

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843
www.boardofwatersupply.com



August 7, 2017

KIRK CALDWELL, MAYOR

BRYAN P. ANDAYA, Chair
DAVID C. HULIHEE
KAPUA SPROAT
KAY C. MATSUI

ROSS S. SASAMURA, Ex-Officio
FORD N. FUCHIGAMI, Ex-Officio

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

ELLEN E. KITAMURA, P.E.
Deputy Manager and Chief Engineer *ekk*

Mr. Bob Pallarino
EPA Red Hill Project Coordinator
United States Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

and

Mr. Steven Chang, P.E.
DOH Red Hill Project Coordinator
State of Hawaii
Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801-3378

Dear Messrs. Pallarino and Chang:

Subject: Board of Water Supply (BWS) Comments to the Conditional Approval of Red Hill Administrative Order of Consent (AOC) Statement of Work (SOW) Deliverable-3.2 Tank Upgrade Alternatives Scope of Work, Red Hill Bulk Fuel Storage Facility (RHBFSF) dated December 8, 2016

The BWS has reviewed the subject document and offers the following comments. This letter supplements our September 30, 2016 letter regarding the Navy's Tank Upgrade Alternatives Scope of Work Outline Final Submission dated September 8, 2016 regarding the RHBFSF (Lau, 2016).

We understand that this document, herein referred to as the AOC SOW 3.2 Conditional Approval, provided essentially two qualifications for regulatory approval of the proposed Navy Scope of Work. The first condition is that the Navy provide two interim progress report updates, the first of which occurred in Honolulu, Hawaii on June 20, 2017. The second progress meeting is yet to be scheduled, but we understand the plan is to have the second progress meeting completed by October 2017 with a draft report for review to be provided in September 2017. The BWS agrees that these interim progress updates are useful both in terms of keeping all stakeholders informed, as well as giving an opportunity for Subject Matter Experts (SME) to provide feedback to the Navy. The

Messrs. Pallarino and Chang
August 7, 2017
Page 2

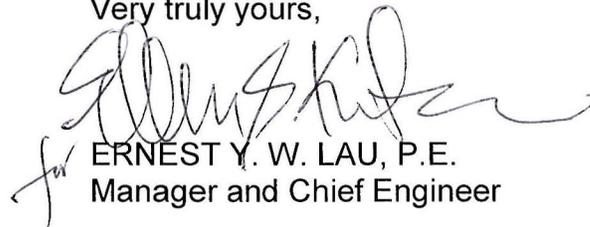
BWS hopes to participate in the second progress update meeting, as we did with the first progress meeting on June 20.

The second condition for approval by the regulators was that the Section 3.2 Scope of Work be expanded to include a decision-making process for determining the best available practical technology (BAPT) for tank upgrades at the RHBFSF. This condition is similar to the BWS recommendations 4, 5, and 6 in our September 30, 2017 letter, and we concur it is an important addition to the scope. The AOC SOW 3.2 Conditional Approval provides an example of how the risk analyses of AOC SOW Section 8 can be incorporated into a tank upgrade decision, but it is our understanding that at this time there is no plan to include a comparison of tank upgrade alternatives in the risk analysis.

The BWS would like to re-emphasize our recommendation that the tank upgrade alternative decisions should also acknowledge, and be made in the context of and comparison to, the alternative of relocating the RHBFSF tanks to other site(s) that do not pose threats to the underlying aquifer. The AOC SOW 3.2 Conditional Approval remains silent on this BWS recommendation.

If you have any questions, please contact Erwin Kawata at 808-748-5080.

Very truly yours,



for ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

cc: Mark Manfredi
Red Hill Regional Program Director
NAVFAC Hawaii
850 Ticonderoga Street, Suite 110
JBPHH, Hawaii 96860

References Cited

Lau, 2016. Board of Water Supply (BWS) Comments to the Work Plans Being Developed Under the Red Hill Bulk Fuel Storage Facility. Administrative Order on Consent (AOC) Statement of Work (SOW) Section 3, Tank Upgrade Alternatives. September 30.