JOSH GREEN, M.D. GOVERNOR OF HAWAI'I KE KIA'ĀINA O KA MOKU'ĀINA 'O HAWAI'I



KENNETH S. FINK, MD, MGA, MPH DIRECTOR OF HEALTH KA LUNA HO'OKELE

In reply, please refer to:

STATE OF HAWAI'I DEPARTMENT OF HEALTH KA 'OIHANA OLAKINO

P. O. BOX 3378 HONOLULU, HI 96801-3378

July 7, 2023

Vice Admiral John Wade
Joint Task Force, Red Hill
1025 Quincy Avenue, Suite 900
Joint Base Pearl Harbor Hickam, Hawai'i 96860-5101
[via email only: john.f.wade2.mil@us.navy.mil]

Dear VADM Wade:

SUBJECT: Red Hill Bulk Fuel Storage Facility, Surge Tank Draining Plan

Conditional Approval

The Hawai'i Department of Health (DOH) received the Joint Task Force - Red Hill's (JTF-RH's) Surge Tank Draining CONOP (concept of operations) and operation orders (OPORD) on May 19, 2023, followed by the Facility Response Plan Addendum, Surge Tank Draining on May 24, 2023. These submissions, collectively referred to hereinafter as the "Surge Tank Draining Plan," are part of the JTF-RH'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 May 31, 2023, and June 2, 2023, respectively, the U.S. Environmental Protection Agency (EPA) and DOH provided comments on the *Surge Tank Draining Plan*, to which the JTF-RH responded on June 24, 2023. In addition, we received additional information during a meeting with the EPA and JTF-RH on June 29, 2023. The meeting added the following to our understanding of the *Surge Tank Draining Plan*:

- 1. During fuel transfer between Surge Tank 1 and Hickam above ground tank, the valves located at the Hickam filter/separator station will remain open.
- 2. Valves 0223C (Surge Tank 3) and 0224C (Surge Tank 4) have been removed from the Fuel Oil Reclamation (FOR) line.
- 3. Branch valves along the fuel transfer path that will not be used will be checked and verified that they are closed prior to transferring the fuel.

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Based on the information provided, the DOH conditionally approves the *Surge Tank Draining Plan*, recognizing that the JTF-RH's responses to the DOH's and EPA's comments, along with the additional information from the June 29, 2023, meeting described above, provide supporting details for the *Surge Tank Draining Plan*. The following items are to be completed before surge tank draining.

- 1. The JTF-RH ensures the Quality Validation (QV) Reports and pressure testing results for repairs at VC-1, as noted in the *JTF-RH's Response to DOH's June 2, 2023 Electronic Correspondence re Surge Tank Draining CONOP* received on June 24, 2023, are submitted to the DOH for concurrence. For surge tank draining, the DOH concurs with QV Reports for Repair Nos. 34, 94, 109, and 110. We understand that the pipeline to Hickam (inclusive of Repair 34), has been in operation since March 2023, after the completion of the repair without issue. The JTF-RH shall follow recommendations provided in the QV Reports to monitor potential weeping during repacking.
- 2. The JTF-RH hosts a site visit prior to surge tank draining for the DOH to inspect spill mitigation and release response systems. We understand the spill mitigation systems will be generally similar to those used during unpacking. Any issues or concerns identified during the site visit shall be addressed, as the DOH deems appropriate.
- 3. Training of personnel associated with surge tank draining is complete to ensure full and consistent understanding of draining before operations begin.
- 4. The information to be included on the CONOP and OPORD for the day of the operation meets design criteria of the fuel system, and sufficient ullage will be provided.

The DOH staff intends to be present during select times of the draining operation. Please accommodate our staff. If you have any questions regarding this letter, 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

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