



UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
REGION IX
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STATE OF HAWAII
DEPARTMENT OF HEALTH
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SEP 15 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: Approval in whole with comments of Red Hill AOC SOW Deliverable- 4.3 Current Fuel Release Monitoring Systems Report

Dear Mr. Miyamoto,

The U.S. Environmental Protection Agency ("EPA") and Hawaii Department of Health ("DOH"), collectively the "Regulatory Agencies", have reviewed the *Current Fuel Release Monitoring Systems Report* ("Report") submitted by U.S. Navy ("Navy") and Defense Logistics Agency ("DLA") on August 16, 2016. The Report satisfies the requirements of Section 4.3 in the Red Hill Administrative Order on Consent ("AOC"), Attachment A- Statement of Work ("SOW") because it documents the current release detection and tank tightness testing procedures used at the Red Hill Facility, and it evaluates some of the capabilities of these fuel monitoring systems. The Report also includes the contents described in Section 4.3 of the AOC SOW. Pursuant to 7(b) of the AOC, the Regulatory Agencies are approving the Report in whole.

The Regulatory Agencies are providing comments in preparation for upcoming meetings and discussions regarding release detection methods at the facility. Per Section 4.4 of the Red Hill AOC SOW, "[w]ithin sixty (60) days from the Regulatory Agencies' approval of the Current Fuel Release Monitoring Systems Report, Navy and DLA shall schedule and hold an initial Scoping Meeting to be attended by the Parties." Therefore, EPA and DOH expect the Navy and DLA to schedule a scoping meeting to discuss new release detection alternatives within 60 days from the date stamp above.

Release Detection Response Capabilities

The Report establishes a baseline upon which the Regulatory Agencies are able to understand the current release detection systems at the facility. In forthcoming work, the Regulatory Agencies will want to assess the capability of new release detection alternatives to detect slow leaks in

comparison with the current systems being utilized. In addition, the Regulatory Agencies expect to discuss Navy's ability to perform more frequent fuel monitoring procedures, and the possibility of conducting onsite tests to confirm the accuracy and reliability of the facility's release detection systems.

Thank you for submitting this deliverable. We look forward to continuing the progress of implementing the work outlined in the Red Hill AOC. Please let us know if you have comments or questions.

Sincerely,


Bob Pallarino
Project Coordinator
EPA Region 9 Land Division


Steven Chang
Project Coordinator
DOH Solid and Hazardous Waste Branch

CC:

Captain Richard D. Hayes III, Navy
Steven Turnbull, Navy