UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
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STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
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January 15, 2016

James A. K. Miyamoto, P.E.
Deputy Operations Officer
Naval Facilities Engineering Command, Hawaii
400 Marshall Road
Joint Base Pearl Harbor Hickam, HI 96860

Dear Mr. Miyamoto,

The U.S. Environmental Protection Agencues (EPA) and Hawaii Department of Health ("DOH"), collectively the "Regulatory Agencies", have reviewed the Red Hill Administrative Order on Consent ("AOC") scoping meeting minutes and attachments provided in your email from December 18, 2015. The comments below apply to only Sections 2, 3 and 8 of the scoping meeting minutes.

Additional Attributes for Tank Upgrade Alternatives Report

We would like the following attributes to be added to the Tank Upgrade Alternatives Report

1. *Consistency with local policies or resolutions.* The report should acknowledge whether a particular alternative is able to comply with policies or resolutions from third-party subject matter experts.
2. *Ability to obtain vendor or manufacturer guarantee*

Comments on *Red Hill AOC Scoping Meeting Summaries 17 Dec 15.pdf*

Page 23, 3) c. (1) states that "EPA wants to be able to justify to stakeholders if a single-wall alternative is selected instead of secondary containment alternative. EPA needs to be able to justify that the single-wall alternative is more robust than the secondary containment option based on the data in the report."

The Regulatory Agencies suggest the following revision,

If a single-wall alternative is ultimately selected instead of a secondary containment alternative, the Report should contain information that supports the basis for this decision. In this instance,

EPA may need to clarify that the single-wall alternative is more protective than the secondary containment option based on the data in the report.

Page 28, 3. discusses the concerns regarding scheduling. The parties agreed workflow management was critical. The Regulatory Agencies recall a more extensive discussion around the development and sharing of a Gantt chart or other more detailed scheduling visual aid to assist with the development of the various coordinated Sections of the AOC Statement of Work. The Regulatory Agencies think that this was an action item for the Navy and Defense Logistics Agency.

As discussed on the AOC project coordinator's call on Monday, January 11, 2016, the Regulatory Agencies also request two copies, one redacted and one unredacted, of the presentation slides for Section 3 of the AOC that were presented at the Scoping Meetings during the week of November 30, 2015.

Thank you for providing the detailed meeting summaries. We look forward to continuing the progress of implementing the work outlined in the Red Hill AOC. Please let us know if you have comments or questions.

Sincerely,

Omer Shalev, U.S. EPA

Roxanne Kwan, DOH