



RED HILL BULK FUEL STORAGE FACILITY

Tank Closure Plan

Responses to 7 April 2023 EPA Comments on the Closure
Plan, Analysis of Alternatives, and Supplement 1

31 May 2023

Office of the Secretary of the Navy

Table of Contents

Responses to EPA Comments on the Red Hill Bulk Fuel Storage Facility Tank Closure Plan 1

Responses to EPA Comments on the Red Hill Tank Closure Plan Analysis of Alternatives & Concept Design to Close In Place 2

Responses to EPA Comments on the Red Hill Tank Closure Plan Supplement 1 5

Responses to EPA Comments on Navy’s Response to 9 February 2023 EPA Comments 9

Responses to EPA Comments on the Red Hill Bulk Fuel Storage Facility Tank Closure Plan (November 1, 2022)

1. *Section 2.1.2 Above-Ground Storage Tank - The Fuel Oil Recovery/Reclaimed (FOR) Tank 311 is intended to collect condensate if the tanks are left in place. However, this plan provides no details on inspection and maintenance of the tank, piping, and appurtenances to prevent additional, future releases. It is also unclear what will happen when the tank and associated pipelines are no longer functional. Please update the Closure Plan with details on FOR Tank 311, and clarify how future releases will be prevented for the life of the tanks.*

Response: The Navy will provide the requested information in a future supplement to the Tank Closure Plan.

2. *Section 2.1.3 Pipelines - It is unclear which pipelines were pigged. Please clarify which pipelines were cleaned, and whether the pipelines were returned to use.*

Response: The three fuel pipelines have each been pigged, with the work occurring in 2005 for the F-76 line, 2015 for the JP-8, and 2019 for the JP-5. The pipelines were returned to use.

3. *Section 5.2 Analysis of Tank Closure Alternatives - Please describe how the final tank reuse/closure decision may affect site assessment and remediation, including access to the lower access tunnel, and opportunities for sampling below the closed tanks. EPA will continue to work with the Navy as the project progresses and additional comments regarding site assessment and remediation will likely be needed in the future once a tank closure plan is finalized.*

Response: This response is offered in context of further information that was provided in Closure Plan Supplement 1 and 2. Site assessment and remediation should not be impacted by currently unknown potential future site use. There are well defined assessment and exposure endpoints that can be applied to current and known future exposure scenarios for risk assessment during the site assessment. Access to the facility will be maintained as needed until such time as site assessment studies and any necessary remedial actions are completed.

Responses to EPA Comments on the Red Hill Tank Closure Plan Analysis of Alternatives & Concept Design to Close In Place

4. *In general, the Jacobs Report appears to be a cursory evaluation of the Navy's closure plan, rather than a robust analysis of closure alternatives. Not enough information has been provided to evaluate and support one alternative over another. EPA anticipates further evaluation of closure alternatives and explanation on how this information will be presented to regulators and the public. This closure alternatives presented at a future date will incorporate requests and suggestions from the public and will fully evaluate all benefits and potential concerns associated with each alternative. Please briefly describe supplements to the Closure Plan concerning tank closure alternatives expected to be submitted in the future.*

Response: This comment appears to be superseded by further discussions and submission of Closure Plan Supplements 1 and 2. It is acknowledged that further discussions regarding details of the selected closure in place alternative are ongoing, and may require future supplement(s) to provide all necessary information for approval.

5. *Navy states that, “[a]ll four closure alternatives will render the tanks incapable of being used for fuel storage and will effectively eliminate any future possibility of the tanks containing fuel.” EPA disagrees with this statement. Unless the tanks are destroyed or closed in a manner that permanently ensures no fluids may be stored in the tanks, the possibility of future storage of fuel is not ensured. For example, in Alternatives 1 and 2, no fill is placed in the tanks and the structure of the tanks is maintained. Electrical connections, and any other utility/service connections that are disconnected could be reinstalled at some point in the future. Alternatives 3 and 4 appear to effectively render the tanks inoperable for future fuel storage.*

Response: Supplement 2 to the Tank Closure Plan provides additional information on how the Navy will render the tanks incapable of being used for fuel storage. The three fuel pipelines will be removed between the tanks and the underground pumphouse, effectively eliminating any future possibility of the facility being used to store fuel.

