

BOARD OF WATER SUPPLY

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



June 18, 2015

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Board of Water Supply
Testimony on the Red Hill Bulk Fuel Facility
Proposed Administrative Order on Consent (AOC)
And Statement of Work (SOW)

Public Meeting
Moanalua Middle School

Members of the State Legislature and Honolulu City Council;
U.S. Environmental Protection Agency (EPA);
Hawaii Department of Health (DOH); U.S. Navy;
Defense Logistics Agency (DLA) and Oahu's Residents

The Board of Water Supply (BWS) does not support the proposed Red Hill AOC and SOW as written. The documents lack public transparency, corrective action specificity, and the immediate implementation of improvements that will protect our groundwater and environment.

The BWS appreciates the long and hard work of the EPA, DOH, Navy and DLA to develop the proposed AOC and SOW. Unfortunately, the contents do not adequately address our concerns about the facility storing 187 million gallons of fuel located 100 feet above a State designated drinking water aquifer; mitigate fuel contaminants already in the groundwater underneath that facility; arrest the corroding condition of the tanks' thin ¼ inch steel wall and their fortification to minimize the risks of a large fuel release contaminating the aquifer.

This aquifer is the only one of its kind and there are no cost effective alternatives that can replace it. BWS does not want its wells that presently show no contamination to become contaminated in the future. At what point do the studies, required under the AOC and SOW to determine the best practicable available technology, become actions for implementation? Studies could potentially continue for years in the name of practicality, while the existing situation remains unchanged. The Tank 5 leak which occurred, even after completing a multi-year clean-inspect-repair and modernization process, does not demonstrate that the status quo approach is protective of the environment and our drinking water.

The AOC needs to require clean-up of the contamination that is presently in the groundwater and rocks underneath the tanks to reduce the amount available for migration to those parts of the aquifer that are still uncontaminated. The absence of free product does not preclude the finding of petroleum constituents already dissolved in the water.

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Also, the AOC and SOW need to include stakeholders and the public in an open process that requires the immediate installation of improvements that will protect the groundwater and environment. The AOC administrative record indicates past studies identified potential improvements that interestingly have not yet been acted upon. Further delays in taking action places our drinking water and environment at risk and defers improvement opportunities vital to the protection and future sustainability of our underground sources of drinking water.

The BWS will be submitting formal written comments on the proposed AOC and SOW by the July 1st deadline, which will be made available on our website. We also requested an extension of the July 1st comment deadline to allow us to review documents that cannot be copied and disseminated because of copyright laws but were listed in the administrative record and not available until now, mid-way through the comment period. The extension will give us the full thirty day review period originally established on the first day the AOC and SOW were announced, which was June 1st. We are making the remaining administrative record documents that can be disseminated available at <http://data.hawaiiopendata.org/>.

Thank you for the opportunity to testify this evening and share our perspective on this very important matter.

Very truly yours,


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