

Fort Bragg ILLICIT DISCHARGE DETECTION AND ELIMINATION PROCEDURE MANUAL



**Prepared by
Directorate of Public Works
Environmental Division
Water Management Section
2020**

TABLE OF CONTENTS

	List of Abbreviations and Acronyms	v
1.0	Introduction.....	1-1
1.1	Background and Purpose	1-1
2.0	Stormwater Drainage System Map	2-1
3.0	IDDE Policy.....	3-1
3.1	Illicit Discharge Definition	3-1
3.2	Fort Bragg Illicit Discharge Prohibition Policy	3-3
4.0	Illicit Discharge Detection Procedures	4-1
4.1	Reporting	4-1
4.2	Employee Training and Public Education	4-1
4.3	Dry-Weather Field Screening	4-2
4.3.1	Responsibility.....	4-2
4.3.2	Dry Weather Inspection Schedule.....	4-2
4.3.3	Dry weather Inspections.....	4-4
4.3.4	Documentation	4-8
5.0	Illicit Discharge Investigation	5-1
5.1	Responsibility	5-1
6.0	Illicit Discharge Elimination.....	6-1
6.1	Responsibility	6-1
6.2	Eliminating Illicit Discharges	6-1
6.2.1	Structural Issues	6-1
6.2.2	Operational Deficiencies.....	6-1
6.3	Enforcement Actions	6-2
6.4	Documentation.....	6-3
6.5	Manual Review	6-4
7.0	References.....	7-1

APPENDICES

Appendix A	Stormwater Drainage System Maps
Appendix B	Stormwater Illicit Discharge Prohibition Policy Statement and EMP
Appendix C	Illicit Discharge Detection and Elimination Forms

LIST OF TABLES

Table 4-1. MS4 Outfall Inspection Schedule, Fort Bragg.....	4-3
---	-----

LIST OF FIGURES

Figure 3-1. Examples of Illicit Discharges.....	3-2
Figure 4-1. Example Rainfall Data Output, Fort Bragg.....	4-5
Figure 4-2. Examples of Levels of Clarity at Outfalls	4-7
Figure 4-3. Floating Solids.....	4-7
Figure 5-1. Illicit Discharge Isolation Observation Steps, Fort Bragg.....	5-2

LIST OF ABBREVIATIONS AND ACRONYMS

ASUS	American States Utility Services
CFR	Code of Federal Regulations
COR	Contracting Officer's Representative
CWA	Clean Water Act
ECB	Environmental Division Compliance Branch
EPA	Environmental Protection Agency
ECA	Environmental Compliance Assistant
ECO	Environmental Compliance Officer
GIS	Geographic Information System
IDDE	Illicit Discharge Detection and Elimination
MS4	Municipal Separate Storm Sewer System
NCDEQ	North Carolina Department of Environmental Quality
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
OWS	Oil/Water Separator
POL	Petroleum, Oils, and Lubricants
RCI	Residential Community Initiatives
SDO	Stormwater Discharge Outfall
TMDL	Total Maximum Daily Load
U.S.	United States
USDA	United States Department of Agriculture
WMS	Water Management Section

1.0 INTRODUCTION

1.1 Background and Purpose

Stormwater runoff from developed land can harm surface water resources by changing natural hydrologic patterns and elevating pollutant concentrations and loadings. Stormwater runoff may contain or mobilize high levels of contaminants, such as sediment, suspended solids, nutrients, heavy metals, and pathogens. To address this problem, the U.S. Environmental Protection Agency (EPA) established stormwater regulations as part of the National Pollutant Discharge Elimination System (NPDES) permits program under the Clean Water Act (CWA), which are implemented through NPDES permits.

The EPA has delegated administration of the NPDES program to the North Carolina Department of Environmental Quality (NCDEQ). Fort Bragg is authorized to discharge stormwater and continue operation of oil water separators not associated with wastewater facilities under NPDES Phase II Permit Number NCS000331 (effective 1 April 2016). This manual has been prepared to support compliance with Part II.D, Illicit Discharge Detection and Elimination, which requires Fort Bragg to “*develop, implement, and enforce a program to detect and eliminate illicit discharges into to the small MS4*”. To ensure compliance with the Illicit Discharge Detection and Elimination (IDDE) requirements of the MS4 Permit, Fort Bragg will follow the procedures outlined in this manual.

