Robert Largent Exchange Environmental Engineer October 2019

40 CFR 280 & The Exchange

Presented to: 2019 FES



Robert Largent

- > BS Environmental Science (Wichita Falls, TX)
- > MS Industrial Management (Tahlequah, OK)
- > Working with gas stations since 2002
 - > AAFES Environmental Engineer since 2013
- > Trained over 500 Federal & State UST Inspectors
 - > UST Installation, Inspections, removals/Site remediation
 - YouTube videos, LinkedIn Group, PEI Forum Moderator
- Participated in creating EPA UST regulations
- > Multiple certifications, licenses, etc
 - > CHMM, NACE, EPA, Sanitarian, GIS, now working on PMP





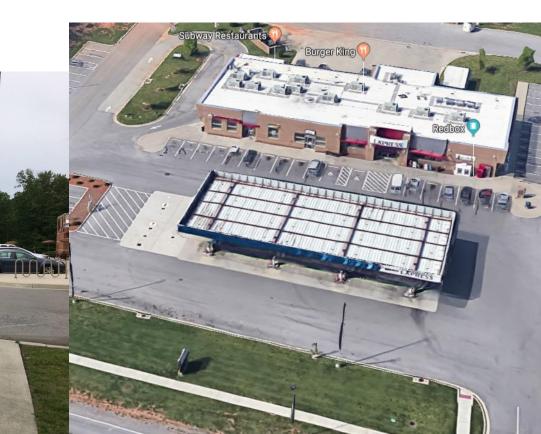


Topics

- > The Exchange (AAFES)
- > Exchange Gasoline Dispensing Facilities (GDF)
- Roles and Responsibilities on Military Installations
- > How the Exchange is meeting new UST requirements
- > Final Thoughts

FXPRESS

Questions











- The Exchange is a Department of Defense organization that provides tax-free shopping and services to an exclusive customer base of more than 12 million military members and their families.
 - > Since 1895 had many names
 - > Army & Air Force Exchange Service (AAFES)
 - > BX/PX
 - > The Exchange

> The Department of Defense's largest retailer

- > 62nd largest retailer in the U.S
- > #36 Convenience store?
- The Exchange gives two-thirds of its earnings to the Army, Air Force, Navy and Marines through Morale, Welfare and Recreation programs













- > The Exchange is a non-appropriated funded government entity that is part of the Department of Defense
 - > ~2% of budget from US Government
 - > 98% of budget is self generated
 - > Associates are Department of Defense (DoD) Federal employees
 - Job listings: ApplyMyExchange.com
- Governed by a Board of Directors responsible to the Secretaries of the Army and Air Force
- > 100% of Exchange earnings support the military community.
- > Serving troops worldwide
 - > We go where you go
- > Store locations
 - > Army, AF, Navy, Marines, Guard
 - > DLA, Reserves, Etc...



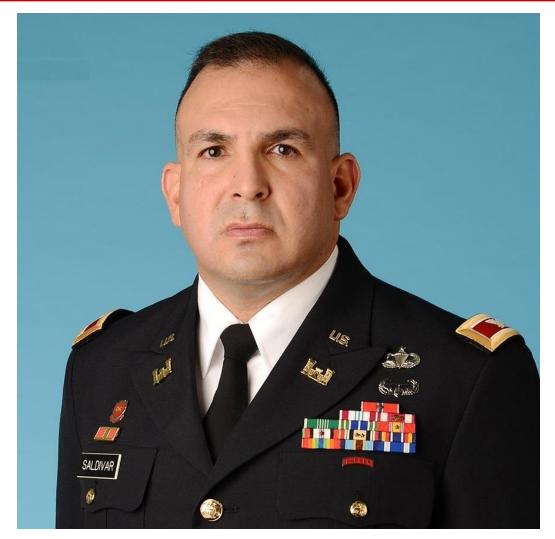


> The Exchange operates more than 4,000 facilities in 33 countries including

- > 122 main stores
- > 165 Military Clothing stores
- > 589 convenience stores and specialty stores that carry furniture, outdoor living merchandise and more
- > 77 movie theaters
- > 1,700+ quick serve restaurants
- > 3,800+ mall stores and kiosks
- > Bakeries, water bottling, warehouses, Airline Catering, etc..
- 85% of the Exchange's 35,000 associates are connected to the military
 - Nearly 11,800 Veterans and military spouses work for the Exchange
 - There are 73 military authorizations in the Exchange. 54 are located in Dallas, Texas at Exchange HQ.*







COLONEL JUAN M. SALDIVAR Command Engineer



Exchange Contingency Support – Europe/Africa

Legend



- **DOX-T Troop Store** Zagan, PL (2017)
 - Powidz, PL (2017)
 - Setermoen, Norway (2018)
 - Vaernes, Norway (2018)
 - MK, Romania (2013)
 - Camp Bondsteel, Kosovo (1995) >
 - Film City, Kosovo (1995)
 - CMLT, Kosovo (2015)
 - NSTA, Bulgaria (2015)
 - Camp Butmir, Bosnia (1995)
 - Embassy Sarajevo, Bosnia (1995)
 - Embassy Cairo, Egypt (2006)



