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United States Coast Guard

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COMDTINST 5090.9A
28 OCT 2020

COMMANDANT INSTRUCTION 5090.9A

Subj: PETROLEUM, OIL, AND LUBRICANT (POL) STORAGE SYSTEM MANAGEMENT

- Ref: (a) Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks (UST), 40 CFR Part 280
 (b) Oil Pollution Prevention, 40 CFR Part 112
 (c) Response Plans for Oil Facilities, 33 CFR Part 154 Subpart F
 (d) Standards for the Management of Used Oil, 40 CFR Part 279
 (e) U.S. Coast Guard Real Property Management Manual, COMDTINST M11011.11 (series)
 (f) U.S. Coast Guard Personal Property Management Manual, COMDTINST M4500.5 (series)
 (g) Financial Resource Management Manual (FRMM), COMDTINST M7100.3 (series)
 (h) Environmental Compliance Evaluation (ECE) Program, COMDTINST 16478.5 (series)

- PURPOSE.** This Commandant Instruction (CI) establishes Coast Guard policy and responsibilities for the acquisition, maintenance, operation, and disposal of petroleum, oil, and lubricant (POL) storage systems. POL storage systems include underground storage tanks (USTs), aboveground storage tanks (ASTs), and mobile fuel storage containers greater than 55 gallons in capacity, as well as associated piping, venting, monitoring, dispensing, and ancillary equipment. This Instruction does not address storage of hazardous waste, bilge water, non-petroleum sludge, potable water, wastewaters, stormwater, non-petroleum chemicals, fuel tanks part of an automotive engine system, or petroleum storage on vessels.
- ACTION.** All Coast Guard unit commanders, commanding officers, officers-in-charge, deputy/assistant commandants, and chiefs of headquarters staff elements must comply with the provisions of this Instruction. Internet release is authorized.
- DIRECTIVES AFFECTED.** Storage Tank Management Manual, COMDTINST M5090.9, dated 02 November 1995, is cancelled.

DISTRIBUTION – SDL No. 170

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NON-STANDARD DISTRIBUTION:

4. DISCUSSION.

- a. Subtitle I of the Hazardous and Solid Waste Amendments (HSWA) of 1984, Pub. L. 98-616, which amended the Solid Waste Disposal Act (SWDA) of 1965, Pub. L. 89-272, determined underground storage standards including establishment of a national regulatory program for managing USTs containing hazardous materials, especially petroleum products. The Energy Policy Act of 2005, Pub. L. 109-058, further amended SWDA to include provision for UST inspections, operator training, delivery prohibition, secondary containment, and financial responsibility. Under subsequent amendments, state and local governments are authorized to establish regulatory programs and standards for storage tanks that are more stringent than federal regulations; therefore, the Coast Guard is also required to comply with those state and local regulations as well.
- b. The Clean Water Act (CWA) of 1977, Pub. L. 95-217, revised the Federal Water Pollution Control Act (FWPCA) of 1972, Pub. L. 92-500, and was amended by the Oil Pollution Act of 1990 (OPA 90), Pub. L. 101-380. The CWA regulates ASTs and containers, along with discharges of pollutants into all waters of the United States. The CWA applies to emergency discharges, as well as discharges during normal operations. Facilities that could cause substantial harm to the environment from a discharge must prepare facility response plans, which identify personnel and equipment available to respond to a worst case discharge of oil. Planning for emergency spill and discharges under the CWA is incorporated in the Spill Prevention Control and Countermeasure (SPCC) Plan.
- c. Federal regulations applicable to USTs are found in Reference (a). Federal regulations for ASTs, bulk storage containers, and SPCC plans are found in Reference (b). Federal regulations for facility response plans are found in both References (b) and (c). Federal regulations for storage and disposal of used oil are found in Reference (d).
- d. The Coast Guard owns and operates a large number of POL storage systems. These systems are defined by asset type according to References (e) and (f) and as follows:
 - (1) All USTs and ASTs 5,000 gallons or greater in capacity are considered real property and are assigned a Real Property Unique Identification (RPUID) number for tracking as a unique real property asset in the Coast Guard Computerized Maintenance Management System (CMMS) of record (e.g., Shore Asset Management (SAM)) real property database.
 - (2) Tanks less than 5,000 gallons in capacity that are affixed to the ground or another structure are considered real property.
 - (3) Tanks less than 5,000 gallons in capacity that are part of a system are generally classified as equipment, with an assigned equipment record under the primary real property system asset it serves.
 - (4) Tanks less than 5,000 gallon capacity which are mobile or capable of being moved are considered personal property.
- e. POL systems are comprised of various components that may include piping, tanks, pumps, and secondary containment structures. Typical systems may include aviation refueling, marine

refueling, heating oil, supply, land vehicle refueling, or general miscellaneous liquid storage other than fuel. Tanks, depending on size, may or may not be accounted as equipment under the particular system.