The Fort Bragg MS4 program is managed by the Directorate of Public Works (DPW)/Environmental Division (ED)/Compliance Branch (ECB)/Water Management Section (WMS). For any questions regarding the MS4 program or illicit discharges please contact:

Lee Ward
Chief, Water Management Section
Directorate of Public Works
Fort Bragg, North Carolina
Office: (910) 396-2301
Direct: (910) 908-5286
lee.p.ward.civ@mail.mil

or

Bill De Carmine
Water Management Section
Directorate of Public Works
Fort Bragg, North Carolina
Direct: (910) 907-5320
william.p.decarmine.civ@mail.mil

2.0 STORMWATER SYSTEM MAP

Fort Bragg maps its entire stormwater infrastructure using ARC GIS software. This includes MS4 outfalls, storm pipes, culverts, stormwater control measures, and other water features. The water Management Section continuously updates maps and attribute tables. Stormwater infrastructure data is verified through field inspections, surveys, information integrated from CAD files, grading plans, and as-built drawings. After thorough verification, the data is forwarded to the Installation GIS Office for inclusion in the installation's geodatabase. Maintaining an accurate map of the stormwater system allows for easy tracing and locating the source of suspected illicit discharges. Using GIS allows for easily accessed attribute information and layer isolation.

As of October 2020, Fort Bragg has identified 85 non-industrial (also known as MS4 stormwater outfalls or discharge locations), two (2) comingled (i.e., industrial and MS4 activities) outfalls, and 39 industrial outfalls.

Since 2013 Fort Bragg has been contracting out comprehensive watershed studies to survey stormwater infrastructure locations and conditions. Data collected during these surveys is utilized to update the stormwater system GIS data. Updated storm sewer system maps, including the addition of new or reclassified (e.g., industrial to non-industrial) outfalls, will be included in this manual as they are developed. Surveys are programed/scheduled and subject to funding availability, completion might not take place until 2023/2024.

Watershed Surveys

Watersheds	Scheduled	Awarded	Complete
Old Post	FY13	FY14	FY15
SAAF	FY13	FY13	FY14
Tank Creek	FY17	FY17	FY19
Beaver Creek	FY18	FY18	FY19
Big Branch	FY18		
Cross Creek	FY19		
McPherson Creek	FY19		
Young's Creek	FY20		
Patriot Point	FY20		

3.0 Illicit Discharge Policy

3.1 Illicit Discharge Definition

Any discharge to a MS4 that is not composed entirely of stormwater except discharges pursuant to an NPDES permit (other than the NPDES MS4 permit), allowable non-stormwater discharges, and discharges resulting from fire-fighting activities.

Illicit discharges to the Fort Bragg MS4 are typically the result of aging infrastructure; industrial, commercial and/or residential practices spill events. Examples of illicit discharges are illustrated in Figure 3-1 and include (but are not limited to) the following:

- Runoff from improperly stored materials
- Improper disposal of POL's or household chemicals into a storm drain inlet
- Leaking dumpsters flowing into a storm drain inlet
- Old or damaged sanitary sewer line leaking fluids into a cracked or damaged storm sewer line
- Allowing wash water with soaps or detergents to discharge to a storm drain inlet
- Washing silt, sediment, concrete, cement or gravel into a storm drain inlet
- POL's from vehicle accidents
- Foam solutions from firefighting testing and training exercises

Examples of authorized non-stormwater discharges that are not significant contributors of pollutants and are not considered illicit discharges at Fort Bragg include the following:

- Water line flushing
- Uncontaminated groundwater infiltration
- Landscape and lawn irrigation
- Air conditioning condensate²
- Street wash water
- Groundwater from footing drains and crawl spaces
- Flows from firefighting activities
- Discharges from potable sources
- Flows from riparian habitats and wetlands
- Dechlorinated swimming pool discharges

**Sewer Pipe Leaking into a Storm Pipe****Oil Dumped at Storm Drain Inlet****Rinsing Dumpster Residue to Storm Drain Inlet****Discharge from a Vehicle Accident**

Source: Illicit Discharge Detection and Elimination - A Guidance Manual for Program Development and Technical Assessments (CWP, 2004)

Figure 3-1. Examples of Illicit Discharges

Illicit connections to the stormwater drainage system can also generate illicit discharges. Illicit connections are any manmade conveyance that is connected to the MS4 without a permit, excluding roof drains and other similar connections. Examples of illicit connections include, but are not limited to, the following:

- Sanitary sewer piping that is connected directly from a building to the stormwater drainage system
- A cross connection between the sanitary sewer and the stormwater drainage system
- A shop floor drain that is connected to the stormwater drainage system

The frequency of illicit discharges typically occurs within the following three classifications as defined by the EPA (CWP, 2004):

- **Continuous** discharges occur most or all of the time, are usually easier to detect, and typically produce the greatest pollutant load.
- **Intermittent** discharges occur over a shorter period of time (e.g., a few hours per day or a few days per year). Because they are infrequent, intermittent discharges are hard to detect, but can still represent a serious water quality problem, depending on their flow type.
- **Transitory** discharges occur rarely, usually in response to a singular event such as an industrial spill, ruptured tank, sewer break, transport accident or illegal dumping episode. These discharges are extremely hard to detect with routine monitoring, but under the right conditions, can exert severe water quality problems on downstream receiving waters.