Mobile Field Exchange (MFE)

- BPTA, PL
- Torun, PL
- DPTA, PL
- Trzebien, PL
- Swietoszow, PL

Rodeo/Exchange Retail Truck (ERT)

- Redzikowo, PL
- Skwierzyna, PL
- Camp Nothinghill, Kosovo

AAFES Imprest Fund Activity (AIFA)

- Akrotiri, Cyprus
- JMTG-U, Ukraine
- Site G, Turkey
- Site K, Turkey
- Garoua, Cameroon
- Agadez, Niger
- Sidi Ahmed, Tunisia
- Niamey, Niger



Our Logistics Operations Span the Globe



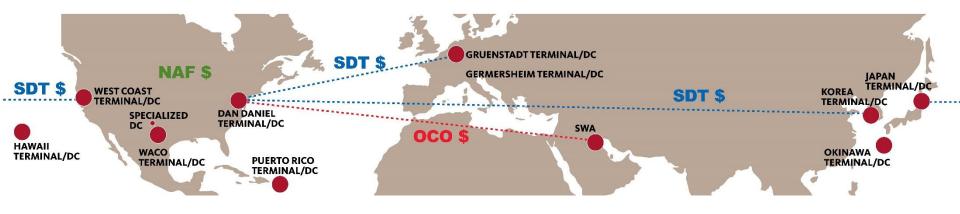
The Exchange is the Third Largest Shipper in the Defense Transportation System

12th Largest Retail
Private Fleet in U.S.
340 Exchange Tractors
1,730 Exchange Trailers
14M Miles Driven

10 Distribution Centers2,527 Associates48M Cases Shipped

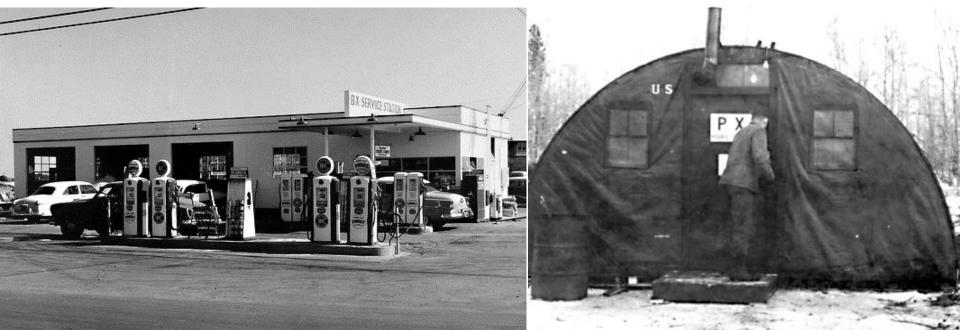
35,835 Containers Exported

4,096 Containers Imported





- Mission: We go where you go to improve quality of life through the goods and services we provide.
- Vision: To be the preferred retail and services provider for the military family through extraordinary customer service and value pricing.
- Core Values: Family Serving Family, Respect Everyone, Courage to Use Good Judgment.





> Operation Iraqi Freedom

- Darren Braswell killed in the line of duty and five other AAFES associates wounded in the line of duty in Iraq
 - Received Defense of Freedom medals, the civilian equivalent of the Purple Heart.





) Online

- https://www.shopmyexchange.com/
- > Honorably discharged Veterans of all United States Armed Forces, including the Air Force, Army, Navy, Marines and Coast Guard as well as the Air Force Reserve, Army Reserve, Navy Reserve, Marine Corps Reserve, Coast Guard Reserve and National Guard.

In Store or online

- > 2019 National Defense Authorization Act
 - Tentatively: All service-connected disabled veterans, Purple Heart recipients, former prisoners of war and primary veteran caregivers will be eligible to shop at commissaries and exchanges
- > CAC Card



2018 BY THE NUMBERS





We go where you

EXCHANGE



85% ASSOCIATES CONNECTED TO MILITARY 1,400 WOUNDED WARRIORS HIRED SINCE 2010 4,768 ASSOCIATES DEPLOYED TO COMBAT ZONES SINCE 9/11

SERVICES

1,358 VETERANS HIRED

EXCH

11,799 7 PLANTS 2.5M 9.9M ETERANS/SPOUSES PROVIDING BAKED GOODS/ SCHOOL LUNCHES SERVED BAKERY ITEMS PRODUCE WATER OVERSEAS AT OR BELOW COST BAKERY OVERSEAS

