



DEPARTMENT OF THE NAVY

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

AUG - 6 2021

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August 2, 2021

CERTIFIED NO: 9489 0090 0027 6232 9870 85

Ms. Roxanne Kwan
Hawaii State Department of Health
Solid and Hazardous Waste Branch
Underground Storage Tank Section
2827 Waimano Home Road #100
Pearl City, HI 96782

Dear Ms. Kwan:

SUBJECT: INITIAL ABATEMENT MEASURES AND SITE ASSESSMENT, HOTEL PIER
DOH FACILITY ID NO. 9-102271, DOH RELEASE ID NO. 210011
DOH HEER INCIDENT RELEASE CASE NOS. 2020317-0914 AND
20200602-1345

As requested in DOH letter U0711HM of June 30, 2021, the Navy is providing information on the initial abatement measures and site assessment related to the fuel release from the defuel pipeline at Hotel Pier on Joint Base Pearl Harbor-Hickam.

As listed in Hawaii Administrative Rules (HAR) 11-280.1-62(a), the following abatement measures were performed:

- (1) Continue to remove as much of the regulated substance from the release site as is necessary to prevent further release to the environment;**

The cleanup and recovery actions began when the release was first detected, and are currently ongoing. The recovery of product decreased from 40 to 50 gallons per day during the initial release, down to 1 to 2 gallons per day during the current period. A summary of the amount of product recovered each month from February through the first three weeks of July 2021 is shown below. Recoverable product will continue to be recovered as required.

Total Free Product Recovered

Total Recovered (gallons)

	Water	Land	Total
Feb	559	45	604
March	1422	648	2070

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April	515	292	807
May	375	683	1058
June	51	24	75
July	13	11	24

- (2) Visually inspect the area around the release site for evidence of any aboveground releases or exposed belowground release and continue to take necessary actions to minimize the spread of contamination and to prevent further migration of the released substance into surrounding soils, air, surface water, and groundwater;**

No evidence of any aboveground releases near Valve Station 3 (VS3) has been observed. Initially, interception trenches were dug to try and capture the free product before it reached the harbor. Later, several observation wells (OWs) were dug throughout the area to track the free product plume and capture free product. The recovery of free product from the trenches and OWs will continue as long as free product continues to be picked up.

Installation of a permanent Ocean boom began on 7/21. The Ocean boom will be permanently installed around the area to contain any residual product that is released from the subsurface.

- (3) Continue to monitor and mitigate any additional fire and safety hazards posed by vapors of free product that have migrated from the release site and entered into subsurface structures (such as sewers or basements);**

Volatile Organic Compounds (VOCs) are monitored during recovery activities. Workers are trained and have respiratory protection in those instances where VOCs exceeded a health and safety action level. There have not been issues with vapors associated with the release.

- (4) Remedy hazards (such as dust and vapors and the potential for leachate generation) posed by contaminated soils and debris that are excavated or exposed as a result of release confirmation, site investigation, abatement, or release response action activities;**

All soil that was excavated from the trenches and OWs was temporarily stored on site in a lined berm, tested, then removed and disposed of properly. No excavated soil currently remains on site. The excavations that were closed were done so using non-contaminated fill material (soil, sand, gravel). All other spill clean-up debris (absorbent socks, pads, etc.) and product, was containerized and picked up for disposal by the Navy.

- (5) Conduct an assessment of the release by measuring for the presence of a release where contamination is most likely to be present at the release site, unless the presence and source of the release have been confirmed in accordance with the site assessment required by section 11-280.1-52(b) or the site assessment required for change-in-service or permanent closure in section 11-280.1-72(a). In selecting sample types, sample locations, and measurement methods, the owner and operator must consider the nature of the stored substance, the type of backfill and surrounding soil, depth and flow of groundwater and other factors as appropriate for identifying the presence and source of the release;**

In addition to the interception trenches, more than 20 OWs were installed throughout the area to track the amount and location of the free product on the water. It is believed that the source of the release was the defuel line. After the defuel line was isolated with blank flanges, the amount of clear product that appeared to be new fuel began to decrease, and eventually ceased entirely. The remaining quantities being recovered have drastically decreased. It is likely there are pockets of product remaining in the area that are being flushed out and will be recovered via the absorbent boom placed into each of the OWs.

The defuel line has been secured. Residual jet fuel/diesel and small amounts of historic product remain in the surrounding area, and are being recovered, but some amount will likely remain over time.

- (6) Investigate to determine the possible presence of free product, and begin free product removal in accordance with section 11-280.1-64;**

The search for remaining free product will continue by observing the boomed area around the pier and the OWs.

- (7) Remove or remediate contaminated soil at the site to the extent necessary to prevent the spread of free product;**

As stated above, all soil that was excavated for the trenches and OWs was stored on site in a lined berm, tested, then removed and disposed of properly. All residual excavated soil has been removed from the site and disposed of in accordance with applicable regulations.

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(8) If any of the remedies in the section include treatment or disposal of contaminated soils, owners or operators must comply with all applicable local, state, and federal requirements.

Contaminated soil is removed from the installation by the Oil Spill Removal Organization (OSRO) contractor, tested, and disposed of as non-hazardous waste at the PVT Landfill.

If there are any questions regarding this matter, or if more information is needed, please contact me at (808) 471-3858.

Sincerely,

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SHERRI R. ENG
Director
Regional Environmental Department
By direction of the
Commander

Copies to: Ms. Gabriela Carvalho, U.S. EPA Region 9, Red Hill Coordinator
Mr. John Floyd, NAVSUP FLC Pearl Harbor
Mr. John Reed, DLA Energy Pacific