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April 9, 2021

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Dr. Elizabeth Char
Chair
Fuel Tank Advisory Committee
Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801-3378

Dear Dr. Char:

Subject: Discussion Topics for the May 20, 2021 Fuel Tank Advisory Committee (FTAC) Meeting

As a member of the FTAC, I request adding the following topics to the agenda for the upcoming May 20, 2021 meeting.

1. A progress update on the eight sections of the Administrative Order on Consent (AOC) by the United States Environmental Protection Agency (EPA) and the Hawaii Department of Health (DOH).
2. A report by the Navy on the projects that have been approved in their budget appropriations for the Red Hill fuel facility and the projects requested for next year's budget. In consideration of the possibility of a major infrastructure funding bill that is being supported by President Biden, the FTAC should be aware of the status of funding requests for the Red Hill facility.

It has been seven (7) years since the leak was reported at the Red Hill Bulk Fuel Storage Facility and it is important to update the FTAC and the public on the progress toward protecting our precious water resources under the facility. Given funding is very critical to implementing any of the approved actions identified under the AOC, it is prudent for the FTAC to know the specific improvements that the Department of Defense (DOD) will be committing to fund and when it will be implemented.

Thank you for your kind consideration of this matter. If you have any questions, please contact me at 808-748- 5061.

Very truly yours

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

Cc: Dr. Keith Kawaoka
Deputy Director of Environmental Health
State of Hawaii Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801-3378

Mr. Chuck Freedman
US Senator Brian Schatz's Office
300 Ala Moana Boulevard, Room 7-212
Honolulu, HI 96850

Ms. Jacqueline Conant
US Representative Ed Case's Office
1132 Bishop Street, Suite 1910
Honolulu, HI 96813

Mr. Carlos Santana
Community Liaison
US Senator Mazie Hirono's Office
300 Ala Moana Boulevard, Room 3-106
Honolulu, HI 96850

US Representative Kaialii Kahele
99 Aupuni Street
Hilo, HI 96720

Captain Gordie Meyer
Commanding Officer
NAVFAC Hawaii
Regional Engineer, Navy Region Hawaii
Naval Facilities Engineering Command
400 Marshall Road,
Joint Base Pearl Harbor Hawaii 96860-3139

Senator Mike Gabbard
Agriculture and Environment Committee Chair
State of Hawaii Senate
State Capitol, Room 201
Honolulu, HI 96813

Representative Nicole Lowen
Energy & Environmental Protection Committee Chair
State of Hawaii House of Representatives
State Capitol, Room 425
Honolulu, HI 96813

Mr. Steve Linder
United States Environmental Protection Agency
Region IX
75 Hawthorne Street
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Mr. Ryan Imata
State of Hawaii
Commission on Water Resources Management
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Honolulu, HI 96813

Mr. Kaleo Manuel
Deputy Director
State of Hawaii
Department of Land and Natural Resources
1151 Punchbowl Street
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Dr. Melanie Lau
Moanalua Valley Community Association
1836 Ala Noe Place
Honolulu, HI 96819

Ms. Natanya Friedheim
Salt Lake Neighborhood Board
925 Dillingham Boulevard, Suite 160
Honolulu, HI 96817

From: [Melanie Lau](#)
To: [Peter Adler](#)
Cc: [Perry, Thu](#)
Subject: [EXTERNAL] FTAC meeting on 5/20/2021
Date: Monday, May 3, 2021 12:27:33 AM

Hi Peter,

I'm glad you are facilitating this meeting again. I think we stayed on task better because of it. In addition to the updates Ernie mentioned, I would like to have the Navy update us on their project with GTTNA. Capt. Gordie Meyer made an off hand comment about this company being chosen for possibly retrofitting the tanks with a double wall stainless steel configuration but when he was asked for more specific information such as the bid / proposal number for their project, how big a space was going to be between the two walls, and would it allow what kind of monitoring systems between the two tank walls, he begged off and said that he had just arrived in his position and needed to be briefed on those details. So, he should provide us with those details at this meeting.