1.1M COMBAT UNIFORMS OUTFITTED AT COST

107.5M MEALS SERVED AT EXCHANGE RESTAURANTS 8.1M HAIRCUTS PROVIDED 4.2M GALLONS OF BOTTLED WATER OVERSEAS



Exchange GDF



Figure A3-49. Mather AFB, California, opening of new service station 8 August 1955. Pictured (I. to r.) are: Shirley Norberg, attendant; MSgt. Fred Slaten, Hq. Air Base Group, customer; Jean Eudy and Roberta Ryan, attendants. (USAF photo, AAFES Archives)



2018 Worldwide GDF Universe

> 207 Gas Stations in US

- > ~495 UST's
- > ~ 52 AST's
- > ~ 24 AST's in Vaults

> 26 gas stations in Europe

- > ~80 UST's
- > 23 gas stations in PAC
 - > ~60 UST's
 - > ~3 AST's (Kerosene)



- > Over 4 million gallons of fuel storage capacity
- Sold more than 445 Million Gallons in 2018
- > Exchange and UFC standard design specifies UST's
 - > Like all major convenience stores
 - > AST's and Vaults are not typically used at Retail locations.
 - ~ Some locations or tanks may be temporarily out of service



Worldwide Fueling Universe

> Distribution Centers for Exchange fleet

- > 4 UST's
- > 1 AST

Switch Points for Exchange fleet

> 2 UST's

Emergency Generators

> 10 UST's

Bakery

> 2 UST's

> Service

> 8 UST's (Waste Oil)

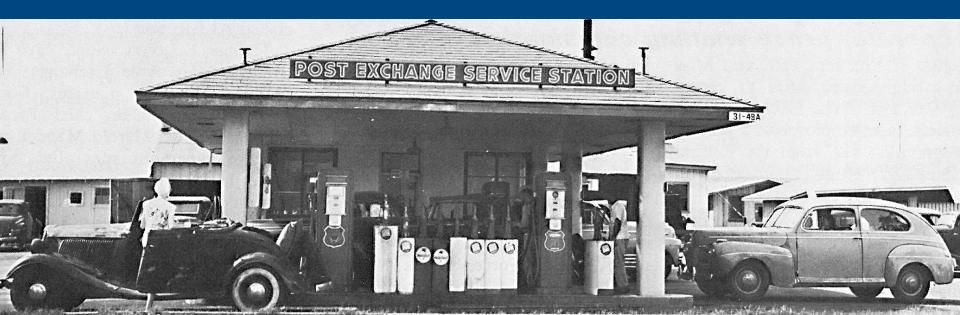
FMO

> 1 AST











Roles and Responsibilities

- Military owns real property on military installations
 - > Real Property relates to land and structures on that land, and includes undeveloped land, office buildings military holdings and more.

> The Exchange

- > Builds new facilities
 - > Facility projects need BoD and Service approval (DD 1391)
- > Real property
 - > Site becomes Real Property when opened
- > Typical Real Property at Gas Stations
 - > UST
 - Double walled systems
 - > FRP tanks
 - > FRP or Flex piping
 - > Sumps
 - > Veeder-Root ATG





- DoD regulations do not allow the Exchange to own real property on Military Installations
 - > The Exchange builds the facility, then turns it over to the Military

> The Military is the Owner of the gasoline dispensing facilities

- > Maintain Environmental Compliance
- > Maintain and repair fueling equipment
 - > Dispensers belong to Exchange except at R&I locations
- > Test and maintain equipment to meet UST regulations
- > Environmental remediation

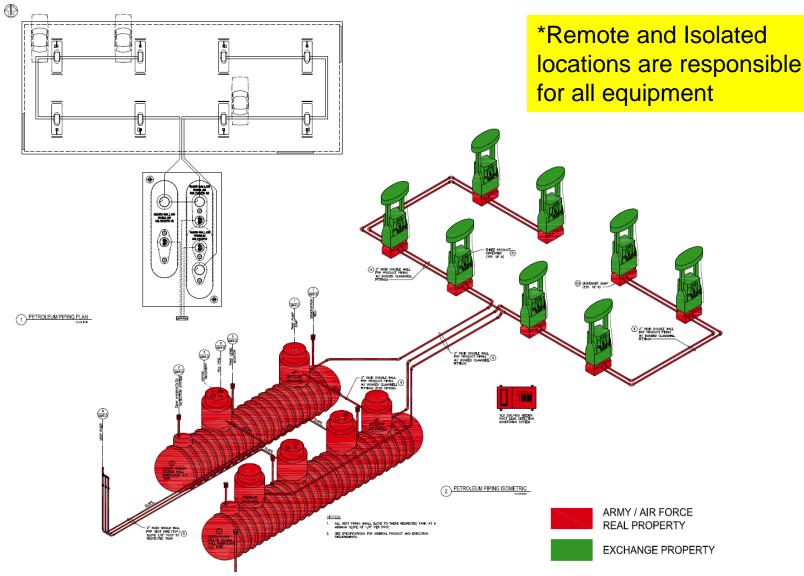
> The Exchange is the Operator

- > Maintain Operator Training certifications
- Monitor Veeder-Root for releases
- > Respond to emergencies and releases
- > Conduct walkthrough Inspections





