



STATE OF HAWAII
DEPARTMENT OF HEALTH
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HONOLULU, HI 96801-3378

In reply, please refer to:
File:

June 19, 2023

Vice Admiral John Wade
Joint Task Force – Red Hill
1025 Quincy Avenue, Suite 900
Joint Base Pearl Harbor Hickam, Hawaii'i 96860
[via email only: john.f.wade2.mil@us.navy.mil]

Dear VADM Wade:

SUBJECT: *Red Hill Bulk Fuel Storage Facility (RHBFSF) AFFF Reclamation Line Repair Plan (June 02, 2023)*

The Hawaii'i Department of Health (DOH) received the subject plan (*AFFF Reclamation Line Repair Plan*) from the Joint Task Force – Red Hill (JTF-RH) on June 2, 2023, in addition to the following references:

- *Reference (a): SGH AFFF Reclamation Line Memorandum, May 18, 2023; and*
- *Reference (b): JTF-RH AFFF Reclamation Line Repair concept of operation.*

Based on the information provided, the DOH agrees that utilizing the aqueous film forming foam (AFFF) sumps and AFFF reclamation line would likely provide the most expeditious method of fuel removal in the event of a release in the lower access tunnel in the tank gallery of the RHBFSF. Furthermore, the potential connection of the AFFF reclamation line to the F-76 line for this purpose shows promise, and we look forward to receiving more information as the plan is developed. Enclosed are our comments and questions on the *AFFF Reclamation Line Repair Plan* and its references. We look forward to receiving your response.

We understand the JTF-RH is inclined not to reintroduce AFFF into the fire suppression system as part of its *Defueling Fire Suppression Plan*, but has yet to commit to a specific AFFF reclamation system design. The DOH similarly prefers AFFF not be used in light of the considerable risks to public health and the environment. The DOH defers to the Federal Fire Department's expertise to determine whether the *Defueling Fire Suppression Plan* is adequate. We offer our enclosed comments and questions on the

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AFFF Reclamation Line Repair Plan as it relates to potential environmental impacts associated with spill response actions.

If you have any questions regarding this letter or the enclosed comments, please contact Ms. Kelly Ann Lee, Red Hill Project Coordinator, at (808) 586-4226 or kellyann.lee@doh.hawaii.gov.

Sincerely,

Kathleen Ho

KATHLEEN S. HO
Deputy Director for Environmental Health

Enclosure

c: Mr. Grant Scavello, U.S. Environmental Protection Agency (w/encl.)
[via email only]

Enclosure

DOH Comments on *Red Hill Bulk Fuel Storage Facility (RHBFSF)*
AFFF Reclamation Line Repair Plan (June 02, 2023)
June 19, 2023 Letter to Vice Admiral John Wade
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Red Hill Bulk Fuel Storage Facility (RHBFSF) AFFF Reclamation Line Repair Plan (June 02, 2023)

1. **Page 2, 2. JTF-RH Repair Plan for Existing AFFF Line:** We understand, based on *Defueling Plan Supplement 2*, the Joint Task Force – Red Hill (JTF-RH) only intends to use two pumps per sump to support its release response plans. However, in *Reference (a)*, Simpson Gumpertz & Heger (SGH) recommends “[a]n analysis should be performed to determine whether the AFFF [aqueous film forming foam] retention pipeline could be pressurized due to the action of the four 1,000-gpm [gallons per minute] pumps and postulated 20,000-gal [gallons] spill volume” (page 9).
 - a. Is the JTF-RH considering using more than two pumps, such that the effects on the AFFF retention pipeline of using up to four pumps needs to be analyzed, as SGH recommends? Having more than two pumps operational could increase the RHBFSF’s ability to accommodate the worst-case spill scenario.
 - b. Slide 9 of *Reference (b)* states pipe supports for reactionary forces are needed if four pumps are used. Is this statement related to the current AFFF reclamation system, or the proposed use of the AFFF reclamation line with the transition to the F-76 line?
2. **Page 4, PVC Line Joint Repair Integrity Testing Plan:**
 - a. Does the planned test comply with SGH’s recommendation of testing the line under conditions similar to the likely spill scenario? Will this test represent having at least two pumps fully operational (or more, if that is being considered)?
 - b. If repairs are required, how will they be performed? Will they follow SGH’s recommendations?

Reference (a): SGH AFFF Reclamation Line Memorandum, May 18, 2023

3. In the *Defueling Consolidated Repair/Enhancement List*, dated October 24, 2022, the JTF-RH asked to forgo repairs to the F-76 line because “JTF-RH can safely complete the defueling of all tanks by utilizing the JP-5 and F-24 fuel lines” (page 6).
 - a. Do any of the forgone repairs, or other repairs, need to be completed, now that the F-76 line may be used for defueling spill response?
 - b. Page 8 of *Reference (b)* states none of the repairs identified in the SGH or National Defense Authorization Act assessments for the F-76 line are needed for the proposed use. Does SGH concur?