UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

JUN 30 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- 5.2 Corrosion and Metal Fatigue Practices Report

Dear Mr. Miyamoto,

The U.S. Environmental Protection Agency ("EPA") and Hawaii Department of Health ("DOH"), collectively the "Regulatory Agencies", have reviewed the *Corrosion and Metal Fatigue Practices Report* ("Report") submitted by U.S. Navy ("Navy") and Defense Logistics Agency ("DLA") on April 4, 2016. The Report satisfies the requirements of Section 5.2 in the Red Hill Administrative Order on Consent ("AOC"), Attachment A- Statement of Work ("SOW") because it explains the "current practices for assessing the condition of the Tanks and associated fuel containment infrastructure, including details on the non-destructive testing procedures." 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 corrosion and metal fatigue at the facility. Per Section 5.3.1 of the Red Hill AOC SOW, "[w]ithin ninety (90) days from approval of the Regulatory Agencies' approval of the Corrosion and Metal Fatigue Practices Report, Navy and DLA shall schedule and hold an initial scoping meeting to be attended by the Parties." Therefore, the Navy and DLA shall schedule a scoping meeting to discuss destructive testing and our comments below within 90 days from the date stamp above.

Methodology for Determining Repairs

We believe that the 0.170 inch threshold for setting equipment sensitivities should be examined. During scoping meetings, we plan to discuss the basis for assuming these corrosion rates and the rationale for setting this threshold.

Tank Material

Section 3-3.2.1 of the Report is based on the assumption that the tank shells are ASTM A283 carbon steel. We agree with the statement that "metallurgical analysis of the tank shell plate is the only method of verifying the shell plate chemical composition and its physical and mechanical properties." Considering the present and expected future scrutiny on the tanks, we plan to cover this assumption during our upcoming scoping meetings for destructive testing.

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
EPA Project Coordinator
EPA Region 9 Land Division

Steven Chang
DOH Project Coordinator
DOH Solid and Hazardous Waste Branch

CC:

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