The Navy also "missed" giving their update meeting in Feb/ Mar 2021. At our Oct 2020 FTAC meeting, we decided on twice a year FTAC meetings. The Navy was responsible for interim, alternate quarter meetings. They did not give one. These questions could have been answered then, which would have given the committee, and public, time to research and ask follow up questions at this meeting.

I asked Capt. Meyer about the results of the fuel needs assessment the Navy conducted and was told to contact my congressmen. I did, but I did not get an answer. I do not want to know exactly how many gallons of fuel we need per year, but with the move to nuclear powered vessels and emphasis on long range missiles, perhaps we can decrease the amount of fuel in these tanks and thus decrease the risk to the aquifer and the people of Hawaii.

In the TUA that the Navy finally proposed in 2019, the Navy commits to implementing a "double wall equivalency secondary containment by 2045 or it will remove the fuel in the tanks". The AOC clearly states that "tanks to which BAPT has not been successfully applied will be taken out of use...and emptied...no later than 22 years from the effective date" of the AOC, which was signed in 2015. So, 2015 + 22 is 2037, not 2045. My question, then, is how did the Navy come up with 2045 and are the regulators allowing this deadline slippage? If so, why?

So, my issues boil down to:

1. short update on the GTTNA project, giving time for questions and clarifications
2. Why did the Navy not give their interim meeting and do they plan to honor that commitment?
3. How did the Navy arrive at the 2045 deadline?
4. Are the EPA and DOH allowing this delay? If so, based on what grounds?
5. What did the fuel needs assessment find?
6. Relocation of the tanks to above ground double walled tanks should also be put out to bid.

Oh, by the way, I am flying out on May 20, so I may be in a taxi or checking in at the airport for the last hour or so of the Zoom meeting. I can mute myself and not share video while I am traveling to the airport, so if I lose connection, please let me back in!

Thank you,
Melanie

Testimony for the Fuel Tank Advisory Committee meeting on May 20, 2021

Dear Fuel Tank Advisory Committee Members:

Thank you for this opportunity to give public input on the disaster waiting to happen.

Preventing a catastrophic crisis is a lot easier than eventually dealing with one.

1989 – the **Exxon Valdez disaster in Alaska** devastated Prince William Sound and its shores

- Human error caused 11 million gallons of oil to contaminate 1,300 miles of coastline

2010 – the **Deepwater Horizon disaster in Louisiana** devastated the Gulf of Mexico and its shores

- 5 key human errors, and 1 colossal mechanical error, caused 210 million gallons of oil to be discharged

Over the last several years, despite promises and reassurances, both the Keystone and Dakota Access Pipelines have leaked hundreds of thousands of gallons of oil onto agricultural land and in local waterways – more examples of human error.

Red Hill, Hawaii – tens of thousands of gallons of jet fuel have already leaked from tanks and pipes; most of which were caused by human error. Which year will become equally famous when the almost 80-year old fuel tanks devastate O’ahu’s primary sole-source aquifer that provides water to most of the residents on the island?

- 2022? 2025? It could still even be 2021!

It is impossible to accurately inspect and monitor every square centimeter of the corroding tanks and pipes. Human error is inevitable.

They say hindsight is 20/20

- It was human error in the 1940s to install the tanks on top of the aquifer
- And it will human error today to not decide to **RELOCATE** the tanks

The tanks have served their purpose - - - and have overstayed their welcome. They must now be emptied and retired before disaster strikes.

There are already enough movies about environmental catastrophes, corporate greed, and unethical elected officials.

- “Erin Brockovich” – what PG&E did to Hinkley, CA
- “Dark Waters” – what Dupont did to Parkersburg, WV
- “Flint” & “Bigger Than Water” – what unethical city officials did to Flint, MI

The Navy’s proposed “kick the can” solution is a Band-Aid over a gaping wound and guarantees another disaster movie. Please don’t let that happen.

