

SB 1168



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 95105-3901

FEB 12 2015

OFFICE OF THE
REGIONAL ADMINISTRATOR

State of Hawaii
Senate Committee on Energy and Environment
Committee on Health
415 South Beretania Street
Honolulu, HI 96813

Attention: Senator Green and Senator Gabbard

Re: Comments on S.B. 1168 *Relating to Underground Storage*

Dear Members of the Committee on Energy and Environment and Members of the Committee on Health:

The U.S. Environmental Protection Agency ("EPA") appreciates the opportunity to provide comments on S.B. 1168 for consideration during your February 17, 2015 committee hearing.

Following the January 13, 2014 release of approximately 27,000 gallons of fuel from Tank #5 at the U.S. Navy's Red Hill Bulk Fuel Storage Facility ("Facility"), EPA, in partnership with the Hawaii Department of Health ("DOH"), has been negotiating an Administrative Order on Consent ("AOC") with the U.S. Navy and the Defense Logistics Agency ("DLA"). The purpose of the AOC is to provide an enforceable agreement to address the potential threat to Oahu's groundwater resources posed by the Facility.

The work to be performed under the proposed AOC requires the Navy and DLA to conduct groundwater assessments and any necessary cleanup at the Facility along with a comprehensive study of technologies that may be implemented at the Facility to reduce the likelihood of future releases to the environment. Once the appropriate upgrade technologies are determined by the studies, the AOC would require the Navy and DLA to upgrade all of the Red Hill tanks that will remain in-use. Secondary containment is one of the upgrade technologies that will be evaluated. However, to date, we have not identified any tanks of similar design to Red Hill where a secondary containment retrofit has been installed successfully. Given the size of the facility and the technical issues involved, it is likely that any major improvements to the Red Hill tanks will require more than ten years to implement.

We estimate our AOC negotiations will be successfully concluded within three months. A public meeting, with an opportunity for public comment, on the agreement and proposed work to be performed will be provided before the AOC is finalized.

EPA encourages the Committee on Energy and Environment and the Committee on Health to consider postponing further legislative action on S.B. 1168 to support the EPA, DOH, U.S. Navy and DLA as we conclude an agreement on a comprehensive solution for addressing the threat to groundwater from the Facility.

In partnership with the Hawaii DOH, the EPA is committed to protecting Hawaii's vital drinking water sources and surrounding environment. Thank you for the opportunity to provide comments on this important matter.

Sincerely,



Jared Blumenfeld



February 17, 2015

SENATE COMMITTEE ON ENERGY AND ENVIRONMENT

SENATE COMMITTEE ON HEALTH

Hearing Date and Time: February 17, 2015, 3:45 P.M., Room 225

Testimony on Senate Bill No. 1168, Related to Underground Storage

Chair Gabbard, Chair Green and Senators,

Good afternoon and thank you for the opportunity to submit written testimony for Committee review related to Senate Bill 1168.

I am Army Brigadier General John O'Neil, the Director of Logistics, Engineering and Security Cooperation at Headquarters, United States Pacific Command.

USPACOM, commanded by Admiral Sam Locklear, is the highest level DoD headquarters in the Indo-Asia-Pacific region. It provides command and control of assigned forces from the Army, Navy, Air Force and Marines operating in the Pacific. The Red Hill Fuel Storage Facility is owned and maintained by the U.S. Navy, while the Defense Logistics Agency serves as the military's global supply chain manager for fuel.

The purpose of my testimony is threefold: to inform the Committee of the vital strategic significance of the Red Hill Fuel Storage Facility; to communicate USPACOM's resolve and commitment to conduct operations in an environmentally responsible and compliant manner; and third, to continue communicating with State leadership and local constituents for any matters of public interest regarding the Red Hill Fuel Storage Facility.

The Red Hill facility holds a significant percentage of petroleum war reserves required to defend national security interests in the Pacific region. It supports all US military forces stationed in and transiting through Hawaii via its hardened, underground, cyber-protected, gravity feed system to Joint Base Pearl Harbor-Hickam. It supports the Hawaii Army and Air National Guard and is capable of defense support to civil authorities should circumstances dictate. There is no comparable US owned facility anywhere from India to mainland USA. Recent analysis and wargaming support moderately reduced fuel quantity stored at Red Hill, though the facility remains a vitally important, enduring capability, into the foreseeable future.

