

MARYLAND DEPARTMENT OF THE ENVIRONMENT
LAND AND MATERIALS ADMINISTRATION – OIL CONTROL PROGRAM
 1800 Washington Boulevard, Suite 620 · Baltimore, Maryland 21230–1719
 (410) 537–3442 · 1–800–633–6101 · <http://www.mde.maryland.gov>

Report of Observations

Date	April 15, 2026	Facility ID	7874
Type of Inspection / Observations	Release Investigation	Case #	26-0420 PG
Site / Facility Name	Joint Base Andrews 316 CES/CEIE	Permit #	2021-OPT-5217
Address	████████████████████ Andrews AFB	MDEnviroScreenOGR	31.1
Point of Contact (POC)	████████████████████	POC Phone	██████████
POC Email	████████████████████	POC Fax	Not provided.

Remarks:

The Maryland Department of the Environment’s (MDE) Oil Control Program (OCP) recently completed a review of the *Memorandum for Maryland Department of the Environment* (the Memorandum) dated April 13, 2026 prepared by Department of the Air Force Headquarters 316th Wing (AFDW) Joint Base Andrews (JBA). The Memorandum is in response to the Report of Observations dated April 10, 2026 prepared by MDE following the facility's failed fuel hydrant system and ongoing petroleum release.

The following are MDE’s responses and requirements (in bold) corresponding to the numbers outlined on the MDE April 10, 2026 Report of Observations, and in the JBA Memorandum dated April 14, 2026:

1. Empty row █████ piping of all petroleum and submit a liquid disposal receipt.

Per the Memorandum, Row █████ piping was emptied of all petroleum on April 13, 2026. JBA confirmed the removal of 13,743 gallons of Jet A from the Row █████ piping. Documentation of disposal was NOT provided as JBA stated the recovered fuel was returned to the storage tank.

This requirement has been satisfied at this time.

2. Submit a timeline for the investigation and subsequent repairs for the failed piping section (Row █████).

a. MDE required an immediate test of the █████ airport hydrant piping on March 26, 2026. The █████ hydrant loop failed precision tightness testing on December 11, 2025 and March 30, 2026. JBA attributed the December 11, 2025 failure to a faulty valve. The point and cause of the March 26, 2026 failure has not been identified to date.

b. MDE hereby denies JBA’s request to utilize the fuel inoculated Tracer test method to pinpoint the leak(s). JBA must utilize a method that will not further contribute to the release of fuel and generate further environmental impacts. Immediately but no later than April 22, 2026, submit a

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corrective action plan for MDE review and approval to determine the point and cause of failure of the piping. MDE recommends JBA research line isolation and helium testing or other alternative investigative method.

3. Provide the amount of oil recovered to date. According to the daily reports, vac events occurred between March 28 (the initial vac event) and April 9, 2026, resulting in the removal of 17,350-gallons of oil-contaminated water described as sheen, fuel, and water. Add the amount of oil recovered with each event and cumulative total in the daily reports. Additionally, provide documentation of the location of all prior vac events.

To date, JBA and their contractors have failed to properly evaluate recovered petroleum impacted liquids to permit quantification of liquid phase hydrocarbon (LPH) recovery. On April 13, 2026, MDE-OCP noted that sticking tanks with water finding paste was not a proper method to evaluate LPH recovery totals. All recovered liquids must be allotted time for liquids to phase separate in the vacuum truck and frac tank. Then the vessels must be gauged with an interface probe capable of measuring both LPH and water. All gauging data is inaccurate unless collected with an interface probe. As of April 15, 2026, JBA has failed to provide the total amount of LPH recovered. JBA has failed to document the daily and cumulative totals of LPH recovered in the daily reports. JBA failed to provide the location of the vac events. Provide the documentation as requested on April 10, 2026. Documentation was due on April 13, 2026 and then daily.

4. Provide a detailed description of the failure point of the 3/30/26 HCNA precision testing labeled as "Facility [REDACTED] Hydrant Loop Issue – Pump House to IVP [REDACTED]" on test records.

Per the Memorandum, "Valve [REDACTED] bleed by was an internal leak, no fuel was observed weeping/dripping/leaking from the valve itself."

Per the test record provided for the March 30, 2026 test, "visible fuel was observed leaking into the body cavity of the double block and bleed valve while Section [REDACTED] was under test pressure." No later than April 22, 2026, provide a schedule for repairs for valve [REDACTED]. Following repairs, conduct a MDE approved precision tightness test of the piping and submit a copy of the test records within 10-days of testing.