Understanding the frequency classifications can help in detecting and eliminating illicit discharges by allowing inspectors to determine if dry weather flows may need additional examination to determine if they should be classified as illicit discharges.

3.2 Fort Bragg Illicit Discharge Prohibition Policy

Fort Bragg is dedicated to detecting and eliminating illicit discharges to the stormwater drainage system. This section defines illicit discharges and outlines the Fort Bragg policy prohibiting illicit discharges.

Ongoing efforts on Fort Bragg have been in place since the inception of NPDES Phase I Permit Program in 1990's. IDDE includes prevention and prohibition, field screening, and investigation procedures.

Deliberate dumping into the stormwater system is illegal under the federal CWA, and is therefore enforceable and punishable by Fort Bragg law enforcement officers and outside entities. Additionally XVIII ABN Corps and Fort Bragg Regulation 200-1 Chapter 12 Wastewater Management calls for Conserving and safeguarding all stormwater collection systems and all bodies of water, whether natural or man-made, including lakes, streams, wells, wetlands, and underground aquifers. Control or eliminate all sources of pollution effecting surface or groundwater quality. Chapter 9 Solid Waste Management Section prohibits littering or illegal dumping of waste. Willful violation of the provisions of XVIII ABN Corps and Fort Bragg Regulation 200-1 will provide the basis for disciplinary action under Article 92, Uniform Code of Military Justice (UCMJ) (Violation of a lawful general regulation for personnel subject to UCMJ) for military personnel, and AR 690-700, Chapter 751, Personnel Regulations and Services (General) (Failure to observe written regulations, orders, rules, or procedures) for civilian employees of the government. All persons, military or civilian, are subject to criminal and civil penalties for violations of these Federal or State statutes.

4.0 ILLICIT DISCHARGE DETECTION PROCEDURES

This section outlines procedures for IDDE incident reporting and dry-weather field screening at the Fort Bragg MS4 outfalls.

4.1 Reporting

All Fort Bragg personnel and residents are encouraged to report illicit discharge and/or illegal dumping activities.

All Illicit discharges/spills, including sewage, are reported to the Fort Bragg Fire and Emergency Services who's personnel are the installation's First Responders, and their telephone number (911) is the primary hotline for reporting illicit discharges/spills. The hotline is manned 24 hours per day, 7 days per week. Fort Bragg personnel can also call Environmental staff (396-2295/396-2141/908-5286). The SPCCP guides the response actions. The Spill Response SOP is followed for investigating, clean up, eliminating these illicit discharges, and reported to NCDNER as necessary (See Appendix C).

Copies of spill reports are stored in the ECB shared electronic Hazardous Waste Team folder.

4.2 Employee Training and Public Education

Fort Bragg's employee training for appropriate personnel, who, as part of their normal job responsibilities, may come into contact with or otherwise observe an illicit discharge or illicit connection to the storm sewer system is as follows.

- Overview Fort Bragg Stormwater Program and Stormwater Pollution Prevention
- Preventing Stormwater Pollution "What Can We Do" Recognizing and Reporting Illicit Discharges.
- Rain Check Stormwater Pollution Prevention Employee Training For MS4's
- IDDE A Grate Concern Illicit Discharge Detection & Elimination Employee Training For MS4's

Fort Bragg established Environmental Public Education in 1995. Environmental Compliance Officer training for Environmental Compliance Officers (ECOs) and Environmental Compliance Assistants (ECAs) in both military and civilian activities. The ECO class last approximately 20 hours and includes: stormwater, pollution prevention, spill prevention, spill response, Hazardous waste, Solid waste, recycling programs, and the maintenance of oil/water separators.

DPW and the family housing management company (Corvias) have periodically distribute information about the IDDE program and how to report via newsletter articles.

