



UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
REGION IX
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STATE OF HAWAII
DEPARTMENT OF HEALTH
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MAR 31 2016

James A. K. Miyamoto, P.E.
Deputy Operations Officer
Naval Facilities Engineering Command, Hawaii
400 Marshall Road
Joint Base Pearl Harbor Hickam, HI 96860

Re: Scope of Work Comments and Completion of Scoping under Section 3.1 of the Red Hill Bulk Fuel Storage Facility ("Red Hill") Administrative Order on Consent ("AOC"), Statement of Work ("SOW")

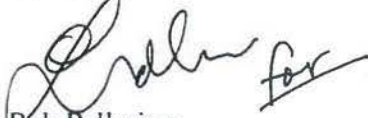
Dear Mr. Miyamoto:

The U.S. Environmental Protection Agency ("EPA") and the State of Hawaii Department of Health ("DOH") are submitting comments on the draft Tank Upgrades Alternatives ("TUA") Scope of Work provided by the U.S. Department of the Navy ("Navy") and Defense Logistics Agency ("DLA") on January 29, 2016. Scoping meetings under Section 3.1 of the Red Hill AOC SOW to develop the content of the TUA Scope of Work began on October 27, 2015. DOH and EPA, collectively referred to as the "Regulatory Agencies", believe that the draft TUA Scope of Work accurately reflects the content of the scoping meetings to date and that formal scoping of this task is essentially complete.

The draft TUA Scope of Work provides a preview of the TUA Report required under Section 3.3 of the Red Hill AOC SOW. The purpose of the TUA Report is to identify and evaluate various tank upgrade alternatives and provide decision makers with enough information to determine whether specific alternatives should be implemented on the tanks at the facility. The TUA Scope of Work should contain distinct criteria for the primary and secondary screening of TUA. Therefore, the use of the term "constructible" for both screenings is inappropriate. The primary screening should use a criterion such as "feasible" and the secondary screening should use the criterion "constructible." The TUA Report should also provide sufficient detail of tank inspection, repair and maintenance procedures for those TUA that pass secondary or additional screenings, including possible coatings and liners, to convey the time and resources required for successful implementation of a specific upgrade alternative.

Thank you for providing an interim draft scope of work for review. Please provide your concurrence that scoping for Section 3 has concluded or outline any remaining steps that you believe are needed before scoping concludes by April 7, 2016. We look forward to continuing the progress of implementing the work outlined in the Red Hill AOC. Let us know if you have comments or questions.

Sincerely,



Bob Pallarino
EPA Project Coordinator



Steven Chang, P.E.
DOH Project Coordinator

CC:

Captain Dean Tufts, Navy