6. *The report assumes that the lower access tunnel would need to be maintained after closure to ensure access to sampling ports. Has Navy considered re-drilling sampling points from the surface, thus eliminating the need and associated cost of maintaining the Lower Access Tunnel?*

Response: The Navy does not have plans to install new sampling ports from the surface. Sampling of the existing soil vapor monitoring ports and groundwater monitoring wells provides a unique opportunity to monitor environmental conditions in close proximity to the bottom of the tanks.

7. *The report does not evaluate the cost of maintaining the structural integrity of the tanks over the long term. Will this cost be estimated by Navy, and will this review be impacted by tank reuse/closure choice?*

Response: Estimation of cost for maintaining the long term structural integrity of the tanks was beyond the scope of the Analysis of Alternatives; however, as requested by DOH during the July 14, 2022, Meet and Confer session, the report does provide rough order of magnitude costs associated with each of the four tank closure alternatives. Most importantly, the Navy did not consider cost as a factor in selecting the preferred alternative of Closure in Place. Instead, Closure in Place was chosen because it provides the safest approach for site workers, the quickest schedule, and the least impact on the environment and local community, while having no significant constraints on engineering feasibility and allowing the potential for beneficial non-fuel reuse of the tanks.

8. *The Report states that, “[r]emoval of the surrounding concrete would create additional safety concerns, including potential destabilization of the rock face and overburden, risk of catastrophic failure, and loss of life during construction.” This speaks to the potential catastrophic effects of the concrete failure over time if the tank is not filled. This cost or evaluation is not included in the analysis. The report also states that, “...the tanks are not expected to deteriorate in the next 50-100 years...” Based on the degradation of the tank and supporting concrete, what is a realistic timeline by which tank structural stability may fail?*

Response: Supplement 2 includes a detailed assessment of the long term structural integrity of the tanks, with supporting seismic analysis and general timeframe for the lasting stability of the concrete and steel liners of the tanks.

9. *How will the piping be managed for different closure options? How will it be cleaned and verified clean? Does Navy expect to find lead-based piping and/or appurtenances that need special handling?*

Response: Piping and appurtenances that are left in place will be maintained by re-painting and sealing in accordance with EPA regulations for lead paint management. If painted pipe is removed, the scrap metal processor receiving the pipe will be notified that the paint may contain lead. No regulated friable asbestos containing material (ACM) has been identified at Red Hill; however, the Navy has identified non-friable ACM in gaskets associated with the pipe flanges. Therefore, if a pipe flange must be disturbed or removed, the work will be conducted in accordance with the NESHAP 40 CFR Part 61, subpart M Standard for Demolition and Renovation, which includes notification 10 days prior to commencing work. This notification must describe the work practices and engineering controls to be used to maintain compliance with the standards contained in 40 CFR 61.145. In addition, the notification must provide the disposal site location, asbestos supervisor certification, authorized point of contact, name and address of the waste transporter, and procedures to be used if non-friable ACM becomes crumbled, pulverized, or reduced to powder. When conducting demolition activities on asbestos-containing pipe flange gaskets, the contractor will establish and maintain worker protections as required by 29 CFR 1926.1101. The contractor’s methods and means for ACM management will be included in the Environmental Protection Plan that will be approved by the Navy and submitted to EPA and DOH for review and comment.

10. *As Navy conducts further investigation of tank reuse options, EPA requests that the Navy convert part, or all, of the facility into a public education center.*

Response: The Navy acknowledges this suggestion.