5. Provide the length of the hydrant loop sections.

For the [REDACTED] hydrant loop, JBA reported the length as 24,524 feet and volume as 143,509 gallons.

JBA notes that Row [REDACTED] loop is approximately 2,100 linear feet, but does not provide Row [REDACTED] storage capacity by gallons. JBA failed to provide the lengths for the remaining hydrant loop sections as required on April 10, 2026 and due no later than April 13, 2026. In addition to the lengths, provide storage capacities no later than April 22, 2026.

6. Provide the piping installation date for all sections of the hydrant loop piping.

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A date of September 21, 2001 was provided with a statement that a more accurate date will be provided.

The [REDACTED] hydrant system is registered with MDE as installed January 1, 2012 and additional information provided by JBA on April 14, 2026 suggests the engineered drawings for the [REDACTED] Hydrant Loop are dated 1997. Provide an accurate installation date for all portions of the hydrant systems as required on April 10, 2026 and due no later than April 13, 2026.

7. Provide the length of the hydrant loop piping that includes the point of failure(s).

For the [REDACTED] hydrant loop, JBA reported the length as 24,524 feet. JBA reported Row [REDACTED] length as approximately 2,100 linear feet.

This requirement has been satisfied at this time.

8. **Do not perform repairs to the hydrant piping without the written approval of MDE. Provide a schedule for the proper abandonment or repair of the hydrant piping. (Required April 10, 2026 and due no later than April 13, 2026.) To give MDE the opportunity to observe field activities associated with the investigation into the point and cause of the hydrant piping failure, notify Jackie Ryan at jackie.ryan@maryland.gov and Michael Jester at michael.jester@maryland.gov a minimum of 72-hours prior to conducting work on the hydrant systems to include but not limited to excavation, repair, testing, and investigation into the point and cause of failure.**
9. **Provide a to-scale schematic of the hydrant piping and connected UST and AST systems as required on April 10, 2026 and due no later than April 13, 2026.**
10. Submit a report to the Department summarizing the steps taken to date to investigate the point of failure and to properly control, contain, and cleanup the release of fuel.

The source of the release was estimated as a failure in hydrant system Row [REDACTED] on March 30, 2026, a week after the detection of the sheen. On April 1 and 5, 2026, the containment, installed to minimize migration of contamination, failed. The containment in the Piscataway Creek only offers a surficial emergency response to minimize impacts to allow for investigation and remediation. To date, efforts to properly control, contain, and cleanup the release of fuel have been minimal and insufficient. This emergency will not be negated until fuel recovery at the source has begun.

Adhere to all requirements issued by MDE to include OCP compliance, remediation, and permit requirements.

11. Submit a report identifying all steps taken to determine the cause of the December 11, 2025 hydrant piping precision tightness test failure and any subsequent repairs that were made to the piping system.

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The test record indicates facility [REDACTED] hydrant loop (section [REDACTED]) failed testing. The testing company recommended the slips on valve [REDACTED] be replaced to allow sufficient isolation to continue leak detection testing. Also noted was a blown Visi-Flow on the transfer line. The testing company identified the double block bleed valve and fill stand [REDACTED] were broken with the shear pin in the stem snapped off. No leak and leak simulation tests for section [REDACTED] were showing a trend of steadily worsening test results. The testing company noted on December 10, 2025 that the recent passing leak detection results were not nearly as good as they had been historically. The testing company notified JBA. The testing company inspected all the pits associated with the system but did not find fuel. Facility [REDACTED] Hydrant Loop was tested on December 11, 2025 with failing results. JBA attributed the failure to a faulty valve. The valve, valve [REDACTED], has not been repaired to date. Repairs are planned for April 2026.

No later than April 22, 2026, provide documentation of the repair to fill stand [REDACTED] and the Visi-Flow on the transfer line, and a schedule for repairs for valve [REDACTED].

12. Submit a report of the investigations and findings following the January, February, and March 2026 hydrant piping release detection failures.

Although reported on April 8, 2026 as release totals, JBA is attributing the January and February 2026 inventory losses to temperature and the compromised valve [REDACTED].

No later than April 22, 2026, provide documentation of the evaluation that led to the determination that the January and February inventory losses are due to the faulty valve and temperatures changes. Documentation must include but not limited to how fuel bypassing the valve and remaining in the system contributes to a loss of inventory and calculations that show volume of fuel due to temperature fluctuations equates to the inventory losses.

13. Continue to keep the [REDACTED] fuel hydrant system closed until MDE provides written approval to place the system in service.

