

BOARD OF WATER SUPPLY

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



July 22, 2016

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Deputy Manager and Chief Engineer

Mr. Bob Pallarino
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94105

Dear Mr. Pallarino:

Subject: Honolulu Board of Water Supply (BWS) Comments
Concerning the Location Changes for Navy Monitoring Wells

The Honolulu Board of Water Supply (BWS) has received your email and figure attachment dated 20 July 2016 that outline the new proposed locations for monitoring wells RHMW-10 and RHMW-11 to be installed as part of environmental investigation activities conducted at the Red Hill Bulk Fuel Storage Facility (RHBFSF). The BWS offers the following comments concerning the revised locations.

Monitoring Well RHMW10

Based on your email, we understand that the reason RHMW-10 has been relocated is due to neighborhood concerns about noise and disruption during drilling. The Navy proposed relocating RHMW10 closer to the RHBFSF where it will be on Navy property (shown on the figure as Option A). The regulatory agencies prefer Option B, which is located approximately 400 feet to the northeast and also on Navy property.

The BWS finds it surprising that both Option A and Option B are proposed to be accessed from the Navy road that is located above the RHBFSF tank farm. During the Administrative Order on Consent (AOC) meetings conducted on May 10, 2016, the Navy and Navy contractors made the statement that the ridge was inaccessible to drill rigs and used this as a reason for not doing vadose zone investigation work. Apparently the Navy and its contractors have found a solution to this problem. The BWS would like to repeat its statement about the importance of vadose zone investigation. Since the ridge of the facility and surrounding area are now apparently accessible, we encourage the Parties to the AOC to plan and conduct a thorough vadose zone investigation at the RHBFSF.

According to the draft work plan for Sections 6 & 7 of AOC Statement of Work (SOW), RHMW10 was selected to provide groundwater elevation information near RHMW03 and

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to provide information about vapor intrusion into the surrounding buildings from groundwater contamination. Assuming these objectives remain unchanged, Option B appears to match the stated objectives better than Option A.

Our understanding is that this SOW has yet to be approved by the regulatory agencies and, therefore, these objectives for RHMW10 may have changed and no longer be applicable. If this is the case, the Navy should consider moving RHMW10 to the north side of the ridge (Halawa Stream side) where it would more likely encounter groundwater contamination.

Monitoring Well RHMW11

Our understanding is that the Navy has proposed moving RHMW11 closer to the South Halawa Stream and southeast from its originally proposed location. The BWS favors this new location because we believe it will provide more information concerning the composition, properties, and depth of valley fill. We encourage the regulatory agencies to approve this location. In our letter to the regulatory agencies dated May 27, 2016, BWS had proposed that the Navy relocate RHMW09 to a similar location, but on the south side of South Halawa stream on Navy property.

Additionally, the Navy has proposed another location, RHMW12, may be used if the new location of RHMW11 does not meet the Navy's needs. The BWS requests that the regulatory agencies explain whether this is an alternate location to RHMW11, should the Navy be unable to secure access or whether this location is proposed in addition to RHMW11? The email indicated that the regulatory agencies still had questions about whether RHMW11 will meet the needs of the work being performed under Sections 6 & 7 of the AOC SOW. The BWS requests that the regulatory agencies indicate to the BWS exactly what these questions are.

Fuel Types and Fuel Additives

During the AOC meetings conducted from May 10 to May 12, 2016, the Navy agreed to provide to BWS a list of the fuel types historically and currently stored at the RHBFSF and also a list of all fuel additives ever or currently used at the facility. The Navy agreed to provide this listing "within a few days". This list has yet to be provided to the BWS by either the regulatory agencies or the Navy. The BWS requests that this information be provided to the BWS immediately.

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

Very truly yours,



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

cc: Mr. Steven Y.K. Chang
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ERWIN KAWATA

From: Pallarino, Bob <Pallarino.Bob@epa.gov>
Sent: Wednesday, July 20, 2016 4:35 AM
To: Ernest Lau; ERWIN KAWATA; Pearson, Jeffrey T; Oki, Delwyn
Cc: steven.chang@doh.hawaii.gov; roxanne.kwan@doh.hawaii.gov; Whittier, Robert (Robert.Whittier@doh.hawaii.gov); Richard R Takaba (richard.takaba@doh.hawaii.gov); Frazier, William Mark (william.frazier@doh.hawaii.gov); Linder, Steven
Subject: Navy's revised Monitoring Well locations.
Attachments: Revised Proposed locations for Monitoring Wells, Map July 11, 2016.pdf

Stakeholders,

Attached is a map provided by the Navy on the new proposed locations for RHMW10 and RHMW11. RHMW10, located to the south of the Facility, was relocated due to neighborhood concerns about noise and disruption during drilling. The Navy has proposed relocating this well closer to the Facility, where it will be on Navy property. On the attached map two options for RHMW10 are shown. Option A was the Navy's original proposal but the Regulatory Agencies suggested moving the well farther to the NE, reflected on the map as Option B.

