



**DEPARTMENT OF THE NAVY**

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November 23, 2020

**CERTIFIED MAIL NO: 9489 0090 0027 6232 2380 64**

Mr. Steven Linder  
U.S. Environmental Protection Agency (EPA)  
Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

**CERTIFIED NO: 9489 0090 0027 6232 2380 71**

Ms. Roxanne Kwan  
State of Hawaii Department of Health (DOH)  
Environmental Management Division  
Solid and Hazardous Waste Branch  
2827 Waimano Home Road  
Pearl City, HI 96782

Dear Mr. Linder and Ms. Kwan:

**Subject: RESPONSE TO EPA AND DOH NOTICE OF DEFICIENCY LETTER  
REFERENCED: THE RED HILL BULK FUEL STORAGE FACILITY  
ADMINISTRATIVE ORDER ON CONSENT TANK UPGRADE ALTERNATIVES  
AND RELEASE DETECTION DECISION DOCUMENT**

I acknowledge receipt of the EPA and DOH letter of October 26, 2020. That letter requests additional information on the United States Navy (Navy) and Defense Logistics Agency (DLA) submission of the Red Hill Bulk Fuel Storage Facility Tank Upgrade Alternatives (TUA) and Release Detection Decision Document (RD DD). I appreciate the letter grants Navy/DLA the opportunity to "cure the deficiencies" and resubmit the document.

Your letter contains 16 requests for information (RFIs). Navy/DLA will be happy to provide the EPA and DOH with the answers to those RFIs. We remain fully committed to open and transparent communication with the regulatory agencies through the Administrative Order on Consent (AOC) process. Since some RFIs will take longer to respond to than others, I propose we provide our responses, in series, as they are completed.

I acknowledge that your decision was not to reject the Best Available Practicable Technologies (BAPT) in the TUA and RD DD. Navy/DLA continue to firmly believe the BAPT decision provides a safe and effective approach to the maintenance of the Red Hill facility. The BAPT's clean, inspect, repair (CIR) program will continue to ensure the foundational integrity of the fuel tanks.

Since the submission of the decision document, additional milestones have been reached:

- Investigation and Remediation of Releases Report (March 2020);
- Groundwater Flow Model Report (March 2020);
- DOH/EPA-accepted Destructive Testing Results Report (July 2020);
- Installation of three additional ground water monitoring wells in the vicinity of Red Hill.
- Improved refueling method demonstrated when Tank 5 was returned to service (May 2020);
- Establishment of a test program for continuous Soil Vapor Monitoring;
- Decision to obtain tank tightness testing equipment for permanent installation; and
- Multiple other improvements to the CIR Program, as described in the TUA and RD DD.

Also, since submission of the decision document, the Navy has begun working with industry to determine the feasibility of existing technologies that could potentially provide for secondary containment of the fuel at Red Hill. Navy/DLA, with the strong support of the EPA and DOH, pledged to explore secondary containment solutions as part of the TUA decision. We further pledged in the decision document to determine the feasibility for potential construction of a water treatment plant or equivalent engineering controls for the aquifer below the facility. The Navy has since submitted an initial requirement and justification supporting a funding request for a water treatment plant costing \$56 million. We have also established a partnership with the University of Hawaii (UH) College of Engineering and Applied Research Lab (ARL) and the Naval Facilities Engineering Systems Command's Expeditionary Warfare Center (NAVFAC EXWC) to develop further means to safeguard operation of the Red Hill facility. As part of that effort, the Office of Naval Research (ONR) has provided a \$1.9 million grant to UH/ARL to design and test further enhancements to the facility's prevention, detection, and mitigation system-of-systems.

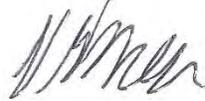
Responding to your RFIs thoroughly will involve a substantial amount of time and effort beyond the 30-day response period mentioned in your letter. I note that several of the RFIs are open-ended questions, are subject to interpretation, or are in need of further clarification. To remedy that, I recommend a series of scoping meetings to qualify the questions you are asking. This will help to properly focus our efforts and aid the timeliness of our responses. Until that discussion has taken place, it will be difficult to precisely estimate the amount of time required to respond to your RFIs. Additionally the scoping meetings will establish a reasonable timeline and plan of action for completion of all RFIs.

In closing, I would like to emphasize that, in keeping with the primary objectives of the AOC, the Navy/DLA team remain dedicated to working in good faith with the EPA and DOH to minimize the risk of any future release of fuel from the Red Hill facility, that the groundwater resource in the vicinity of Red Hill is protected, and that the facility is operated and maintained in an environmentally protective manner. As part of the U.S. Department of Defense, it is also our duty to protect our nation. Red Hill is a critically important strategic military asset, as well as a crucial resource for the State of Hawaii in the event of a crisis. I assure you that we are accomplishing, and will continue to accomplish, both our military mission and the primary objectives of the AOC.

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If you have any questions or require more information, please contact Mr. Donald Panthen, Red Hill Program Director, at (808) 473-4148, or myself. We look forward to advancing this important work in the days ahead

Sincerely,



J. G. MEYER  
Captain, CEC, U.S. Navy  
Regional Engineer  
By direction of the  
Commander

Copy to: Dr. Elizabeth Char, Director, Hawaii Department of Health  
Mr. Jeff Scott, Director, Land Division, Environmental Protection Agency, Region IX  
Commander, Defense Logistics Agency, Indo-Pacific  
Commanding Officer, NAVSUP Fleet Logistics Center Pearl Harbor HI  
Commanding Officer, Naval Facilities Engineering Systems Command and  
Expeditionary Warfare Center