



**DEPARTMENT OF THE NAVY**  
COMMANDER  
NAVY REGION HAWAII  
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Ser N4/070  
March 4, 2022

**CERTIFIED NO: 9489 0090 0027 6232 9782 74**

Ms. Gabriela Carvalho  
Red Hill Project Coordinator  
U.S. Environmental Protection Agency (EPA), Region 9  
Pacific Islands Contact Office  
300 Ala Moana Blvd, Room 5124  
Honolulu, HI 96850

**CERTIFIED NO: 9489 0090 0027 6232 9782 81**

Ms. Roxanne Kwan  
State of Hawaii Department of Health (DOH)  
Environmental Management Division  
Solid and Hazardous Waste Branch  
2827 Waimano Home Road #100  
Pearl City, HI 96782

Dear Ms. Carvalho and Ms. Kwan:

**SUBJECT: REVISED SCOPE OF WORK (SOW) FOR ADMINISTRATIVE ORDER ON  
CONSENT (AOC) SECTION 8.2 RISK/VULNERABILITY ASSESSMENT  
(RVA) PHASE 2 FOR THE RED HILL BULK FUEL STORAGE FACILITY.**

The purpose of this correspondence is to request to continue discussions on the proposed way ahead for the Section 8.2 Risk/Vulnerability Assessment Phase 2 Scope of Work (SOW) for the Red Hill Bulk Fuel Storage Facility (RHBFSF).

In accordance with the requirements of the AOC, and in continued collaboration with the EPA and DOH, the Navy continues to work diligently in addressing the deficiencies contained in Section 8.2 Risk/Vulnerability Assessment Phase 2 Scope of Work (SOW) identified by the regulators in the Notice of Deficiency letter dated September 2, 2021.

This Notice of Deficiency letter from the EPA/DOH provided an original revised RVA Phase 2 SOW submission deadline of November 1, 2021. After numerous meetings and discussions with both the EPA and DOH, the Navy determined additional time would be required to produce a revised SOW acceptable to both regulatory agencies.

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In a letter to the EPA and DOH dated November 1, 2021, the Navy requested the revised RVA Phase 2 SOW submission deadline be extended to March 4, 2022. At that time, the Navy believed an approved SOW for RVA Phase 2 could be developed by holding bi-weekly meetings with the regulators.

An independent third party contractor is currently conducting an assessment of the RHBFSF. The Navy anticipates the results from the independent assessment will provide insight that will aide in developing the RVA Phase 2 SOW. This includes, but is not limited to, the description of the products the RVA will produce, the methodology employed to produce those products, the compatibility with a future containment fate and transport model, and the rationale for the roles of the various participants in conducting the RVA.

The Navy believes it is prudent to allow sufficient time for the independent assessment to be completed to utilize information from the assessment to produce a revised SOW that will acceptable to both regulatory agencies. Assuming the third party assessment is completed by the currently scheduled due date of April 22, 2022, the Navy proposes that all AOC parties meet no later than May 31, 2022. This meeting will be for the purpose of a) determining our path forward based on the results of the assessment, and b) establishing a reasonable due date for resubmission of the SOW.

If you have any questions, please contact CDR Darrel Frame at [Darrel.e.frame.mil@us.navy.mil](mailto:Darrel.e.frame.mil@us.navy.mil) or by phone at (808) 312-2652.

Sincerely,



J. G. MEYER  
Captain, CEC, U.S. Navy  
Regional Engineer  
By direction of the  
Commander