4.3 Dry-Weather Field Screening

The Water Management Section conducts dry weather inspections at all storm water outfalls to identify any potential illicit discharges. These inspections are documented on an inspection form (see Appendix B) kept in the WMS office and stored in the Fort Bragg Stormwater Management Database. The results of these inspections are discussed and summarized in the annual report submitted to NCDEQ.

4.3.1 Responsibility

Outfall dry weather inspections are the responsibility of DPW WMS. Contractors hired by the installation perform outfall dry weather inspections.

4.3.2 Dry Weather Inspection Schedule

As required by Section II.B.3c (1) (a) of the MS4 Permit, the stormwater outfalls have been prioritized for screening. The EPA suggests MS4 communities inspect at least 20% of their outfalls per year. Fort Bragg schedules around 5% of their total MS4 outfalls each month. Weather permitting; the goal is to inspect all MS4 outfalls at least once per year.

4.3.3 Dry Weather Inspections

Outfall dry weather inspections field crews will visually inspect each outfall and complete a Dry-Weather Outfall Inspection Form provided in Appendix B. Special attention is paid to outfalls that are flowing when no rain has occurred within the last 72 hours and/or outfalls where foul odors or discolored water is noted. When the screening of an outfall indicates a potential illicit discharge, the Fort Bragg Stormwater Program Manager will be notified so an investigation, as described in Section 5.0, can be performed. Any identified spills or conditions that represent a serious threat to personnel safety or equipment damage will be immediately reported to Fort Bragg Fire and Emergency Services.

4.3.4 Documentation

All field reports will be reviewed and maintained by DPW WMS staff in the Fort Bragg Stormwater Management Database.

A service order request will be submitted vial e-mail or phone to the DPW Operation & Maintenance Division(OMD)/Customer Service Order Desk to address any maintenance issues identified during the outfall screenings. OMD will determine whether the issue can be addressed with a service order or whether an FB Form 4283, Engineering Facilities Work Request, will be required. A blank FB Form 4283 is provided in Appendix B.

5.0 ILLICIT DISCHARGE INVESTIGATION

Potential illicit discharges can be detected through community reporting or outfall inspections as described in Section 4.0. Once a potential illicit discharge has been detected, it becomes necessary to investigate to identify and eliminate the source of the discharge. The investigation may result in the source being easily identified or it may require a more in-depth inspection as outlined in this section.

5.1 Responsibility

In 2012 the Water Management Section developed an Illicit Discharge Detection & Elimination Field Investigation Guide (see Appendix C). The guide lays out procedures for detecting, tracing, and removing sources of illicit discharges. Trained Qualified personnel physically inspect the drainages looking for illicit discharge pipes, seeps, or other suspect flows. Tools to help personnel identify potentially illicit discharges include field test kits to determine chemical characteristics, and the storm sewer map, which shows base infrastructure in addition to other items required by the permit. Field personnel utilize maps to help identify the source of the discharge.

6.0 ILLICIT DISCHARGE ELIMINATION

Fort Bragg is committed to eliminating illicit discharges to the stormwater drainage system. This section outlines mechanisms for eliminating confirmed illicit discharges and enforcement actions that may be enacted to achieve compliance.

6.1 Responsibility

Initiating and verifying the elimination of an illicit discharge is the responsibility of DPW ECB. DPW ECB staff will provide educational materials and advocate for funding when needed to eliminate illicit discharges. Depending on the location and type of discharges, specific elimination actions may be conducted by other organizations including Unit Commanders, ECO's, Housing Management staff (Corvius), the installations Utility Service providers, Electrical - Sandhills Utility Services (SUS), Water/Wastewater - American States Utility Services (ASUS), and Natural Gas – Piedmont Natural Gas (PNG), or other outside contractors hired by the installation.

6.2 Eliminating Illicit Discharges

Illicit discharges are generally the result of either structural issues or operational deficiencies. The mechanism for eliminating a discharge will depend on the discharge type.

6.2.1 Structural Issues

Examples of structural issues that may result in illicit discharges include:

- Illicit connections with the sanitary sewer
- Oil/water separators (OWS) pretreating industrial wastewater discharging to the stormwater drainage system
- Leaking concrete containment berms and/or valves
- High level bypass pipes at sanitary sewer lift stations

Structural issues will generally require a construction action to eliminate the illicit discharge. Repair projects for structural issues will be initiated through completion of a service order request to the Operation & Maintenance Division (OMD) Service Order Desk. OMD will determine whether the issue can be addressed with a service order or whether an FB Form 4283, *Facilities Engineering Work Request*, will be required. A blank FB Form 4283 is provided in Appendix B. Funding for the repair will be determined once the work request has been submitted and reviewed by DPW Business Operations and Engineering Divisions.