Sincerely,
Denise Boisvert
Waikiki

From: [Andrea Wagner](#)
To: [Perry, Thu](#)
Subject: [EXTERNAL] Red Hill Fuel Tanks
Date: Wednesday, May 19, 2021 4:11:53 PM

I am hoping to join tomorrow's Zoom meeting on the Red Hill fuel tank situation, but wanted to share my concerns in advance in case I am not able to do so.

My concerns about the Red Hill fuel tanks have to do with their age, recurring spills associated with the site, and their impact on residents and our primary industry, tourism. Other parts of the country have faced similar problems, eventually resulting in the Navy replacing aging fuel tanks. Why not in Hawaii, where fresh water is limited to wells under each island that are already stressed by growing populations, industry, and agriculture. Adding the risk of jet fuel leaking into the water supply is unacceptable. Do we really need to wait until people fall ill or die before we take action?

Many thanks,

Andrea Wagner
672 Lawelawe St.
Honolulu, HI 96821
808-840-3016

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"You must do the thing you think you cannot do."

From: [Helen Nakano](#)
To: [Perry, Thu](#)
Cc: [Helen Nakano](#)
Subject: [EXTERNAL] Testimony regarding Red Hill Fuel Tanks
Date: Tuesday, May 18, 2021 10:25:47 PM

To: Thu Perry, Dept. of Health

Please add my testimony against the approval of allowing the Navy to continue to operate the fuel tanks on Red Hill. The tanks continue to leak. The Navy continues to delay the removal of the tanks. The steel plate containing the fuel continues to rust.

The contamination of our aquifer seems inevitable.

The fuel tanks on Red Hill represent a man-made time bomb.

Bill Sharp in Island Voices, Sunday Star Advertiser, dated 5/16/21, opined, "Hawaii is just as rich of a target to China as it was to Imperial Japan during the 1940s." He listed all the "warships" conveniently located right here: Indo-Pacific Command Headquarters, U.S. Pacific Fleet, Pearl Harbor Naval Shipyard, U.S. Pacific Air Forces, U.S. Army Pacific, U.S. Pacific Marine Corps Forces Pacific, the 14th U.S. Coast Guard District, the National Security Agency, the Defense Intelligence Agency, the Central Intelligence, and strategic weapons.

On Monday, we read that Congress is considering a bipartisan bill seeking \$25 billion to shore up the Naval Shipyard. What about using the money to remove the tanks above our aquifer instead?

We have all gone mad. The two options people in Hawaii have seem to be: death by bombs from our terrible enemy China or death by water poisoned by our own military.

I ask that the Department of Health act on behalf of the people.

Sincerely,
Helen Nakano
Ph: 808-988-5671
Email: hanafudahawaii@gmail.com
3080 Puhala Rise
Honolulu, HI 96822

From: [laurag](#)
To: [Perry, Thu](#)
Subject: [EXTERNAL] Fuel tanks
Date: Thursday, May 13, 2021 4:16:45 PM

Members of Fuel Tank Advisory Committee,

We are tired of having to fight to save our drinking water, but we will never give up. This is just too important for our grandchildren. Please do the right thing and move and replace these tanks. On Thursday night another 1,000 gallons spilled. I want to know what is being done to immediately stop this and protect our water. The water belongs to all of us, not the military. What gives them the right to destroy our water? Why do we even put up with them? They have not proven themselves to be good environmental partners here in Hawaii. Mahalo, Laura Gray R.N.

From: [Paul Bernstein](#)
To: [Perry, Thu](#)
Subject: [EXTERNAL] Red Hill Tanks
Date: Wednesday, May 19, 2021 3:38:41 AM

Aloha,

I realize that deciding what to do with the Red Hill fuel storage tanks is quite complex and controversial. Given the tremendous risk to residents and businesses on Oahu, it seems imperative that something is done to the tanks to ensure no leakage. I recognize that such actions would be expensive, but something similar to what was done in San Diego seems in order. If the tanks were to leak it would be an absolute disaster for hundreds of thousands of Oahu residents. Given that residents have nowhere to evacuate on island and it would take several days to bring in enough clean water to meet the needs of those without clean water, it seems imperative to mitigate against the risk of such a catastrophe.

