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Subject: [Non-DoD Source] U.S. EPA and DOH Comments on Red Hill SOW Submittalsfor Sections 2.2, 4.2, 5.1
Regulatory Agency Comments on Red Hill Outlines for Reports.pdf

Jimmy and Team,

The U.S. Environmental Protection Agency ("EPA") and the Hawaii Department of Health ("DOH") have reviewed the outlines submitted that correspond to Sections 4.2 *Outline of Current Fuel Release Monitoring Systems Report* and 5.1 *Outline of Corrosion and Metal Fatigue Practices* Report of the Red Hill Bulk Fuel Storage Facility ("Facility") Statement of Work ("SOW"), along with the preliminary outline for the *TIRM Procedures Report* corresponding to Section 2.2 of the SOW. The Regulatory Agencies require additional information and revisions to the deliverables under Sections 4.2 and 5.1 prior to providing approval. Our comments and additionally those made by our consultants, PEMY Consulting, are attached in this email. Please pass on to your appropriate contacts as necessary.

Reports submitted to the Regulatory Agencies for Sections 2.2, 4.3 and 5.2 must include more detailed information than the current content of the outlines appear to describe. In particular, the Regulatory Agencies will expect the reports under the SOW to contain full specifications or procedures, or easily accessible electronic materials, for applicable work being conducted at the Facility. Moreover, for those procedures currently implemented at the Facility, the Regulatory Agencies request that the Navy and DLA provide justification for a technical procedure employed and its appeal over other procedures that may be applicable. For those procedures that have been modified from an industry or government standard in order to satisfy the unique circumstances at the Facility, the Reports must include the modified procedure specification or, at a minimum, describe in detail how the procedure has been altered from a particular standard. The Reports should also contain and describe ongoing studies or secondary analyses currently performed on recorded data in order to assess site conditions or operational performance. Additional comments are contained in the attachment.

Thank you for submitting these Report outlines. We look forward to the upcoming week of scoping meetings beginning on November 30, 2015. Please contact me if you have any questions or concerns.

Sincerely,

Omer Shalev
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