6.2.2 Operational Deficiencies

Examples of operational deficiencies that may result in illicit discharges include:

- Washing activities in areas that discharge to a storm drain inlet
- Runoff from improperly stored material
- Illegal dumping
- Dumpster leachate
- Improperly managed secondary containment valves

Elimination of operational deficiencies can be achieved through BMP's such as education, modification of processes, and/or relocation of the discharge generating activities. DPW Compliance Branch staff will work with facility occupants as needed to promote compliance.

6.3 Enforcement Actions

As discussed in Section 3.2 of this manual, illicit discharges to the stormwater system are prohibited by various Fort Bragg policies and instructions. Prohibition is also addressed through contract language with contractors performing work on base. Corrective actions focus first on education to promote voluntary compliance and escalate to increasingly severe enforcement actions if voluntary compliance is not obtained. The Fort Bragg community is comprised of military and civilian personnel and residents and enforcement actions associated with illicit discharges will depend on the organization of the responsible party or parties. Fort Bragg will generally follow a three-step enforcement action policy for confirmed illicit discharges; however, more serious violations or continued, egregious non-compliance may warrant a more aggressive approach. Actions conducted under each enforcement step include the following:

- **Step 1: Initial Actions** – DPW ECB will provide documentation (e-mail, Spill Report, Photos) describing the location and nature of the illicit discharge, the date it was confirmed, the required elimination action, and a reasonable timeframe for compliance. If the source of the illicit discharge is due to a structural issue, the documentation will also include a reference to the Service Order Number or a copy of the FB Form 4283 initiated to correct the issue. For military organizations and tenants, the documentation will be sent to the ECO or ECA. For contractor organizations, the documentation will be sent to the Contracting Officer's Representative (COR) overseeing the responsible party. Documentation for illicit discharges occurring in housing areas will be sent to the Residential Community Initiatives (RCI). *Step 1 is not meant to be punitive. It is an opportunity to inform and educate the responsible parties and to encourage voluntary compliance.*

- **Step 2: Intermediate Actions** – If the confirmed illicit discharge has not been eliminated or if the illicit discharge is detected a second time at the facility under the responsibility of the same organization at a later date, ECB will send a “notice of violation” letter regarding the unresolved issues with a second compliance date. For military organizations and tenants, the letter will be sent to the AEC or equivalent. For contractor organizations, the letter will be sent to the COR overseeing the responsible party. Letters for illicit discharges occurring in housing areas will be sent to the RCI. *To the extent possible, Step 2 is meant to bring about an immediate stop to activities generating the illicit discharge until such time that procedures are put in place to prevent future discharges. For contractor activities, Step 2 may result in a stop work order from the COR.*
- **Step 3: Final Actions** – If the confirmed illicit discharge has not been eliminated by the second compliance date or if the illicit discharge reoccurs at the facility a third time under the responsibility of the same organization at a later date, ECB will send a second “notice of violation” letter regarding the unresolved issues. For military organizations and tenants, the letter will be sent to the Unit Commander or equivalent. For contractor organizations, the letter will be sent to the COR overseeing the responsible party. Letters for illicit discharges occurring in housing areas will be sent to the RCI. *Step 3 may result in disciplinary action for military organizations and tenants; loss of contract and/or removal from base for contractors; and loss of housing lease for residents in base housing.*

6.4 Documentation

Digital copies of all enforcement letters and correspondence between all parties regarding the resolution of the illicit discharge will be saved on the ECB shared server.

6.5 Manual Review

Regular review of the IDDE Procedures Manual is important in order Fort Bragg to have an up-to-date standard to use for assessing the overall effectiveness of the IDDE Program for compliance with NPDES Phase II Permit Number NCS000331. The Fort Bragg MS4 Program Plan outlines the procedures for the IDDE program evaluation and assessment. Refer to the MS4 Program Plan for guidance for performing the annual evaluation.

7.0 REFERENCES

Center for Watershed Protection (CWP). 2004. *Illicit Discharge Detection and Elimination - A Guidance Manual for Program Development and Technical Assessments*. Ellicott City, MD: CWP.

Fort Bragg. NPDES Phase II Permit Number NCS000331

North Carolina Department of Environmental Quality (NCDEQ). 2008. *Stormwater Discharge Outfall (SDO) Qualitative Monitoring Report Supplement SWU-242A: Guidance for Rating Stormwater Discharge*. Unknown.

