

CSS 14933

ATTACHMENT J-0200000-05
FORMS

CERTIFICATION OF WORK

(To be completed by the Contractor and saved in the Contractor's CMMS)

FACID/Building: WV038 Date of Visit: 1-24-19

Contractor Personnel on Site:

- | | |
|---------------------|----------|
| 1. <u>Ray Chain</u> | 4. _____ |
| 2. _____ | 5. _____ |
| 3. _____ | 6. _____ |

Work Performed: EVACUATE VACUUM TEST INTERSPACE @ 4K USF

Preventive Maintenance - Services Completed (Annual, Quarterly, Monthly, equipment identification, etc.)

- | |
|----------|
| 1. _____ |
| 2. _____ |
| 3. _____ |
| 4. _____ |

Inspection, Testing, and Certification

- | |
|----------|
| 1. _____ |
| 2. _____ |
| 3. _____ |
| 4. _____ |

Other Recurring Services

- | |
|----------|
| 1. _____ |
| 2. _____ |
| 3. _____ |
| 4. _____ |

Service Calls – Service Call Number and Description

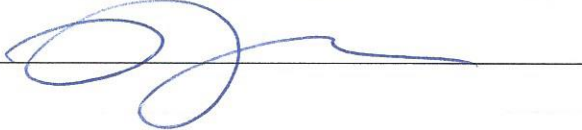
- | |
|---|
| 1. <u>CSS14933 WV038 WO# 7208</u> |
| 2. <u>EVACUATE WATER FROM INTERSPACE</u> |
| 3. <u>VACUUM TEST INTERSPACE @ 4000 Gallon Fuel oil USF</u> |

Over and Above Repair Work – Order Number and Description of Work Completed

CERTIFICATION OF WORK

To be signed by the Contractor:

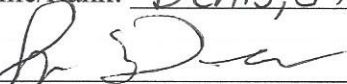
Print Name: RAY CHAIN Date: 1-24-19

Signed: 

To be signed by Facility Manager:

By signing the Certification of Work, the said government representative signature does not constitute acceptance of any work performed by the contractor, it only acknowledges that the contractor was on-site during the identified timeline:

Print Name/Rank: Denis, Shawn Date: 20190124

Signed: 

E-Mail: Shawn.m.denis.mil@mail.mil

APPENDIX C-1

TANK SECONDARY CONTAINMENT INTEGRITY TESTING DRY TEST METHOD

Facility Name: <u>Romney WV USARC</u>	Owner: <u>USARC - 99th RSC DPW</u>
Address: <u>11 Industrial Park</u>	Address: <u>5231 South Scott Plaza</u>
City, State, Zip Code: <u>Romney WV 26757</u>	City, State, Zip Code: <u>FT Dix NJ</u>
Facility I.D. #: <u>WV038</u>	Phone #:
Testing Company: <u>Enfellow Amico</u>	Phone #: Date: <u>1/24/19</u>

This data sheet is for testing the integrity of the dry secondary containment of a underground storage tank (UST). See PEI/RP1200 Section 4.2 for the test procedure.

Tank Number	4000	4000	4000	4000		
Tank Material	STEEL	STEEL	STEEL	STEEL		
Product Stored	#2 FO	#2 FO	#2 FO	#2 FO		
Tank Capacity,* gallons	4000	4000	4000	4000		
Test Start Time	12:46pm	12:48	12:49pm	12:52pm		
Initial Vacuum Reading, inches Hg (See Table 4-1 below.)	5"	5"	5"	5"		
Specified Test Duration (See Table 4-1 below.)	<input type="checkbox"/> 1 hour <input checked="" type="checkbox"/> 2 hours	<input type="checkbox"/> 1 hour <input checked="" type="checkbox"/> 2 hours	<input type="checkbox"/> 1 hour <input checked="" type="checkbox"/> 2 hours	<input type="checkbox"/> 1 hour <input checked="" type="checkbox"/> 2 hours	<input type="checkbox"/> 1 hour <input type="checkbox"/> 2 hours	<input type="checkbox"/> 1 hour <input type="checkbox"/> 2 hours
Test End Time	12:47pm	12:49pm	12:52pm	12:55pm		
Final Vacuum Reading, inches Hg	0"	0"	0"	0"		
Is the Annular Space Dry After the Test?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Test Results	<input type="checkbox"/> Pass <input checked="" type="checkbox"/> Fail	<input type="checkbox"/> Pass <input checked="" type="checkbox"/> Fail	<input type="checkbox"/> Pass <input checked="" type="checkbox"/> Fail	<input type="checkbox"/> Pass <input checked="" type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail

TABLE 4-1

Vacuum, inches Hg	Capacity, gallons	Duration, hours
10	<20,000	1
	20,000+	2

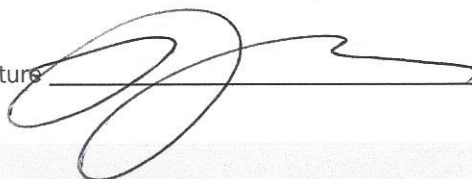
Comments:

*Total tank capacity, including all compartments in a multi-compartment tank.