- f. Specific standards and requirements associated with AST ownership, maintenance, operations, and disposal are primarily included in state and local fire codes. States and localities typically adopt various National Fire Protection Association (NFPA) consensus standards as requirements. Examples of such NFPA Standards include: NFPA 30, Flammable and Combustible Liquids Code; NFPA 30A, Code for Motor Fuel Dispensing Facilities and Repair Garages; NFPA 31, Standard for the Installation of Oil-Burning Equipment; NFPA 70, National Electric Code; NFPA 77, Recommended Practices on Static Electricity; NFPA 110, Standard for Emergency and Standby Power Systems; and NFPA 704, Standard System for the Identification of Materials for Emergency Response. Coast Guard petroleum storage tanks are subject to these requirements, as well as any state or local regulations pertaining to ASTs.
 - g. All fuel storage systems with 10% or more of their storage capacity, including piping, below ground are considered by regulation to be USTs. Standards and requirements associated with UST ownership, design, construction, installation, notification, maintenance, operations, discharge detection, discharge response and corrective action, closure, and disposal are primarily included in federal regulations, state laws and regulations, and local ordinances, see Reference (a).
 - h. Standards and requirements for POL storage systems are primarily included in References (a) through (c). Coast Guard POL storage systems are subject to these requirements, where applicable.
5. DISCLAIMER. This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. It is intended to provide operational guidance for Coast Guard personnel and is not intended to nor does it impose legally-binding requirements on any party outside the Coast Guard.
 6. MAJOR CHANGES. This Instruction cancels and replaces the existing Storage Tank Management Manual, COMDTINST M5090.9, to reflect current organizational responsibilities, and regulatory requirements. The significant changes include: realigning organizational responsibilities on storage tank management; adding secondary containment requirements for new and replaced tanks and piping; adding operator training requirements; adding periodic operation and maintenance (O&M) requirements for UST systems; addressing UST systems deferred in the 1988 UST regulation; adding new discharge prevention and detection technologies; updating codes of practice; requiring response plans for all tanks; and updating state program approval requirement.
 7. IMPACT ASSESSMENT. This Instruction formalizes existing personnel roles, duties, and responsibilities, as applicable, for the storage tank management program. The policies in this Instruction have been analyzed by all affected Coast Guard elements and are currently supported by current fund allocations. If specific changes are made to employee's positions or conditions of employment, then the local Commandant (CG-124) specialist will be contacted to determine if there are any local bargaining obligations.

8. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS.

- a. The development of this Directive and the general policies contained within it have been thoroughly reviewed by the originating office in conjunction with the Office of Environmental Management, Commandant (CG-47). This Instruction is categorically excluded under current Department of Homeland Security (DHS) categorical exclusion (CATEX) A3 from further environmental analysis in accordance with the U.S. Coast Guard Environmental Planning Policy, COMTINST 5090.1 and the Environmental Planning (EP) Implementing Procedures (IP).
- b. This Directive will not have any of the following: significant cumulative impacts on the human environment; substantial controversy or substantial change to existing environmental conditions; or inconsistencies with any federal, state, or local laws or administrative determinations relating to the environment. All future specific actions resulting from the general policies in this Instruction must be individually evaluated for compliance with the National Environmental Policy Act (NEPA) and Environmental Effects Abroad of Major Federal Actions, Executive Order 12114, Department of Homeland Security (DHS) NEPA Policy, Coast Guard Environmental Planning policy, and compliance with all other applicable environmental mandates.

9. DISTRIBUTION. No paper distribution will be made of this Instruction. An electronic version will be located on the following Commandant (CG-612) web sites. Internet:
<http://www.dcms.uscg.mil/directives/>, and CGPortal:
<https://cg.portal.uscg.mil/library/directives/SitePages/Home.aspx>.