11. *Alternative 3 does not discuss the use of sand as a fill material. Has this been considered, or are there logistical reasons why this material was not considered a realistic choice?*

Response: The Analysis of Alternatives did not evaluate the use of sand because the other options are generally more favorable for use as fill material. In particular, the use of unwashed sand generated from dredging operations would not be acceptable because the residual salt would be corrosive to the steel tank linings.

12. *Please confirm that, if tanks are to be reused, Navy will consider converting only those tanks required to meet the needs of the chosen reuse method. In other words, not all 20 tanks need to be converted to the same use post closure.*

Response: The Navy acknowledges this suggestion and will consider such a possibility during the evaluation

of beneficial non-fuel reuse options.

13. *For typical UST systems (i.e., gasoline storage tanks at stations), tank removal provides an opportunity to sample the ground more easily below the tank as part of the site assessment process. The Closure Plan does not consider whether certain closure actions could result in less cumbersome sampling moving forward, such as drilling sampling ports from inside the tanks, or removing “windows” from inside the tank that could be used for sampling under the tanks. Do existing holes in the steel liner need to be welded shut if the tanks will not be put back into operations? This question also applies to sampling behind the sides the tanks.*

Response: The Navy is engaging with EPA and DOH for planning requirements for the Site Assessment. This collaborative effort will develop data requirements following a Uniform Federal Policy Quality Assurance Project Plan format to ensure quality scientifically defensible data that can drive assessment and remediation processes going forward. We expect to use sampling methods that will minimize or eliminate the need for drilling sampling ports or “windows” from inside the tanks. A review of closure requirements has clarified that there are no requirements to weld the removed tell-tale system openings.

14. *Were other options considered in closure of the surge tanks?*

Response: The Analysis of Alternatives was focused on presenting the options for closure of the large underground storage tanks, so a detailed evaluation of alternatives for the surge tanks was not performed. For the surge tanks, filling was determined to be the best approach because the tanks are relatively small; they have no potential non-fuel reuse; and they can be filled with inert material without causing significant impact to the environment or surrounding community.

15. *The FOR system in the lower access tunnel is not addressed in this document. Please describe the actions to be taken with respect to the USTs that are incorporated into the FOR system (i.e., the zone 7 sump and main FOR sump).*

Response: The FOR system will remain in place to drain any water that collects in the tanks and tunnels after closure in place. The FOR line will carry the water to the FOR tank for proper disposal. Once defueling and cleaning activities are completed, the FOR system will turn into a condensate drain line, and will be renamed/repurposed as it would no longer be in service as part of a regulated underground storage tank. The FOR line will be cleaned of fuel/tank bottoms prior to this transition to use as a condensate drain.

Responses to EPA Comments on the Red Hill Tank Closure Plan Supplement 1

16. *Figure 1-1 mentions DOH concurrence but does not mention EPA concurrence for plan approval. EPA has issued a draft 2023 Consent Order that, when finalized, will require the Navy to seek approval from EPA for the closure plan and subsequent closure work. When this order is finalized, closure plan documents should be updated to reflect this reality.*

Response: The Navy will comply with the final signed 2023 Administrative Consent Order.

17. *Enclosure (1) includes information on cleaning tanks and sumps. Part 2, “Products,” listed the cleaning detergent as “FS O-D-1276.” Please submit product detail information on all cleaning products that will be used for tank and sump cleaning.*

Response: As discussed during the ongoing technical meetings among DOH, EPA, and Navy, the cleaning contractor will choose the specific cleaning solution, and its material composition and safety data sheet will be described in the contractor work plan, which will be provided to DOH and EPA for review and comment prior to the contractor beginning the work. The product FS O-D-1276 is an artefact that should have been deleted from Enclosure 1.