Fuel System Responsibilities



Equipment in red belongs to the Installation and should be identified to drive a sustainment requirement per the FSM 3



Meeting new UST requirements

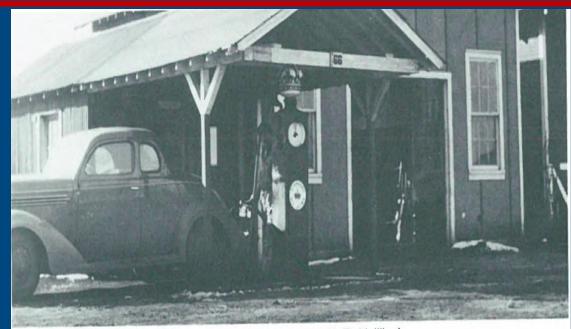


Figure A3-47. Chanute Army Air Field, Illinois, gas station and "Lubritorium." First completed in 1917, the lubritorium was completed in April 1936. (AAFES Archives)



Fuel System Responsibilities

- Maintain Environmental Compliance Records
- > Maintain Operator Training certifications
- Conduct walkthrough Inspections
- Monitor for releases
- Respond to emergencies and releases





Gas Happens

EXPRESS



> Three Binder Record Keeping System

Fuel System Recordkeeping Requirements							
Binder #1 Permanent and Training Records	Binder #2 Operations, Testing and Inspection Records	Binder #3 Repair and Maintenance Records					
TABS	TABS	TABS					
Notification Form	30 Day Release Detection Results	Work Orders					
Tank Registrations	Walk Through Inspection Checklist	Maintenance Records					
Facility Spill Response Plan	Annual Line Leak Testing Results	Repairs					
Site Plans/Drawings	Annual Tests and System Inspection	Dispenser Calibrations					
Permits	Three Year Test Results NESHAP, Sumps, Spill Buckets	Operating Manuals					
Operating Licenses	Inspection Reports	Insite 360 Instructions					
LEX Training Records	Aboveground Storage Tank (AST) Inspection Records	Stage II VR (if installed) CARB Executive Order					
EOP 36-03	Alarm Response Log	Stage I and/or II Inspection Records					
Tank Charts	Class A/B/C Operator Certifications	UST system compatibility with renewable Fuels					



Training

> Managers at all Exchange GDF's

- > LEX-175S Fuel Management Training
- Annually

> All Associates at all Gas Dispensing Facilities

- > LEX FM01- Fuel Emergency Response
- Annually

Managers with UST's

- > Class A & B Operator Training (Except CA)
 - > Must be certified within 30 days of assuming position
 - > Look for reciprocity
 - > Free to \$150

> All Associates at Exchanges with UST's

- > Class C Operator Training
 - > Must be certified before assuming duties
 - Free to ~\$15
 - LEX FM01- Fuel Emergency Response, meets this criteria in many states 28





Walkthrough Inspections

40 CFR §280.36

- > (a)(1)(i) Every 30 days inspect
 - > (A) Spill Prevention Equipment
 - > (B) Release Detection Equipment
- (a)(1)(ii) Annually
 - > (A) Containment sumps
 - > (B) Hand held release detection equipment

Exchange

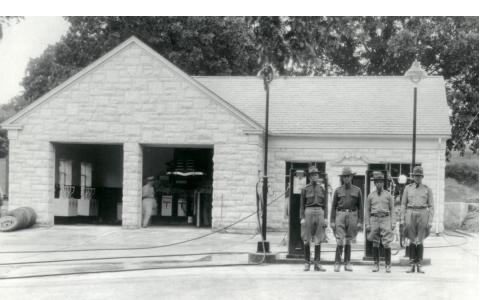
- > 30 Day
 - > Created checklists for Exchange use
 - > Unless State has a checklist
 - > Normal for Class A/B Operator to perform
- > Annual
 - Some can be done by Class A/B
 - Most require a contractor to test equipment





> We made our own checklist

- > Modeled on PEI RP 500 & 900
- Took out sections that didn't apply
- At a minimum our sites inspect when staffed (Daily/Weekly)
- Recommend to do Tank fill area checks during/after deliveries