USPACOM remains committed to operating environmentally sound facilities, demonstrated through a trained workforce and continued financial investment that has improved safety, accountability, detection and monitoring at Red Hill. From Sep-Dec 2014, USPACOM supported four presentations to House Armed Service Committee staffers in Washington DC to

secure future year funding that supports sustainment, restoration and modernization of the Red Hill Fuel Storage Facility.

Additionally, the Red Hill Task Force established pursuant to SCR 73, supports collaboration between DoH, EPA, BWS and the US Navy. They have done good work, and the report contains value-added recommendations. The Navy is working with the Environmental Protection Agency and the state Department of Health on an Administrative Order on Consent / Statement of Work that will ensure the Red Hill facility remains safe and environmentally sound. Those efforts should be allowed to continue.

This Committee has within its power, the decision to defer voting on Bill 1168 in order to allow Task Force work to continue; and enable completion of technical feasibility study of Bill proposals, that would better inform Committee decisions moving forward.

On behalf of United States Pacific Command, thank you for the opportunity to submit testimony on this matter. Should the Committee desire, I consider it a privilege to meet in the near future and provide additional information as necessary.

Submitted by:

John E. O'Neil

Brigadier General, US Army

J4, USPACOM

SENATE COMMITTEE ON ENERGY AND ENVIRONMENT

SENATE COMMITTEE ON HEALTH

Testimony on Senate Bill No. 1168, Related to Underground Storage

Hearing Date and Time: February 17, 2015, 3:45 P.M., Room 225

Testimony on behalf of Navy Region Hawaii

Good afternoon, Chair Gabbard, Chair Green, Vice Chairs, and Senators,

I am Captain Dean Tufts of the United States Navy. I am the Commanding Officer of Naval Facilities Engineering Command, Hawaii, and also the Regional Engineer for Navy Region Hawaii. I've had the opportunity to serve across the globe, including time in Iraq and Afghanistan, and this is my second opportunity to serve here in Hawaii with my family. As my two oldest were born here, we clearly consider this great state one of our homes. With me today is Mr. Aaron Poentis, my Regional Environmental Program Director, and Mr. Scott Hedrick from Naval Supply Systems Command, Fleet Logistics Center-Pearl Harbor.

Thank you for allowing me to speak with you today. I am testifying relative to Senate Bill 1168. The bill would have the Legislature direct the State Department of Health (DOH) to amend its regulations regarding field-constructed underground storage tanks. This bill is targeting primarily the Department of Defense's Red Hill Bulk Fuel Storage Facility.

Red Hill's gravity-fed fuel distribution system provides an important capability to the Pacific Fleet and the Pacific Air Forces. The facility cannot be replicated, given our capacity, security, and redundancy requirements. As you may know, the Red Hill facility is a series of 20 tanks which each have the capacity to hold 12.5 million gallons of fuel. Each tank was built in place, with quarter-inch steel plates backed by 3 to 5 feet of concrete, inside a hill made of basalt... a very hard, dense rock. Ideas relating to a typical buried 10,000 gallon local gas station tank inside a concrete vault, where simple engineering solutions are achievable, cannot be easily applied to our 250-foot-high, 100-foot-across tanks that are inside a rock mountain. Any tank upgrades at Red Hill require research, study, testing and well-founded science-based decision-making before proceeding. This is precisely the process that DOH, the United States Environmental Protection Agency (EPA) Region 9, and the Navy have worked diligently to develop. Conversely, this bill proposes required actions without proper engineering-based research, such as the requirement for cathodic protection. Simply put, cathodic protection requires an electrically-conductive environment. The basalt rock and concrete surrounding the Red Hill tanks is a poor electrically-conductive environment. While that means that cathodic protection won't work at Red Hill, it also means that corrosion (which is an electrochemical process) on the outside of the tanks is also minimal.

