



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
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5750
Ser N00/0648
September 9, 2019

CERTIFIED NO: 7016 0910 0001 0898 4545

Mr. Jeff Scott
Director of Land, Chemicals, and Redevelopment Division
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105

CERTIFIED NO: 7016 0910 0001 0898 4552

Dr. Bruce Anderson
Director of Health
State of Hawaii Department of Health
1250 Punchbowl Street
Honolulu, HI 96813

Dear Mr. Scott and Dr. Anderson:

SUBJECT: TANK UPGRADE ALTERNATIVES (“TUA”) AND RELEASE DETECTION DECISION DOCUMENT FOR THE RED HILL ADMINISTRATIVE ORDER ON CONSENT (“AOC”) STATEMENT OF WORK (“SOW”) SECTIONS 3 AND 4

In accordance with the Red Hill AOC SOW Section 3.5 TUA Decision Document and Implementation, SOW Section 4.8 New Release Detection Alternatives Decision Document and Implementation, and References (1) and (2), Navy/DLA are submitting the TUA and Release Detection Decision Document to the Regulatory Agencies for review and approval.

The Navy and DLA requested permission to proceed with procurement and installation of the proposed release detection equipment on 26 October 2018. The Regulatory Agencies conditionally approved this request on 29 November 2018 (Reference 2). The following comments address the eight conditions listed in the letter granting conditional approval:

1. Navy/DLA will specify equipment that can be installed while the tank is in service to allow equipment to be installed without draining fuel out of the tank.
2. Navy/DLA plan to install proposed leak detection equipment for each tank locally (i.e. next to each tank) as part of the initial phase of the release detection system. A following phase will install communication lines between the local indication and the control room to allow the control room operator to conduct release detection on demand.

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3. As part of the AOC, Fleet Logistics Center Pearl Harbor (FLCPH) Fuels Department has established thresholds for initiating causative research for soil vapor monitoring. Similar thresholds will be established for conducting on demand release detection once equipment capabilities are fully understood to avoid initiating unnecessary causative research investigations.

4. The Decision Document includes a pilot project for real time soil vapor monitoring.

5. The Decision Document includes discussion of the layers of protection necessary to protect the environment and human health from harm.

6. As part of the AOC, FLCPH Fuels Department has already instituted a process for identifying alternative tank capacity to allow for immediate fuel movement in the unlikely event that a release occurs.

7. FLCPH Fuels Department has considered the ability and benefits or disadvantages for reducing the current measured level change that initiates an unscheduled fuel movement (UFM) alarm. However, the current set points appear to be adequate to prevent inadvertently initiating an UFM alarm while still protecting the environment from harm. Recall the prior release was not caused by a failure of a UFM alarm but by improper repairs being followed by inadequate operator response.

8. As part of the Decision Document, Navy/DLA will determine the feasibility of potential construction of a water treatment plant or equivalent engineering controls for protecting the aquifer below the Red Hill Facility. No later than 2022, Navy/DLA will evaluate the design, logistics, operations, and sustainment requirements of such a facility in order to estimate the cost and construction schedule, including how to best attain future DoD military construction.

At the request of EPA staff, Navy/DLA have compared the levels of environmental protection between each of the alternatives. The comparison can be found at the end of Appendix D. Navy/DLA considers alternative 1A along with all other additional improvements, controls and measures as the best level of environmental protection for all release scenarios.

If you have any technical questions, please contact CAPT Marc Delao, the Regional Engineer at (808) 471-3926 or by email at marc.delao@navy.mil.

Sincerely,



R. B. CHADWICK, II
Rear Admiral, U.S. Navy
Commander, Navy Region Hawaii

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- References:
1. Letter from Mr. Shalev and Ms. Kwan to CAPT Delao dated May 21, 2018, Re: Approval of Red Hill Administrative Order on Consent (“AOC”) Statement of Work (“SOW”) Section 3- Tank Upgrade Alternatives
 2. Letter from Mr. Shalev and Ms. Kwan to CAPT Delao dated November 29, 2018, Re: Expectations for Release Detection Decision Document, Section 4.8 of the Red Hill Administrative Order on Consent (“AOC”) Statement of Work (“SOW”) and Comments on Early Procurement of Release Detection Equipment

- Enclosures:
1. Document Certification
 2. TUA and Release Detection Decision Document

Red Hill Administrative Order on Consent
TUA Decision Document and Implementation and
New Release Detection Alternatives Decision Document and Implementation
Deliverable

Section 3.5 TUA Decision Document and Implementation

Section 4.8 New Release Detection Alternatives Decision Document and Implementation

In accordance with the Red Hill Administrative Order on Consent, paragraph 9,
DOCUMENT CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fines and imprisonment for knowing violation.

Signature:



CAPT Marc R. Delao, CEC, USN
Regional Engineer, Navy Region Hawaii

Date:

5 Sep 2019