



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: July 2, 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, OCP Report of Incident #23722. On April 8, 2026, JBA informed MDE of the volume and scope of the inventory losses and releases to the environment. . Since the first report, JBA has monitored and recovered petroleum impacts to Piscataway Creek. OCP understands the base and adjacent communities are served by public water.

In a Memo dated May 4, 2026, OCP established three focus areas for this release:

1. Emergency Spill Response and Protection of the Piscataway Creek Drainage

Data collected as part of JBA's monitoring of Piscataway Creek demonstrates the following:

- Petroleum impacts in the form of petroleum odors, sheen, dissolved phase and liquid phase hydrocarbons persist, but have decreased in presentation.
- Recovery activities have assisted in reducing the downstream risk of daily impacts.

- The greatest risk of petroleum migration occurs during and following a significant rain event (defined as precipitation of 0.10 of an inch or greater).

Based on our review of the monitoring data received to date, OCP hereby approves the following:

- a. **Beginning July 1, 2026**, OCP approves a minimum of **weekly** (Wednesday or Thursday) vacuum recovery events at the outfall **and requires emergency** vacuum recovery events within 12 hours of each significant rainfall event (0.10 of an inch or greater). If petroleum impacts are observed at the conclusion of an emergency vacuum recovery event, **daily** vacuum recovery events must be performed until the absence of petroleum impacts are observed.
- b. **Beginning July 1, 2026**, conduct **weekly inspections** of stream containment materials (hard boom, soft boom, and absorbent sweeps) at the stormwater outfall, Piscataway Creek, and Locations [REDACTED] and [REDACTED] **and conduct emergency inspection** within 12 hours of a significant rainfall event (0.10 of an inch or greater).
 - i. Absorbent materials that exhibit evidence of petroleum absorption must be removed, properly disposed of, and replaced at the time of inspection.
 - ii. If petroleum impacts are observed during the emergency inspection after a significant rainfall event, **daily** follow up inspections must be performed until the absence of petroleum impacts are observed.
- c. **Beginning July 1, 2026**, within 24 hours of completing weekly or emergency recovery events, submit an email update to MDE-OCP. Weekly updates must include a summary of the vacuum recovery event(s), containment inspection(s), a liquid recovery table, and photo-ionization detector (PID) readings from the storm drain system for the week.
- d. **Continue** weekly sampling of Piscataway Creek at the three established sampling locations.
 - i. **Beginning July 1, 2026**, continue to collect and analyze surface water samples for full suite volatile organic compounds (VOCs), including fuel oxygenates and naphthalene, using EPA Method 8260 and for total petroleum hydrocarbons – diesel and gasoline range organics (TPH-DRO and TPH-GRO) using EPA Method 8015.
 - ii. **Beginning July 1, 2026**, OCP will no longer require collection of PFAS samples in conjunction with Case No 26-0420PG. This waiver does not apply to PFAS sampling requirements established for other MDE projects at JBA.

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

On December 11, 2025, the [REDACTED] hydrant loop failed a precision tightness test. On March 26, 2026, MDE required an immediate test of the [REDACTED] airport hydrant piping. On March 30, 2026, two sections of the [REDACTED] hydrant loop failed a precision tightness test.

- On March 31, 2026 and again on April 10, 2026 **with a due date of April 13, 2026**, MDE-OCF required JBA to submit a timeline for the investigation of and subsequent repairs to the piping that failed precision tightness testing. **MDE-OCF has not received the required timeline.**

On June 10 and 11, 2026, JBA initiated a tracer test of the hydrant lateral row [REDACTED] piping. After inoculation of the tracer into the piping on the 10th, testing was performed to determine if the tracer compound was detected in the return piping at the [REDACTED]. The test indicated that no tracer was detected. The 28 tracer ports were sampled on the 10th and again on the 11th. Tracer was not detected at any of the tracer ports. On June 11, 2026, the pressure on the hydrant lateral row [REDACTED] piping was released. For the procedure, the piping was pressurized to 12 psi. At completion, the pressure had decreased to 8 psi.