10. RECORDS MANAGEMENT CONSIDERATIONS. This Instruction has been thoroughly reviewed during the directives clearance process, and it has been determined there are no further records scheduling requirements, in accordance with Federal Records Act, 44 U.S.C. 3101 et seq., NARA requirements, and Information and Life Cycle Management Manual, COMDTINST M5212.12 (series). This policy does not have any significant or substantial change to existing records management requirements.

11. POLICY. The following requirements apply to all POL storage systems.

- a. Unit Environmental Management System (EMS) or Compliance Management Plan (CMP). All POL storage systems must be operated and maintained as an integral component of an EMS or CMP in order to minimize environmental risk. The EMS or CMP must ensure:
 - (1) All applicable and appropriate POL storage system regulatory requirements (federal, state, and local) and best management practices are:
 - (a) Identified, evaluated, and properly addressed.
 - (b) Implemented to assure regulatory compliance and prevention of discharges to the environment.
 - (2) All unit or site specific pollution prevention (P2) plan requirements are identified, implemented, and properly documented. POL P2 plan (e.g., SPCC, FRP) statuses must be

detailed and maintained in a designated database. Plan requirements detailed in References (b) and (c) are briefly summarized below:

- (a) Coast Guard units that have the capacity to store and transfer 1,320 gallons or more of POL products in containers 55 gallons or larger that could reasonably be expected to discharge oil to navigable waters of the U.S. or adjoining shorelines, such as lakes, rivers, and streams must prepare, implement, and maintain a Spill Prevention, Control, and Countermeasure (SPCC) plan in accordance with Reference (b).
 - (b) All Coast Guard facilities that transfer POL in bulk to or from a vessel having an onboard storage capacity of 250 barrels (10,500 gallons) or greater of oil must prepare and submit a Facility Response Plan (FRP) to the cognizant Coast Guard Captain of the Port (COTP) office in accordance with Reference (c). In addition, any Coast Guard facility that transfers POL over water to or from vessels (any size boats or cutters) and has a total oil storage capacity (USTs and/or ASTs) greater than or equal to 42,000 gallons, must prepare and submit an FRP to the EPA Regional Administrator in accordance with Reference (b).
 - (c) Coast Guard units that store POL in containers 55 gallons or larger with a total storage capacity less than 1,320 gallons must comply with appropriate state registration and inspection requirements where no federal mandate exists (i.e., SPCC not required). In such circumstances, units must incorporate spill prevention and response procedures (SPRP) as part of the unit's overall emergency response action plan. The SPRPs must be reviewed, evaluated, and updated annually, as part of spill response after-action analysis, or whenever the use or design of a POL storage system is modified. The SPRPs should describe, at a minimum:
 - 1) Unit procedures and protocols to prevent, identify, and discover leaks or spills;
 - 2) Availability of personnel, location, and use of spill response equipment and materials;
 - 3) Initial response procedures and methods for responding to and containing a discharge or spill;
 - 4) List of emergency contacts;
 - 5) Notification and reporting requirements; and
 - 6) Inventory monitoring and control procedures.
- (3) Roles and responsibilities for all POL storage system management requirements are identified, delegated, and documented.
 - (4) Training requirements for appropriate POL storage system management are identified, assigned, accomplished, and properly documented.

