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In reply, please refer to:
File:

June 30, 2021 U0711HM

CERTIFIED MAIL NO. 7020 1290 0001 2737 5600
RETURN RECEIPT REQUESTED

Rear Admiral Timothy Kott
Commander, Navy Region Hawaii
850 Ticonderoga Street
Pearl Harbor, Hawaii 96860-5101

Dear RADM Kott:

SUBJECT: Red Hill Bulk Fuel Facility
Pearl Harbor, Hawaii
Hotel Pier Near Arizona Street, Pearl Harbor, Hawaii
UST Facility ID No. 9-102271, UST Release ID No. 210011
HEER Incident Release Case Nos. 2020317-0914 and 20200602-1345

On May 18, 2021, the Department of Health (DOH), Underground Storage Tank (UST) Section received a copy of the *2021 One-time Leak Detection Testing Report of 11 Sections of Petroleum Pipelines, Joint Base Pearl Harbor-Hickam, Hawaii,* dated February 16, 2021. The report documents two pipeline pressure test failures of the 6-inch multi-product defuel line located beneath Arizona Street between Valve Stations (VS) VS-3 and VS-1C. The pipeline pressure test failures occurred on January 20, 2021 and January 23, 2021. Pressure test failures of the single-walled piping constitute a suspected UST release. The pressure test failures combined with the existing evidence of a release to surface waters is confirmation that a release from the Red Hill Bulk Fuel Storage Facility has occurred. Therefore, the DOH-UST Section has assigned confirmed UST Release ID No. 210011 for the piping release at the VS-3 manifold of Hotel Pier.

On March 17, 2020 and June 2, 2020 releases of oil to surface water were reported by the Navy On-Scene Coordinator to the DOH-Hazard Evaluation and Emergency Response (HEER) Office. Since that time, the DOH and the United States Coast Guard have been working with the Navy to locate and identify the source of the release as an emergency response action. The DOH issued a Notice of Interest letter to the Navy on December 21, 2020 requiring the Navy to locate and secure the oil release, remediate the oil spill, and conduct additional pipeline testing. Navy installed skillets to isolate the underground portion of the 6-inch multipurpose defuel line that receives over pressure

fuel from the three active fuel lines (JP-5, F-24, and F-76) on January 23, 2021. The DOH received from the Navy requested schematic diagrams and pressure relief valves specifications on May 25, 2021 that verify that during times of overpressure fresh fuel could be placed in the defuel line.

Under the emergency response phase, the Navy has undertaken and continues release response actions to locate and secure the source(s) of release, contain, and recover oil on surface water and in soils in the immediate vicinity of Hotel Pier. Based on environmental media samples collected and analyzed, the subject release appears to have co-mingled with documented historical releases at Hotel Pier. The current fuel recovery quantities from the Hotel Pier site have been declining over the past several months indicating that efforts to isolate the potential release points have likely been successful in mitigating further release to the environment.

The DOH and the Navy are planning a transition from the ongoing joint emergency response phase to state oversight meeting the requirements of HAR 11-280.1, UST and HAR 11-451, State Contingency Plan overseen respectively by the UST Section and the HEER-Department of Defense State Memorandum of Agreement (DSMOA) Program. Details on joint oversight implementation will be agreed upon as soon as the Navy has identified the funding source(s) and process to meet the state requirements.

Hawaii Administrative Rules (HAR) 11-451, Hawaii State Contingency Plan, requires that Navy Region Hawaii and the Defense Logistics Agency conduct response actions to prevent or minimize the release of oil so that it does not migrate to cause substantial danger to present or future public health or welfare, to the environment, and natural resources.

Chapter 11-280.1, HAR, "Underground Storage Tanks," Subchapter 6 “Release Response Action,” requires UST owners and operators to investigate releases of regulated substances from their UST systems. Guidance documents can be found on the DOH-UST Section website at: http://health.hawaii.gov/shwb/.

In accordance with chapter 11-280.1, subchapter 6, owners and operators of UST systems with confirmed release are required to send the following documentation to the DOH, Solid and Hazardous Waste Branch, UST Section, located at 2827 Waimano Home Road, #100, Pearl City, Hawaii 96782:

1. **Confirmed Release Notification (CRN) Form** - Within seven (7) days of confirming the release.

2. **Initial Abatement Measures and Site Assessment** - Within 20 days after release confirmation, owners and operators will submit a report to this office summarizing the initial abatement steps taken under HAR 11-280.1-62(a) and any resulting information or data.

3. **Initial Site Characterization Report** - Within 45 days of release confirmation to include initial release response actions, description and estimated quantity of the release, analytical results of soil, groundwater, surface water, soil vapor (SV) sampling, water quality, use and location of wells in a one-mile radius, location of utilities and other requirements in accordance with HAR 11-280.1-63. Follow the format of a Site Investigation Report in Section 18.5.9 of the DOH-HEER Technical Guidance Manual (TGM).

4. **Free Product Removal** - Removal of petroleum free product to the maximum extent practicable in accordance with HAR 11-280.01-64. If free product is found in the subsurface of a confirmed UST release site, then a Free Product Removal Report is due to this office within 45 days of confirming the UST release.

5. **Notification of members of the affected public** - Within 90 days of confirming a UST release, owners and operators shall notify members of the public in writing who are directly affected by the confirmed release in accordance with HAR 11-280.01-65.1. These include landowners, lessors, lessees, and easement holders at the release site.

6. **Release Response Reporting** - If release response actions exceed 90 days following a confirmed UST release, then a first quarterly status report is due to include all release response actions taken in the first 90 days and a plan for future release response action. Follow the format for a Site Investigation Report in Section 18.5.9 of the DOH-HEER TGM. Quarterly Release Response Reports for your facility are due every 90 days until otherwise notified by the DOH-UST Section.

The DOH-UST Section has adopted the DOH-HEER TGM and the DOH-HEER guidance for UST release response investigations including multi-increment sampling of soil, monitoring well construction/groundwater sampling, and SV sampling. For required sampling analytes by fuel type, see Table 9-5 of the TGM at: www.hawaiidoh.org. Please ensure that all future sampling events are performed in accordance with the DOH-HEER TGM and the DOH-HEER guidance.

Once the subject release has been transitioned from the emergency response phase to the assessment/remediation phase, the DOH will be able to provide oversight under the

DSMOA Program in the Site Discovery, Assessment, and Remediation Section of the DOH-HEER Office. The Naval Facilities Engineering Systems Command Hawaii, Environmental Restoration will have to initiate the addition of the site to the current DSMOA Cooperative Agreement (CA 2020-2022) and provide Joint Execution Plans to allow for the DOH oversight. Should you have any questions regarding this oversight, please contact: Dr. Maria E. Q. Reyes at 586-4249 or maria.reyes@doh.hawaii.gov.

Although the DOH will be providing oversight of the Navy's assessment and remediation actions under the DSMOA Program, please understand that the Navy is also responsible for complying with and reporting release response actions in accordance with the timelines described in the aforementioned UST regulations. Please include your DOH-UST Facility ID and Release ID numbers on all future correspondence regarding this release to the DOH-UST Section. An electronic copy in a single pdf file on CD is required for each report submitted to the DOH-UST Section. We appreciate your cooperation and prompt attention to this matter.

If you have any questions regarding this letter, please contact Ms. Roxanne Kwan at 586-4226 or by email: roxanne.kwan@doh.hawaii.gov.

Sincerely,

Keith E. Tanaka Env.
Deputy Director for Environmental Health

c: Elizabeth Galvez, HEER Office
Maria Reyes, HEER Office