U.S. EPA. 2013. 40 CFR 122, EPA Administered Permit Programs: The National Pollutant Discharge Elimination System. Washington, DC: U.S. Government Printing Office.

Fort Bragg Spill Prevention, Control, and Countermeasure (SPCC) Plan

APPENDIX A

STORMWATER DRAINAGE SYSTEM

MAPS

The Stormwater Drainage System maps are too large to place in this document. The maps can be viewed in pdf or in GIS.

APPENDIX B

ILLICIT DISCHARGE DETECTION AND ELIMINATION FORMS:

- Dry-Weather Outfall Inspection Form
- Fort Bragg Spill Report Form
- Facility Engineering Work Request FB Form 4283

Dry Weather Outfall Inspection

Inspector Name:

Inspection Date:

Last Precipitation Date:

Precipitation:

Outfall ID:

Pipe Diameter:

Outfall Type:

Is apron present?

☐ Yes ☐ No

Apron comments:

If yes: ☐ Concrete ☐ Metal ☐ Trash Guard ☐ No Trash Guard ☐ Other

Is rip-rap present?

☐ Yes ☐ No

Rip-rap condition:

Industrial activities in immediate vicinity of outfall:

Does the outflow allow the free flow of water?

☐ Yes ☐ No

If not, what is obstructing the flow?

☐ Garbage ☐ Sediment ☐ Vegetation ☐ Animal Dens

Indicate any evidence of environmental impacts:

- ☐ Scouring
- ☐ Sediment build-up
- ☐ Garbage entrapment
- ☐ Entrapment of decaying vegetation
- ☐ Illicit discharges

Is drainage occurring?

☐ Yes ☐ No

Drainage Source:

a. Color:

c. Odor:

b. Clarity:

d. Staining:

Identify maintenance needs:

- ☐ Obstruction removal or cleaning
- ☐ Erosion stabilization
- ☐ Apron not intact
- ☐ Visible joints not intact
- ☐ Pitting/rusting/holes present
- ☐ Concrete spalling present
- ☐ Road distress above pipe present
- ☐ Other:

Rate each outfall's need for repair, replacement or maintenance:

Comments:

FORT BRAGG SPILL REPORT FORM

**Directorate of Public Works
Environmental Compliance Branch
Fort Bragg, North Carolina 28310-5000**

Spill Response Incident Number: **9223-2**

This Spill report Form (Form SP-1) should be used to evaluate and document the status of each Ft. Bragg spill. Form SP-1 is used in conjunction with the Spill Response Plan (SRP). The SRP contains general procedures to be followed in the early stages of a spill. Installation Spill Response Team (ISRT) personnel should transition to the Installation Spill Contingency Plan (ISPC), Facility Response Plan (FRP) and Spill Prevention Control and Countermeasures Plan (SPCCP) after appropriate notifications and response actions are underway.

1a. DATE OF SPILL (ex., 01-Jan-08)		1b. TIME OF SPILL (H:M:M)	
2a. BUILDING LOCATION	2b. BUILDING NUMBER	2c. BUILDING COORDINATE	
3a. PRODUCT SPILLED		3b. AMOUNT / VOLUME SPILLED and UNIT OF MEASURE	
4a. PERSON REPORTING SPILL		4b. TELEPHONE NUMBER	
4c. UNIT OR ACTIVITY		4d. UNIT OR ACTIVITY TELEPHONE NUMBER	
5a. SPILL RESPONDERS			
5b. SPILL RESPONSE EQUIPMENT			
6. CAUSE OF SPILL			
7a. DESCRIPTION OF SPILL			
7b. METHOD OF CLEAN UP			
8. CORRECTIVE ACTIONS TAKEN			
9. SPILL REPORT DOCUMENTED BY			
10. DPW-ENVIRONMENTAL COMPLIANCE BRANCH REPRESENTATIVE			
11a. FORWARDED TO	NC, DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES (Send copy by e-mail to: james.brown@ncmail.net (FACSIMILE (910) 486-0707))		N
11b. FORWARDED TO	ENVIRONMENTAL SUSTAINMENT DIVISION (ESD) / DPW-ECB		Y
11c. FORWARDED TO	NATIONAL RESPONSE CENTER (800.424.8802)		N
11d. FORWARDED TO			
12a. DATE REPORT(S) E-MAILED (DD-MM-YY)		12b. TIME REPORT(S) E-MAILED (H:M:M)	
13. ADDITIONAL INFORMATION			