- (5) POL storage system management compliance records and other documentation are systematically managed.
 - (6) POL storage system life-cycle maintenance and repair is accomplished and documented according to all applicable requirements.
 - (7) All POL storage systems, inclusive of all ancillary equipment and components, must be installed, constructed, operated, maintained, and disposed of in accordance with manufacturer's specifications and warranty requirements, applicable industry standards, established pollution prevention plans, established tactics, techniques, and procedures (TTP) documents, and established Coast Guard enterprise facilities preventative maintenance plans (PMs). Ancillary equipment and components include day tanks, pipelines, vents, transition sumps, automatic and manual tank gauging systems, and alarms and leak detection systems.
- b. Restrictions. Installation of new or replacement POL USTs is prohibited unless space restrictions, historic preservation concerns, safety issues, or security and infrastructure vulnerability issues prohibit the use of a comparable AST. All UST installations must be approved in advance of system acquisition by Commandant (CG-43).
- c. Inventory Control. An inventory control system must be implemented to adequately determine if the POL storage system is leaking.
- (1) A reconciliation between all fuel deliveries, quantities dispensed or used, and storage system beginning and end of month quantities must be made within 3 business days of the end of each month.
 - (2) Reconciliations are calculated using the formula "beginning month tank quantity + deliveries – dispensed/use quantities = +/- month end tank quantity".
 - (3) All discrepancies that fall outside the predetermined ranges described in the inventory control procedures must be immediately investigated upon discovery.
 - (4) Discrepancies that occur two months in a row must be reported to the unit's supporting Civil Engineering Unit (CEU) as soon as possible (usually within 24 hours) for technical advice and guidance. Recurring discrepancies may indicate that the tank could be leaking.
- d. Fuel Quality. A record of the sulfur content of all diesel fuel delivered must be maintained for 5 years. This information can be obtained from the fuel retailer.
- e. Asset Management. All POL storage tanks considered real property (i.e., 5,000 gallons or greater capacity) must be enrolled in the Coast Guard CMMS of record (e.g., SAM) real property database. The asset record description for these assets must include either the acronym "AST" or "UST" depending on whether the tank was installed aboveground or underground. All POL storage tanks considered personal property (i.e., less than 5,000 gallon capacity) must be enrolled in the Coast Guard's personal property inventory database. All POL storage tanks considered real property equipment (i.e., less than 5,000 gallon capacity and non-mobile) must be enrolled in the CMMS as equipment. See References (e) and (f) for additional asset management requirements.

- f. Records Management. A records management system must be implemented as part of the unit's CMP or EMS to assure proper management, retention, and availability of all necessary compliance records associated with POL storage systems (active and decommissioned). All POL storage system records required by regulations, policy, or established TTP (Process Guide Technical Order, PGTO) must be complete, current, accurate, and stored in designated areas, in accordance with established protocols. Examples of required records include, but are not limited to, design and construction data or as-built records, manufacturer's data and warranty information, inspections records, training records and personnel certifications, preventative maintenance records, inventory control records, tank registration data and documentation, pollution prevention plans, etc. POL storage system records and data must be readily available for presentation and review during audits and inspections. They must be properly maintained for the service life of the system(s) plus ten years. After ten years, the records and data must be digitized, if not already done, and permanently archived. Contact the Records Management office to revise the NARA records schedule for POL records based on the mission and business needs.
- g. Training. All POL storage systems must have staff who have received the legally mandated training, are knowledgeable of the applicable response plans, and who are capable of responding to a discharge at all times. A documented record of training must be maintained for a minimum of three years and must be readily available for presentation and review during audits and inspections.
- h. Host-Tenant Agreements. Memorandums of Agreement (MOAs), Memorandums of Understanding (MOU), and other appropriate documentation must be established and implemented between host units and all subordinate units, tenants, and/or contractors. The agreements must establish the responsibility for regulatory compliant O&M of all POL storage systems are identified, recognized, and properly delineated and assigned.
- i. Operational Controls. Operational controls must be established as part of the unit's environmental CMP. Operational controls must ensure all procedures, processes, and activities are developed, maintained, and implemented to satisfy full regulatory compliance of the POL storage systems at all times.
- j. Budget and Procurement. Expenditures associated with the acquisition, installation, maintenance, operation, and disposal or demolition of POL storage systems must be managed in accordance with the Coast Guard Financial Resources Management Manual/Manual Procedures (FRMM/FRMM-P), see Reference (g), and any associated or supporting procedures and process guidance. In general, POL storage system expenses are managed as follows:
- (1) Fees for permits, registrations, or any other regulatory submission associated with a new installation or modification (e.g., updated SPCC plan) are considered part of the project and paid for from the appropriate project funding source [e.g., AFC-43 or Procurement, Construction, and Improvements (PC&I) funding].
 - (2) Registration and permitting fees (i.e., annual fees, change in service and closure) are considered an organization level (O-level) responsibility and paid for as a unit operational expense.