	DETAILED UST SYSTEM INSPECTION CHECKLIST		
Category	Description	Reference	PEI RP 900
Leak Dete	· · ·		6.4
TLS 450+	Automatic Tank Gauge/Leak Detection Uni	t	
	Power is On		6.4.1.1
	No Warnings or Alarm lights		6.4.1.2
	There is an inventory printout for each tank that appears accur	ate	6.4.1.3
	Printer has paper and is working (If ATG uses printer)		6.4.1.4
inventory	Daily Inventory Reconciliation		
	Inventory Records reconciled daily and within variances		6.4.4.1
Fank Fill A	lrea		6.5
Fill Cover	Small manhole over fill pipe/spill bucket		
	Cover in place and not broken		6.5.1.1
	Cover color coded for product and on correct product		6.5.1.2
Spill Area	Containment area around fill pipe		
	No dirt, trash, water or fuel		6.5.2.1
	No cracks, rusting, bulges or holes		6.5.2.2
Fi ll P ipe	Dry Break or Drop tube for fuel delivery in Spill bucket		
	Cap locked		6.5.3.1
	No obstructions inside fill pipe		6.5.3.2
Spill Kits	Barrels with emergency spill materials		
	Restocked all used items		
	Use this form to record daily UST System inspections each r	nonth.	
	Refer to link below for detailed instructions		
Reference	http://www.pei.org/sites/default/files/PDF/Appen	dix-A1.pd	[
Reference	http://www.pei.org/rp900		

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Monthly (30 Day) Checklists

MONTHLY UST/AST SYSTEM INSPECTION CHECKLIST

- Require checks for every month of the year
 - Completed by the Class A/B Operator



1015	2141116	1 001/1	101 01	DIENTI			CHECK	LIUT
Facility #						MO/YR		
Location N	Vame						BLDG #	
Address				Installation			State	
Month	Inspections	TLS 450+	Interstitial	Inventory	Water check	Defic	ciencies	Inspector
January								
February								
March								
April								
Мау								
June								
July								
August								
September	r							
October								
November								
December								
	Use this form to record Monthly UST System inspections each year.							
Refer to link below for detailed instructions								
Reference	http://www.pei.org/sites/default/files/PDF/Appendix-A2.pdf							
Reference	http://www.pei.org/rp900							



Daily/Weekly

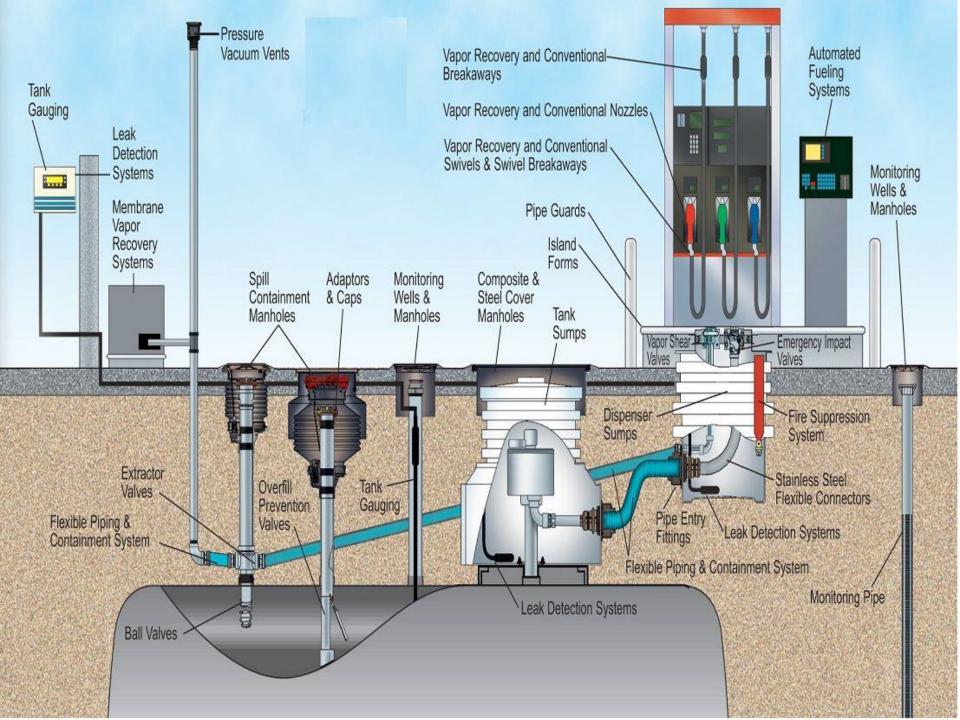
DAILY/WEEKLY UST SYSTEM INSPECTION CHECKLIST

	St	tage I V	apor Re						DAI	LY/WI	EEKLY U	JST SY	STEM	INSPEC	TION	CHECK	LIST
Facility #			301614030			MO/YR	March	2017	Facility #		:	301614030	00		MO/YR	March	2017
Location N				Offutt Expre			BLDG #	902	Location N	ame			Offutt Expre	255	•	BLDG #	902
Address	I	902 Garland		Installation	Offut		State	NE	Address	9	902 Garland		Installation	Offut	tt AFB	State	NE
Day	Nozzle	Hose	Breakaway		Card reader	Defic	iencies	Inspector	Day	TLS 450+	Inventory	Fill Pipe	Spill Area	Spill Kits	Defi	ciencies	Inspector
1	×	 ✓ 	×	✓	~			Largent	1	~	 ✓ 	×	 Image: A second s	×			Largent
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5								Largent	5	×	 ✓ 	×	 Image: A second s	 ✓ 			Largent
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7	 Image: A set of the set of the	 ✓ 	X	 Image: A set of the set of the	 ✓ 	# 7 Unl	Leaking	Largent	7	×	 ✓ 	×	 Image: A second s	×	Buck	et Clean	Largent
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51								Laigent									