18. *Navy proposes verification of tank cleaning by California Code of Regulations Title 23 § 2642 – Visual Monitoring. This rule states that “(c) [v]isual monitoring of the exposed portion of a partially concealed underground storage tank shall not relieve an owner or operator from monitoring the concealed portion of the tank using a non-visual monitoring method as specified in section 2641.” Please clarify how subpart (c), above, will be applied at Red Hill.*

Response: The entire shell of each tank is visible, so the only concealed areas would be the FOR and product nozzles. The Navy will develop an approach to cleaning the nozzles and submit this approach at a future date. As discussed during the ongoing technical meetings among DOH, EPA, and Navy, there are no regulations or written guidelines that address verification of tank cleaning for underground storage tanks. Nevertheless, EPA and DOH have requested a verification method to demonstrate the effectiveness of the cleaning process. The Navy identified a visual method using ultraviolet (UV) light, and we proposed this method in Supplement 1 as an approach that could be straightforward and effective. The Hawaii Administrative Rules (HAR) do not address visual inspection, but the California Code of Regulations has a section on visual monitoring, so we referenced that section in Supplement 1.

19. *Additional information is needed to determine whether this fluorescence detection method is an appropriate method for determining total residual petroleum within a tank. Trace contamination adsorbed to the internal surface area of the tanks, a tremendous surface area, could result in significant total volumes of petroleum product. Enclosure (2) – “Standard Operating Procedures for Visual Monitoring” outlines the general process for conducting visual analysis and UV scanning to detect petroleum in the tanks after cleaning. The following questions are made in reference to Enclosure (2):*

- a. *How will Navy determine the amount of residual petroleum per unit surface area detectable by this method? Is it possible to use this method of detection to produce quantitative (or, “semi-quantitative”) results?*

Response: The Navy does not propose using the UV light method to determine an amount of residual petroleum per unit surface area, and the UV light approach does not produce a range of quantifiable results. Instead, the UV light will indicate whether or not residual petroleum is present or absent, and the absence of fluorescence will add to other lines of evidence that, taken together, will demonstrate the tanks are clean. The other lines of evidence are 1) the Navy will conduct a thorough cleaning process that involves venting

and pressure washing of the entire tank, and 2) following cleaning, a marine chemist will certify the air inside the tank to be acceptable for human occupancy and “hot work” such as welding. The hot work standard is typically used in closure of underground storage tanks as a standard for cleaning, and no further evidence is required. The hot work standard applies to air samples, but the air samples also reflect the condition of the tank walls because any significant amount of fuel residue remaining on the walls would partition to the air. For the Red Hill tanks, the UV light method will provide further confirmation (beyond the hot work standard) that the tanks are clean. Following this confirmation, the Navy believes it is reasonable to expect that any fuel residue would be negligible or non-existent, such that it would not be a quantifiable volume.

- b. *Components of petroleum products fluoresce across different spectra. Different fuel types could produce different detection results. How will this be taken into account?*

Response: The UV absorbance spectrum for the types of fuels stored at Red Hill (JP-5, F-76, and F-24) will cause the material to fluoresce under the UV lights that are commercially available and will be used in the Red Hill tanks. Thus, the detection results will accurately reflect presence or absence of fuel for the range of fuel types at Red Hill.

- c. *What procedures will be taken to demonstrate fluorescence from 25 feet? In other words, what actions will be taken to create a control standard used to demonstrate that this method reliably and consistently detects residual petroleum?*

Response: The Navy will require the contractor to create a control standard. At a minimum, the control standard will involve coating a metal surface with fuel and shining the UV light from a distance of 25 feet to verify fluorescence. This is a conservative approach because the UV light will be held at a distance less than 25 feet when it is used within the tanks.

- d. *How will Navy ensure inspectors are sufficiently trained and able to perform consistently (i.e., visual identification is a qualitative metric and different inspectors may operate with different detection sensitivities).*

Response: Navy will require the contractor to train inspectors to ensure consistency in identifying fluorescence. Since the UV method is based on a straightforward determination of presence or absence of fluorescence, limited training will be required. Any indication of fluorescence will be documented on Navy and DOH approved field inspection sheet.

- e. *Where within the tanks will inspection be performed? The entire surface area? A selection of inspection points?*

Response: The UV inspections will involve the entire area of the tanks. If the early results show few or no areas of fluorescence, the inspection areas may be reduced as the work proceeds. The specific inspection areas will be proposed in the contractor work plan for DOH and EPA review and comment.

