



RED HILL BULK FUEL STORAGE FACILITY TUA DD Fact Sheet

RED HILL BULK FUEL STORAGE FACILITY TANK UPGRADE ALTERNATIVE AND RELEASE DETECTION DECISION DOCUMENT (TUA DD) SUPPLEMENTAL FACT SHEET

In August 2021, the Navy submitted the TUA Supplemental document to the Administrative Order on Consent (AOC) regulators - the Environmental Protection Agency (EPA) and the State of Hawaii Department of Health (DOH) in support of the Navy's 2019 Tank Upgrade Alternative and Release Detection Decision Document (TUA DD).

The TUA Supplemental provides amplifying information to substantiate how the Navy's enhanced Clean, Inspect and Repair (CIR) program is the most viable tank upgrade alternative that satisfies the best available practicable technology (BAPT) requirement set forth under the AOC. The document also details how the enhanced CIR Program provides a foundation for the Navy to move forward in its secondary containment initiative.

TUA DD and TUA Supplemental:

- The TUA DD embraces all options as the Navy considers realistic and timely options to best protect the environment and the water while supporting national defense.
- This TUA DD rests on the foundation of significant investments in two major programs; first the upgrades to the current facility to ensure it remains safe and operational; and second an accelerated program to develop a secondary containment upgrade in the near term.
- The Department of Defense (DoD) is investing \$750 million of system enhancements and upgrades into Red Hill over 10 years as the focus of this TUA DD.
- The Navy is putting equal effort into an accelerated project focused on secondary containment technology, in development with a leading engineer in the industry.
- This is not a choice of a single wall tank upgrade over dual wall, it is a strong investment in both while acknowledging that one is a mature program and one is in the program developmental phase.

Tank Upgrade Alternative (TUA) Supplemental Details:

- In developing the TUA Supplemental document the Navy carefully considered:



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- All related AOC reports regarding technology, operations, and environmental conditions at Red Hill;
 - Ongoing research and development and technology evaluation efforts;
 - EPA and DOH request for amplifying information to support the TUA DD recommendation, and;
 - Public comments on the TUA DD received by the EPA and DOH in December of 2019.
- Part 1 of the TUA Supplement is the Executive Summary. It also provides additional supporting details for the BAPT recommendation and reaffirms the Navy's commitment to secondary containment.
 - Part 2 of the TUA Supplement provides detailed Navy responses to each of the 16 RFIs. Each RFI response is comprised of the following three sections; a) the RFI from the regulators; b) the Navy's summary response; c) the Navy's detailed response.
 - Part 3 of the TUA Supplement contains additional evidence and enclosures in support of the Navy's BAPT recommendation detailed in Part 2 of the supplement.

Best Available Practicable Technology (BAPT)/Secondary Containment:

- The 2019 TUA DD established that the Navy's enhanced Clean, Inspect and Repair (CIR) program is the only alternative to meet today's BAPT requirement and is compatible (relative to key attributes such as inspection, construction, repair and reliability) with potential future solutions currently being evaluated.
- The enhanced CIR program ensures the Red Hill tanks will be maintained and does not commit resources or infrastructure that will impede future BAPT implementation.
- The current BAPT recommendation serves as the foundation that will support the next BAPT recommendation (5 years from initial BAPT approval) and will include findings from ongoing research and development efforts and new technological advancements.
- The Navy's next BAPT recommendation will also depend on the results of the secondary containment pilot project currently being conducted by Gaztransport & Technigaz – North America (GTT NA).



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- GTTNA is pursuing the feasibility of applying its dual membrane technology as a Red Hill tank secondary containment solution that meets State requirements. The dual membrane consists of two metal barriers with interstitial monitoring. This means the area outside of the fuel tank can be monitored to safeguard the environment. This potential solution to secondary containment was not known in 2019.

Background/Timeline:

- In 2015, the U.S. Navy and the Defense Logistics Agency (DLA) entered into an Administrative Order on Consent (AOC) with the Environmental Protection Agency (EPA) and the State of Hawaii's Department of Health (DOH) to establish a process for upgrading and implementing technical solutions, focusing on continued safe operations at Red Hill while protecting the environment and drinking water.
- September 2019 - Navy and DLA submitted the Tank Upgrade Alternative and Release Detection Decision Document (TUA DD) to the EPA and DOH which summarized the Navy's approach to improvements at the Red Hill and included the Navy's recommendation of today's Best Available Practicable Technology (BAPT).
- October 26, 2020 – EPA and DOH sent a request for amplifying information regarding the Navy's TUA DD submission.
- August 18, 2021 – After clarifying the EPA and DOH request for information, the Navy developed the TUA Supplemental and submitted to the Regulators.