



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File:

October 4, 2022

Rear Admiral John Wade
Commander, Joint Task Force, Red Hill
850 Ticonderoga Street, Suite 110
Joint Base Pearl Harbor Hickam, Hawai'i 96860-5101
[via email only: john.wade@pacom.mil]

Dear RDML Wade:

**SUBJECT: Red Hill Bulk Fuel Storage Facility Unpacking Plan
Conditional Approval**

The Hawai'i Department of Health (DOH) has reviewed the U.S. Department of the Navy's (Navy's) latest version of the Unpacking Plan, submitted on September 27, 2022. The Unpacking Plan is part of the Navy's overall plan to defuel the Red Hill Bulk Fuel Storage Facility on O'ahu, as required under the DOH's May 6, 2022 Emergency Order.

On September 19 and 21, 2022, respectively, the DOH and U.S. Environmental Protection Agency (EPA) provided comments to the Navy's previous version of the Unpacking Plan, dated September 7, 2022. After careful review, several meetings, and observations during the spill response dry run and drill, the DOH finds the current version of the Unpacking Plan responsive to most of these questions and concerns. Accordingly, the DOH conditionally approves the September 27, 2022 Unpacking Plan for immediate action, in conjunction with the current Facility Response Plan (FRP) updated for unpacking and mitigative measures described in the September 22, 2022 Spill Exercise Plan. The following items are to be completed before unpacking, or conducted during unpacking as noted below:

1. The Navy ensures that outstanding documentation noted in the "Response to Requests for Information from DOH dated September 19, 2022," received on September 28, 2022, has been completed and provided to the DOH. Documentation will include appropriate changes to the FRP and Spill Prevention Control Countermeasures that reflect the DOH's comments, such as deployment of booms around Yard Oiler Non-Propelled vessels, updating the call tree numbers in the FRP, and having vacuum trucks on standby during unpacking Phases III and IV.
2. On Sept 28, 2022, the Navy reported it had sealed all drains along the [REDACTED] Line (French Drain) in the [REDACTED] Tunnel to prevent oil from entering the subsurface, in the event of a large spill. The Navy shall submit before unpacking:
 - a. Documentation regarding work done to seal the drains;

- b. Confirmation that the drains above the Underground Injection Control boundary line were sealed; and
 - c. Confirmation that adequate measures have been implemented to allow for hydraulic pressure relief from groundwater beneath the [REDACTED] Tunnel.
3. The Navy hosts a site visit prior to unpacking for the DOH to inspect repairs and systems installed to divert and recover oil in the event of a spill during unpacking. This request was made in number 6.c of the DOH's Unpacking Plan comments, dated September 19, 2022. Any issues or concerns identified during the site visit must be addressed, as the DOH deems appropriate.
4. The Navy expeditiously removes any fuel from the main containment sump after completing Phase III gravity unpacking activities for each fuel type.
5. Training of personnel associated with unpacking is completed to ensure full and consistent understanding of unpacking before operations begin.

Should you have any questions regarding this letter, please contact Ms. Kelly Ann Lee, Red Hill Project Coordinator of the Solid and Hazardous Waste Branch at (808) 586-4239 or kellyann.lee@doh.hawaii.gov.

Sincerely,

Kathleen Ho

KATHLEEN S. HO
Deputy Director for Environmental Health

- c: Rear Admiral Stephen Barnett, Navy Region Hawai'i [via email only]
Captain Gordie Meyer NAVFAC Hawai'i [via email only]
Mr. Donald Panthen, NAVFAC Hawai'i [via email only]
Ms. Gabriela Carvalho, EPA [via email only]
Mr. Wayne Praskins, EPA [via email only]