- f. *Does the Navy have evidence, experience, or related literature demonstrating the successes and failures of using laser-induced fluorescence (LIF) to detect petroleum products on metal surface, specifically (or media other than the subsurface)? Please provide this information to EPA if it exists.*

Response: As described in the references listed in Supplement 1, laser induced fluorescence (LIF) uses a laser to induce UV fluorescence and identify petroleum in the subsurface. In an open air setting such as the Red Hill tanks, a standard UV light bulb can be applied instead of LIF. The Navy does not have specific experience with LIF being used to detect petroleum products on metal or media other than the subsurface. However, within the food and pharmaceutical industry, UV fluorescence is routinely used to validate cleanliness of processing tanks. Overall, the principle of UV fluorescence to detect petroleum products is the

same, whether it is used in the subsurface as LIF, food processing tanks, or the Red Hill tanks.

- g. *The Contaminated Sites Clean-Up Information website states that “...deicing agents, antifreeze additives, and some detergent products...” may also fluoresce. Explain how Navy will avoid a false-positive result.*

Response: The Navy will treat any surface fluorescence as a positive indication of petroleum residual contamination that will be targeted for further cleaning. Given the inability of UV fluorescence to differentiate petroleum from the other listed constituents, the Navy will accept the effort associated with re-cleaning false positive areas.

20. *The “Red Hill Tank Visual Monitoring Field Form” contains a typo on Question 1 (“1. Are walls of the tank tank dry?”)*

Response: The typo will be corrected.

21. *The “Red Hill Tank Visual Monitoring Field Form” does not solicit information on the areas of the tank that were inspected. Please update the form to require the inspector to certify the areas/zones within the tank that were inspected.*

Response: The form will be updated as requested.

22. *Please describe what will happen to pipelines after they are cleaned. Will they be disposed of, recycled, left in place?*

Response: In order to demonstrate the Navy’s commitment to never again store fuel at Red Hill, the Navy will remove the three fuel pipelines between the RHBFSF and the underground pump house at Pearl Harbor. The Fuel Oil Reclaimed (FOR) line will be left in place and operational. Additional details regarding pipeline removal are included in Closure Supplement 2.

23. *This submittal references the Unified Facilities Guide Specifications (UFGS) but does not always specify which UFGS is being referenced. Please review and ensure all UFGS are specified.*

Response: The contractor will comply with all relevant UFGS and API standards for tank cleaning, and the individual sections will be noted in the contractor work plan, which will be submitted for EPA and DOH review and comment.

24. *Page 11, section 3.2 indicates that the FOR lines will continue to be used to move oily wastewater to Tank 311. The FOR line from the main sump to Tank 311 is underground and the layout is such that it is likely that the regulated substance (oily wastewater) would be contained in the piping. Please describe efforts to tightness test portions of this pipeline.*

Response: The underground portion of the FOR line undergoes regular tightness testing as part of the leak detection program at Red Hill. Testing of the FOR line was last completed in January 2023.

25. *Planning for beneficial non-fuel reuse is ongoing, and EPA is aware that Navy contractor Nakapuna has initiated the first stage of solicitation by survey to the public to provide proposals for tank reuse. EPA will continue to provide feedback on this process as new information is made available. For now, EPA provides the following comments:*

- a. *Stating that the RHBFSF will “no longer be used to store...chemicals...” is vague and may cause confusion in the future. The term “chemicals” is broad, and stakeholders may hold different interpretations of the term. Suggest replacement with more specific language and/or clarification in future distributions.*

Response: In future distributions, the Navy will work to use clear and specific language as suggested. For example, rather than saying “chemicals,” we can say “substances that could negatively impact the environment or public health.”