The Red Hill Facility was built between 1940 and 1943, but it is not outdated. It remains just as functional as other age-resistant landmarks, such as the Hoover Dam and the Empire State Building. The Red Hill Facility has been, and continues to be, upgraded. The Navy constantly seeks and evaluates the

best available technologies that would be technologically feasible and effective at the Facility. Since 2006, we have spent \$138 million to improve pipelines, install groundwater and soil vapor monitoring systems, structurally reinforce and renovate the tunnels and passageways, improve ventilation, improve tank interiors, and protect the Red Hill drinking water shaft, the potable water shaft closest to the Red Hill Facility from which Joint Base Pearl Harbor-Hickam (the Base I work and live on) gets up to 20% of its water each day. In addition, next month, we will award contracts for a \$50 million project to upgrade our fire suppression systems and install oil-tight doors in the access tunnels.

The Department of Defense (DoD) asks the Legislature to defer this bill for at least a year to allow DOH to continue its work with EPA and the Navy. We have partnered over the last few months on an Administrative Order on Consent (AOC) and Statement of Work (SOW) for the Red Hill Facility. The AOC/SOW creates a deliberate, collaborative process that will give DOH and EPA greater regulatory oversight roles. Together, we will seek out and implement technologies to enhance the Facility's ability to protect the environment while allowing its continued operation.

While the DoD opposes this bill, we believe we will have a sound process in place to achieve technologically feasible solutions to protect the environment. Let me assure you that we entirely agree that the protection of drinking water in Hawaii is an unquestioned, non-negotiable requirement. The AOC/SOW, which describes tasks that the Navy will complete within certain time constraints, is dedicated to meeting that requirement.. It will address topics including tank inspection, repair and maintenance procedures... tank upgrade alternatives... release detection... corrosion protection... groundwater protection... and other areas. This legally enforceable document will provide the roadmap for the Red Hill Facility with enhanced oversight and approval roles for DOH and EPA beyond what this proposed bill would otherwise authorize.

We understand the concerns expressed following our report one year ago that an estimated 27,000 gallons of fuel were released from one Red Hill tank, Tank 5. That tank had been closed for three years while it was given what we call a "life extension" upgrade in which additional steel plates are welded onto the interior of the tank. We turned over to the contractor an operational and certified "tight" tank. When it was returned to us in December 2013, it could not securely hold fuel. Several steps were immediately taken to address the reported release. In coordination with the regulatory agencies, the tank was immediately drained and we increased our monitoring at all groundwater and potable water locations. We are now going through a prescribed investigative process to identify the root cause of the problem as well as remedy the issues created during the upgrade work.

Let me be clear that no other tanks were involved in this release of fuel. We note that other bills have included words that give the impression that the Red Hill tanks are leaking. I assure you that is not the case. Five other Red Hill tanks have gone through this same several-year upgrade process and did not release fuel after being put back into service.

Of course we very much regret that this fuel release occurred. We continue to monitor analytical results from independent certified laboratories confirming that the potable water distributed to Oahu's residents from the shafts nearest to Red Hill meet all Federal and State Safe Drinking water standards.

We are working closely with DOH and EPA to make sure it stays that way. Red Hill fuel operators carefully monitor for releases around the clock through a precise, computerized inventory management system, augmented with routine groundwater monitoring. We have 10 different monitoring sites around the Red Hill facility to detect migration of any contaminants -- two of these wells were installed last October -- and we are continuing to sample at all 10 sites in accordance with procedures developed with DOH. Our operations at Red Hill have never caused unsafe drinking water at any potable water source on Oahu.

In addition to our persistent groundwater monitoring, in 2008, the Navy developed and implemented a Groundwater Protection Plan which was approved by DOH. The plan was updated in 2009, 2010, and again in 2014, each time with reviews by DOH. The Navy is in consultation with the DOH and EPA to again update an existing Groundwater Flow Model and Contaminant Fate and Transport Model which will be incorporated into an updated Groundwater Protection Plan.

We believe this bill, if enacted, would in effect render meaningless the effort by the State Department of Health, the United States Environmental Protection Agency and the Navy to reach agreement on future operation and environmentally protective measures to be implemented for Red Hill. While I cannot discuss the specifics of our negotiations, once we have reached agreement, the public will be provided an opportunity for review and comment. With EPA and DOH, we will hold another public meeting, as we did last summer at Radford High School, to discuss the actions and milestones of the AOC/SOW and hear from our neighbors.