FUEL SYSTEM CHECKLIST

D - Daily M - Monthly A - Annually T-Triennial

COMPONENTS	D	м	А	т
DAILY CHECKLIST	WHEN SITE OPEN	DOCUMENT MONTHLY		
Fill Cover Color/Condition	×			
Water in Tanks	~	~		
Inventory Control (If required)	 	✓		
Fill Pipe Cap	~	~		
Spill Kits	 Image: A set of the set of the	 Image: A set of the set of the		
Veeder-Root	~	~	 ✓ 	
Spill Buckets	×	×	×	×
Fuel dispensers	~		CALIBRATE 6 MONTHS	
Monthly checklist		×	12 MONTHLIES	
Tank Leak Test		~		
Piping Leak Test		~		
Tank Vents		~		
Class A/B/C Operator Certificate		×		
Stage I Vapor Recovery		~	~	×
Stage II Vapor Recovery		 Image: A set of the set of the	 Image: A set of the set of the	
Dispenser Sumps		~	~	 Image: A set of the set of the
Drop Tube			×	
Leak Detector			~	
Submersible Turbine Pump			×	
E Stop Test			 	
Site Diagram			×	
Tank Top Sumps			×	×
Overfill Prevention				 Image: A second s





- Environmental Compliance Assessment Program (ECAP) Inspection
 - Loss Prevention Manager performs ECAP Inspection annually to protect the Exchange from the negative consequences of violating environmental regulations
 - Emphasis on the most frequently cited NOV's and environmentally sensitive areas
 - > Spill Buckets, UDC, Record Keeping
 - ECAP Results are reported to HQ Executive Group and Region SVP's during the Quarterly ESAC meeting

> Audits

- Exchange Auditors may do targeted audits of Exchange GDF facility processes
 - Submit GDF audit suggestions to Exchange Environmental Engineer
- Military

EXCHANGE[™] **Environmental Compliance**

Veeder-Root is a brand of Automatic Tank Gauge. >

2015/2016 >

TLS-450 PLUS

> Upgraded all Exchange locations in US to Veeder-Root TLS 450+

VEEDER-ROOT

- > Except California
- **Remotely Monitored** >





TLS 450 PLUS

- Currently Veeder-Root is remotely monitoring 195 locations online in real time for deliveries, alarms, compliance and releases.
 - > Alarms
 - Veeder-Root will email and call manager if an alarm requires local actions
 - > Most alarms resolved remotely
 - Compliance or releases
 - > If leak test fails or other compliance related alarms
 - Veeder-Root will email and call manager and Installation
 POC on file

Insite 360

- > The Insite360 website displays data from the ATG
 - > Available online to anyone on Installation
- > Environmental compliance information is retrieved from Insite360
- > Holds 5 years of data

Insite 😡 S BACK

Last Updated:

GLBARCO VEEDER-ROOT



Site Address:	Site Contact:
1333 Cassidy Rd Ft. Bliss, TX 79916	Manager 915-566-8371 201or202
es de la contrat de secto	ite Communication: Normal

Site Group: BLISS

Last Updated: 08/01/2016 15:15 Last Updated: 08/01/2016 12:16

Data Logger Site Compliance: Compliant

Tank Gauge:

Minimum Flow Rate: 0 Last Updated: 07/31/2016 00:00

Last Comm to Site:

08/01/2016 15:15

Maximum Flow Rate: 0 Last Updated: 07/30/2016 00:00

Site Id:

830771

Tank 1 - Unleaded 1	Tank 2 - Unleaded 2	Tank 3 - Premium	Tank 4 - Diesel
Capacity: 19,703 Gallons Product: UNLEA	Capacity: 19,703 Gallons Product: UNLEA	Capacity: 19,703 Gallons Product: PREMI	Capacity: 10,369 Gallons Product: DIESEL2
Diameter: 118 inches Manifold: 1,2	Diameter: 118 inches Manifold: 1,2	Diameter: 118 inches Manifold:	Diameter: 118 inches Manifold:
Volume: 13,042 Gallons	Volume: 12,501 Gallons	Volume: 10,775 Gallons	Volume: 4,006 Gallons
Ullage: 6,661 Gallons	Ullage: 7,202 Gallons	Ullage: 8,928 Gallons	Ullage: 6,363 Gallons
Water: 0.0 Gallons	Water: 0.0 Gallons	Water: 0.0 Gallons	Water: 0.0 Gallons
0.0 inches	0.0 inches	0.0 inches	0.0 inches
Temp: 86.67 F	Temp: 87.03 F	Temp: 88.27 F	Temp: 92.91 F
Last Updated: 08/01/2016 13:02	Last Updated: 06/01/2016 13.02	Last Updated: 08/01/2016 13.02	Last Updated: 08/01/2016 13:02
Alarms: 0	Alarms: 0	Alarms: 0	Alarms: 0
Last Updated:	Last Updated	Last Updated	Last Updated:
Compliance: Compliant Last Updated: 08/01/2016 12:16	Compliance: Compliant Last Updated: 08/01/2016 12:16	Compliance: Compliant Last Updated: 08/01/2016 12:16	Compliance: Compliant Last Updated: 08/01/2016 12:16
Variance: 0.43%	Variance: 0.43%	Variance: 0.20%	Variance: -0.02%
Inventory:	Inventory:	Inventory:	Inventory:
Inventory Volume: 13,042 Gallons	Inventory Volume: 12,501 Gallons	Inventory Volume: 10,775 Gallons	Inventory Volume: 4,006 Gallons
Water Levet: 0.0 Inches	Water Level: 0.0 inches	Water Levet: 0.0 inches	Water Level: 0.0 inches
Last Updated: 08/01/2016 13:02	Last Updated: 08/01/2016 13:02	Last Updated: 08/01/2016 13:02	Last Updated: 08/01/2016 13:02

O Poll Now Reports Settings

nmunication: Normal

ns Product: UNLEA ...

0

0

0

Manifold: 1,2

ns 5

ons

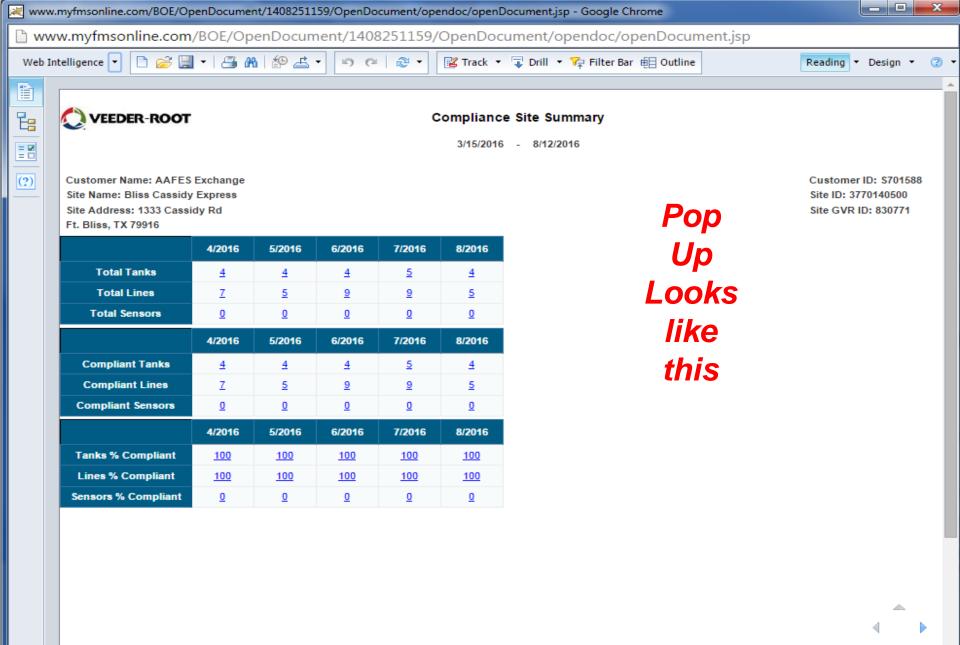
2

fed: 08/01/2016 15:15

Site Compliance: Compliant Last Updated: 08/01/2016 12:16

Minimum Flow Rate: 0 Last Updated: 07/31/2016 00:00 Maximum Flow Rate: 0 Last Updated: 07/30/2016 00:00

Tank 2 - Unleaded 2		Tank 3 - Premium	Tank 4 - Diese
Capacity: 19,703 Gallons Product: UN	(Internet)	Capacity: 19,703 Gallons Product: PREMI	Capacity: 10,36
Diameter: 118 inches Manifold: 1,2		Diameter: 118 inches Manifold:	Diameter: 118 in
Volume: 12,501 Gallons	0	Volume: 10,775 Gallons	Volume: 4,006
Ullage: 7,202 Gallons		Ullage: 8,928 Gallons	Ullage: 6,363
Water: 0.0 Gallons		Water: 0.0 Gallons	Water: 0.0 G
0.0 inches		0.0 inches	0.0 in
Temp: 87.03 F		Temp: 88.27 F	Temp: 92.91
Last Updated: 06/01/2016 13:02		Last Updaled: 08/01/2016 13:02	Last Updated: 08/01/2
Alarms: 0		Alarms: 0	Alarms: 0
Last Updated:		Last Updated:	Last Updated:
Compliance: Compliant	0	Compliance: Compliant	Compliance: Co
Last Updated: 08/01/2016 12:16		Last Updated: 08/01/2016 12:16	Last Updated: 08/01/2
Variance: 0.43% Last Updated: 08/01/2016 00:00	0	Variance: 0.20%	Variance: -0.029 Last Updated: 08/01/2
Inventory:		Inventory:	Inventory:
Inventory Volume: 12,501 Gallons		Inventory Volume: 10,775 Gallons	Inventory Volume: 4
Water Level: 0.0 inches		Water Level: 0.0 inches	Water Level: 0.0 incl
Last Updated: 08/01/2016 13:02		Last Updated: 08/01/2016 13:02	Last Updated: 08/01/