- b. *The statement, “[p]otential beneficial reuse must be viable assuming the DOD will continue to own the property” is unclear. Please provide clarification to the term, “viable,” in this sentence.*

Response: The statement means that the beneficial reuse must work under the condition that DOD still owns the property. In other words, if a potential reuse depends on property transfer to a new owner, then it would not be a viable reuse.

- c. *Please provide clarification to the statement, “[p]otential beneficial reuse must be considered viable based on the current DON proposal for tank and pipeline closure...”. Is it correct that reuse cannot involve the removal/destruction of any tanks or pipelines, and that the surge tanks must be filled with inert material?*

Response: The details of tank and pipeline closure are being discussed at ongoing technical meetings among DOH, EPA, and Navy. Some of the details may change, but the expectation is that the large USTs will be closed in place and the surge tanks will be filled with inert material. The potential reuse must be viable in the sense that it must work with the conditions that exist following closure activities. For example, if the reuse depends on using the surge tanks, then it would not be viable if the tanks are already filled.

- d. *Please provide estimated dates for completion for the three avenues to collect information on non-fuel reuse (i.e., Nakupuna public solicitations, University of Hawai’i investigation, and the DOD stakeholder input).*

Response: The Navy estimates the results of the Nakupuna public solicitations will be published and available on the internet prior to the Fall 2023 Fuel Tank Advisory Committee (currently estimated to be in November, 2023). The Navy estimates the published version of the University of Hawai’i investigation will be available on the internet in February, 2024. The collection of potential reuse ideas from DoD stakeholders and the detailed business case and engineering feasibility assessments required by the FY23 NDAA is due to Congress in February, 2024.

Responses to EPA Comments on Navy’s Response to 9 February 2023 EPA Comments

26. *Navy’s response says that Nakupuna will solicit input via an online questionnaire but does not say how this opportunity will be promoted. Will there be social media posts, public meetings, webpage updates, etc., to share the survey broadly?*

Response: Nakupuna’s online questionnaire has been promoted on television, through Facebook live interviews, press releases and in person monthly at multiple neighborhood board meetings. Emails were also sent to elected officials, schools, businesses, churches, civic clubs, neighborhood boards, and other types of community organizations.

27. *Please provide information on the “local area” that will receive paper copies of the survey. Details on whether the local area pertains to those served by the JBPHH PWS, households on base, or a larger area would be helpful.*

Response: As a follow-up to their initial questionnaire, Nakupuna’s second survey will utilize two methods: 1) an online survey to a geographically representative set of households across Oahu, and 2) mail out surveys to households in the Red Hill area. Exact addresses are still being determined, but the area will generally focus around Red Hill, including Halawa Valley.

28. *Regarding the tank reuse solicitation to be performed by Nakupuna, EPA requests that Navy inform EPA of any soon-to-be-released surveys or mailers with sufficient time for EPA to review and comment on the materials prior to release. Please continue providing notice of public engagement actions well in advance of action so EPA is prepared.*

Response: The Navy has already published one survey for Red Hill Facility reuse at the following website: <https://www.redhillrepurposing.com/>. The Navy anticipates that Nakupuna will publish a second survey in June using both online and mail out strategies to obtain information. The questions for the second survey are still being developed, but the Navy will provide EPA with an advanced copy of proposed questions for review and comment.

29. *In response 1(f), it states that “Navy will consider benefits of the [tank reuse] options in terms of their...social...aspects.” Please describe how the Navy will weigh social benefits in this context.*

Response: The Navy has contracted with a federally funded research and development center (FFRDC) as required by the FY23 NDAA to complete detailed evaluations, including cost-benefit and engineering feasibility, of potential beneficial non-fuel reuse concepts for the Red Hill Bulk Fuel Storage Facility. Specifically, the NDAA requires the cost-benefit analysis to cover each of the following for each such alternative use:

- i. The design and construction costs.
- ii. Life-cycle costs, including the operation and maintenance costs of operating the facility, such as annual operating costs, predicted maintenance costs, and any disposal costs at the end of the useful life of the facility.
- iii. Any potential military benefits.
- iv. Any potential benefits for the local economy, including any potential employment opportunities for members of the community.
- v. A determination of environmental impact analysis requirements.
- vi. The effects of the use on future mitigation efforts.
- vii. Any additional factors determined to be relevant by the federally funded research and development center in consultation with the Secretary.

