DRAFT
Proposed Administrative Order on Consent
Red Hill Bulk Fuel Storage Facility
Pearl Harbor, Oahu
Hawaii DOH, US EPA, US Navy, and DLA

COMMUNICATION STRATEGY

Projected Action Date:	May 2015
Location:	DOH, Honolulu EPA R9, San Francisco
Level of Public Interest:	High
DOH Lead:	Steven Chang, Solid and Hazardous Waste Branch Roxanne Kwan, UST Section
DOH Media Contact:	Janice Okubo/Keith Kawaoka
EPA Program Lead:	Steven Linder – UST Office Rebekah Reynolds - ORC
EPA Media Officer:	Dean Higuchi, 808-541-2711
EPA Congressional Liaison:	Dean Higuchi, 808-541-2711
Navy/DLA Lead:	Tom Clements

Action Description:

The administrative order on consent (AOC) provides for the performance by Navy and Defense Logistics Agency (DLA) of a release assessment, response(s) to release(s), and actions to minimize the threat of future releases in connection with the field constructed underground bulk fuel storage tanks, surge tanks, pumps, and associated piping at the Red Hill Bulk Fuel Storage Facility ("Facility"), located near Pearl Harbor, on the island of Oahu in the State of Hawaii.

Issue Background:

On January 13, 2014, Navy discovered a loss of fuel from Tank #5 and immediately notified Hawaii Department of Health ("DOH") and EPA. On January 13, 2014, Navy began transferring fuel from Tank #5 to other storage tanks. The transfer of all fuel from Tank #5 was completed on January 18, 2014. On January 16, 2014, Navy verbally notified DOH and EPA of a confirmed release from Tank #5. On January 23, 2014, Navy provided written notification to DOH. Navy estimates the fuel loss at approximately 27,000 gallons. The total amount released to the environment is unknown. Following the January 2014 release, Navy increased the frequency of monitoring and performed additional monitoring of Navy Well 2254-01 and shall continue to monitor Navy Well 2254-01 in accordance with the Groundwater Protection Plan approved by DOH. The Groundwater Protection Plan will also be updated in accordance with the SOW. Current drinking water monitoring results confirmed compliance with federal and state Maximum Contaminant Levels for drinking water both before and after the January 2014 release.

The Facility was constructed and became operational in the 1940s. The Facility includes twenty (20) field-constructed steel underground bulk fuel storage tanks ("Tanks"). The Tanks are constructed of steel, encased by an estimated minimum of 2.5 to 4 feet of concrete surrounded and supported by basalt bedrock. Each Tank has a fuel storage capacity ranging from approximately 12.5 to 12.7 million gallons resulting in a Facility-wide total of approximately 250 million gallons of fuel. However, as of the Effective Date, eighteen (18) tanks are active or in use and two (2) ~~of the twenty (20)~~ tanks are not currently in operation. Of the eighteen (18) in use tanks, three (3) are empty awaiting various stages of a service life extension program. The remaining fifteen (15) tanks are in use, storing over 180 million gallons of fuel at any given time.

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Commented [SY1]: This text is basically taken from the Task Force Report.

Agency Message:

The objective of the AOC is to ensure that the groundwater resource in the vicinity of the Facility is protected and to ensure the operation and maintenance of the Facility in an environmentally protective manner. EPA and DOH look forward to continued work with the Navy and DLA on this long term effort to address potential risks from this unique and complex Facility through a comprehensive solution to protect health and the environment.

Parties to the AOC:

- US Navy
- Defense Logistics Agency
- Hawaii Department of Health

- US EPA
- Hawaii Department of the Attorney General

Key Stakeholders:

- Honolulu Board of Water Supply
- Governor – State of Hawaii
- Mayor – City and County of Honolulu
- Honolulu City Council
- Hawaii Congressional Delegation
- Hawaii State Legislature
- State of Hawaii Residents

Communication Strategy

ACTION	Person Responsible
HDOH Website on Red Hill Goes Live	Richard Takaba
EPA's Website on Red Hill Goes Live	Bonnie Barkett
Issue Press Release	Dean Higuchi
Call/Email Press Release to US Navy/DLA	
Email AOC/SOW/Press Release/Public Meeting info Honolulu BWS – Ernie Lau Hawaii Governor David Ige Mayor Kirk Caldwell CCH Honolulu City Council HI Hawaii Congressional Delegation HI Hawaii State Legislature	
Publish Notice of Public Meeting (x days prior to meeting)	
Conduct Public Meeting	EPA/DOH/Navy/DLA

Commented [KRS2]: Added Richard Takaba name.