Mahalo nui loa,
Dr. Paul Bernstein

From: [Waikiki - Hawaii Condo](#)
To: [Perry, Thu](#)
Subject: [EXTERNAL] Fuel Tank Advisory Committee Testimony for May 20, 2021
Date: Friday, May 14, 2021 1:58:23 PM

Dear Members of the Fuel Tank Advisory Committee,

The tanks are KUPUNA already. They have been working nonstop for almost 80 years. They deserve to RETIRE with dignity!

The Navy must urgently start building a new location to store their fuel reserves that is not right above the source of water for the vast majority of O'ahu's residents.

Woulda, coulda, shoulda...

Coulda, shoulda, woulda...

Shoulda, woulda, coulda...

There will be too many ways to express lame excuses for not having emptied the old, rusting jet fuel tanks in Red Hill BEFORE the inevitable disaster that awaits O'ahu's primary sole-source aquifer.

Please don't let Oahu's residents, its tourists, our Nation, or the World ever hear those three words - in any order - in the same sentence as the words "Red Hill jet fuel tanks".

Sincerely,
Mr. Kim Jorgensen
Honolulu



Environmental Caucus of The Democratic Party of Hawai'i

via email: thu.perry@doh.hawaii.gov

Thursday, May 20, 2021

Members of the Fuel Tank Advisory Committee
Underground Storage Tank (UST) Section
Department of Health
1250 Punchbowl Street
Honolulu, Hawaii 96813

Ms. Thu Perry
Public Participation Coordinator
Solid & Hazardous Waste Branch
Department of Health
919 Ala Moana Boulevard, #212
Honolulu, Hawaii 96814

Re: Red Hill Bulk Fuel Storage Facility Tank Upgrade Alternatives

Aloha, Members of the Fuel Tank Advisory Committee and Ms. Perry:

Thank you for this opportunity for the Environmental Caucus of the Democratic Party of Hawai'i (DPH) to provide comments relating to the mandate of the Fuel Tank Advisory Committee (FTAC) under Hawai'i Revised Statutes (HRS) §342L-62 (a) relating to the Red Hill Bulk Fuel Storage Facility. Under consideration are: (1) the short- and long-term effects of leaks of the fuel tanks, including effects relating to the health of residents, safe drinking water, and the environment; (2) response strategies to mitigate the effects of leaks from fuel tanks; (3) methods to improve communication between the United States Navy, Air Force, and Army; the State; any local board of water supply; and the public in the event of leaks from any fuel tank; (4) groundwater test results in the areas surrounding the fuel tank facilities, with a particular emphasis on the groundwater near the Red Hill Bulk Fuel Storage Facility; (5) the implications of shutting down any fuel tank facility; and (6) updates on progress toward meeting goals of agreement between the State, the affected county, and the federal government.

The Democratic Party of Hawai'i has an enrolled membership of over 115,000 active and associate members in the State of Hawai'i. The Environmental Caucus of the Democratic Party of Hawai'i is a semi-autonomous organization that advocates and advances the Platform and Resolutions adopted by the Party's members at the Democratic Party's State Conventions and the O'ahu County Democratic Conventions.

We emphasize the massive size and dangerous nature of the Red Hill USTs. They were built during World War II, 80 years ago. There are 20 tanks, 19 in operation (each 100 feet in diameter, and 250 feet in height, each tank capable of holding 12.5 million gallons of fuel), capable of holding 250 million gallons of fuel in total with all 20 tanks operational. These tanks sit merely one hundred feet above the primary drinking-water Moanalua-Waimalu aquifer in the City and County of Honolulu. The fuel tanks are composed of rusting, thinning steel, crumbling in places, encased in porous concrete, that are highly susceptible to spontaneous leakage due to corrosion of the steel lining.



