

EMP Action Items - FY Q1 2020				NOTES
Tank Management (Low Priority)				B Tomlinson, D Moore, J Clauss, P Swartz also invited
Met November 19, 2019: T. Meyer, M. Lindsey, D. Bruner, S. Dunn, M. Simko, C. Ward, K. Yargus				844-467-6272 109753#
Objective: Upgrade and maintain all fuel tank systems on the facility to meet mission and regulatory requirements				NOAA unable to attend but provided the following update: middle of a procurement to get the backup generator belly tanks refinished New labels will be installed once the work is done
				David Kinsey from VA DEQ inspected NOAA USTs on September 24, 2019 and downgraded the tanks to unregulated because they are not used for generators anymore We still plan on doing the monthly leak testing and the annual piping tightness testing.
Target:				C Ward - Navy doing a feasibility study of closing UST and filling with sand
1) Upgrade storage tanks				
2) Annually review the Integrated Contingency Plan annually				
3) Review tank records				
4) Communicate/Partner with Facilities, Logistics, and Tenants				
Actions	Start	Completion/ Ongoing	Responsibility	
1) Upgrade storage tanks	FY Q3 2007	FY Q4 2020	J. Clauss	
a) Complete fuel tank system upgrades	FY Q3 2007	FY Q4 2020	J Clauss	No funding yet for D-4 bollards although has a fire code requirement - JC R-1 at Navy closed in place and is empty Due to be cleaned in FY2020
2) Annually review the Integrated Contingency Plan (ICP)	CY Q1 2019	FY Q4 2020	D. Bruner	Next ODCP renewal due 4/7/2021
a) Maintain annual Change History log in Master ICP	CY Q1 2019	CY Q4 2020	S Dunn M Simko	
b) Quarterly review Section 1 5 1 and 1 5 2 asterisk items and submit significant changes to DEQ P E must certify changes if significant	CY Q1 2019	CY Q4 2020	D Bruner	
3) Review Tanks and Records	FY Q1 2009	FY Q4 2020	D. Bruner	
b) Perform annual tank inspections (Code 250)	FY Q1 2019	CY Q4 2020	D Bruner S Dunn	
c) Complete annual review of tank inspection records	FY Q1 2019	CY Q4 2020	D Bruner S Dunn	
d) Meet regulatory requirements	FY Q3 2019	CY Q4 2020	J Clauss	
i) Renew registrations	FY Q3 2019	CY Q4 2020	D Bruner	W-20A-10 3/10/2020, U-30B-15 and U-65-15 6/23/2020 comment added 3/11/2020
ii) Complete annual interstitial monitoring	FY Q4 2018	FY Q1 2020	P Swartz	Electronic Leak Detection System (or clear gauge if not electronic) need to be removed and physically actuated annually to ensure proper operation See POL-001 from 2014 EFR

iii) Complete annual underground piping pressure testing	FY Q4 2018	FY Q1 2020	P Swartz	Completed by a certified inspector. F-26. Verify that F-26 is only tank requiring this. Are lines at D-9A/B considered underground? Review previous DEQ inspection language.
iv) Complete annual leak detection testing	FY Q4 2018	FY Q1 2020	P Swartz	Automatic Tank Gauging (F-26) and Automatic Line Leak Detector (F-26) need to be calibrated by third party annually See JD-2 report April 2014.
v) Complete 5 Year Pressure Testing of Pipes	FY Q1 2018	FY Q1 2022 (12/21/2021)	P Swartz	Requirement 9 VAC 25-91-130- B.4 but there is an exemption for AST with a capacity of 5,000 gallons or less used for storing heating oil for consumptive use on the premises where stored; (9VAC25-91-30 B.1). U-12 test attempted 2/19, but unable to complete test. Code 250 will contact DEQ to discuss resolution.
vi) Complete Secondary Containment Certification	FY Q1 2021	FY Q4 2021	P Swartz	Only D-9A and D-9B
vii) Complete daily and monthly inspections	FY Q1 2020	FY Q4 2020	P Swartz	D-50 to go off-line
4) Communicate/Partner with Facilities, Logistics, and tenants	FY Q1 2020	FY Q4 2020	D Bruner	
Resources:				
Time: This program will be implemented during FY 2020				
People: Tank management requires approximately (0.25 FTE x 2) FTE's and 0.1 WYE per year				
Money: Pressure testing/calibrations/third party inspections				
Tank closure				
Third party independent evaluation				
Required Training:				
1) Annual ICP Training (including SWP3)				
2) Required Annual Tank Training (Inspection and Operation)				
Monitoring and Measurement:				
1) Track the ongoing need for upgrade or replacement of all tanks on site and maintain an up-to-date listing of all priority tanks, based on applicable requirements				

