



DEPARTMENT OF THE NAVY  
COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPHH HI 96860-5101

5090  
Ser RHPMO/343  
October 13, 2023

Grant Scavello  
U.S. Environmental Protection Agency, Region 9  
Red Hill Project Coordinator  
75 Hawthorne Street  
San Francisco, CA 94105-3922

Kelly Ann Lee  
State of Hawai'i, Department of Health  
Red Hill Project Coordinator  
P.O. Box 3378  
Honolulu, HI 96801-3378

Dear Mr. Scavello and Ms. Lee:

**SUBJECT: CLARIFICATION OF SCOPE REQUIRED BY 2015 ADMINISTRATIVE  
ORDER ON CONSENT AND SCHEDULE FOR CONSOLIDATED  
ENVIRONMENTAL SCOPE OF WORK RED HILL BULK FUEL STORAGE  
FACILITY**

This letter is a follow-up to the Department of the Navy's (DON) two previous responses to the U.S. Environmental Protection Agency (EPA) and the State of Hawai'i Department of Health (DOH) (collectively, "Regulatory Agencies") February 17, 2023, letter related to clarifying the scope of the 2015 Red Hill Administrative Order on Consent (2015 AOC). In the DON's March 6, 2023 response, the DON agreed that it is beneficial to clarify the scope of release investigation and response work and the underlying authorities driving the effort; agreed that certain items from the 2015 AOC were no longer relevant or required, particularly those focused on efforts necessary to continue operating the Red Hill Bulk Fuel Storage Facility (RHBFSF); and requested an opportunity to discuss the specifics of the Regulatory Agencies' February 17, 2023 letter, the complexities of the items identified, and the multiple authorities cited. The DON met with EPA and DOH pursuant to that request on April 11, 2023, and subsequently responded via letter on May 15, 2023, expressing the DON's commitment to coordinating petroleum and per- and poly-fluoroalkyl substances (PFAS) responses where petroleum from the RHBFSF and PFAS are commingled.

Throughout subsequent discussions with EPA and DOH, the DON has generally agreed that the remaining items from the Regulatory Agencies' February 17, 2023 letter are best consolidated under the 2015 AOC Statement of Work. To accomplish this, the DON proposes to build on the framework of the Section 6 Investigation and Remediation of Releases (IRR) deliverables. Additionally, the DON proposes to update deliverables under Section 7.1

Groundwater Flow Model Report, Section 7.2 Contaminant Fate and Transport Model, and Section 7.3 Groundwater Well Network Report, to reflect current efforts and timeframes.

The DON proposes to meet with the Defense Logistics Agency (DLA), EPA and DOH to review Regulatory Agencies' feedback on the 2021 IRR Report, and discuss what an updated IRR Report should include. During this discussion, it may be prudent for the parties to the 2015 AOC to also plan for future updates to the IRR Report upon completion of the Red Hill underground storage tank (UST) closure site assessment pursuant to State of Hawai'i UST regulations, Chapter 11-280.1 of the Hawai'i Administrative Rules (HAR). Coordinating activities in this way will make the IRR Report a more comprehensive management plan that could provide greater public transparency and lead to expedited environmental response decisions.

The following are working documents that would be incorporated directly, or as appendices, into the revised IRR Report, with new documents following as they become available:

- Red Hill Shaft Recovery and Monitoring Plan;
- Adit 3 Site Characterization;
- Red Hill Shaft Flow Optimization Study; and
- Soil Vapor Extraction Pilot Test Report.

Any other pilot-scale remediation tests or interim remedial actions conducted prior to submittal of a full remediation plan will be incorporated directly, or as appendices, into the IRR Report.

To reflect the status of the modeling efforts that have been discussed with the Regulatory Agencies to address the comments identified in the your March 2022 letter, DON proposes that deliverables under Section 7.1 Groundwater Flow Model Report and Section 7.2 Contaminant Fate and Transport Model should reflect the timelines associated with:

- Geological Conceptual Site Model;
- Groundwater Flow Model;
- Vadose Zone Modeling; and
- Contaminant Fate and Transport Model.

To reflect the status of the monitoring and well network expansion efforts that have been discussed with the Regulatory Agencies, DON proposes that deliverables under Section 7.3 Groundwater Monitoring Well Network should include timelines associated with:

- Groundwater Protection Plan Update;
- Groundwater Monitoring Well Expansion Plan;
- Consolidation and Optimization of the Groundwater Sampling Programs; and
- Soil Vapor Monitoring Program.

5090  
Ser RHPMO/343  
October 13, 2023

The DON stands ready to meet with DLA, EPA and DOH to ensure that these items are appropriately addressed under the 2015 AOC processes.

Please do not hesitate to contact me directly for matters related to this correspondence. I am available by email at [anthony.m.pecoraro2.mil@us.navy.mil](mailto:anthony.m.pecoraro2.mil@us.navy.mil), or by phone at (808) 221-0291.

Sincerely,

A. M. PECORARO  
Red Hill Executive Agent  
By direction  
of the Commander