Construct all bulk storage container installations so that you provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation. You must ensure that diked areas are sufficiently impervious to contain discharged oil. Dikes, containment curbs, and pits are commonly employed for this purpose. You may also use an alternative system consisting of a drainage trench enclosure that must be arranged so that any discharge will terminate and be safely confined in a facility catchment basin or holding pond.

Response

With the exception of one AST located at the Gibson Road sanitary landfill which is recommended for replacement, all regulated ASTs at Fort Gordon are either double walled or are single walled and have an adequate form of secondary containment. **The status of several of the 40 CFR 112 regulated USTs at Fort Gordon relative to secondary containment is unknown. These USTs must be investigated and resolved as described in Section 8.1.7.**



9.1.2.3 Containment Discharge - 112.8(c)(3)

Requirement

Not allow drainage of uncontaminated rainwater from the diked area into a storm drain or discharge of an effluent into an open watercourse, lake, or pond, bypassing the facility treatment system unless you:

- Normally keep the bypass valve sealed closed;
- Inspect the retained rainwater to ensure that its presence will not cause a discharge as described in 112.1(b);
- Open the bypass valve and reseal it following drainage under responsible supervision; and
- Keep adequate records of such events, for example, any records required under permits issued in accordance with 112.41(j)(2) and 112.41(m)(3) of this chapter.

Response

Draining of containment areas by a normally sealed closed valve shall only be performed by trained personnel, which will ensure only uncontaminated water is released as defined in 40 CFR 112. Records of all containment discharge shall be kept and maintained at the general site location by the manager. In addition, a copy shall be provided to the environmental department for review and documentation.

9.1.3 Buried Metal Storage Tanks

9.1.3.1 Requirement 112.8(c)(4)

Protect any completely buried metallic storage tank installed on or after January 10, 1974 from corrosion by coatings or cathodic protection compatible with local soil conditions. You must regularly leak test such completely buried metallic storage tanks.

Response

Most USTs installed after January 10, 1974 are either fiberglass reinforced polyethylene or steel (STI-P3 with dielectric coatings) as identified in Section 1, Table 1-2 of the STMP. All USTs identified with corrosion protection must be tested in accordance to Section 3, Table 3-6 of the STMP. Those USTs with unidentified corrosion protection are listed Table 3-7 of the STMP. Tanks with unidentified protection must be verified by inspection. Tanks found without protection must be upgraded or removed.

9.1.3.2 Requirement 112.8(c)(5)

Not use partially buried or bunkered metallic tanks for the storage of oil, unless you protect the buried section of the tank from corrosion. You must protect partially buried and bunkered tanks from corrosion by coatings or cathodic protection compatible with local soil conditions.



Response

There are no partially buried and/or bunkered tanks at Fort Gordon.

9.1.4 Integrity Evaluations

9.1.4.1 Requirement 112.8(c)(6)

Test each aboveground container for integrity on a regular schedule, and whenever you make material repairs. The frequency and type of testing must take into account container size and design (such as floating roof, skid-mounted, elevated, or partially buried). You must combine visual inspection with another testing technique such as hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or another system of non-destructive shell testing. You must keep comparison records and you also must inspect the container's supports and foundations. In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges or accumulation of oil inside diked areas. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph.

Response

All aboveground storage tanks will be formally tested for integrity on a regular schedule as detailed in Section 3 of the STMP. In addition, any material repairs also will require a formal integrity test. The schedule for these inspections is presented in Section 3.0 of the STMP. Records of these inspections shall be maintained at each tank facility location, as required.

9.1.4.2 Requirement 112.8(c)(7)

Control leakage through defective internal heating coils by monitoring the steam return and exhaust lines for contamination from internal heating coils that discharge into an open watercourse, or pass the steam return or exhaust lines through a settling tank, skimmer, or other separation or retention system.

Response

This does not apply to Fort Gordon since no tanks have internal heating coils.



9.1.5 Engineering Controls - 112.8(c)(8)

Requirement

Engineer or update each container installation in accordance with good engineering practice to avoid discharges. You must provide at least one of the following devices:

- High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station. In smaller facilities an audible air vent may suffice;
- High liquid level pump cutoff devices set to stop flow at a predetermined container content level;
- Direct audible or code signal communication between the container gauge and the pumping station; or
- A fast response system for determining the liquid level of each bulk storage container such as digital computers, telepulse, or direct vision gauges. If you use this alternative, a person must be present to monitor gauges and the overall filling of bulk storage containers.

You must regularly test liquid level sensing devices to ensure proper operation.

