Land and Materials Administration
Oil Control Program

MEMORANDUM

SUBJECT: **Project Tracking Communication Memo**
Case No. 26-0420PG
Joint Base Andrews
[redacted] Fuel Hydrant Release
Row [redacted] Investigation
Prince George's County, Maryland

PARTIES: Maryland Department of the Environment (MDE), Oil Control Program (OCP)

and

Joint Base Andrews (JBA) 316 CES/CC

DATE: April 30, 2026

On March 23, 2026, Joint Base Andrews (JBA) reported the discovery of fuel odors and a slight rainbow sheen near an outfall to the Piscataway Creek [redacted] of the base (*Incident #23722*). JBA deployed absorbent material onto Piscataway Creek at the referenced outfall and opened an investigation to determine the source of the sheen. On April 8, 2026, JBA updated Incident #23722, to identify the release of Jet A from the [redacted] Fuel Hydrant system. JBA suspects the release occurred from the Row [redacted] loop. The base and adjacent communities are served by public water.

On March 31, 2026, OCP opened Case No 26-0420PG to track *Incident #23722*. OCP has issued multiple *Reports of Observations* (ROOs) to document the progress of the investigation and requirements from MDE-OCP. ROOs were issued with requirements to JBA on the following dates: 3/26/26, 3/31/26, 4/10/26, 4/13/26, 4/20/26, and 4/22/26. Additionally, OCP issued ROOs to document site observations only on 4/10/26 (2nd ROO) and 4/17/26.

JBA has communicated daily site updates through emails to MDE and transmitted supporting documents and updates for project deliverables through Memorandums.

Currently, the focus of this investigation is three key areas, and updates should be provided in the applicable key area as the investigation progresses. This Memo will serve to document and track project updates and requirements.

Key Focus Areas:

1. **Emergency Spill Response and Protection of the Piscataway Creek Drainage** - Absorbent materials have been deployed at the outfall to Piscataway Creek, and along selected intervals of the creek between the outfall and the base [redacted] security fence. Two enhanced underflow damns are installed to increase stream containment and slow the progress of petroleum impacts on the creek. **Daily monitoring, recovery of petroleum impacts (e.g. petroleum impacted water, fuel sheen, and free phase fuel, also referred to as liquid phase hydrocarbons or LPH), and maintenance of instream containment is required until MDE determines the emergency risk to Piscataway Creek has been negated.**

   *****Emergency measures are NOT considered remedial actions by MDE, only recovery of fuel from the subsurface source zone will be considered remedial efforts. *****

   a. **Storm Drain Manways** [redacted] – Heavy petroleum impacts have been observed in these storm water inlets adjacent to the Row [redacted] hydrant loop.

   b. **Piscataway Outfall** – Heavy petroleum impacts have been observed at the larger outfall that drains the entire airfield, which is the headwaters of the Piscataway Creek.

   c. Liquid Recovery – No later than April 13, 2026, provide the amount of oil and petroleum impact water recovered. Daily thereafter, provide updates to the tabulated liquids recovery totals.

      To date, JBA and their contractors have failed to properly evaluate recovered petroleum impacted liquids to permit quantification of LPH recovery. To date, JBA has failed to provide the total amount of LPH recovered by specific location. JBA has failed to document clear daily and recovery cumulative totals of fuel recovered in the daily reports.

      It is critical to provide an accurate accounting of all liquids recovered from the storm drain system and the stormwater outfall. **OCP requires the following:**
      - All liquids recovered must be permitted time to settle and phase separate in the vessel of first collection (e.g. JBA spill response trailer or Vac Truck).
      - The first collection vessel must be gauged with an oil water interface probe.
      - The JBA team must quantify the total gallons in the vessel, the portion of the recovered liquids that are LPH vs the portion that is water. These will give us the daily recovery totals by location.

- Once this data has been collected, the liquids may be transferred to the frac tank.
- Once liquids are added to the frac tank, the frac tank must be gauged with an oil water interface probed to again record total fluids, LPH and water levels.
- It is important to train all JBA staff assisting with monitoring this clean-up, to properly collect these measurements. Collection of consistent data is critical.
- Provide liquids disposal receipts for all liquids leaving the base.

i. 4/22/26 – OCP required JBA to provide a table to document daily recovery totals. The table must clearly identify recovery totals each day and must be reconciled when liquids leave the base for proper disposal.

ii. 4/24/26 – OCP provided technical feedback to the table received. The table needs to better track recovered liquids and clarify discrepancies

iii. 4/28/26 – MDE expressed the continued need for full accurate disclosure of daily stream recovery totals. JBA has continued to fail to provide an accurate accounting of the liquids recovered (LPH, petroleum impacted water, and total liquids) from the Piscataway drainage. Accurate recovery totals help guide monitoring requirements and frequencies. In addition, identified areas of impacts and known recovery zones can help focus future subsurface investigations. Finally, the failure to collect accurate recovery totals results in a failure to provide proper accountability to the actual impacts to Piscataway Creek.

d. **Surface water sampling** – To monitor the effectiveness of containment and the dissolved phase petroleum impacts to the Piscataway Creek, OCP selected three surface water sampling locations, identified by GPS coordinate locations. **JBA must collect weekly surface water samples from these locations. All surface water samples must be analyzed for full suite VOCs, including fuel oxygenates, naphthalene, perchloroethylene and trichloroethene, using EPA Method 8260, TPH-DRO and TPH-s using EPA Method 8015 and PFAS targeted compounds list established in EPA** Method **1633. Results must be shared between the MDE and JBA teams.**

i. 4/28/26 – MDE notified of JBA's plans to collect required weekly surface water samples

ii. 4/29/26 – MDE provided analytical results for all samples collected on 4/13/26 and VOC analytical results for samples collected on 4/20/26.

