



**STATE OF HAWAII**  
**DEPARTMENT OF HEALTH**  
P. O. BOX 3378  
HONOLULU, HI 96801-3378

In reply, please refer to:  
File:

February 12, 2014

U0204RT

Mr. Aaron Poentis  
Program Director  
Environmental Department  
Navy Region Hawaii  
850 Ticonderoga St. Suite 110  
Pearl Harbor, Hawaii 96860

Dear Mr. Poentis:

SUBJECT: Red Hill Tank Complex  
Facility ID 9-102271/Release ID 140010

The U.S. Navy notified the Department of Health's Hazard Evaluation and Emergency Response (HEER) Office on Monday, January 13, 2014 to report a suspected underground storage tank release from Tank 5 of the Red Hill Tank Complex. The capacity of the tank is 12.7 million gallons. The DOH-HEER Office initiated an Incident Command structure and began gathering data from the Navy and coordinating the DOH response. Meetings were conducted by the DOH-HEER Office with participants from the Navy, DOH-Safe Drinking Water Branch, DOH-Solid and Hazardous Waste's Underground Storage Tank (UST) Section, and the Honolulu Board of Water Supply.

This letter will address the requirements of the DOH-UST Program and the regulations governing USTs under Hawaii Administrative Rules (HAR) Chapter 11-281 Underground Storage Tanks <http://gen.doh.hawaii.gov/sites/har/AdmRules1/11-281.pdf>

Monitoring of oil/water interface probes, soil vapor, and groundwater monitoring wells have been performed at increased frequency since the release was discovered. The DOH-HEER Office, Safe Drinking Water Branch, and UST Section have provided comments and approved the proposed short-term increased monitoring schedule that will continue monitoring of these parameters until July 2014, with increased monitoring frequency specified if increasing concentrations are found.

The Initial Release Response Report is due within 90 days of reporting a confirmed UST release. The DOH received the Confirmation of UST Release form on January 24, 2014.

Please also include the following information in your Initial Release Response Report:

1. Date and time release was discovered.
2. Method of detection and measurements and calculations for determining fuel lost.
3. Time interval between discovery of release and commencement of tank draining.
4. Time interval to drain tank to bottom and remove all residual product.
5. Modification of 2008 Groundwater Protection Plan and 2009 revisions to comply with the requirements of Environmental Hazard Evaluations as specified in the DOH-HEER Guidance.
6. Models to estimate groundwater flow and capture zones using recent local groundwater elevations for the Navy's drinking water pump station and Honolulu Board of Water Supply wells.

The facility is unique in both construction and storage capacity. As responsible parties of this UST system, the Navy is responsible for compliance with Subchapter 7, "Release Response Action." Certain requirements that are routine for a UST release at a retail gasoline facility may be difficult to achieve for this subterranean facility constructed within the basalt.

In addition to the Initial Release Response Report, the DOH requests a preliminary Work Plan report to discuss methods for achieving the requirements of HAR 11-281 Subchapter 7. Please complete the preliminary report within 30 days of your receipt of this letter and discuss with the DOH if you encounter any challenges or obstacles to this deadline. The following should be included in the preliminary Work Plan report:

1. Models to estimate downward vertical migration of free product.
2. Methods or options for non-invasive scanning of basalt to determine area and volume of contaminant mass prior to any drilling investigation.
3. Methods and locations for borings to most efficiently characterize the extent of contamination.

Following review, the DOH-UST Section would like to meet with the Navy and other interested parties to discuss selection of methods before the final work plan is prepared and work commences.

The DOH-UST Section uses the DOH-HEER guidance for Environmental Action Levels (EALs), Environmental Hazard Evaluations (EHEs) and Environmental Hazard Management Plans. All sites with contamination exceeding the DOH-HEER EALs are

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required to prepare an EHE. The data provided previously for the comprehensive risk assessment may be used and updated with data obtained since 2008.

The DOH-HEER EAL guidance: <http://eha-web.doh.hawaii.gov/eha-cma/Leaders/HEER/environmental-hazard-evaluation-and-environmental-action-levels>

The DOH-HEER Technical Guidance Manual (TGM) <http://www.hawaiiidoh.org/>. For petroleum guidance and use of EALs, including for soil vapor sampling. The DOH-UST Section does not currently require multi-increment sampling for UST release sites but it is an option if responsible parties wish to perform MIS according to the DOH-HEER TGM.

The DOH UST homepage: <http://health.hawaii.gov/shwb/underground-storage-tanks/>.

If you have any questions regarding this letter, please contact Mr. Steven Chang, Program Manager, Solid & Hazardous Waste Branch at (808) 586-4226.

Sincerely,

STUART YAMADA, P.E., CHIEF  
Environmental Management Division

c: Gary Gill, Deputy Director for Environmental Health  
Steven Chang, Solid and Hazardous Waste Branch  
Keith Kawaoka, Hazard Evaluation and Emergency Response Office  
Joanna Seto, Safe Drinking Water Branch  
Roger Brewer, Hazard Evaluation and Emergency Response Office  
Ernest Lau, Honolulu Board of Water Supply  
Wade Hargrove III, Hawaii Department of the Attorney General  
Steven Linder, EPA Region 9  
Bob Pallarino, EPA Region 9  
Roy Hardy, Department of Land and Natural Resources

## DOCUMENT TRACKING FORM

<b>Action</b>	<b>By</b>	<b>Date</b>
1 <sup>st</sup> draft	RT	02.07.14
Revised	RT	02.10.14
Revised	RT	02.10.14
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To md	Rk	2/12/14
Finalized for signature	Md	2/12/14

**c:**

Gary Gill, Deputy Director of Health  
Keith Kawaoka, DOH HEER Office  
Joanna Seto, Safe Drinking Water Branch  
Dr. Roger Brewer, DOH-HEER Office  
Ernest Lau, Honolulu Board of Water Supply  
Wade Hargrove III, Hawaii Dept of the Attorney General  
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