



UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
REGION IX
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STATE OF HAWAII
DEPARTMENT OF HEALTH
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JUN 30 2016

Mr. 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: Modification of Submission Required for 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 April 4, 2016. Although the Report mostly satisfies the requirements of Section 4.3 in the Red Hill Administrative Order on Consent ("AOC"), Attachment A- Statement of Work ("SOW"), the Regulatory Agencies require clarification of several items detailed in the Report.

The Report describes the current fuel release monitoring systems at the facility, however the Regulatory Agencies request the Report be revised to reflect the following comments and recommendations. The Regulatory Agencies request a modified Report be submitted by August 2, 2016.

Section 2-3: Tank Tightness Reports

This section should be revised to state annual tightness testing is one of several methods to ensure that tank is not leaking and is fit for service. Other methods such as inventory reconciliation and periodic tank inspection should be mentioned here and references inserted to those sections, as appropriate.

Section 2-4.1.1

Revise this section to state where Soil Vapor Monitoring Records are located.

Section 3-4.2: Provide Summary of Site-Specific Procedures

The Report should be revised to provide an example of a current (post 2014) tank-specific operational procedure for Red Hill. This section describes how a return-to-service (RTS) operations order supplements the tank filling SOP for initial tank filling, and cites Appendix K as the location of that RTS operations order. The document in Appendix K is a generic procedure for filling above-ground, atmospheric, welded steel storage tanks. Appendix K does not contain specific flow rates, describe when to conduct a four-hour trend analysis, or specify a 48 hour settling period at hold intervals. The site specific procedure should explicitly identify which specific equipment or valve is to be operated when a given tank is to be filled or emptied or other operation performed on the tank.

Section 5-3: Dynamic Release Detection Systems:

Based on our understanding, the report should plainly state that the Red Hill tanks do not have an engineered dynamic release detection system. This paragraph should also summarize the unique geometric and operational aspects of the Red Hill facility that preclude installing a commercially available system. And this section should be revised to describe the Automated Fuel Handling Equipment (AFHE) system and its capabilities to detect inventory discrepancies during dynamic operations.

Section 6-2: Automated Fuel Handling Equipment (AFHE):

The Report should be revised to clarify when Appendix E is followed and what procedure is used specifically following 1) a "warning" alarm and 2) a "critical" alarm. Section 6-2 lists both warning and critical alarms that are actuated if an unscheduled fuel movement beyond a specified measurement occurs. Appendix E- DFSP Pearl Harbor Unscheduled Fuel Movement (UFM) Standard Operating Procedure lists a procedure to be executed in the event a UFM alarm is received. It is unclear if Appendix E is followed when a critical alarm or a warning alarm is actuated.

Additionally, the Report should include the UFM report, or reports, for the release from Tank 5 that occurred in January 2014.

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