

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843
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December 27, 2016

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Mr. Bob Pallarino
EPA Red Hill Project Coordinator
United States Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

and

Mr. Steven Chang, P.E.
DOH Red Hill Project Coordinator
State of Hawaii
Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801-3378

Dear Messrs. Pallarino and Chang:

Subject: Briefing Before the United States House of Representatives Committee on Armed Services and Request for Consideration of Tank Replacement and Relocation Regarding the Red Hill Bulk Fuel Storage Facility

The Board of Water Supply (BWS) writes to notify the United States Environmental Protection Agency (EPA) and the Hawaii Department of Health (collectively, the "Regulatory Agencies") of the decision of the United States House of Representatives Committee on Armed Services (the "Armed Services Committee") requiring the United States Navy, in coordination with the Defense Logistics Agency (DLA) and the EPA to provide a briefing to the Armed Services Committee explaining the development, screening, and analysis of the best available tank upgrade alternatives intended to address fuel releases from the underground storage tanks at the Red Hill Bulk Fuel Storage Facility (the "Facility"). Specifically, the Armed Services Committee:

[D]irects the Secretary of the Navy, in coordination with the Director of the Defense Logistics Agency and the Administrator of the United States Environmental Protection Agency, to provide a briefing to the House Committee on Armed Services not later than 30 days after the regulatory agencies' approval of the completion of the Tank Upgrade Alternative

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decision document for application, of the best available practicable technology or technologies that will be used in the Red Hill Bulk Underground Fuel Storage Facility upgrade. The briefing should address the process for collecting proposals for the review of available technologies, the specific technologies that were evaluated, the reasons the technology or technologies have been selected, and, to the extent available, the estimated costs, scope of work, and construction timelines associated with each alternative. In addition, **the briefing should compare the costs of implementing the technology or technologies that have been selected with the cost of the replacement or relocation of the existing storage tanks.**

H. R. Rep. No. 114-537, pt. 1, at 359 (May 4, 2016) (emphasis added).¹

The Armed Services Committee has determined that any meaningful evaluation of potential tank upgrade alternatives must include a comparison with the cost of replacing or relocating the tanks. The BWS agrees. There is no reasonable basis for the Navy and DLA not to consider tank replacement and relocation as alternatives for upgrading the existing tank structures at the Facility. Accordingly, the BWS respectfully requests that the Regulatory Agencies require the Navy and DLA to study tank replacement and relocation in connection with the evaluation of various tank upgrade alternatives required pursuant to Section 3 of the Statement of Work setting forth the tasks to be undertaken in compliance with the Administrative Order on Consent for the Facility.

If you have any questions, please feel free to contact me at 808-748-5061.

Very truly yours,



ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

Enclosure

cc: Alexis Strauss, EPA Region IX
Dr. Virginia Pressler, Hawaii DOH

¹ This report of the Armed Services Committee has been attached for your convenience.

114TH CONGRESS }
2d Session

HOUSE OF REPRESENTATIVES

{ REPORT
114-537

NATIONAL DEFENSE AUTHORIZATION ACT
FOR FISCAL YEAR 2017

R E P O R T

OF THE

COMMITTEE ON ARMED SERVICES
HOUSE OF REPRESENTATIVES

ON

H.R. 4909

together with

ADDITIONAL VIEWS

[Including cost estimate of the Congressional Budget Office]



MAY 4, 2016.—Committed to the Committee of the Whole House on the
State of the Union and ordered to be printed