Response

Many storage tanks are equipped with (or must be equipped with) direct-reading visual gauges (constantly attended operation or surveillance station) or high level alarm type devices designed to prevent overfills. PSTs requiring upgrading with these systems are discussed in Section 4.0 of the STMP in Table 4-1 and Table 4-2. All level gauges and high level alarms will be calibrated annually as discussed in Section 3.0 of the STMP.

All 40 CFR 112 regulated USTs have or must be upgraded with spill catchment buckets for the tank fill ports.

9.1.6 Visual Observations

9.1.6.1 Requirement 112.8(c)(9)

Observe effluent treatment facilities frequently enough to detect possible system upsets that could cause a discharge as described in 112.1(b).

Response

There are no treatment facilities on the base.

9.1.6.2 Requirement 112.8(c)(10)

Promptly correct visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts. You must promptly remove any accumulations of oil in diked areas.



Response

Discharges of any quantity of oil from its container, seams, gaskets, piping, valves or bolts shall be promptly removed from any containment area. Waste material generated shall be disposed of in accordance with all local, state and federal regulations. The procedure to be followed with regard to any discharge of any quantity can be found in the ISCP (Appendix J). This document goes into great depth with regard to appropriate actions and procedures that will be required in the event of a spill.

9.1.7 Mobile Equipment - 112.8(c)(11)

Requirement

Position or locate mobile or portable oil storage containers to prevent a discharge as described in 112.1(b). You must furnish a secondary means of containment, such as a dike or catchment basin, sufficient to contain the capacity of the largest single compartment or container with sufficient freeboard to contain precipitation.

Response

One mobile refueler, various drums, and several PODS are staged at various locations throughout Fort Gordon. Some were observed to have no type of secondary containment to capture a spill in the event of a discharge. All mobile or portable containers must be provided with secondary containment structures once stored. The secondary containment must be of sufficient quantity to store all of the tanks contents plus freeboard. Table 1-4 of Section 1 of the STMP depicts the PODS and one refueler that are required to have this containment.

9.2 Facility Transfer Operations, Pumping, & Facility Process - 112.8(d)

9.2.1 Requirement 112.8(d)(1)

Provide buried piping that is installed or replaced on or after August 16, 2002, with a protective wrapping and coating. You must also cathodically protect such buried piping installations or otherwise satisfy the corrosion protection standards for piping in part 280 of this chapter or a State program approved under part 281 of this chapter. If a section of buried line is exposed for any reason, you must carefully inspect it for deterioration. If you find corrosion damage, you must undertake additional examination and corrective action as indicated by the magnitude of the damage.

Response

All new buried piping and piping must have adequate cathodic protection as required by federal and state regulations. Engineering site plan drawings and as-built records shall be maintained at the respective department where such construction activity occurred.



9.2.2 Requirement 112.8(d)(2)

Cap or blank-flange the terminal connection at the transfer point and mark it as to origin when piping is not in service or is in standby service for an extended time.

Response

All piping will be properly capped/blind flanged when not in service in accordance with the requirement.

9.2.3 Requirement 112.8(d)(3)

Properly design pipe supports to minimize abrasion and corrosion and allow for expansion and contraction.

Response

All piping supports are designed to minimize abrasion and corrosion as well as allow for expansion and contraction. The majority of the smaller ASTs utilize systems designed for supporting small diameter piping. All underground piping associated with SPCC regulated tanks will be protected from corrosion. PSTs requiring piping upgrades to minimize corrosion are indicated in SPCC Table 9-1.



SPCC Table 9-1 Regulated PSTs Corrosion Protection Upgrades

Tank ID	Tank Type	Capacity (gallons)	Contents	Nearest Building	Facility	Pipe Corrosion Protection	Piping Exposure	40 CFR 112 Regulated	40 CFR 112 Required Upgrades
14600A	AST	275	#2 Fuel Oil	14600	DPWL/Maintenance	Unknown	Above/Underground	Not Compliant	Install area lighting and collision barrier. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
14600C	UST	8000	#2 Fuel Oil	14600	DPWL/Maintenance	Unknown	Underground	Not Compliant	Install area lighting, collision barrier, HLA and spill bucket. Verify secondary containment. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
14603A	AST	10000	#2 Fuel Oil	14603	Centralized Maintenance Facility	Unknown	Above/Underground	Not Compliant	Install area lighting. Remove rust and repaint. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
14A	AST	4000	Empty	Marina	Fort Gordon Marina	None	Above/Underground	Not Compliant	Install area lighting, collision barrier, valve surface security, drain security, and HLA. Remove rust and repaint.



