



DEPARTMENT OF THE NAVY
COMMANDER
NAVY REGION HAWAII
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JBPHH, HAWAII 96860-5101

5090
Ser N45/139
December 11, 2021

CERTIFIED NO: 7020 1810 0000 8940 8857

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

Dear Ms. Kwan:

SUBJECT: RED HILL BULK FUEL STORAGE FACILITY
INITIAL ABATEMENT MEASURES AND SITE ASSESSMENT, FIRE
SUPPRESSION DRAIN LINE, DOH FACILITY ID NO. 9-102271

As required by Hawaii Administrative Rules (HAR) 11-280.1, the Navy is providing information on the initial abatement measures and site assessment related to the November 20, 2021 release from a fire suppression drain line in the Red Hill lower access tunnel.

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

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

No UST system is known to have released fuel on November 20, 2021. However, the damaged section of the fire suppression drain line has been isolated and drained of all fluid.

- (2) Visually inspect the area around the UST or tank system for evidence of any above ground releases or exposed below ground 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;

Multiple entities of the Navy and first responders completed visual inspections throughout the Red Hill lower access tunnel. Personnel completed multiple wash downs to clean the lower access tunnel of the fuel and water mix. The Navy believes fuel and water was released into the environment from the damaged fire suppression drain line. Actions are ongoing to address the contamination and prevent further migration.

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

First responders showed up and monitored lower explosive limit (LEL) and volatile organic compound (VOC) levels upon arrival and did not allow unprotected personnel to enter the tunnel until after it was deemed safe. For the first few days after the incident, until after multiple wash downs were completed, LEL and VOC levels were monitored and personnel were not allowed to remain in the area for extended periods of time. LEL and VOC levels in the lower access tunnel have since returned to normal.

- (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;

After the initial discovery of the damaged fire suppression drain, the drain line was isolated and fuel and water inside the pipeline collected for proper disposal. The Navy is continuing efforts to recover any fuel and water mixture that escaped the pipeline.

- (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 UST 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;

The Navy's contractor is collecting and analyzing site assessment samples as agreed upon with DOH. The Navy is providing sample results via email as they become available.

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

As documented in the Navy's cumulative data spreadsheet electronically shared via email with DOH, free product was observed at the Red Hill Shaft on December 3, 2021. Free product removal activities commenced on December 10, 2021, upon approval of the skimming plan by DOH. Details will be provided in a Free Product Removal Report.

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

Contaminated soil was not identified during initial abatement and site assessment activities.

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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 was not identified during initial abatement and site assessment activities. Any contaminated soil identified in the future will be treated and disposed of in accordance with all applicable local, state and federal requirements.

If there are any questions regarding this matter, or if more information is needed, please contact me.

Sincerely,

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

Copies to: Ms. Gabriela Carvalho, U.S. EPA Region 9, Underground Storage Tank Program
Office
Mr. John Floyd, NAVSUP FLC Pearl Harbor
Mr. John Reed, DLA Energy Pacific

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Blind copy to: Ms. Susan Lohr, NAVFAC HI EV14

Blind copy to (electronic via email): Ms. Dayna Fujimoto, NAVFAC HI EV1
Mr. Andy Huang, NAVFAC HI EV11
Ms. Caroline Rossi, NAVFAC HI EV14
Ms. Raelynn Kishaba, NAVFAC HI EV12