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EnviroWatch, inc.

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February 5, 2015

Mr. Thomas Finch

and

Mr. David Mulligan

Community Assistance Technical Services (CATS)

Pipeline Safety Office

Lakewood Co. 80228

Dear Mr. Finch

and

Mr. Mulligan

My name is Carroll Cox. I am the president of EnviroWatch, Incorporated, a nonprofit organization whose mission is to assist in putting an end to environmental injustice by way of investigating and exposing environmental degradation, habitat destruction, poaching, clear cutting, pollution, animal cruelty, and government waste and abuse.

Please accept this letter as my formal complaint and request to have the Office of United States Department of Transportation Pipe Services investigate the unlawful release of jet fuel from a Hawaii Fuel Facilities Corporation, located on Sand Island Access Road, Honolulu, Hawaii, Island of Oahu.

Sources report that the Cathodic Prevention System was turned off for a period of five months or longer. The operators of the facility documented a possible loss of product from tank #2 one day after the

ship completed its offloading of jet fuel to tank #2. However, the report was ignored by management. Also, monitoring wells outside of the HFFC facility could not be located. The United States Environmental Protection Agency (EPA) "Order for Removal Mitigation or Prevention of a Substantial Threat of Oil Discharge" states that on December 22, 2014, ASIG notified the Hawaii Department of Health of a possible release of approximately 42,000 gallons (1,000 bbls.) of petroleum based jet fuel from tank #2 at the facility". But, the State Department of Health News Release dated January 28, 2015, notes "DOH received notification of the release on January 21, at 12 noon and immediately began oversight of response efforts the same day". Also the EPA reports "on January 21, US Coast Guard Sector Honolulu contacted ERS regarding a jet fuel release on Sand Island access road Honolulu, Hawaii. These claims suggest that the release occurred at least one month before any action was taken to abate the problem and allowed the product be unlawfully introduced into the environment for approximately one month.

I have enclosed a copy of my letter to AIG in support of my complaint.

Thank you.



Carroll Cox
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February 5, 2015

Mr. Scott Morita
745 Fort Street
Suite 1500
Honolulu, HI 96813

Dear Mr. Morita,

I am the president of EnviroWatch, Incorporated, a nonprofit organization whose mission is to assist in putting an end to environmental injustice by way of investigating and exposing environmental degradation, habitat destruction, poaching, clear cutting, pollution, animal cruelty, and government waste and abuse.

I write to you to respectfully ask your assistance in providing answers to the questions that follow. I believe the information provided by various entities involved in responding and cleaning up the spilled fuel at Sand Island has not adequately and accurately communicated the cause, original date, magnitude, or amount of jet fuel that leaked from tank #2 located in the Hawaii Fueling Facility Corporation compound on Sand Island access road.

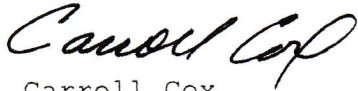
The EPA's "Order for Removal Mitigation or Prevention of a Substantial Threat of Oil Discharge" states that on December 22, 2014, ASIG notified the Hawaii Department of Health of a possible release of approximately 42,000 gallons (1,000 bbls.) of petroleum based jet fuel from tank #2 at the facility". But, the State Department of Health News Release dated January 28, 2015, notes "DOH received notification of the release on January 21, at 12 noon and immediately began oversight of response efforts the same day". Also the EPA reports "on January 21, US Coast Guard Sector Honolulu contacted ERS regarding a jet fuel release on Sand Island access road Honolulu, Hawaii.

We have obtained information that claims workers detected a decrease in the inventory of the product in tank #2 one day after the ship off loaded jet fuel product to tank #2 in December 2014. If this is true, clearly it would contradict the claim that the spill of the jet fuel product occurred on January 21, 2015, as the DOH reported in their January 28, 2015 Press Release.

- Who did AIG notify at DOH? What was the date and time the notification was made? Who made the notification? What is the name of the person at DOH who received the release notification?
- Did operators of the plant identify the cause of the release? If yes, when did they identify the cause?
- Did the operators drain the tank to prevent additional release? When did the release stop?
- When was the last time tank #2 received jet fuel product? Please provide a copy of the daily inventory record up to the notification of the leak.
- When was any concern of product loss or release first noticed? Note, If you lost 42,000 gallons (your est.) it would seem all of this would not have been released in one day.
- Do you have an inventory management system that shows jet fuel inventory for each tank? If yes, when did this program start showing any losses?
- If you have an inventory management system, does it have an alarm or warning to alert the operations personnel that the fuel product in the tank(s) is decreasing in volume?
- Does this facility and or this tank have any release or leak history? If yes when, what amount, what type of product, and was the product recovered? If product was recovered, please provide method of recovery and final disposition of the recovered product.
- Are there systems or programs in place to help protect the integrity of the systems? If so, were they all working as designed? Were any systems not working as required by code or common practices? If yes please advise the date(s) the systems were not working and what was done to correct or repair the systems.
- Does tank # 2 have a liner under it?
- Does the facility have a containment liner to prevent product from leaving the facility or entering into the ground water?
- When was tank #2 last inspected? Were holes, cracks or other damages detected in the tank? Were repairs recommended and completed? If yes, what type of repairs were made?
- Do either of the Hawaii Fueling Facility Corporation facilities at the Honolulu International Airport and Sand Island have Cathodic protection? If yes, at which facilities are the Cathodic protection systems installed and what type of unit is installed at each facility?

• Were either of the systems intentionally turned off or malfunctioning at any time since January 1, 2008? If yes, when did the disruption occur? If the systems did malfunction, what was done to repair the systems, and was any product lost or introduced into the environment? If yes, and how much was introduced.

Thank you,



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