



Maryland

Department of the Environment

Wes Moore, Governor
Aruna Miller, Lt. Governor

Serena McIlwain, Secretary
Suzanne E. Dorsey, Deputy Secretary
Adam Ortiz, Deputy Secretary

July 28, 2026

[REDACTED]
Commander, 316th Civil Engineer Squadron

[REDACTED]
Joint Base Andrews, MD 20762

RE: [REDACTED] LOOP TESTING

Case No. 2026-0420-PG

Joint Base Andrews

[REDACTED]
Prince George's County, Maryland
Facility ID 7874

Dear [REDACTED]:

On July 14, 2026, Joint Base Andrews (JBA) proposed to test Facility [REDACTED] hydrant loop, with hydrant lateral row [REDACTED] isolated, by conducting a one-time, point-in-time underground pipeline leak detection test using fuel. On several occasions, both verbally and in writing, Maryland Department of the Environment (MDE) informed JBA that any proposal to test the hydrant system must include a test method that will not further contribute to the release of fuel or generate further impact to the environment. The use of fuel in the test could further impact the environment. MDE encouraged JBA to research other test methods.

To date, the specific points of failure of Facility [REDACTED] hydrant loop are unknown. Investigation to determine the point of failure of hydrant lateral row [REDACTED] was due no later than April 13, 2026. It is known that hydrant lateral row [REDACTED] is compromised based on precision tightness testing and limited tracer testing. The point and cause of failure remain unknown. JBA has failed to adequately assess the hydrant lateral row [REDACTED] failure. JBA was aware of the failure of valve [REDACTED] by December 11, 2025. Valve [REDACTED] was not repaired or replaced until April 29, 2026. JBA must thoroughly investigate hydrant lateral row [REDACTED] to determine the point and cause of the failure.

MDE denies the July 14, 2026 Facility [REDACTED] hydrant loop test proposal.

It is the responsibility of JBA to submit a viable proposal for MDE review and approval to test Facility [REDACTED] hydrant loop by a method that will not further contribute to the release of fuel or generate further impact to the environment. To assist JBA, MDE provides the following suggestions for consideration to be incorporated in the proposal to test the section of piping from valve [REDACTED] to isolation valve pit [REDACTED]

- Prior to beginning any test on any section of the Facility [REDACTED] hydrant loop, implement the strictest safety protocols in accordance with federal, state, and local regulations and standards established for testing such as ASME. Install pressure relief valves where required and establish and maintain a safety exclusion perimeter. Identify safety protocols to be used in the proposal.
- The proposal should include testing to be conducted under the on-site close supervision of a certified tester with experience in large volume pipeline testing, and if helium is used, helium leak mass spectrometry. MDE will not approve testing except by a certified tester with such experience.
- Isolate and empty the failed section of pipeline located between valve [REDACTED] at the pump house and isolation valve pit [REDACTED]
- Completely purge the line with dry nitrogen to remove fuel vapor from the piping.
- Introduce high purity dry nitrogen, medical grade helium, or a mixture of the two with a minimum of 5% helium to the maximum operating pressure of the piping. Increase the piping pressure in increments of 10 to 25 percent of the total test pressure holding each increment for a minimum of 15 minutes. If using helium, verify helium is detected, at a minimum, at each end of the piping prior to the start of the test. MDE recommends using helium or a nitrogen/helium mix because it allows for the detection of small leaks and has the ability to aid in pinpointing the location of the leak.
- Upon reaching final test pressure, allow the test pressure to stabilize for a one-hour period prior to the start of the test. The test pressure must be held for a minimum period of 24 hours. A longer test period may be required at the discretion of the Department.
- Continually or periodically monitor test pressure and pipeline temperatures for the full test period, a minimum of 24 hours, maintaining a record. MDE recommends monitoring, at a minimum, at each end of the pipeline.
- At the conclusion of the test, there should be no loss of pressure.

Helium Use

- If using helium, the helium detector must be capable of detecting 5 parts per million of helium and be calibrated and checked per the manufacturer's requirements prior to testing.

- If the test pressure drops, the pipeline shall be inspected, while under pressure, using an appropriate helium detector. Use the helium detector, at a minimum, to test for helium every 10' along the surface directly above the entire pipeline. Assess locations above the pipeline to ensure there are adequate detection points installing monitoring points as necessary taking into account the structure of all material between the piping and ground surface.
- Test readings shall be collected after the initial pressure is applied and then re-tested at least 24 hours later if no initial detections are observed. A longer test period may be required at the discretion of the Department.

The above comments are suggestions for consideration and to help expedite the investigations which have been moving at a slow pace in violation of MDE directives. MDE provides guidance, technical recommendations, regulatory standards, and oversight regarding the oil storage systems pursuant to its statutory authority to protect human health and the environment. A legal responsibility and liability for the safe operation, physical integrity, routine inspection, testing execution, maintenance, leak detection, spill prevention, containment, reporting, and environmental remediation associated with any oil storage system located at or operated by Joint Base Andrews rests with the facility owner and operator pursuant to applicable federal and state laws.

If you have any questions, please contact the Oil Control Program at 410-537-3442.

Sincerely,



Arno Laud, Program Manager
Oil Control Program
Land and Materials Administration

cc: Ms. Susan R. Bull, Chief, Remediation Division, Oil Control Program
Ms. Jackie L. Ryan, Chief, Compliance Division, Oil Control Program