Tester's Name (print)

Ray Chain

Tester's Signature



Fratello & Amico, Inc.

3709 Darby Road
Bryn Mawr, PA 19010
Phone: 610-520-2270 • Fax: 610-520-2277

January 26, 2019

Mr. Bernard W. Koblinsky
Project Manager/99th – Region 4
CMI Management, Inc.
5285 Shawnee Road, Suite 510
Alexandria, VA 22312

RE: CSS #14933, WV038, Updated Report of Underground Fuel Oil Storage Tanks Investigations and Repairs, Romney USARC, 11 Industrial Park Road, Romney, WV 26757

Dear Mr. Koblinsky,

We are pleased to submit the following updated report of our findings for Investigation, Diagnosis and Repairs to the facility Underground Fuel Oil Storage Tanks, Probes and Monitoring Equipment.

Background: We originally visited this facility on Wednesday, November 28, 2018 to assess the initial work order and returned on Tuesday, December 18, 2018 and commenced a more in-depth investigation into the warnings on both UST Monitoring Panels.

Our investigation revealed that the Reserve Center is equipped with a 4,000 gallon (64" x 288") double wall underground storage tank which was programmed into operation on September 12, 2000. The monitoring panel indicates a lost signal with probe 2, which is the interstitial space leak monitoring probe for the tank.

The interstitial space was accessed and found to contain 57" of water, this is always supposed to be dry. The probe was removed and dried and retested but found to be inoperative.

While we were on site, we verified the operation of the fuel level probe as well. The panel indicated that the tank contained 23" of fuel and no measurable water. Our stick measurements indicated the same, therefore the panel and Probe 1 appear to be working properly.

The OMS is equipped with a 2,500 gallon (64" x 179") double wall underground storage tank which also was programmed into operation on September 12, 2000. The monitoring panel indicates a lost signal with probe 1, which is the tank level monitoring probe for the tank. The panel indicated that the tank contained 39.89" of fuel and no measurable water. Our stick measurements indicated 40 ½" of fuel, virtually the same, therefore the panel and Probe 1 appear to be working properly. While we were on site, we verified the interstitial space was dry.

The presence of water in the interstice of the 4,000 gal. UST is alarming and should be addressed immediately, however the failure of the leak probe is not surprising given their age. We offered to provide a proposal to address the interstice issues within 24 hours. While the OMS is indicating level sync discrepancy, it is still accurate. Regardless, physical stick measurement of tank levels before ordering and delivery of fuel should always be performed. We attached tank charts for both the 2,500 and 4,000 gallon tanks based on the programmed sizes.

On a related issue, both of the monitoring panels are running software from 1999, the manufacturer no longer provide this model panel and replacement parts are slowly being discontinued. The monitors have lost power many times in the past and are not indicating the actual date and time. The Center is off by around three months but the OMS is off by four years. The setup is password protected and password is not readily available.

We offered to provide a proposal to reinstall updated software for both of these panels, however given their age and diminishing technical support, understand that the drive hardware and or software could fail during the attempt. We also stated that in the event the testing of the interstitial space shows the tank integrity remains intact, you should consider upgrading both monitoring panels.

On Wednesday, December 26, 2018, we submitted a limited scope proposal to evacuate the interstice of the 4,000-gallon UST and perform a vacuum test on it to assess its integrity. We deferred addressing the other issues with the monitoring panels and sensors until tank integrity was determined. On Tuesday, January 22, 2019 we were given a Notice to Proceed with the limited scope investigation under CSS#14933, WO#7208, on Asset#7787.

Site Service: We mobilized to the facility on Thursday, January 26, 2019, and commenced our investigation. The interstice was evacuated and found to contain approximately 100 fluid ounces of water without a trace of hydrocarbons.

We setup our vacuum gauges and vacuum source and at 12:46pm, pulled 5" of vacuum on the tank interstice. As we were starting the paperwork to record the test, we noticed that the vacuum had almost immediately been lost.

Tanks can lose vacuum initially due to deflection of the sides or ends, so we immediately re-established vacuum on the space.

Again, it was lost quickly, and again we re-established. This was repeated four times, all of which were failures.

At 7:30pm we emailed ENV and OPS personnel the photographs of the four tests and failures.

Conclusions and Recommendations:

Note: While we do not have access to the original construction drawings and details, based on our site investigation and testing, it is reasonable to assume that this 4,000 gallon UST is essentially a single wall steel tank without the benefit of secondary containment or leak detection monitoring.

A catastrophic loss of fuel oil could occur below ground without any signs or warnings whatsoever.

It is critical that the Corp, or whomever is responsible for the facility, treat this with the utmost urgency.

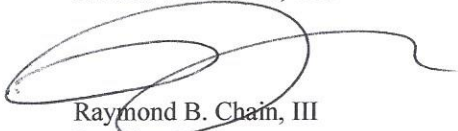
A proposal to test the interstice of the 2,500-gallon UST will be submitted later today.

Attachments: Vacuum Test Report
Photos of the Tests

Thank you for the opportunity to be of service, please feel free to call with any questions.

Sincerely,

Fratello and Amico, Inc.



Raymond B. Chain, III
President