

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843
www.boardofwatersupply.com



August 1, 2017

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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: Board of Water Supply (BWS) Comments to the United States Environmental Protection Agency and Hawaii Department of Health Letter Conditionally Approving the United States Navy's Section 8.2 Scope of Work ("SOW") – Risk/Vulnerability Assessment, Dated May 16, 2017

The BWS has reviewed the above-referenced letter from the United States Environmental Protection Agency (EPA) and the Hawaii Department of Health (DOH) to the United States Navy and we offer our comments below for your consideration and response.

The BWS is encouraged by the regulatory agencies' decision to require more of the SOW prepared by the Navy and Defense Logistics Agency (DLA). The BWS concurs with the regulators' eight EPA and DOH conditions for approval, in addition to the concerns raised in our letter of May 26, 2017 (Lau 2017).

The eight conditions of approval of the "Risk Scope" that satisfies section 8.2 of the Red Hill Administrative Order on Consent (AOC) Statement of Work (SOW) as outlined in the EPA and DOH letter dated May 16, 2017 are as follows:

1. The Navy and the DLA will produce a risk and vulnerability assessment that simulates consequences of potential uncontrolled releases, like those described in the results of this Risk Scope, to the groundwater and drinking water aquifers.
2. The Navy and DLA shall provide a comparison of risks and benefits between the current Facility and alternative fuel storage facilities.
3. The Navy and DLA shall offer the Regulatory Agencies similar opportunities, where practicable, to comment on the contractor's technical assumptions, decisions, and recommendation during the development of the Quantitative Risk and Vulnerability Assessment (QRVA).
4. The Navy and DLA shall make available to the Regulatory Agencies, on an ongoing basis, a description of data provided to the contractor performing the QRVA.
5. The Navy and DLA shall provide clarification in section 2.4.2 of the Risk Scope that the contractor will provide a concise document for review.
6. The Navy will clarify the status updates shown in Figure 2-1.
7. The Navy and DLA will consider requiring the contractor to produce additional interim deliverables.
8. The Navy and DLA will modify Figure 2-1 to clarify the QRVA process.

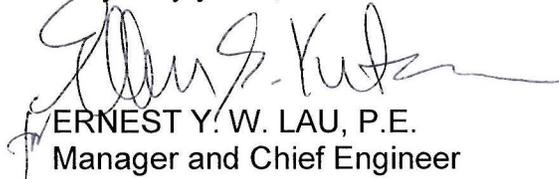
The EPA and DOH conditional approval letter states that the Risk/Vulnerability Assessment Report will be submitted for EPA and DOH approval within eighteen (18) months (December 2018). As we have discussed in the past, conditional approvals are only effective if the EPA and DOH continue to follow-up with the Navy and DLA to make certain all conditions in the conditional approval letter are met. The BWS trusts that the EPA and DOH will be diligent and require that all conditions in the conditional approval letter are met before any draft and/or final Risk/Vulnerability Assessment Report(s) are issued.

The BWS further trusts that the EPA and DOH will continue to communicate with the BWS concerning the status of the risk assessment work and update the BWS at regular intervals and if the Navy and DLA are meeting the conditions as outlined in the conditional approval letter.

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If you have any questions, please feel free to contact Erwin Kawata at 808-748-5080.

Very truly yours,



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

cc: Mark Manfredi
Red Hill Regional Program Director
NAVFAC Hawaii
850 Ticonderoga Street, Suite 110
JBPHH, Hawaii 96860

References Cited

Lau, E. Y. W. (2017). Letter to Mr. Bob Pallarino, United States Environmental Protection Agency (EPA) and Mr. Steven Y.K. Chang, State of Hawaii, Department of Health regarding: Board of Water Supply (BWS) Comments to the Red Hill Administrative Order on Consent (AOC) Statement of Work (SOW) Section 8.2: Risk/Vulnerability Assessment and the Navy Transmittal Letter Date April 13, 2017, May 26.