On June 16, 2026, MDE verbally committed to having a representative of the Department on site on June 22, 2026 because JBA proposed to conduct a second round of tracer testing of the hydrant lateral row [REDACTED] piping. On June 17, 2026, JBA confirmed the testing scheduled for June 22, 2026. JBA stated that the testing would include sampling of the tracer ports only and that no re-pressurization of the line would take place as planned. On June 18, 2026, MDE was notified that the tracer sampling event was canceled.

On June 25, 2026, JBA stated that they did not have a proposed pressure test strategy from their contractor. JBA proposed to engage the pumps to circulate fuel in the [REDACTED] hydrant loop with lateral row [REDACTED] isolated and increase pressure in the line in a step process with 24-hour wait time to determine if a pressure loss was recorded.

MDE hereby denies JBA's June 25, 2026 request to test [REDACTED] hydrant loop with lateral row [REDACTED] isolated as proposed, and offers the following:

- To date, JBA has not determined the source of the release.
- To date, JBA has not determined the point of failure of lateral row [REDACTED].
- JBA has voiced concerns over the possibility of additional points of failure within the failed section of piping between valve [REDACTED] and [REDACTED].
- Corrective actions are past due.
- JBA must propose a test method for both sections of the piping that failed precision tightness testing that will not further contribute to the release of fuel or generate further impact to the environment.
- Immediately submit a corrective action plan to determine the point(s) and cause(s) of failure of the [REDACTED] hydrant loop that includes both sections of the piping that failed precision tightness testing. MDE recommends JBA research line isolation and helium testing as alternative investigative methods.

- To date, JBA has not provided a report for the June 10 and 11, 2026 tracer test (due June 25, 2026) or any insight into the changes from the June 22, 2026 plan to re-inoculate lateral row piping.

3. Site Characterization and Recovery of the Subsurface Petroleum Impacts:

- a. Site characterization loop has been initiated. To date the results are inconclusive and MDE-OCP has reviewed any results generated by your consultant.
- b. Continued investigation is required to identify the point of release and the migratory pathway to the storm water management system and Piscataway Creek.
- c. To summarize results and clearly identify data gaps in this investigation, OCP requires JBA to submit a Conceptual Site Model (CSM) **no later than July 29, 2026**. The CSM must be utilized to guide additional site investigation and remedial activities based on the data and information obtained to date. The CSM must include a detailed narrative of all the site-specific information and data that has been collected to date including subsurface investigations; monitoring well, stormwater, and surface water sampling; product recovery activities; and stormwater drainage system evaluations. The CSM must be a stand-alone document that provides all supporting information gathered over the course of this site investigation. Include detailed maps, cross-sections and a narrative explaining fate and transport of contamination and potential exposure pathways to on- and off-site receptors. The CSM must include recommendations in the form of a work plan to address identified data gaps and proposals for additional site investigation and remedial activities. At a minimum, the CSM must include the following information:
 - i. A comprehensive site history with a bulleted chronology of all events, proposals, and approvals
 - ii. A description of current and past land use at the site and nearby properties, including abandoned utility corridors;
 - iii. A site map detailing the locations of important site features;
 - iv. All soil, groundwater, and surface water analytical data collected;
 - v. A monitoring well gauging summary;
 - vi. Groundwater flow direction and dissolved phase concentration maps;
 - vii. All boring logs and well completion reports;
 - viii. Cross sections that illustrate relevant surface and subsurface (current and former) features including the hydrant loop system, stormwater drainage system, and other utilities in the area; soil borings and monitoring wells, geologic contacts, and any other relevant information available to assist with the visualization of subsurface conditions at the site;
 - ix. Documentation of any additional work that was performed along with its respective data; and

- x. Discussion of potential exposure pathways, data gaps and recommended additional activities.
- xi. The CSM must summarize and consider all available data and information into one report to guide future site activities. The model will evolve over the course of this case and will be required to be updated as new data and information are obtained.