- (3) Recurring operating and maintenance expenses are considered O-level expenditures to be covered in unit operational budgets.
- (4) Repairs beyond unit level capabilities (i.e., over \$5,000) will be managed as depot level (D-level) responsibilities funded by either AFC-43 or PC&I depending on the magnitude and circumstances of the required repairs.
- (5) Alterations, improvements, and/or demolitions on POL storage systems, tanks, or other components driven by D-level shore infrastructure projects will be funded from the project funding.
- (6) Responses to spills and leaks within unit capabilities are covered with unit operational funding. Responses to environmental discharges beyond unit capabilities and long-term remediation of environmental liabilities as the result of discharges will be managed at the D-level and funded with Environmental Compliance and Restoration (EC&R) funding. .

12. RESPONSIBILITY. Personnel responsible for management of POL storage systems include:

- a. Unit Commanders, Commanding Officers, Officers-in-Charge, or those delegated in writing must:
 - (1) Establish and implement appropriate operating controls (i.e., unit CMP or EMS as described in Paragraph 11.a) to assure POL storage systems are managed and operated within complete regulatory compliance.
 - (2) Comply with all applicable federal, state, and local laws and regulations, Executive Orders (EOs), and Coast Guard policy and procedures guidance (e.g., TTP, Configuration Standard Technical Order (CSTO), etc.) governing the use, installation, construction, operation, maintenance, and disposal of POL storage systems at the units and facilities under their command.
 - (3) Develop, implement, routinely test and evaluate, and periodically review and recertify all necessary and appropriate emergency response plans to provide a continued state of accuracy, completeness, and effectiveness.
 - (4) Assure all personnel managing, operating, and maintaining POL storage systems are adequately trained (initial and annual refreshers) and knowledgeable of system requirements and responsibilities to implement pollution prevention plans (e.g., SPCC) requirements.
 - (5) Execute organization level maintenance (OLM) requirements.
 - (6) Register and permit all POL storage systems in compliance with applicable federal, state, and local laws and regulations.
 - (7) Record all POL storage system regulatory agency environmental inspections (EIs) and environmental enforcement actions (EEAs) (e.g., Notice of Violations (NOVs)) in the “Regulator Site Visit Report” module of the Coast Guard Compliance and Processes Tracking (CPTrack) database properly and in a timely fashion. All EEAs must be reported

to supporting Legal Services Command element, Commandant (CG-47), SILC (EMD), and supporting CEU in accordance with established protocols within two (2) calendar days of receipt.

- (8) Establish and maintain a records and data management system that fulfills the requirements delineated in Paragraph 11.f above. All POL storage system records, reports, and data must be readily available to regulatory officials and external or remote Coast Guard stakeholders. The unit POL storage tank profile data must be kept current, accurate, and complete.
 - (9) Conduct all required POL storage system OLM in accordance with procedures, protocols, and schedules as established and entered in the Coast Guard enterprise CMMS of record (i.e., SAM). Effective OLM is required to help prevent and minimize accidental POL discharges to the environment due to POL storage system or component degradation, failure, or inoperability.
 - (10) Request and properly document D-level POL storage system corrective maintenance (CM) or repairs identified during OLM, POL storage system and tank inspections, environmental compliance evaluations (ECEs), or during regulatory agency audits and inspections that are beyond unit level capabilities. Monitor and coordinate accomplishment of such CM and repairs with supporting CEU to ensure they are implemented in a timeframe reflective of the associated regulatory and environmental risk.
 - (11) Enter corrective actions in CPTrack for all deficiencies or findings of noncompliance associated with POL storage system O&M identified during the ECEs. As detailed in Reference (h), ensure corrective action is determined and documented in CPTrack, corrective action is accomplished, and all ECE POL storage system corrective action findings in CPTrack are closed out in accordance with established protocols and policy.
 - (12) Inspect or continuously observe POL storage systems and system operations to identify potential environmental liabilities (PELs) such as fuel observed in manholes or in underground secondary containment piping. Any identified or suspected PELs must be documented in the "Potential EL" module of CP Track. Units must assist D-Level resources with evaluation of the PELs and with any necessary follow-on remediation of environmental liabilities resulting from POL storage system operations.
- b. Office of Environmental Management (CG-47) must:
- (1) Maintain this Commandant Instruction to accurately reflect all current federal, state, and local regulations, and other applicable regulatory authority; Applicable or Relevant and Appropriate Requirements (ARARs); EOs; DHS Directives; and DHS and Coast Guard goals and objectives.
 - (2) Review and approve prior to issuance all new or substantive revisions to policy, TTPs, process guides, and training developed by other Coast Guard programs, organizational elements, and/or units to confirm they align with, are consistent with, and support this Instruction and References (a)–(h). Requests for Commandant (CG-47) review and approval of policy, procedures, guidance, and training programs must be sent to the following mailbox: HQS-SMB-CG-47-POLICYREVIEW@uscg.mil.