Under items (iv), (v) and (vii), the Navy will coordinate with the FFRDC to ensure that the analysis will look at positive effects on society as a whole (e.g. proposed reuse will not add risk to the environment or human health and may provide jobs to the people of Hawai’i).

30. *In response 1(g), Navy states, “[w]hile consideration of non-fuel reuse is dependent on the permanent tank closure method selected, it is a separate process from underground storage tank (UST) closure.” Please clarify this response. Is Navy suggesting that reuse is outside the scope of UST closure requirements? Regulatory closure involves permanent tank closure, site assessment, and necessary remediation.*

Response: The Navy agrees that regulatory closure under the HAR involves permanent tank closure, site assessment and necessary remediation, but the HAR does not address reuse. While reuse can only occur if the tanks are properly closed in place, the Navy believes that reuse is outside the scope of UST closure requirements, and we are not aware of other closed USTs that have been reused for non-fuel purposes. Beneficial non-fuel reuse will almost certainly require analysis under the National Environmental Policy Act, and the EPA and the public will have opportunities to provide input.

31. *EPA requested that Navy establish a minimum distance between waste accumulation areas and drainage systems/waters. Navy stated that solid waste accumulation areas would be established “as far as practicable” from water features (i.e., storm drains, ditches, streams, etc.). EPA again stresses the importance of having a standard procedure for minimizing distance between waste accumulation areas and these features. Consider implementing a system that establishes additional precautionary measures when a set minimum offset distance cannot be reached.*

Response: Neither federal nor state waste management regulations establish minimum distances between waste accumulation areas and drainage systems or waters. Thus, the Navy does not have any regulatory guidance for establishing a standard procedure, but we have elected to establish the waste accumulation areas as far as practicable from the Halawa Stream and other drainage systems. These solid waste accumulation areas provide a separation distance of 200 or more feet from Halawa Stream. In addition, as best management practices, all liquid waste accumulation will be located within secondary containment; solid waste will be stored on lined areas or in lined containers; and weekly inspections of the containers, secondary containment, and spill kits will be conducted. The Navy will require the contractor to perform the weekly inspections, and the Navy will provide compliance oversight in accordance with the existing Waste Accumulation Point manual for JBPHH. The contractor’s method and means to select and establish the waste accumulation areas, manage the waste containers, and conduct the weekly inspections will be detailed in the contractor’s Environmental Protection Plan that must be approved by the Navy and will be submitted to EPA and DOH for review and comment.

32. *Once a request for a waste manifest review is made, how long until the Navy delivers the information to the regulators?*

Response: Within 10 working days of receipt, all returned hazardous waste manifests and solid waste shipping papers will be recorded in the operating record of the RHBFSF. The Navy will provide regulator access to the operating record upon request. If EPA would like more immediate access to the shipping papers, the Navy can require the contractor to send copies directly to EPA as they are received. In addition, once a hazardous waste shipment is received by a TSD facility, EPA has immediate electronic access to the manifests through EPA’s E-manifest system.

33. *Regarding responses to EPA’s previous comments #5 and #9 - As described, it appears that the FOR sumps will be undergoing a “change-in-service.” Please include additional information in future supplements on how the requirements of HAR 11-280.1-71 and HAR 11-280.1-72 will be met.*

Response: The Navy will provide this additional information in future supplements as requested.

34. *Regarding responses to EPA’s previous comments #6, #32, and #33: The UST systems may include piping and appurtenances outside of the tank farm and pipelines to the underground pumphouse. EPA recommends arranging a meeting with EPA and DOH for an in-depth discussion on this topic.*

Response: The Navy welcomes the opportunity for further discussion with EPA and DOH to resolve this issue.