



STATE OF HAWAII  
DEPARTMENT OF HEALTH  
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In reply, please refer to:  
File:

August 24, 2023

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

Dear Vice Admiral Wade:

SUBJECT: Repacking Plan, Conditional Approval  
Red Hill Bulk Fuel Storage Facility

The Hawai'i Department of Health (DOH) has reviewed the Joint Task Force – Red Hill's (JTF-RH's) latest version of the Repacking Plan, which includes the following:

- *Defueling Plan Supplement 2*, received May 16, 2023;
- Repacking and Equalization Concept of Operations, received August 4, 2023; and
- Repacking and Equalization Operation Orders, received August 11, 2023.

In addition, the DOH reviewed the Quality Validation (QV) Reports associated with the identified repairs and enhancements needed for repacking (253 repairs from the original *Consolidated List of Repairs for Safe Defueling*, received October 24, 2023, and 42 repairs from the *Red Hill Incremental Repair List*, received July 28, 2023). The DOH has conditionally approved *Defueling Plan Supplement 2* and the QV Reports for repairs and enhancements required for repacking. The Repacking Plan is 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 June 30, 2023, the DOH received responses to our June 23, 2023 comments on the JTF-RH's *Defueling Plan Supplement 2*. Subsequently, the DOH participated in numerous meetings to discuss design and validation of repairs and enhancements, repacking operations, and planned spill mitigations; and observed a spill drill and repacking exercise. We understand that the repacking operation will occur in phases – gravity flow from the upper tank farm, pumping from Building 1554, then filling and pressure equalization from the 1-inch equalization lines. After each phase, there will be a hold period to conduct inspections of the pipelines for potential leaks. Release response and mechanical teams will be available to address these issues, should they occur. Emergency drawdown procedures have also been developed.

Spill mitigation measures will be installed beforehand to direct potential fuel flow away from preferential pathways to the environment – for example, sealing drains along the Hume Line (French Drain) in the Harbor Tunnel and installing diversion berms at Adit 3 – and spill response kits will be available.

We also understand that the Fleet Logistics Center and JTF-RH have scheduled training for personnel associated with repacking, which will be completed prior to the operation to ensure full and consistent understanding of repacking before operations begin.

Accordingly, the DOH conditionally approves the Repacking Plan with spill mitigation and response measures as identified in *Defueling Plan Supplement 2* and the current *Facility Response Plan* updated for repacking. The following items are to be completed before repacking:

1. As recommended in some of the QV Reports, drip pans and absorbents will be placed under repaired areas as precautionary measures. Spill kits should also be available in these areas.
2. The Zone 7 sump shall be protected and not utilized in release response, as the sump has not been tested above the 23-inch level.
3. The JTF-RH addresses the DOH's concerns as may be identified during the spill mitigation walkthrough scheduled for August 24, 2023 or the operations walkthrough scheduled for August 25, 2023.

After repacking is complete, we understand that the Fleet Logistics Center and JTF-RH will continue to monitor fuel in the pipelines (and the tanks) and will have rovers walking the lines.

If you have any questions regarding this letter, please contact Ms. Kelly Ann Lee, Red Hill Project Coordinator at the Solid and Hazardous Waste Branch at (808) 586-4226 or [kellyann.lee@doh.hawaii.gov](mailto:kellyann.lee@doh.hawaii.gov).

Sincerely,

*Kathleen Ho*

KATHLEEN S. HO  
Deputy Director for Environmental Health

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