Compliance Site Summary

Compliance Site Detail

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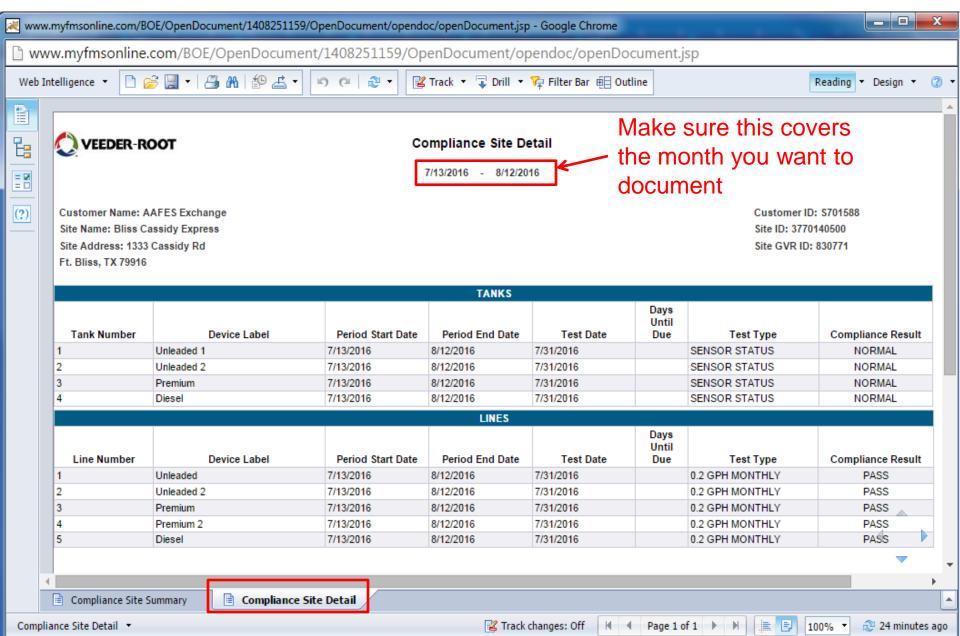
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Compliance Site Detail





Final Thoughts





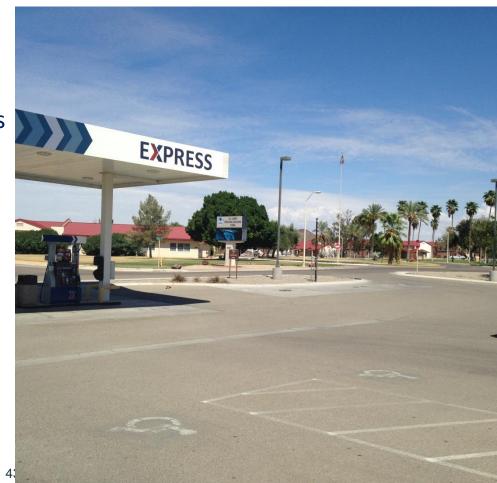
Final Thoughts

> Aging systems

- > Tanks typically have 30 year warranties
- > Lifecycle
- > Repair vs replace

New State regulations

- Inventory Control
- > Enacting 40 CFR 280 timelines
- Corrosion
- > New Fuels
- **NESHAP**





Thank you for your time and attention



Fuels Team

Repairs and Maintenance

> <u>Greg Smith</u> (214)312-2109

Legal, Permits, Fees, Fines

> <u>Troy Wallace</u> (214)312-3067

Responsibility for Funding Repairs

> <u>Captain James Green</u> (214)312-2107

> Fuel Operations

> <u>HQ Fuel</u> (214)312-3189

Veeder-Root Compliance issues if site has TLS 450Plus

 Jason Patriquin
 (336)315-2816

Veeder-Root Alarms (locations with TLS 450Plus)

> <u>Alarm Team</u> (800)997-7725

> Environmental compliance

 Robert Largent
 (214) 312-2099









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- This is an online-only shopping benefit and does not grant on-base access.

To verify your eligibility to shop your military exchanges online, go to *shopmyexchange.com/Veterans*





