

BOARD OF WATER SUPPLY

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



July 23, 2018

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Mr. Omer Shalev
United States Environmental Protection Agency
Region IX
75 Hawthorne Street (LND-4-3)
San Francisco, California 94105

and

Ms. Roxanne Kwan
Solid and Hazardous Waste Branch
State of Hawaii
Department of Health
2827 Waimano Home Road
Pearl City, Hawaii 96782

Dear Mr. Shalev and Ms. Kwan,

Subject: Honolulu Board of Water Supply Comments on Half-Day Meeting Held on June 6, 2018, Meeting for Red Hill Administrative Order on Consent (AOC) Statement of Work (SOW) Sections 6 and 7

The Honolulu Board of Water Supply (BWS) offers the following comments to the subject meeting held June 6, 2018.

The BWS is participating as a subject matter expert (SME) under paragraph 1.1 of the Red Hill Bulk Fuel Storage Facility (RHBFSF) AOC Statement of Work (SOW) by reviewing various work products prepared by the Navy under the AOC and also by attending AOC technical meetings. In this role, BWS attended the half-day June 6, 2018 AOC update meeting. Much of the time reserved for this meeting was spent by the Navy's contractors presenting approximately 90 slides covering very detailed technical data and analyses concerning: (1) the potential for natural attenuation of released fuel in the subsurface within the RHBFSF; and (2) an estimation of a maximum fuel release volume the subsurface could attenuate without impacting groundwater. The Navy and/or its contractors did not provide the BWS with any materials to review prior to the start of the meeting. The BWS assumes that no information was provided to other SMEs in advance of the presentation but cannot be sure. In any regard, the BWS believes that without the opportunity to review the relevant information beforehand, the half-day AOC meeting attended by the BWS provided little opportunity for it or other SMEs to evaluate the Navy's work or give constructive feedback.

We wish to make clear to the AOC Parties and others that the BWS remains willing to participate and engage in constructive discussions concerning the AOC process; however,

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without communication and transparency the current format of these meetings is not conducive to an open technical dialogue or meaningful SME input. To the contrary, BWS' participation during this meeting was limited to listening to the Navy's presentation and asking a few clarifying questions. In no way should the BWS' participation be construed as endorsing any of the Navy's data or analyses. Moreover, the meeting time was too brief to even begin to discuss the Navy's most significant assertions, such as its apparent conclusion that 88,000 to 918,000 gallons of fuel could be released from Red Hill tanks without impacts to groundwater.

The June 6, 2018 half-day AOC meeting was not a productive demonstration of the Navy's work to the SMEs. The Navy's presentation of the underlying data, assumptions, analyses, methods, and findings was so short that it lacked the very information necessary to evaluate the validity of the underlying work. If the objective of the AOC technical meetings is to simply to give SMEs some notice of certain ongoing technical work, then the record should be clear and not misconstrued as a fulsome consultation with SMEs.

We respectfully ask that the AOC Parties facilitate an open dialogue on important technical issues, particularly where, as here, the Navy suggests that nearly a million gallons of fuel could be released from Red Hill without impacts to groundwater. Further, we reiterate our request that meeting presentation materials be provided at least several days if not weeks in advance so that SMEs can prepare for and contribute to a productive technical discussion of issues important to the AOC and our drinking water. The BWS and our ratepayers depend on our Sole Source aquifer for drinking water, as does the Navy. Fuel contamination of our drinking water is a vital concern for all of us. AOC Parties and SMEs should ensure all interested parties have the information and time necessary to achieve meaningful participation and consultation.

If you have any questions, please contact Mr. Erwin Kawata, Program Administrator of the Water Quality Division at (808) 748-5080.

Very truly yours,



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

cc: Mr. Steve Linder, United States Environmental Protection Agency Region IX
Mr. Mark Manfredi, NAVFAC Hawaii, Red Hill Regional Program Director/Project Coordinator