

## **DEPARTMENT OF THE NAVY**

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPHH, HAWAII 96860-5101

5750 Ser N4/0484 April 13, 2017

CERTIFIED NO: 7016 0910 0001 0899 9006

Mr. Bob Pallarino
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105

Mr. Steven Y.K. Chang, P.E., Chief State of Hawaii Department of Health Environmental Management Division Solid and Hazardous Waste Branch 919 Ala Moana Boulevard, Room 210 Honolulu, HI 96814

Dear Mr. Pallarino and Mr. Chang:

SUBJECT: ADMINISTRATIVE ORDER ON CONSENT STATEMENT OF WORK SECTION 8.2 SCOPE OF WORK, RED HILL BULK FUEL STORAGE FACILITY, JOINT BASE PEARL HARBOR-HICKAM, OAHU, HAWAII

The Scope of Work for Red Hill pursuant to the Administrative Order on Consent ("AOC") Statement of Work ("SOW") Section 8, Risk/Vulnerability Assessment is enclosed.

The U.S. Department of the Navy ("Navy") and Defense Logistics Agency ("DLA") generated this Scope of Work based on the concurrence with the U.S. Environmental Protection Agency ("EPA") and Hawaii Department of Health ("DOH") of the objectives outlined in Section 8.1 and agreements reached through scoping meetings which closed on January 13, 2017. The most significant agreement from scoping was the upgrading of the Risk/Vulnerability Assessment to a Quantitative Risk and Vulnerability Assessment ("QRVA") due to its ability to provide a more in-depth, rigorous, and repeatable approach to assessing risk.

To accommodate the execution of a baseline QRVA, which for large complex facilities normally takes 5 to 7 years, it will be broken into four distinct phases: internal events (excluding internal fire and flooding), internal/external fire and flooding, seismic events, and other external events.

The first phase of the baseline QRVA is designed to focus on internal events (not including fire or flood). This includes, but is not limited to equipment or structural failures in frontline and support systems, human errors, etc. As agreed by the parties, the phase 1 report will satisfy Section 8.3 requirements of the Red Hill AOC SOW, and is due 18 months from the approval of

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the enclosed Scope of Work. The remaining three phases will be performed sequentially and overlapped where technically feasible to better support ongoing work under the AOC.

Each phase of the QRVA will be used as a tool for the parties of the AOC to inform future decisions on best available practicable technology (BAPT) to mitigate risk and enhance safety.

Should you have any questions regarding this matter, please contact, Mr. Mark Manfredi, Red Hill Regional Program Director, at (808) 473-4148 or via e-mail at mark.manfredi@navy.mil.

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R. D. HAYES, IN

Captain, CEC, U.S. Navy

Regional Engineer By Direction of the

Commander