In summary, your military in Hawaii requires continuous and uninterrupted access to large volume, secure and survivable fuel storage facilities. The Red Hill Bulk Fuel Storage Facility meets our needs today and will in the future. Ensuring an environmentally safe storage and operating environment in our community is a top priority and we respectfully request your support to defer action on this bill for at least a year to ensure that the State Department of Health, the EPA, and the Navy have sufficient time to complete our collaborative Administrative Order on Consent and associated Statement of Work.

Thank you for the opportunity to testify today.

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

Testimony of
CARTY S. CHANG
Interim Chairperson

Before the Senate Committees on
ENERGY AND ENVIRONMENT
and
HEALTH

Tuesday, February 17, 2015
3:45 PM
State Capitol, Conference Room 225

In consideration of
SENATE BILL 1168
RELATING TO UNDERGROUND STORAGE

Senate Bill 1168 proposes to direct the Department of Health to adopt rules requiring all field-constructed storage tanks and tank systems currently exempt under Chapter 11-281, Hawaii Administrative Rules, to meet all the requirements that must be met by all other owners and operators of underground storage tanks and tank systems. **The Department of Land and Natural Resources (Department) offers the following comments.**

Underground storage tanks are a major threat to the public trust water resources of the State. It is critical that all owners and operators of underground storage tanks regularly monitor for leaks using approved methods, maintain adequate records, and meet corrosion protection, spill, and overflow requirements. These systems are prone to leak over time, as evidenced by the recent case regarding the Red Hill fuel storage tanks. The Department notes that a representative from the Department's Commission on Water Resource Management sat on the Red Hill Task Force.

Our underground aquifers are the major source of drinking water for the people of Hawaii. We have a public trust obligation to protect and preserve this valuable and irreplaceable resource. We must be proactive and protective to ensure the long-term sustainability of our precious water resources.

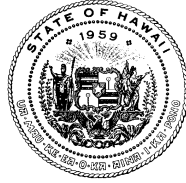
The Department defers to the Department of Health regarding the appropriate mechanism to bring all fuel storage tanks and systems into a uniform compliance standard and regarding the technical details and implementation of measures outlined in this bill.

CARTY S. CHANG
INTERIM CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

DANIEL S. QUINN
INTERIM FIRST DEPUTY

W. ROY HARDY
ACTING DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
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**Testimony COMMENTING on S.B. 1168
RELATING TO UNDERGROUND STORAGE**

SENATOR MIKE GABBARD, CHAIR
SENATE COMMITTEE ON ENERGY & ENVIRONMENT

SENATOR JOSH GREEN, CHAIR
SENATE COMMITTEE ON HEALTH

Hearing Date: February 17, 2015

Room Number: 225

1 **Fiscal Implications:** None.

2

3 **Department Testimony:** The Department appreciates the intent of this measure but
4 recommends deferring action at this time.

5 The Department is committed to taking measures required to prevent the future releases from all
6 underground storage tanks (USTs). Currently, rules enforced by the Department require that all
7 new USTs (with the exception of field constructed tanks (FCTs)) be provided with secondary
8 containment. Secondary containment is considered to be the most protective configuration for
9 non-FCTS and has been shown to be practical for these tanks which normally have a capacity of
10 less than 60,000 gallons.

11 However, due to the complexity, size, design and construction of FCTs, such as the Red Hill
12 tanks, secondary containment remains an unproven technology for use at this time. Immense
13 engineering challenges need to be analyzed and creative solutions may need to be developed
14 through the use of pilot studies, before the most appropriate technology and procedures can be
15 selected for implementation at FCTs.

16 The Department believes that more time and information is needed to determine appropriate
17 upgrades to these older FCTs before requiring immediate changes.

18 In an effort to address the challenges presented at Red Hill, the U.S. Navy, Defense Logistics
19 Agency, the EPA, and the Department are committed to completing the ongoing negotiations
20 that are designed to produce an Administrative Order on Consent (AOC). The AOC is intended
21 to establish a process to make well-researched, well-planned and cost-effective improvements to
22 protect the groundwater resource beneath the Red Hill Bulk Fuel Storage Facility. At this time,

- 1 we believe that this collaborative, enforceable approach provides a preferred way to address the
- 2 environmental concerns posed by this facility. Unfortunately, S.B. 1168 may have the
- 3 unintended consequence of complicating the ongoing negotiations by requiring a specific
- 4 solution which may not yet be practical.
- 5 Thank you for the opportunity to testify on this measure.