14. Immediately investigate the source of the sheen/release observed on Piscataway Creek and adjacent storm drain.

Submit daily updates of the investigation and activities findings as required in the MDE Report of Observations issued on April 10, 2026 and enhanced by the Report of Observations issued following the April 13, 2026 MDE site visit.

“Items 15- 24: JBA Provides that requirements 15-24 will require additional coordination and will require an extension until June 15, 2026 to complete these items.”

MDE issued requirements 15-26 to ensure expedited liquid phase hydrocarbon (LPH) recovery as close to the source of the release as possible to prevent further migration of LPH to waters of the

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State. Fuel remained in the failed Row ■ Loop until April 13, 2026, presenting a continuous source of petroleum and a risk to sensitive receptors of the State. Continued monitoring of the creek is required but only offers a surficial means of protection. Vertical and horizontal characterization of the plume and immediate recovery of LPH as close to the source of release are crucial for the timely and successful recovery of fuel released to the environment.

- MDE will not grant this requested extension. All deadlines established in the April 10, 2026 Report of Observations remain in effect and the deadlines are now considered past due.
- JBA is welcome to present an alternative aggressive method of site characterization for MDE to review and consider.
- Until an alternative method of site characterization is proposed, Items 15-24 of the April 10, 2026 Report of Observations remain in effect.
- On April 13, 2026, the JBA team gauged close proximity groundwater monitoring wells (results provided on April 14, 2026). A total of nine monitoring wells were gauged. The measured first depth to water was determined to be ABOVE the screened interval in every well gauged. Based on this finding, OCP has determined these wells are NOT properly completed to monitor the Jet A release.

Based upon the paperwork reviewed, OCP has the following Additional Requirements:

15. No later than April 22, 2026, submit a copy of the two most recent cathodic protection test records for all hydrant systems.
16. No later than April 22, 2026, submit a copy of the impressed current cathodic protection inspection logs from the last two inspections that identified if the cathodic protection for all hydrant systems was properly functioning.
17. 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.
18. No later than April 22, 2026, provide a copy of the most recent complete assessment of the impressed current cathodic protection systems associated with all hydrant systems. 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.
19. No later than April 22, 2026, submit all repair records from the past year for all hydrant impressed current cathodic protection systems.
20. No later than April 22, 2026: Provide the type, make, and model of the oil-water separator located adjacent to the Building ■ pump house. Determine if a separate oil holding tank associated with the separator exists. Conduct an 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. Submit record of the findings. Perform repairs as necessary. Submit a copy of all repair and test records. Submit verification the oil-water separator is appropriate for the application for which it is installed.

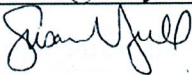
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21. No later than April 22, 2026, provide the frequency leak tests are performed on each segment of all hydrant systems.
22. No later than April 22, 2026, provide a detailed description of how inventory is performed to include, but not limited to frequency, data collection, calculations, and number and location of data collection points and meters.

Photographs Taken: Yes No

NOTES

- Report the following conditions to the Department immediately, but not later than 2 hours after the detection, at 410-537-3442 during normal business hours, or to the Emergency Response Division hotline at 1-866-633-4686:
 - Evidence of a spill, release, or discharge of oil;
 - A release detection method, monitoring results, or investigation of an alarm indicates that a spill, release, or discharge may have occurred;
 - Investigation of an inventory variation reveals a leak;
 - If a storage tank system fails a test for tightness,;
 - Two consecutive inconclusive precision tightness test results;
 - A storage system (aboveground or underground) is determined to be leaking;
 - Test failure of spill catchment basins, containment sumps, or test of a cathodic protection resulting determination the system is inadequate;
 - Presence of liquid phase hydrocarbons; absorbed or free product in soil; vapors in soil, basement, sewer or utility line; or waters of the State;
 - Unusual operating conditions exist, such as erratic behavior of product dispensing equipment, the sudden loss of a regulated substance from a storage tank system, unexplained presence of water in a storage tank, or liquid in the interstitial space of a secondary containment system.
- Reports should not be made via voice messages to OCP case managers.
- Operating without a permit or in violation of a permit, regulation, or law may result in the assessment of civil or administrative penalties and or other legal sanctions.

MDE Representative: Susan R. Bull Phone: 410*-537-3499 Email: susan.bull@maryland.gov	Emailed: Provided to the JBA team by email Person Interviewed (print):
Signature: 	Signature:
Date: April 16, 2026	Date: April 16, 2026