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While the concern focused on the Red Hill Fuel Tank Facility has always centered around the tanks themselves, as recently as twelve days ago, on May 8, 2021, a release of about 1,000 gallons of jet fuel from a distribution pipeline occurred with only 700 gallons of the released fuel recovered. While the Navy's containment system "properly monitored, detected and collected the fuel release as designed," this still adds an additional factor, often overlooked by the public and environmental groups, that not only must we be concerned with the eroding tanks but we must also be concerned with the gravity-fed pipeline and other accessory structures that pose risks of releases. The Red Hill tanks are connected to three gravity-fed pipelines that run 2.5 miles inside a tunnel to fueling piers at Pearl Harbor, all of which pose points of releases within the 2.5 mile distance.

While the FTAC is conducting its separate hearing pursuant to HRS §342L-62 (a), it is important to note that the State of Hawai'i Department of Health (DOH) is also conducting a contested case hearing to determine the terms of a five-year operating permit that the Navy needs to follow to continue employing the Red Hill tanks. Earlier permits were not required. The contested case hearing was conducted throughout the week of February 1 – 5, 2021, debating the merits of awarding an operating permit for the Navy to continue to store up to 187 million gallons of fuel at Red Hill. Both separate actions focus on the age and construction of the Red Hill tanks, a single-wall tank system of quarter-inch-thick welded steel plates backed by 2 to 4 feet of concrete embedded in saturated volcanic rock.

The Red Hill tanks are not operated, and cannot be operated, in a manner that is protective of our groundwater. The practical alternative is to build new tanks above ground in a safe location and relocate the fuel — just as the Navy did at the Naval Base Kitsap-Manchester in the State of Washington. There, it replaced eight World War II-era underground fuel storage tanks with six larger above-ground, state-of-the-art steel storage tanks. Each new tank has the capacity to hold an estimated 5.25 million gallons of either JP-5, a type of carrier jet fuel, or F-76, a type of marine diesel fuel. This upgrade, albeit smaller in size than Red Hill, allows the installation to meet the Navy's fuel storage and distribution requirements at a more cost-effective manner with improved maintenance efficiencies without causing any significant impact on the water, geological or cultural resources on or near the installation per its EIS. The Red Hill tanks could surely be replaced and upgraded in this same manner as well.

Like the Sierra Club and the Honolulu Board of Water Supply (BWS), the DPH Environmental Caucus, is advocating for the full removal of the tanks. The Sierra Club and BWS could appeal to the state Circuit Court in the event of an unfavorable administrative ruling by the DOH. DOH Director Dr. Libby Char will have the final say on whether the Navy receives a permit to continue its operations of fuel storage for Pearl Harbor fueling pier and RIMPAC, Rim of the Pacific Exercise, the world's largest international maritime warfare exercise. RIMPAC is held biennially on even-numbered years hosted and administered by the United States Navy's Indo-Pacific Command, headquartered at Pearl Harbor, in conjunction with the Marine Corps, the Coast Guard, and Hawaii National Guard forces under the control of the Governor of Hawaii. The DOH ruling could take several months.

As should be very clear from the record, the 2014 release of 27,000 gallons of fuel from Tank 5 was by no means the only release. A release from Tank 6 was reported by the Navy in 2002. Tanks 15 and 16 also had fuel releases after 1988, according to a Navy report in 2014. The Navy TRIM report in 2016 indicates that Tank 5, Tank 10, Tank 17, Tank 19, and Tank 20 underwent inspections after 1988 that identified through-wall corrosion and possible leaks below the detection limit. The groundwater data from



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2005 to the present show petroleum chemical contaminants in groundwater samples. Petroleum staining was found in cores taken before 2014 beneath Tanks 19 and 20. (See AMEC Report, 2002.) Further, the Navy's Red Hill Facility Groundwater Protection Plan (GWPP) report documents leaks from various tanks from 1940s through to the 1980s (Navy report, 2008.)