Red Hill Bulk Fuel Storage Facility

In January 2014, the U.S. Navy detected the release of an estimated 27,000 gallons of JP-8 jet fuel from an underground storage tank located at the Red Hill Fuel Storage Facility in Hawaii. The committee notes that there are three wells within a 1.4 mile radius of the Red Hill Bulk Fuel Storage Facility: a Navy well in addition to the Halawa shaft and the Moanalua well, both of which are operated by the Honolulu Board of Water Supply. In response to the fuel release, the U.S. Navy, Defense Logistics Agency, U.S. Environmental Protection Agency, and the Hawaii Department of Health negotiated an enforceable order, known as an Administrative Order on Consent, which was signed in September 2015. As part of the order, the committee notes that the Navy committed to further updates of its existing Ground Water Protection Plan, to include the installation of additional monitoring wells as needed and establishing response procedures in the event that contamination originating from the facility is found in any drinking water well. The U.S. Navy and the U.S. Environmental Protection Agency confirm that drinking water remains in compliance with federal and state standards. As the U.S. Navy and Defense Logistics Agency continue to execute the Ground Water Protection Plan, the committee encourages close coordination and consultation with the U.S. Environmental Protection Agency, the Hawaii Department of Health, and the Honolulu Board of Water Supply regarding the presence of fuel constituents detected in monitoring efforts and the potential effects of those fuel constituents on human health.

Further, the committee notes that in accordance with the Administrative Order on Consent, the U.S. Navy and Defense Logistics Agency have undertaken a study to identify and evaluate various tank upgrade alternatives to determine the best available practicable technology, as approved by the Hawaii Department of Health and the U.S. Environmental Protection Agency, to ensure the continued safe operation of the Red Hill Bulk Fuel Storage Facility and prevent future fuel leaks into the environment. Therefore, the committee directs the Secretary of the Navy, in coordination with the Director of the Defense Logistics Agency and the Administrator of the U.S. Environmental Protection Agency, to provide a briefing to the House Committee on Armed Services not later than 30 days after the regulatory agencies' approval of the completion of the Tank Upgrade Alternative decision document for application, of the best available practicable technology or technologies that will be used in the Red Hill Bulk Underground Fuel Storage Facility upgrade. The briefing should address the process for collecting proposals for the review of available technologies, the specific technologies that were evaluated, the reasons the technology or technologies have been selected, and, to the extent available, the estimated costs, scope of work, and construction timelines associated with each alternative. In addition, the briefing should compare the costs of implementing the technology or technologies that have been selected with the cost of the replacement or relocation of the existing storage tanks. Finally, the briefing should address any updates to Ground Water Protection Plan, as well as the latest data available from ground water monitoring and how any

detected levels of fuel constituents relate to state and Federal standards.

LEGISLATIVE PROVISIONS

Section 2201—Authorized Navy Construction and Land Acquisition Projects

This section would contain the list of authorized Navy construction projects for fiscal year 2017. The authorized amounts are listed on an installation-by-installation basis. The state list contained in this Act is intended to be the binding list of the specific projects authorized at each location.

Section 2202—Family Housing

This section would authorize new construction and planning and design of family housing units for the Department of the Navy for fiscal year 2017.

Section 2203—Improvements to Military Family Housing Units

This section would authorize the Secretary of the Navy to make improvements to existing units of family housing for fiscal year 2017.

Section 2204—Authorization of Appropriations, Navy

This section would authorize appropriations for Navy military construction at the levels identified in section 4601 of division D of this Act.

Section 2205—Modification of Authority To Carry Out Certain Fiscal Year 2014 Project

This section would modify the authority provided by section 2201 of the Military Construction Authorization Act for Fiscal Year 2014 (division B of Public Law 113-66) and authorize the Secretary of the Navy to make certain modifications to the scope of a previously authorized construction project. This section was included in the President's request.

Section 2206—Extension of Authorizations of Certain Fiscal Year 2013 Projects

This section would extend the authorizations listed until October 1, 2017, or the date of the enactment of an act authorizing funds for military construction for fiscal year 2018, whichever is later. This section was included in the President's request.

Section 2207—Extension of Authorizations of Certain Fiscal Year 2014 Projects

This section would extend the authorizations listed, and originally included in section 2201 of the Military Construction Authorization Act for Fiscal Year 2014 (division B of Public Law 113-66), until October 1, 2017, or the date of the enactment of an act authorizing funds for military construction for fiscal year 2018,