- (3) Monitor and evaluate compliance with Coast Guard POL storage system policy requirements and responsibilities. Identify deficiencies and associated risks to review and discuss at the Sustainability, Energy, Environmental Readiness (SEER) Council meetings.
 - (4) Designate database(s) of record to contain required information and documents related to environmental management of POL storage systems.
 - (5) Establish program priorities and, as appropriate, define strategy to achieve conformance.
- c. Office of Civil Engineering (CG-43) must:
- (1) Issue and maintain a CSTO governing POL storage systems and associated components to support and facilitate unit compliance with all applicable federal, state, and local regulations and include the following:
 - (a) POL USTs and ASTs (with the exception of storage containers or tanks that are mobile and storage containers 55-gallons or less) and associated piping construction standards, including but not limited to, requirements for double walls, cathodic protection, automatic detection of discharge, and an effective alarm activation.
 - 1) All POL UST systems must have leak detection sufficient to notify unit personnel of a discharge of product into the environment or into installed secondary containment.
 - 2) All existing POL storage systems at units without a certified SPCC and all new POL storage systems must have a leak detection system or monitoring method sufficient to notify unit personnel of a discharge of product from any part of the fuel storage, conveyance, and distribution system into the environment or into installed secondary containment.
 - (b) All POL ASTs must be labeled with the content, system size, and a unique tank number or other unit designation.
 - (c) All mobile POL storage systems that generally operate in a fixed location at a facility must have secondary containment sufficient to address, at minimum, the most likely quantity of oil that would be discharged during a typical failure. While not in use, mobile storage systems must be parked in areas where containment measures are in-place to minimize the impact from spills and ensure any spills would be contained and prevented from leaving the immediate area where the mobile storage system is parked.
 - (2) Issue and maintain PGTO addressing O&M of POL storage systems complying with all applicable federal, state, and local regulations.
 - (3) Ensure relevant D-level project work conforms to current Coast Guard POL storage system policy and TTP (e.g., CSTO, PGTO). Ensure POL storage system pollution prevention plans (i.e., SPCC), tank registration data, and other administrative requirements that may be impacted by D-Level project work are appropriately and properly amended and updated, as required.

- (4) Maintain and manage POL storage system real property data in the databases of record (e.g., SAM and Oracle Fixed Assets (OFA)).
 - (5) Ensure D-level POL storage system deficiencies are properly and appropriately managed and addressed through the annual planned obligation priorities (POP) processes, including regional (R-POP), centralized (C-POP), demo (D-POP), and planning (P-POP). Ensure projects and resources are prioritized based on evaluated environmental, regulatory, and operational risks.
 - (6) Support unit level (O-level) operation, management, and maintenance of POL storage systems through execution of ECEs; training and education outreach; providing subject matter expertise (SME) guidance assisting units with development and implementation of operational controls, preparation of pollution prevention and emergency response plans, record and data management procedures, and other elements of a unit environmental CPM; managing and monitoring OLM; and maintaining oversight of accuracy and completeness of POL storage system related data in CPTrack.
- d. Judge Advocate General and Chief Counsel (CG-094/CG-LMI-E) and Legal Services Command (LSC) must support Unit Commanders/Command Officers/Officers in Charge with advice on issues associated with POL storage system management, to include:
- (1) Interpretation and application of requirements applicable to POL systems codified in regulations and administrative codes;
 - (2) Determination of applicability of permits and registration fees;
 - (3) Determination of Coast Guard responsibilities and liabilities for remediation of spills or discharges to the environment; and
 - (4) Development of responses to EEAs.

13. FORMS/REPORTS. None.

14. REQUEST FOR CHANGES. Units and individuals may recommend changes via their chain of command to Commandant (CG-47) at EnvironmentalCompliance@uscg.mil.

/NATHAN A. MOORE/
Rear Admiral, U.S Coast Guard
Assistant Commandant for Engineering and Logistics