SB1168
RELATING TO UNDERGROUND STORAGE
Senate Committee on Energy and Environment
Senate Committee on Health

February 17, 2015

3:45 p.m.

Room 225

The Office of Hawaiian Affairs (OHA) **SUPPORTS** SB1168, which will provide basic minimum safety standards for field-constructed underground storage tanks (USTs) that pose demonstrable risks to our water supply and environment.

Fresh water is unquestionably one of Hawai'i's most valuable resources. The importance of fresh water to Hawai'i and its people is reflected in the 'ōlelo no'eau, "Ola i ka Wai (Water is Life)." Traditional water sharing and management practices reflected the critical nature of fresh water to these islands, and helped to ensure sufficient fresh water for food production, drinking and other domestic uses, as well as numerous ecological services. Groundwater sources in particular fed culturally significant springs, and provided for the brackish water conditions necessary for the nearshore resources dependent on the estuarine habitat. Today, our groundwater sources also provide us with potable drinking water of the highest quality, and agricultural water to meet our local food production needs.

Unfortunately, over the last few decades, our land use patterns, rapidly growing population, proliferation of invasive plant and animal species, diminishing rainfall levels, and impending climate change impacts have raised significant and unprecedented concerns for our groundwater supply. Most recently, the discovery of a fuel leak in the largest underground fuel storage tank in our islands – located directly adjacent to a primary source of potable groundwater – has revealed another particularly insidious threat to our critical and life-giving water resources. **Both the capacity of such USTs, which are field-constructed due to their immense size, as well as their location underground, where leak detection by conventional means may not be possible until a late stage, counsel strong precautionary measures to ensure their long-term stability and timely awareness of any compromises to their structural integrity.**

This measure is accordingly a minimal, prudent reaction to the hindsight provided by the ongoing situation with the Red Hill UST fuel leak. While the costs of installing and maintaining field-constructed USTs may increase due to the baseline regulatory safeguards required in this bill, such costs will likely be far outweighed by the potential costs of remediating future, preventable spills that may impact our drinking water, springs, and nearshore environment.

Accordingly, OHA urges the Committees to **PASS** SB1168. Mahalo for the opportunity to testify on this important measure.



Massapequa Water District

Tel: 516 798-5266

84 Grand Avenue
Massapequa, NY 11758

Fax: 516-798-0279

Commissioners
Thomas P. Hand
Joseph T. Tricarico
Raymond J. Avema

Stanley J. Carey, Superintendent
Constance A. Belegrios, Business Manager

February 10, 2015

Senator Mike Gabbard
Senator Josh Green
Conference Room 225
State Capitol
415 South Beretania Street

Re: Hawaii Legislature Senate Bill No. 1168 in Strong Support of
Proposal to Revise Department of Health Underground Storage Tank Rules

Dear Senators Gabbard and Green:

The Massapequa Water District provides drinking water to over 43,000 residents on Long Island, New York. An EPA designated sole source aquifer serves as the drinking water supply for over 3 million people including the area we serve. Unfortunately we are dealing with one of the largest groundwater contamination plumes in the country that is emanating from the Grumman-Navy facility located in Bethpage New York. The two mile wide by five mile long by 700 foot deep plume was a result of the past improper storage and disposal of industrial chemicals. This massive plume now impacts and / or threatens twenty five supply wells that provide drinking water to over 250,000 people.

We are writing to you to extend our strong support to our colleagues at the City and County of Honolulu Board of Water Supply. More specifically we strongly support Hawaii Legislature Senate Bill No. 1168 that requires the Department of Health (DOH) to establish rules requiring field-constructed underground storage tanks or tank systems to meet the same requirements that must be met by all other owners and operators of underground storage tanks or systems under chapter 11-281, Hawaii Administrative Rules. This legislation is critical to proactive drinking water protection.

Based on the history of the Grumman-Navy plume and our experience with groundwater contamination issues, we are in firm agreement that providing Hawaii's largest field-constructed underground storage tank with an exemption from regulatory requirements that must be met by other underground storage tank and tank system owners is extremely detrimental to human health and the environment. No such exemptions exist in New York State. Failure to close this loophole can have serious if not catastrophic consequences to the local water supply. Consistent and proactive regulatory measures are essential for source water protection.