It is important to note that a major leak from even one of the Red Hill tanks could jeopardize drinking-water for the majority of O'ahu's population of one million people. These leaks cannot be "cleaned up." The water will simply be rendered undrinkable for anyone – civilians or military. Alarming, the Navy itself affirmed that there is a 27.6% chance of the tanks leaking up to 30,000 gallons of fuel every single year. Many studies have detected petroleum contamination in the groundwater beneath the tanks. Since their construction in the 1940s, it is believed the tanks have leaked more than 178,434 gallons of fuel. This latest May 8, 2021, release proves that the 80-year-old Red Hill fuel tanks pose a serious threat to drinking water for hundreds of thousands of O'ahu residents.

This is a disaster waiting to happen. It is essential that the Red Hill USTs be removed, or at least upgraded to secondary containment. However, it is clear that the owner of the USTs has no plan to undertake either plan for at least 15 years. This is unacceptable.

The Hawai'i Administrative Rules (HAR) § 11-280.1-21 require that all UST systems be upgraded to secondary containment by a firm fixed date, July 15, 2028, except for field-constructed tanks (*e.g.*, Red Hill Field Tanks) and airport hydrant systems, which must be provided with secondary containment by July 15, 2038.

The DPH Environmental Caucus strongly opposed allowing the field-constructed tanks to have a fixed-date extension in HAR § 11-280.1-21 from July 15, 2028 to July 15, 2038, and the Navy's proposed 2nd extension to July 1, 2045, which was also as opposed by the DOH and EPA. Accordingly, we urge the FTAC to require the EPA and the DOH to require secondary containment for the Red Hill Bulk Fuel Storage Facility, or in the event that secondary containment is determined to be infeasible, then the relocation of the fuel tanks away from the aquifer no later than July 15, 2028.

In 2018, the O'ahu County Democrats, out of dire concern over the risk to the Moanalua-Waimalu Aquifer, the major drinking water source from Moanalua to Hawai'i Kai, affecting hundreds of thousands of residents, businesses and visitors, adopted the following resolution:

OC 2018-11. Urging the United States Navy to retrofit its twenty jet fuel tanks or relocate them to a location away from the aquifer

Whereas, A Navy analysis may underestimate the contamination potential of leaks from giant fuel tanks from Red Hill; and

Whereas, The Navy has 20 underground fuel storage tanks dating to World War II in Red Hill above Pearl Harbor; and



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Whereas, The tanks sit on an aquifer that supplies a quarter of the water consumed in urban Honolulu; and

Whereas, More than 27,000 gallons of jet fuel leaked from one of the tanks in 2014; and

Whereas, The Navy's evaluation of the potential risks appears to be skewed toward concluding that millions of gallons of jet fuel could be released without damaging the groundwater; and

Whereas, The Navy cannot locate the leaked fuel or accurately assess the risk to our groundwater; and

Whereas, Instead, the Navy is providing models to produce its preferred outcomes; and

Whereas, The Navy and regulatory agencies are working on a 20-year-plan to reduce the risk of leaks and fuel contamination from the tanks; and

Whereas, The plan includes new tank designs and potentially storing the fuel someplace other than Red Hill; and therefore, be it

Resolved, That the O'ahu County Democrats of the Democratic Party of Hawai'i urge the United States Navy to install double-walled tanks at Red Hill within five years or move the tanks if the Navy is unable to retrofit the twenty tanks into double-walled tanks within the time prescribed; and be it further

Resolved, That the O'ahu County Democrats of the Democratic Party of Hawai'i urge the Hawai'i State Legislature, and the U.S. Congress to mandate that the Navy retrofit the twenty Red Hill tanks to double-walled tanks within five years and or relocate the twenty tanks to a location where the risk of leakage into the aquifer and groundwater is greatly minimized; and be it

Ordered, That copies of this resolution be transmitted to the United States Navy, members of the Hawai'i Congressional Delegation, the Governor of the State of Hawai'i, the Lt. Governor of the State of Hawai'i, Hawai'i Legislators who are members of the Democratic Party; the Mayor of the City and County of Honolulu; and Members of the City Council of the County of Honolulu; and the 2018 convention resolutions committee of the Democratic Party of Hawai'i.