iii. 4/30/26 – MDE provided TPH-DRO, TPH-GRO and PFAS analytical results for samples collected on 4/20/26. A tabulated summary of the MDE data, with highlighted constituents of concern is attached as a supplemental document to this addendum.

iv. 5/1/26 – MDE has not yet received JBA sampling data

2. Investigation and Repair of the [redacted] Fuel Hydrant Loop Failures:

a. Investigation of the Point(s) of Failure
No later than May 10, 2026, submit a report of all actions taken to date to determine that the hydrant piping failure was contained to only row [redacted]. This review must be supported with all

documentation reviewed or otherwise utilized that led to this conclusion. Provide documentation of where and how row [redacted] is isolated identifying specific valves and locations.

MDE required JBA to submit a corrective action plan to determine the point and cause of the failure of the hydrant system piping no later than April 22, 2026. **As of May 4, 2026, the required corrective action plan has not been received by MDE**, and this task is now considered overdue. The corrective action plan must locate the specific point(s) of failure of the [redacted] Hydrant Loop. JBA must utilize a method of investigation that will NOT further contribute to the release of fuel. Submit the overdue corrective action plan and include a detailed schedule for investigation, testing, and repairs. **No investigation, testing, or repairs may be performed to any part of the hydrant loop systems without the written approval and on-site presence of MDE.**

Notify MDE at least 72 hours in advance of any work (repairs, investigations, testing, etc.) to be conducted on the hydrant loop systems by emailing both Michael Jester and Jackie Ryan at michael.jester@maryland.gov and jackie.ryan@maryland.gov, respectively, and confirming by phone, 410-537-3024 and 410-537-4153, respectively, no later than 48-hours in advance.

Provide documentation of the delay in the repair to valve [redacted] after the December 11, 2025 test failure.

Continue to keep the [redacted] airport fuel hydrant system out-of-service until MDE provides written approval to place the system in-service.

c. Registration
No later than May 10, 2026, properly register the airport hydrant systems with OCP. A registration form is available on MDE's webpage.

d. Inventory
No later than May 10, 2026, provide a copy of all data reviewed or otherwise utilized to conduct inventory for November 2025 through March 2026 and a complete copy of the inventory records for the corresponding months. JBA stated that all calculations for fuel inventory are based on 60°F temperature even though ambient temperatures during January 2026 ranged from approximately 29°- 44° and February 2006, from approximately 20°-30°. Include in the data submitted, the computer calculated amount for closeout inventory for the day and what is calculated by the accountants as having been issued.

e. Documentation of Compliance
By no later than April 22, 2026, now past due, provide annual cathodic protection test records for calendar years 2024 and 2025. OCP required JBA to submit a copy of the two most recent impressed current cathodic protection test records for all hydrant systems no later than April 22, 2026. A record dated July 2023 was provided for testing conducted in July and August 2023. **Testing is required annually.**

By no later than April 22, 2026, now overdue, provide the last two years of impressed

current cathodic protection inspection logs. OCP required JBA to submit a copy of the impressed current cathodic protection inspection logs from the last two inspections that identified if the full hydrant cathodic protection systems were properly functioning no later than April 22, 2026. JBA stated that this record was provided on April 22, 2026. This record is not included in the July 2023 cathodic protection report that was provided on April 22, 2026.

No later than April 22, 2026, provide a copy of the corrosion expert's design of the impressed current cathodic protection systems associated with all hydrant systems. JBA stated that the design of the system is included in the report provided on April 22, 2026. ***The July 2023 record is currently under review by OCP.***

The following documents were required to be provided by April 22, 2026, to date OCP has not received these documents and they are now considered past due:

i. A copy of the most recent complete assessment of the impressed current cathodic protection systems associated with all airport hydrant systems and if an assessment has not been completed in the past five years, submit a copy of the most recent inspection and conduct an inspection in accordance with NACE standards.

ii. A copy of all repair records from the past year for the airport hydrant impressed current cathodic protection systems.

iii. The type, make, and model of the oil-water separator located adjacent to the Building [redacted] pump house. Documentation of the determination if a separate oil holding tank associated with the separator exists. Documentation into the investigation to ensure the oil-water separator and vent piping are properly installed. The vent risers were no longer in a fully upright position on April 13, 2026. Documentation of all findings. Record of all repairs and testing conducted as a result of the investigations. Verification the oil-water separator is appropriate for the application for which it is installed.

3. **Site Characterization and Recovery of the Subsurface Petroleum Impacts:** Immediately, but no later than April 15, 2026, initiate an Emergency Subsurface Investigation in the area of the [redacted] fuel hydrant system at Joint Base Andrews. Now past due. This investigation must evaluate the vertical and horizontal extent of petroleum impacts to soils and groundwater, identify the migratory pathway to the Piscataway Creek, and identify proper recovery locations.

   a. 4/17/26 – MDE understands that JBA is working to onboard an environmental contractor to complete this work. MDE expects the following past due items as soon as the contractor has joined the team:

      i. **Provide OCP with proposed boring locations on a site diagram for review.**
      ii. **The investigation must include the advancement of subsurface borings and the installation of permanent groundwater monitoring and recovery wells.**
      iii. **JBA must be prepared to begin immediate recovery of any LPH.**
      iv. **OCP personnel must be on site to observe all investigation activities**.