*Committed to deliver and preserve our water supply for the welfare, health, and safety
of the inhabitants of the Massapequa Water District*

The proper and uniform regulation of underground storage tanks (USTs) is the first line of defense for source water protection. According to the EPA, "*Source water is untreated water from streams, rivers, lakes or underground aquifers that is used to provide public drinking water, as well to supply private wells used for human consumption. Some water treatment is usually necessary, so public utilities treat most of the drinking water before it enters the home. However, the cost of this treatment, as well as the risks to public health, can be reduced by protecting source water from contamination. EPA, other federal agencies, states, local communities, businesses and citizens all play a role in ensuring that drinking water is protected.*" This importance was underscored by the federal Safe Drinking Water Act (SDWA) Amendments of 1996 that created a Source Water Assessment Program (SWAP) to evaluate existing and potential threats to the quality of public drinking water supplies throughout the U.S. The foundation of SWAP is to ensure safe drinking water through a multiple-barrier approach which begins with preventing contaminants from impacting source water. Therefore exempting the largest field-constructed underground storage tank with a capacity of 187 million gallons of fuel per day is clearly not meeting the fundamental principle for drinking water protection.

For the reasons stated above, we urge you to pass this critical drinking water protection legislation.

Please feel free to contact our office if you should have any questions.

Very truly yours,
Massapequa Water District


Stan Carey
Superintendent

cc: Erwin Kawata - Board of Water Supply, City & County of Honolulu



**Testimony to the Senate Committee on Energy and Environment
and the Senate Committee on Health
Tuesday, February 17, 2015 at 3:45 P.M.
Conference Room 225, State Capitol**

RE: SENATE BILL 1168 RELATING TO UNDERGROUND STORAGE

Chairs Gabbard and Green, Vice Chair Wakai and Members of the Committee:

My name is Kamakana Kaimulua, and I am the Vice President of Military Affairs at The Chamber of Commerce of Hawaii (The Chamber). I am here to state that The Chamber **opposes** SB 1168, which requires the Department of Health to establish rules requiring field-constructed underground storage tanks or tank systems to meet the same requirements that must be met by all other owners and operators of underground storage tanks or systems under chapter 11-281, Hawaii Administrative Rules.

In recognizing how critical the U.S. military presence is to Hawaii's economy, the Chamber underscores that the Red Hill fuel facility is vital to military readiness as it supports all Hawaii-based military actions and a significant share of many more in the Asia-Pacific region.

It is the understanding of the Chamber that this legislation threatens the U.S. military's ability to respond to crisis in the region, whether it is conflict or humanitarian aid/disaster relief, due to the fact that the requirements proposed in this bill are not fiscally feasible. Furthermore, if the current bill is passed it is likely that the Red Hill facility will close based on the prescribed 10-year timeframe the Navy will be required to upgrade each of the tanks that are currently used. Within the current fiscal constraints and mission requirements, seeking an alternative to maintaining Red Hill has also proven difficult. The military's ability to remain "ready to respond" is essential for preserving the military's presence in the State and protecting our second largest industry.

While the Chamber opposes this measure, we believe that measures should be taken to ensure the safety of Oahu's drinking water. The Department of the Navy, State Department of Health, Defense Logistics Agency and the Environmental Protection Agency remain engaged in negotiating a suitable resolution to address the 2014 fuel leak. As such, the Chamber requests that the joint committee defer this bill for a year to provide all parties involved the time to reach a suitable agreement. If after the course of a year the committee feels that significant progress has not been made, it could then move the bill forward during the 2016 Legislative Session.

Should this joint committee, in fact, decide to pass this measure, we ask that you at least consider extending the July 1, 2025 compliance deadline.

Thank you for the opportunity to testify.



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Based on the history of the Grumman-Navy plume and our experience with groundwater contamination issues, we are in firm agreement that providing Hawaii's largest field-constructed underground storage tank with an exemption from regulatory requirements that must be met by other underground storage tank and tank system owners is extremely detrimental to human health and the environment. No such exemptions exist in New York State. Failure to close this loophole can have serious if not catastrophic consequences to the local water supply. Consistent and proactive regulatory measures are essential for source water protection.

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Stan Carey
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cc: Erwin Kawata - Board of Water Supply, City & County of Honolulu