

## BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU  
630 SOUTH BERETANIA STREET  
HONOLULU, HI 96843  
www.boardofwatersupply.com




March 5, 2020

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Deputy Manager and Chief Engineer 

Mr. Steve Linder  
EPA Red Hill Project Coordinator  
United States Environmental Protection Agency  
Region IX  
75 Hawthorne Street  
San Francisco, California 94105

and

Ms. Roxanne Kwan  
Solid and Hazardous Waste Branch  
State of Hawaii  
Department of Health  
2827 Waimano Home Road  
Pearl City, Hawaii 96782

Dear Mr. Linder and Ms. Kwan:

**Subject: Request for Update on Status of United States Department of the Navy's "AOC SOW Section 5 Corrosion and Metal Fatigue Practices, Destructive Testing Results Report" dated July 7, 2019**

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The Honolulu Board of Water Supply (BWS) requests a status update of the Navy's above-referenced report (DT Report). The BWS understands that, pursuant to Section 5 of the Statement of Work (SOW) for the Red Hill Bulk Fuel Storage Facility (Red Hill) Administrative Order on Consent (AOC), the Navy must obtain approval of the DT Report from the United States Environmental Protection Agency and the Hawaii Department of Health (collectively, "Regulatory Agencies"). To date, however, the BWS is unaware of any such approval by the Regulatory Agencies.

The Navy's current inspection and repair process for the Red Hill tanks depends on its ability to accurately and reliably detect backside corrosion damage indirectly using non-destructive evaluation (NDE) methods and weld new plates over all compromised portions of the tanks' steel liners before the corrosion can grow through the tank wall. As set forth in our comment letter dated October 7, 2019, the DT Report has confirmed that the Navy's current tank wall inspection techniques are not sufficiently reliable to detect the potential for leaks and repair them before they occur and, moreover, the Navy's own laboratory testing proves that the NDE scanning is inaccurate (Lau, 2019). In light of the underlying destructive testing results, the BWS finds it unlikely that the Navy can maintain its NDE technology has been "validated" or that

there is a rational basis upon which the Navy can continue to rely upon this faulty NDE scanning.

Section 5.4 of the AOC SOW provides that once the parties determine that the results of the Navy's destructive testing work "indicate the need for evaluation and implementation of potential changes in practices to control corrosion or metal fatigue," additional scoping meetings must be scheduled within sixty days for the purpose of developing "appropriate modifications" to the scopes of work and timelines for AOC tasks related to tank inspection, repair, and maintenance and tank upgrade alternatives. It is clear to the BWS that the Navy's tank wall inspection techniques are neither accurate nor reliable, and that the DT Report only serves to underscore the urgent need for both the evaluation and implementation of considerable changes to the Navy's current tank inspection and repair process and/or the selection of more protective tank upgrades.

Thank you for your attention to this matter. If you have any questions, please feel free to contact Mr. Erwin Kawata, Program Administrator of the Water Quality Division, at 808-748-5080.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Ernest Y.W. Lau', is positioned above the printed name.

ERNEST Y.W. LAU, P.E.  
Manager and Chief Engineer

#### References

Board of Water Supply (BWS). 2019. Subject: Comments on Navy's "AOC SOW Section 5 Corrosion and Metal Fatigue Practices, Destructive Testing Results Report" dated July 7, 2019 and IMR's Report "Destructive Analysis of 10 Steel Coupons Removed from Red Hill Fuel Storage Tank #14" dated December 17, 2018. October 7.