FACILITIES ENGINEERING WORK REQUEST For use of this form, see DA Pam 420-6: the proponent agency is OACSIM																	
PART A (See Requestor Instructions)		CUSTOMER ID	DOCUMENT SERIAL NUMBER	FY	TYPE	SUMMARY OF WORK FOR TITLE						DATE					
												DA	MON	YR			
INSTALLATION ABBREVIATION OF FACILITIES		BUILDING/ FACILITY NUMBERS															
		1	2	3	4	5	6	7	8	9							
REMARKS: This project will comply with Title 10, USC Section 2461, for maintenance, repair and construction contracts for real property using Operations & Maintenance funds.																	
ORGANIZATION BENEFITING FROM WORK				SENIOR ENGINEERING REP. NAME				SENIOR ENGINEERING REP. EMAIL ADDRESS				SENIOR ENG REP PHONE #					
WORK DESCRIPTION (Description and justification of work requested)																	
WORK REQUEST POINT OF CONTACT (NAME, PHONE, EMAIL)							WORK REQUEST ALTERNATE POINT OF CONTACT (NAME, PHONE, EMAIL)										
PART B (APPROVING OFFICIAL ONLY)		CHAMPION PROGRAM:				FUNDING PLAN DOCUMENT:				DATE							
		FUNDING SOURCE:								DAY	MON	YR					
		PPSID:				MDEP:											
		ISR#:				WBS ELEMENT (for main work effort):											
NEPA DOCUMENTATION REQ'D			WORK TO BE PERFORMED			WORK BUDGET		APPROVAL AMOUNTS				REIMBURSABLE SOURCE OF FUNDS					
YES	NO		<input type="checkbox"/>	IN-HOUSE DESIGN	CLASS	TERMS	FUNDED	UNFUNDED									
<input type="checkbox"/>	<input type="checkbox"/>	RECORD OF ENV CONSIDERATION	<input type="checkbox"/>	SELF-HELP	Repair	Sustain	\$		\$			<input type="checkbox"/>	GFEBs				
<input type="checkbox"/>	<input type="checkbox"/>	EA INITIATED	<input type="checkbox"/>	CONTRACT	Repair	Restore	\$		\$			<input type="checkbox"/>	MIPR				
<input type="checkbox"/>	<input type="checkbox"/>	EA COMPLETED	<input type="checkbox"/>	TROOP	New	Modern	\$		\$			<input type="checkbox"/>	CHECK with SERVICE AGREEMENT				
					BOS	M/ J acct	\$		\$			WORK BREAKDOWN STRUCTURE					
						TOTAL						DESIGN:					
												PREAWARD:					
DESIGN APPROVAL (Please type or print name)				DATE		APPROVAL AUTHORITY (Please type or print name)						APPROVAL ACTION		DATE			
				DA	MON	YR							<input type="checkbox"/> APPROVED		DA	MON	YR
DESIGN APPROVAL SIGNATURE						APPROVAL AUTHORITY SIGNATURE						<input type="checkbox"/> DISAPPROVED					

APPENDIX C

Illicit Discharge Detection & Elimination Field Investigation Guide

APPENDIX D

SPILL RESPONSE AND REPORTING PROCEDURES

**SPILL PREVENTION, CONTROL, AND
COUNTERMEASURE PLAN (SPCC)/
FACILITY RESPONSE PLAN (FRP)**

APPENDIX D

**Spill Response And Reporting Procedures/
Forms And Discharge Report To NCDENR
And U.S. EPA Regional Administrator**

**FOR
Fort Bragg, North Carolina**

Contract No. W912HN-12-D-0032 TO 0005

Prepared For:



U.S. Army Corps of Engineers, Savannah
100 W. Oglethorpe Avenue
Savannah, GA 31401-3640

December 5, 2014

Prepared by:



Applied Sciences and Information Systems, Inc.
209 Business Park Drive, Suite 200
Virginia Beach, VA 23462
757-498-0100

the submission of this data, the Government will have the right to duplicate, use, or disclose the data to the extent provided in the contract. This restriction does not limit the Government's right to use information in the data if it is obtained from another source without restriction or contained in the proposal in its entirety.