[End quote]

For these reasons, the Environmental Caucus of the Democratic Party of Hawai'i urges the FTAC to require the EPA and the DOH to mandate secondary containment for the Red Hill Field Tanks or, if secondary containment is determined to be infeasible, then the relocation of the fuel tanks away from the aquifer so



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that the people of the State of Hawai'i, particularly those residing, working, and visiting the City and County of Honolulu, can feel safe and free of the potential risk of petroleum contamination to its major drinking-water aquifer for generations to come.

In addition, we urge that HAR §11-280.1-23 and HAR §11-280.1-42 be made applicable to Red Hill field-constructed tanks. These sections require hazardous substance USTs to use interstitial monitoring and secondary containment without exceptions. Interstitial monitoring detects the presence of liquid in the interstitial space between the lining. Double-walled tanks must be designed for continuous electronic monitoring or visual inspection of interstitial space for signs of leaks using sensors connected to an automatic tank gauge which triggers a visual or audible alarm whenever the sensors detect liquid.

The Red Hill steel linings are encased in cement subject to 80 years of deterioration. Cement is porous and offers no protection to (or from!) the environment. Thus, 80 years of leaks have entered our environment and, to affirm the risk of future releases, the Navy affirmed a 34% chance of a major fuel leak at the facility in the next 100 years. If the aquifer is polluted by a major failure at one the Red Hill tanks or by a migration plume of leaked oil, it would be catastrophic, rendering O'ahu uninhabitable. An adequate supply of safe drinking water is critical for life and our economy.

We also urge that HAR §11-280.1-67 apply to require public notification IMMEDIATELY in the event of a confirmed release from the Red Hill Field Tanks. The public demands immediate notification so that proper preparation can be undertaken accordingly, not only when a corrective action plan is in place, but at the onset so that the public can properly prepare for drinking water contamination by bottled water storage. Further, a desalination facility should be constructed given the Navy's own prediction of a 27.6% chance of an annual release of 30,000 gallons of fuel per year. It would be malfeasance, or at a minimum, nonfeasance, for government officials to fail to adequately prepare for this eventuality.

Given that (1) O'ahu's sole-source groundwater aquifer provides critical drinking water supplies that simply cannot be replaced, (2) an enormous amount of fuel (currently 187 million gallons of fuel but the Tank Farm has a full capacity of 250 million gallons of fuel) is stored a mere 100 feet above the major drinking-water aquifer that lies in saturated volcanic rock, (3) petroleum chemicals have repeatedly been detected in groundwater and rocks underneath the tanks, and (4) the Navy's interim report appears to lull the public into the mistaken belief that up to a 700,000 gallon release would not cause any impacts to the Navy's Red Hill Shaft, we believe that it is far better to err on the side of caution and require the reinforcement of the Red Hill Field Tanks in the same manner required of non-field constructed tanks, *i.e.*, secondary containment with interstitial monitoring by July 15, 2028, or in the alternative, to drain the 187 million gallons of jet fuel, marine diesel, and other petroleum constituents and relocate the fuel into state of the art above-ground tanks in an area where they will not pose a "clear and present danger" or cause an "imminent and substantial endangerment (ISE)" to human health and the environment from UST and gravity-fed pipeline releases above a major drinking water aquifer.



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Mahalo for this opportunity to provide public comments on this critical matter,

/s/ Melodie Aduja

Melodie Aduja

Co-Chair, Environmental Caucus of the Democratic Party of Hawai'i

Email: legislativepriorities@gmail.com

/s/ Alan B. Burdick

Alan B. Burdick

Co-Chair, Environmental Caucus of the Democratic Party of Hawai'i

Email: burdick808@gmail.com