Commented [RR3]: Need to discuss with HI whether to do this jointly and incorporate their process into the press release.

Commented [RR4]: Tom are you thinking that publish means in a newspaper of general circulation in the affected area? Or DOH can go through their process.

Commented [HT5R4]: I was thinking of a newspaper notice, but we should decide after talking to DOH

Q and A – AOC for Red Hill Bulk Fuel Storage Facility

What is the purpose of the AOC?
The AOC is an enforceable document that establishes an agreed upon timeframe for the Navy and DLA to evaluate and remediate existing contamination to the extent practicable in the vicinity of the Red Hill Facility as well as to evaluate and implement measures to prevent future releases from the

Tanks at the Red Hill Facility. The AOC sets forth a planning and implementation schedule for the Navy and DLA to accomplish this work, all of which is subject to review and approval by DOH and EPA.

What are the specific actions the Navy and DLA need to do?
The AOC requires the Navy and DLA to determine the best practicable fuel release prevention and detection measures for the Tanks at the Red Hill Facility, and to upgrade all in use Tanks at the facility. The AOC also requires the Navy and DLA to conduct an updated analysis of the hydrogeology of the area surrounding the Red Hill Facility, an assessment of the extent of contamination caused by past fuel releases, an evaluation of potential remediation methods and implementation of such measures, and an assessment the risk the Red Hill Facility poses to the drinking water resources in Oahu. All work performed by the Navy and DLA must be developed in consultation with DOH and EPA and is subject to the approval of those agencies.

Commented [RR6]: Tom's comment:

I'd like to see much more prominence to the task of upgrading the tanks. We added similar language to the press release.

What are the deadlines?
The AOC and associated SOW require the Navy and DLA to perform various tasks concurrently. The hydrogeological modeling, site characterization, remediation method determinations and risk assessment will occur over the next two years. The timeline for remediation work and the extent of the remediation is dependent on the methods determined to be best suited to the conditions of the site.

The initial evaluation of Tank upgrade alternatives will occur within the first two years and re-evaluations will occur every five years afterwards. All in use Tanks will be evaluated and upgraded within 20 years after the initial evaluation. If necessary, the Navy may request a schedule extension of up to 5 years.

Commented [HT7]: I'd like to emphasize the 20 years as the presumption.

How will this protect Oahu's drinking water supply?
The hydrogeological studies and risk assessment will determine the extent of any existing contamination and the potential for migration of contamination towards ~~the~~ drinking water ~~aquifers~~supply wells. The Tank upgrades will reduce the potential for future releases of petroleum into the surrounding area.

Is Oahu's drinking water supply safe?
To date the release of fuel from the Red Hill Facility has not impaired the use of drinking water supply wells in and around the Red Hill Facility.

Commented [HT8]: Should we include anything about monitoring results?

Will Oahu's drinking water supply be monitored?
Yes. Drinking water wells in the areas surrounding the Red Hill Facility are already regularly monitored, and samples are analyzed for chemicals of concern. The AOC provides for the installation of additional groundwater monitoring wells in areas between the Red Hill Facility and the Honolulu Board of Water Supply drinking water wells. Upon the completion of the hydrogeological modeling of the area additional groundwater monitoring well locations will be identified.

Are there any fines or penalties?
No. The AOC establishes a strict timeline for the Navy and DLA to complete the various tasks, including interim milestones to ensure progress is being made. The Navy and DLA are subject to monetary penalties in the event they do not meet the timelines in the AOC.

Commented [SY9]: This seems to contradict with the third or last sentence. Are we trying to say that there are no fines or penalties for past or future releases?

Will the Navy still use the fuel tanks now and into the future?
Yes. The facility is currently in use. Over the long-term, the determination as to which and how many Tanks will be used to store fuel will ultimately be made by the Navy and DLA. The AOC establishes a final deadline of at most 27 years from the date the AOC is signed by all parties to have completed all Tank upgrades (2 years for initial study and 20-25 years to implement upgrades, depending on whether a schedule extension(s) of totaling up to 5 years is needed). After the final deadline, any Tanks that have not been upgraded can no longer be used to store regulated substances, i.e. petroleum products.