

# BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU  
630 SOUTH BERETANIA STREET  
HONOLULU, HI 96843



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## Summary of the Board of Water Supply's Comments on the Proposed Administrative Order on Consent (AOC) and Attachment A, Statement of Work (SOW) on the Red Hill Bulk Fuel Storage Facility

The following is a summary of the Board of Water Supply's (BWS) comments on the proposed Administrative Order on Consent (AOC) and Statement of Work (SOW) for the Red Hill Bulk Fuel Storage Facility submitted to the U.S. Environmental Protection Agency (EPA) and the Hawaii Department of Health (DOH) on July 20, 2015.

The comments are based on a detailed technical evaluation of the AOC and SOW documents and considered the testimonies heard at the June 18 Public Meeting. It also reflect Ka Wai Ola, Water For Life, the BWS guiding principle and declaration to the importance of water for life and our commitment as stewards of this most precious resource to ensure a safe, dependable, and affordable water supply for present and future generations.

### Background

On June 1, 2015, the EPA and the Hawaii DOH released for public review and comment a proposed AOC and SOW that require the US Department of Navy (Navy) and the Defense Logistics Agency (DLA) to take measures to minimize the threats from past and future leaks at the Navy's Red Hill Bulk Fuel Storage Facility (Red Hill or Facility). Today, more than 70 years since Red Hill's construction, the Facility continues to hold about 180 million gallons of fuel in aging and corroding tanks, 100 feet above the groundwater that Oahu depends on for drinking water.

### Summary of BWS Comments

The BWS is unable to support the AOC and SOW as currently written for the following reasons.

1. The AOC and SOW need to require thorough site study (characterization) and clean-up of the existing below-ground contamination in a timely manner according to standard guidelines and put in place a properly designed monitoring well network.
2. The AOC and SOW allow for the continued study of improvements to the Facility when appropriate solutions have already been identified. These improvements should be made quickly to eliminate the threat to our drinking water from new fuel releases.
3. The time frames for doing the work under the SOW are too long and lack firm deadlines to protect our drinking water and comply with regulations. As written, the documents allow Facility operations to continue relatively the same for decades.

4. The AOC and SOW unacceptably limit participation by the public and major stakeholders.
5. The AOC and SOW should require the full disclosure (without censorship) and access to all records, data, and studies about fuel leaks at the Facility over its history.
6. The AOC and SOW is able to override compliance with existing and future regulations that apply to the Facility. If the AOC and SOW decisions conflict with existing or future regulations, the most stringent regulations should be applied to the Facility. For example, the Facility should be governed by the new US EPA Underground Storage Tank (UST) regulations that now apply to field constructed USTs like the Red Hill tanks.
7. The AOC and SOW should require a written commitment to fund all of the AOC and SOW tasks and improvements in a timely manner. Please identify the currently available funding that could be used for these tasks now.

The BWS's comments are based on information provided by the Navy and DOH to date, including the AOC Administrative Record. Our review of this information revealed the following:

1. The Red Hill fuel tanks have been corroding along the inside and outside of their steel walls for more than 70 years. The corrosion has caused significant thinning of the steel tank wall and, in some cases, fully penetrated the steel.
2. The corrosion process will continue to damage the steel tank wall and the steel reinforcement in the surrounding concrete, which will lead to more frequent and larger fuel releases than have occurred in the past.
3. Tank corrosion and rehabilitation options have been studied since the 1990s and solutions have already been identified that could be completed in roughly four years. These options are expected to provide roughly 20 more years of service life at much lower risk than the "clean, inspect, and repair" methodology that is currently used.
4. The location of the estimated 27,000 gallons of fuel released from Tank #5 in January 2014 into the rocks and groundwater beneath the Facility is still unknown. Important questions must still be answered to develop an adequate understanding of site conditions that control the movement of leaked fuel through the rocks and groundwater beneath the Facility.

The BWS strongly recommends that the proposed AOC and SOW be revised in order to properly protect our drinking water supply from past and future releases from the Facility's aging and corroding fuel tanks and pipelines. The BWS is ready to work with the Parties to quickly solve the important problems we have identified and so help prevent more contamination of our drinking water supply and environment from the Red Hill fuel tanks.

For a copy of our detailed comments, please go to [www.boardofwatersupply.com](http://www.boardofwatersupply.com).