

CLARE E. CONNORS 7936
Attorney General of Hawai'i

DIANE K. TAIRA 3761
WADE H. HARGROVE III 7897
Department of the Attorney General, State of Hawai'i
465 South King Street, Room 200
Honolulu, Hawai'i 96813
Telephone: (808) 587-3050

Attorneys for Department of Health, State of Hawai'i

DEPARTMENT OF HEALTH
STATE OF HAWAI'I

THE UNITED STATES DEPARTMENT OF)	Department of Health Docket No.
THE NAVY, c/o REAR ADMIRAL)	21-UST-EA-02
TIMOTHY KOTT, COMMANDER NAVY)	(Administrative Enforcement Action)
REGION HAWAII,)	
)	In the Matter of the Emergency Order Re:
850 Ticonderoga St., Suite 110JBPHH, Hawaii)	Change-In-Service and Defueling of 20
96860-5101,)	Underground Storage Tanks, Red Hill Bulk
)	Fuel Storage Facility
Respondent.)	
)	DEPARTMENT OF HEALTH EXHIBIT
)	LIST
)	

DEPARTMENT OF HEALTH EXHIBIT LIST

The Department of Health intends to present the following documentary evidence at the hearing in the above-captioned matter:

EXHIBIT NUMBER	NAME OF DOCUMENT
D01	Exhibit D01 Overview of RHBFSF system layout
D02	Exhibit D02 TEC, Inc., Red Hill Bulk Fuel Storage Facility Final Groundwater Protection Plan, January 2008

D03	Exhibit D03 RH location of aquifers and monitoring wells
D04	Exhibit D04 EEI, Inc., Red Hill AOC SOW 3.0 Tank Upgrade Alternatives (TUA), December 2017
D05	Exhibit D05 Administrative Order on Consent, dated September 28, 2015
D06	Exhibit D06 AOC Statement of Work, September 28, 2015
D07	Exhibit D07 Destructive Testing Results Report, dated July 7, 2019
D08	Exhibit D08 Regulatory Agency Disapproval Letter on Destructive Testing Results Report, dated March 16, 2020
D09	Exhibit D09 NAVFAC, Naval Facilities, Engineering Command, Red Hill Facility Tank, Inspection, Repair, and Maintenance Procedure Decision Document, April 24, 2017
D10	Exhibit D10 NAVFAC, Naval Facilities, Engineering Command, Red Hill Facility Tank, Inspection, Repair, and Maintenance Report, October 11, 2016
D11	Exhibit D11 EPA-DOH, Approval of Red Hill AOC SOW Section 2.4 TIRM Procedures Decision Document and Clarifications, September 5, 2017
D12	Exhibit D12 Summary of TIRM Schedule Delays
D13	Exhibit D13 NAVFAC, Supplement to Red Hill Bulk Fuel Storage Facility, AOC Tank Upgrade Alternatives and Release Detection Decision Document, August 2021 [redacted]
D14	Exhibit D14 ABS Consulting, Quantitative Risk and Vulnerability Assessment, Phase 1 (Internal Events without Fire and Flooding), November 12, 2018
D15	Exhibit D15 Regulatory Agency Approval Letter on QRVA Phase 1, September 23, 2019
D16	Exhibit D16 USEPA and DOH, Comments on on Ongoing Work to Satisfy the Red Hill Bulk Fuel Storage Facility AOC SOW requirements 7.1.3 and 7.2.3 February 23, 2018
D17	Exhibit D17 EPA-DOH comments on TUA deliverables August 14, 2018
D18	Exhibit D18 DOH comments on CSM and IRR Reports, March 30, 2020

D19	Exhibit D19 DRAFT - DOH Review Navy Groundwater Flow Model & Related Issues with the Navy CSM for the Red Hill Facility, October 19, 2021
D20	Exhibit D20 NAVFAC Engineering Command, Conceptual Site Model, Investigation and Remediation of Releases and Groundwater Protection and Evaluation, June 30, 2019
D21	Exhibit D21 Exponential increase in vapor concentrations below Tank 5 before and after 2014 Tank 5 release
D22	Exhibit D22 Navy slides GWFM WG meeting Hypothetical large sudden release holding capacity results for scenario January 11, 2017 (slide 126)
D23	Exhibit D23 Red Hill Shaft Detection History 2011-2021 – TPH-d (diesel range)
D24	Exhibit D24 Red Hill Shaft Detections History 2018-2021 - TPH-o (oil-residual range)
D25	Exhibit D25 Commander, Naval Supply Systems Command, Memo to Commanding Officer, NAVSUP Fleet Logistics Center Pearl Harbor, COMMAND INVESTIGATION INTO THE FUEL SPILL AT THE
D26	Exhibit D26 October 3, 2021, 238 pm email from CAPT Hornyak to RADM Stamatopoulos
D27	Exhibit D27 November 17, 2021 email from John Floyd
D28	Exhibit D28 DOH email of Navy reporting November 20 release of 9000 gallons
D29	Exhibit D29 Navy Region Hawaii Press Release - Navy Responds to a release from a fire suppression drain line, November 21, 2021
D30	Exhibit D30 Department of the Navy, Confirmed Release Notification Form, Fire Suppression Drain Line, DOH Facility ID NO. 9-102271, HEER Incident Case No. 20211120-2330
D31	Exhibit D31 Email documenting that Navy informed DOH of receiving complaints 11-28-2021
D32	Exhibit D32 Hawaii Department of Health Press Release December 1, 2021
D33	Exhibit D33 Eurofins Analytical Report for sampling event December 5, 2021
D34	Exhibit D34 Hawaii Hazard Evaluation and Emergency Response Office EAL Surfer (2017) TPH-d and TPH-g EALs
D35	Exhibit D35 Navy preliminary sampling results received 12-11-2021
D36	Exhibit D36 Layer of fuel floating on water collected from Red Hill Shaft 12-5-2021

D37	Exhibit D37 Tetra Tech-Torrent Laboratory Report from 12-5-21 sampling
D38	Exhibit D38 Chromatograms of 12-5-21 product layer samples from Red Hill Shaft compared to Red Hill fuel samples
D39	Exhibit D39 Hydrocarbon toxicity review 2014
D40	Exhibit D40 Dec 5 Joint Health Services Factsheet-Potential Exposure to Contaminated Water
D41	Exhibit D41 Dec 9 DOH Drinking Water Petroleum Exposure - Health Care Provider Evaluation and Treatment Guidance
D42	Exhibit D42 US Dept of Health and Human Services ATSDR Toxicological Profile for JP-5, PJP-8 and Jet A fuels
D43	Exhibit D43 US Dept of Health and Human Services ATSDR Toxicological Profile for kerosene and fuel oils
D44	Exhibit D44 University of Chicago Hydrocarbon Poisoning Fact Sheet
D45	Exhibit D45 Up to Date -Acute Hydrocarbon Exposure-Clinical toxicity, evaluation and diagnosis
D46	Exhibit D46 Hydrocarbon Pneumonitis. Pediatrics September 1974
D47	Exhibit D47 Hydrocarbon pneumonitis following fuel siphonage-A case report and literature review
D48	Exhibit D48 Goldfrank's Toxicologic Emergencies 10th edition Hydrocarbons chapter 108
D49	Exhibit D49 Heat Map of Complaints
D50	Exhibit D50 DRAFT - Navy IRR Limitations Outline
D51	Exhibit D51 Department of Health Presentation of Evidence

DATED: Honolulu, Hawai'i, December 18 , 2021.

/s/ Wade H. Hargrove III
WADE H. HARGROVE III
Deputy Attorney General
Attorney for Department of Health