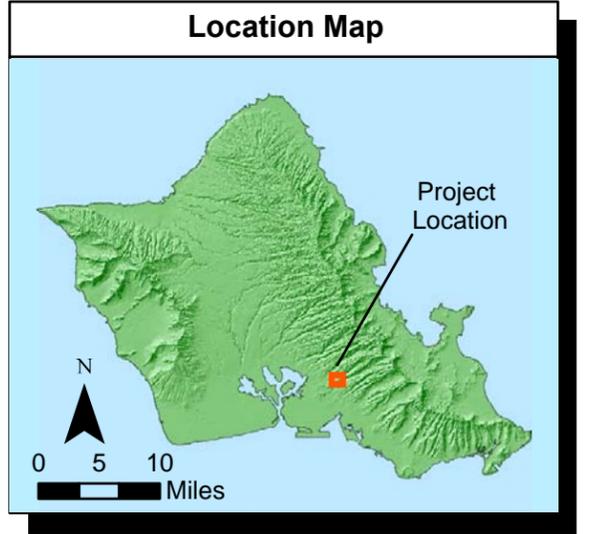
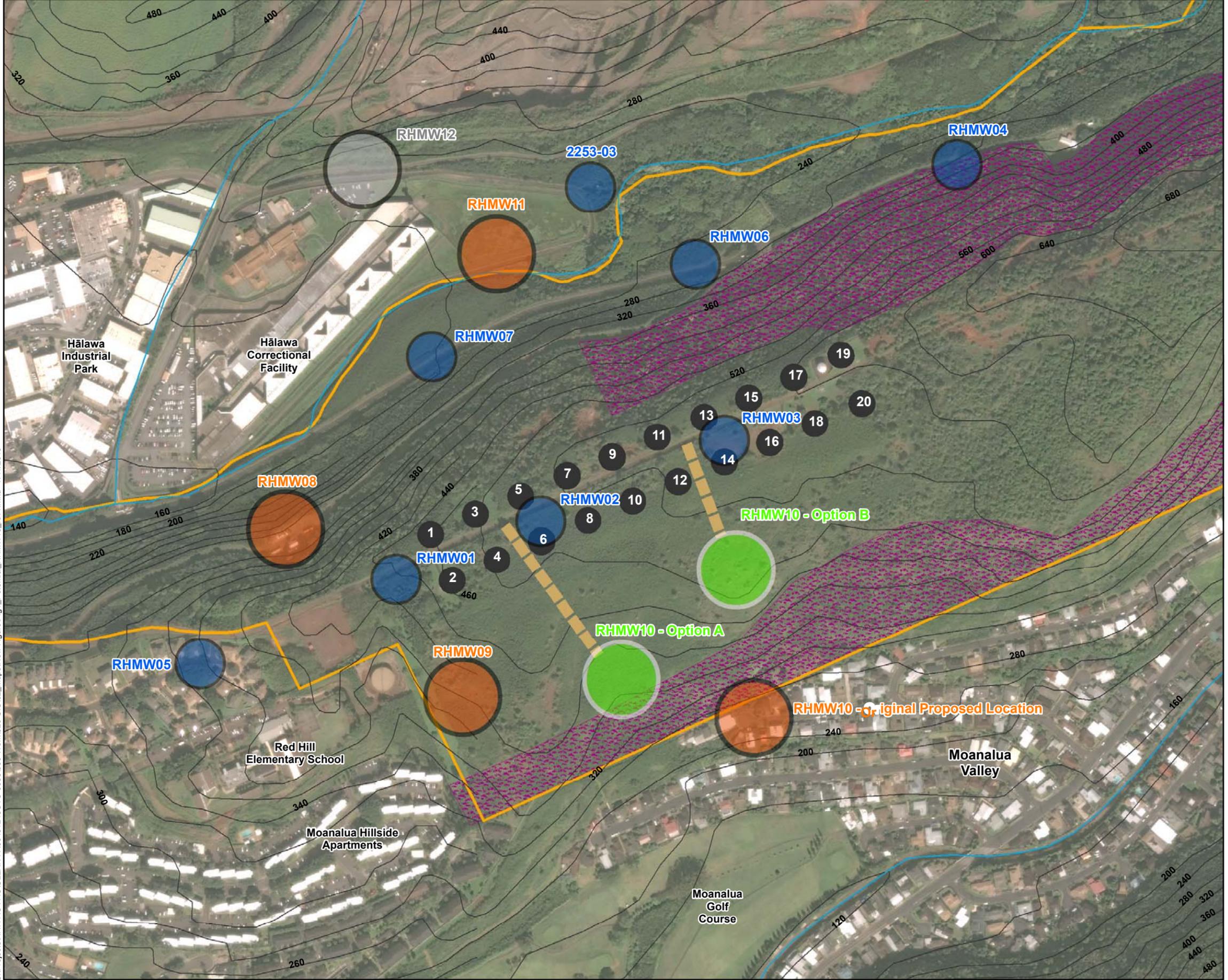
The Navy has proposed moving RHMW11 closer to the South Halawa Stream and farther to the NE from its original location. The original location, indicated on the map as RHMW12, may still be used if the new location does not meet the Navy's needs.

The regulatory agencies have not yet officially approved these new locations. While we are inclined to approve the relocation of RHMW10, we still have questions about whether RHMW11 will meet the needs of the work being performed under Sections 6&7 of the AOC SOW. The Navy is moving forward on the installation of RHMW08 and RHMW09.

Please provide any comments or concerns about this change to the Regulatory Agencies as soon as possible. We are also available to discuss this in more detail if necessary.

Bob Pallarino
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DRAFT PREDECISIONAL FOR DISCUSSION PURPOSES ONLY, DO NOT CITE OR QUOTE



- Notes**
1. Map projection: NAD 1983 UTM Zone 4N
 2. Base Map: DigitalGlobe, Inc. (DG) and NRCS. Publication Date: 2015
 3. Acronyms and Abbreviations:
UST - Underground Storage Tank
 4. Privileged Well Information, 5 U.S.C. 552(b)(9)
 5. Installation of RHMW12 contingent on RHMW11 field observations.



Figure 1
Potential RHMW10 Drilling Locations
Red Hill Bulk Fuel Storage Facility
JBPHH, O'ahu, Hawai'i

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