



## Upcoming Events/ Training

- Sept 7 4th QTR FY16 EQCC Meeting, 1300-1400, Darling Hall GC Conf Rm
- Sept 8 Hazardous Materials/ Waste Refresher e-Training
- Sept 13 SPCC Training, 0830-1200 Bldg 11307
- Sept 15 Stormwater Industrial Training, 0900-1100 Bldg 11307

Call 791-6278 for more info

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Fort Gordon Green Matters



# All About Compliance

**What is compliance?** Conforming to a rule, policy, standard or law. The Army is required to abide by and meet state, federal and local environmental requirements. **Inspections** ensure that laws are followed for the protection of human health and the environment. They are used as a tool to assess the environmental compliance status of an organization and the installation as a whole.

**Inspections** are conducted to evaluate Environmental programs or media areas using the following methods:

- Interviewing facility or site representatives
- Reviewing records, reports and permits
- Taking photos
- Observing facility or site operations

## Types of Inspections

- **Self-Assessment** – conducted by individual activities or organizations.
- **Annual Environmental Performance Assessment (AEPA) System**- conducted by installation Environmental staff members.
- **External Environmental Performance Assessment & Assistance System (EPAAS)** - conducted by the IMCOM & AEC.
- **Environmental Protection Division/Environmental Protection Agency compliance inspections** – State and Federal inspections used to determine compliance and support enforcement actions.

# Compliance and Storage Tanks

## Storage Tanks

Bulk Storage Containers: any container used to store petroleum products such as motor fuel, petroleum solvents, heating oil, lubricants, used oil, etc. These containers are used for purposes including, but not limited to, the storage of petroleum products prior to use, while being used, or prior to further distribution in commerce. Tank types at Fort Gordon include: aboveground (AST) or completely buried/underground (UST), integral generator/AST's, drums, fuel PODS, and used cooking oil containers. Tanks that hold 55 gallons or more are regulated per 40 CFR 112 which, along with the Clean Water Act (CWA), drives the Spill Prevention Control and Countermeasures Plan (SPCC).



## Why it is important to Manage Storage Tanks

If not properly managed, these storage tanks could leak contaminants into the soil and into our water supplies. Petroleum products are made up of volatile organic compounds (VOCs). The least amount could do significant damage to our environment and human health. Ft. Gordon has an active tank management program.

## Prevention Measures

- Consider the location: Are the tanks near drinking water wells, streams, ponds, ditches, storm drains, or sanitary sewers, wetlands, mudflats, navigable waters, etc.
- Corrosion Control
- Secondary containment
- Routine inspections
- Remove inactive tanks
- Integrity testing periodically
- Secure tanks by closing and locking all valves

## Common Storage Tank Facts

- A spill of only one gallon of oil can contaminate a million gallons of water
- It's much easier to take measures to mitigate spills than to clean one up
- Discharges can and sometimes occur (human error, tank/piping/equipment failure)
- Routine inspections, maintenance, testing, secondary containment and expeditious spill response are essential
- All facilities (including Federal) that meet minimum storage capacities must comply with laws/regulations <sup>7</sup>

# More Compliance Points to Ponder

## Asbestos/Lead Reminders

When renovating or painting make sure to submit a **DO form 4283** before **ANY** work is started. No sanding or puttying of walls, or no drilling should be done until a 4283 has been submitted and/or approved by DPW Environmental. For units wanting to do work themselves, there is a Self-Help Class offered at the U DO IT classroom the first Wednesday of every month at 0800. For more information/questions please contact the Asbestos/Lead program manager, Mr. Ulysses Price at 791-9652/2526.

## Industrial Stormwater

- Make sure stormdrains are free, open, and unclogged
- Landscaping/Erosion Control items should be covered and contained to prevent contaminants from entering the storm drain.
- Drip pans should be placed under vehicles at motor pools for vehicles being parked for more than 24 hours.
- Batteries should be stored inside.
- Piles of Trash/Debris/Recyclables should be covered on a pallet off the ground.
- Trash Bins should be closed at all times never stored near any stormdrains.

## Storage/Handling Essentials for POLs (Petroleum, Oils, Lubricants)

- Proper container/compatible material
- Secured/tightened lids, plugs, etc.
- Spill buckets/Drip pans—keep clean/free of water
- Secondary containment sufficiently sized
- Properly labeled
- Regular inspections
- Document (training, repairs, spills, containment draining, regular briefings/exercises, etc)
- Compliant housekeeping/BMP practices

Phase II MS4s are required to develop a program to reduce pollutants in stormwater runoff to the MS4 for construction sites disturbing one or more acres," according to the EPA. This is to ensure that pollutants do not make their way into our lakes, rivers, and estuaries which can have negative impacts on our aquatic life and environment. It is very important to have BMP's (Best Management Practices) in place. The goal for BMPs is to prevent sediment and pollutants from entering state waters. Some of the common stormwater violations seen on construction sites are:

- ◆ **Concrete Washouts.** A common violation is not having concrete washouts, or they are not properly installed and maintained according to the Georgia Manual for Erosion and Sediment Control. No concrete should ever enter a storm drain. It can impair the storm drain system and result in flooding. It can also harm aquatic life.
- ◆ **Silt Fences.** The main violation seen with silt fences is improper maintenance. Perimeter BMPs must stay in place at ALL times.
- ◆ **Construction Exits.** The common violation seen here is the absence of construction exits, or they are not properly installed. The state requires that a construction exit must be 20'x50' with a geotextile liner, and use stone that is 1.5"-3.5". The purpose is to reduce the transport of mud and other sediments from the construction site onto the roadways. If the gravel or crushed stone becomes overwhelmed with mud/clay, more rock or crushed stone must be added to prevent sediment from leaving the site.



## Did You Know?

The Root Cause Analysis is a process used to identify:

- The true reason for a violation or noncompliance.
- Identify the solution to correct and prevent future findings.
- Properly defining the cause of the problem is 90% of the solution.
- Not just “WHAT is wrong, but “WHY”?

This process is the key to maintaining compliance. If you know what the problem is, then you can minimize the potential for future deficiencies and/or regulatory violations.

\* **Green Matters** is going quarterly starting Oct 2016.

### MOST COMMON FINDINGS/ISSUES

- ⇒ Improper or lack of hazardous waste labeling.
- ⇒ No or infrequent weekly inspections of waste storage areas.
- ⇒ Lack of properly trained personnel in HW management.
- ⇒ Lack of properly trained personnel in Spill Prevention.
- ⇒ No Activity/Unit Environmental Officer
- ⇒ Personnel not familiar with the installation Environmental Policy.
- ⇒ Poor recordkeeping
- ⇒ Failure to maintain updated SOPs and Management Plans.
- ⇒ Failure to make SOPs and Management Plans available for use.
- ⇒ Improper disposal of solid waste.
- ⇒ Lack of planning for projects to include NEPA review.
- ⇒ Lack of collision barriers for tank protection.

### Sources:

Nathan Kirby– Industrial Stormwater Specialist

<https://www.epa.gov/sourcewaterprotection> (Protect Sources of Drinking Water)

Stephanie Hadley– Training/SEMS/EPASS Program Manager

Tom Osburn - SPCC Program Manager