UNIT-LEVEL SPILL RESPONSE PROCEDURES**

(Applicable to ECOs, ECAs and other Container Area Managers)

In the event of a spill, individuals will take the following actions:

1. Determine what type of material has been spilled.
2. Weigh all safety factors; check MSDS to determine health and physical hazards.
3. If it is not safe to begin spill response or if the spill too large for you to contain:
 - Call the Fort Bragg Fire Department at 911.
 - Notify supervisor.
 - Wait for assistance.
4. If safe for you to begin spill response:
 - Ensure your personnel have the proper personal protective equipment.
 - Contain the spill (plug leaks or set container upright).
 - Use spill absorbent or appropriate spill pads/booms to contain spill.
 - Sweep up absorbent and properly dispose of contaminated pads/booms.
 - Turn in contaminated absorbent/materials to the DPW Hazardous Waste Office.
5. In the event of a fire:
 - Call 911 immediately.
 - Evacuate the area.
 - Notify supervisor.
 - Provide a copy of hazardous material inventory to fire fighters upon arrival.
 - Do not attempt to put out chemical fires – conventional fire extinguishers may make the situation worse.

Any spill of fuel, solvents, oxidizers, acids, highly flammable materials, or any spill over **FIVE (5)** gallons requires immediate notification of the Fire Department (911) and DPW. (396-2295/396-2141)

Contact the Fire Department **IMMEDIATELY** if anything enters storm drains, sewer system or any other waterway (creek, lake, pond, ditch, etc.) during a spill.

Never attempt to clean a spill without using the proper protective gear (gloves, goggles, etc.)

Spills over 5 gallons must be verified by DPW, even if cleaned up by unit.

NEVER conceal spills from DPW - Failing to report spills may result in fines from NCDENR and US EPA as well as civil/criminal penalties for willful neglect.

***This information was obtained from the Fort Bragg ECO/ECA Environmental Compliance Guide (Version 2, October 2006)*

SPCC PROGRAM MANAGEMENT-LEVEL SPILL REPORTING REQUIREMENTS (Cont.)

(Applicable to ECB Personnel and Senior Post Officials)

Both federal regulations and North Carolina regulations include specific requirements for reporting releases of petroleum, oil, and lubricants (POLs). These reporting requirements are distinct, where the circumstances of one POL release may need to be reported only to the State of North Carolina, another may need to be reported only to a federal agency.¹ **But in most cases where reporting is required, both the state and federal authorities must be notified.** When the circumstances of a particular release require reporting under both state and federal criteria, notification of just one of the agencies is not sufficient to meet the legal reporting requirements. Details of POL release reporting requirements at the state and federal levels, as well as internal Fort Bragg reporting requirements are summarized below. Contact information for agencies is presented in a table that follows the text.

Fort Bragg Internal Reporting Requirements

All POL releases of five (5) gallons or more must be immediately reported to the Directorate of Public Works (DPW) Environmental Compliance Branch (ECB) by telephone, (910) 396-2295/2141. Additionally, the ECB staff that respond to the release must complete a Fort Bragg spill report form within 24-hours following the completion of response actions. The form should be stored in the spill binder.

Furthermore, should a release trigger either or both of the governmental spill reporting requirements described in the sections below the ECB must also be immediately notified by telephone. The SPCC Team Leader or competent designee will determine which agencies and/or organizations must be notified and complete the required reports for submittal.

Note that the actual notifications to a governmental agency or to Headquarters are to be made **only by ECB**, or by senior command in consultation with ECB.

North Carolina Reporting Criteria

The North Carolina general statutes at NCG 143-215.85(b) requires that any oil spill be reported that meets any one of the following criteria:

- Causes a sheen on any surface water (ditch, stream, pond, OR
- Is greater than 25 gallons, regardless of location.

Additionally, if the petroleum released or spilled:

- Is less than 25 gallons,
- Does not cause a sheen on nearby surface water, AND
- Is more than 100 feet from all surface water bodies,

¹ There are federal and state requirements for reporting certain releases of non-POL chemicals and substances as well, but releases of these types are not addressed in this Plan. If a release occurs involving a non-POL chemical or substance, untreated domestic or industrial wastewaters, or a material regulated as hazardous waste, these releases may have reporting requirements as well under the federal "reportable Quantity" (RQ) rules, under North Carolina NPDES rules, or under federal/state RCRA rules. Upon discovery of such non-POL releases ECB and/or the Fire Department should be notified, but response actions and governmental notifications are not specified for these types of incidents in this Plan.

SPCC PROGRAM MANAGEMENT-LEVEL SPILL REPORTING REQUIREMENTS (Cont.)

(Applicable to ECB Personnel and Senior Post Officials)

THEN the person who owns or has control over the oil must immediately take measures to collect and remove the discharge. If it cannot be cleaned up within 24 hours of the discharge or if it later causes a sheen on nearby surface water, the person must immediately notify the NCDENR.