SPCC Table 9-1 Regulated PSTs Corrosion Protection Upgrades

Tank ID	Tank Type	Capacity (gallons)	Contents	Nearest Building	Facility	Pipe Corrosion Protection	Piping Exposure	40 CFR 112 Regulated	40 CFR 112 Required Upgrades
202A	AST	1000	Diesel	202	Dorsey Rd. Pumping Station	None	Above/Underground	Not Compliant	Install spill bucket and HLA. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
25501A	UST	5000	#2 Fuel Oil	25501	Dental Clinic	Paint/None	Above/Underground	Not Compliant	Install collision barrier and drain security. Verify secondary containment. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
28320A	UST	10000	#2 Fuel Oil	28320	DMWR M&A / BOSS Hdqtrs.	Unknown	Underground	Not Compliant	Install area lighting, collision barrier, drain security, spill bucket, and HLA. Verify secondary containment. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
29808A	AST	275	Diesel	29808	Signal Towers	Unknown	Above/Underground	Not Compliant	Install area lighting, valve surface security, and spill bucket. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.



SPCC Table 9-1 Regulated PSTs Corrosion Protection Upgrades

Tank ID	Tank Type	Capacity (gallons)	Contents	Nearest Building	Facility	Pipe Corrosion Protection	Piping Exposure	40 CFR 112 Regulated	40 CFR 112 Required Upgrades
310C	BFCUST	200000	#2 Fuel Oil	310	H/C Plant - Medical Center	None	Underground	Not Compliant	Install HLA and spill bucket. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
310D	UST	30000	#2 Fuel Oil	310	H/C Plant - Medical Center	None	Underground	Not Compliant	Replace with DW UST. Install HLA. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
35200A	UST	8000	#2 Fuel Oil	35200	P-Xtra	Unknown	Underground	Not Compliant	Confirm status of UST. Remove UST if no longer in service. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
35200B	UST	10000	#2 Fuel Oil	35200	P-Xtra	Unknown	Underground	Not Compliant	Confirm status of UST. Remove UST if no longer in service. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.



SPCC Table 9-1 Regulated PSTs Corrosion Protection Upgrades

Tank ID	Tank Type	Capacity (gallons)	Contents	Nearest Building	Facility	Pipe Corrosion Protection	Piping Exposure	40 CFR 112 Regulated	40 CFR 112 Required Upgrades
36700A	UST	8000	#2 Fuel Oil	36700	Ring Hall	Unknown	Underground	Not Compliant	Install area lighting, drain security, HLA, and spill bucket. Verify secondary containment. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
36700B	UST	8000	#2 Fuel Oil	36700	Ring Hall	Unknown	Underground	Not Compliant	Install area lighting, drain security, HLA, and spill bucket. Verify secondary containment. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
47A	AST	275	Diesel	47006	Lift Station	Paint/None	Above/Underground	Not Compliant	Install area lighting and collision barrier. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
49300A	AST	6000	Gasoline	49300	AAFES-Gate 5	None	Above/Underground	Not Compliant	Install area lighting. Remove rust and repaint. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.



SPCC Table 9-1 Regulated PSTs Corrosion Protection Upgrades

Tank ID	Tank Type	Capacity (gallons)	Contents	Nearest Building	Facility	Pipe Corrosion Protection	Piping Exposure	40 CFR 112 Regulated	40 CFR 112 Required Upgrades
49300B	AST	6000	Gasoline	49300	AAFES-Gate 5	None	Above/Underground	Not Compliant	Install area lighting. Remove rust and repaint. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
49300C	AST	6000	Gasoline	49300	AAFES-Gate 5	None	Above/Underground	Not Compliant	Install area lighting. Remove rust and repaint. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
49300D	AST	6000	Gasoline	49300	AAFES-Gate 5	None	Above/Underground	Not Compliant	Install area lighting. Remove rust and repaint. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.
560A	AST	495	Diesel	560	WWTP	None	Above/Underground	Not Compliant	Install collision barrier and drain security. Verify cathodic protection-if necessary provide cathodic protection for piping or move aboveground.



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9.2.4 Requirement 112.8(d)(4)

Regularly inspect all aboveground valves, piping, and appurtenances. During the inspection you must assess the general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. You must also conduct integrity and leak testing of buried piping at the time of installation, modification, construction, relocation, or replacement.

Response

All PSTs including the associated appurtenances will be inspected as described in Section 3.0 of the STMP. All buried piping will be subject to leak testing (pneumatic or similar) upon completion of any installation, modification, construction, relocation or replacement and prior to going into service.

9.2.5 Requirement 112.8(d)(5)

Warn all vehicles entering the facility to be sure that no vehicle will endanger above-ground piping or other oil transfer operations.

Response

Only properly trained and authorized personnel shall have access to tank facilities.