

JOSH GREEN, M.D.
GOVERNOR OF HAWAII
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KENNETH S. FINK, MD, MGA, MPH
DIRECTOR OF HEALTH
KA LUNA HO'ŌKELE

STATE OF HAWAII
DEPARTMENT OF HEALTH
KA 'OIHANA OLAKINO
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File:

September 8, 2023

Rear Admiral Stephen Barnett
Commander, Navy Region Hawai'i
850 Ticonderoga Street, Suite 110
Joint Base Pearl Harbor-Hickam, Hawai'i 96860-5101
[via email only: stephen.d.barnett.mil@us.navy.mil]

Dear Rear Admiral Barnett,

SUBJECT: DOH Response to Request for Concurrence on Concepts Related to Closure of the Red Hill Bulk Fuel Storage Facility

The Hawai'i Department of Health (DOH) received the U.S. Department of the Navy's (Navy's) letter, dated August 16, 2023, requesting concurrence on three concepts, quoted below, relating to closure of the Red Hill Bulk Fuel Storage Facility. In addition, we received the following enclosed with the letter:

- Enclosure 1: *Tank Cleaning Schedule, Submittals for Regulatory Review*, dated July 20, 2023; and
 - Enclosure 2: *Tank Rinsate Flow Plan*, dated July 20, 2023.
1. “[L]ist of proposed submittals and the timelines for completing reviews of said submittals.”

The DOH concurs in concept with the list shown in the letter, with the exception of the “Air Emissions Approval for Generators and Ventilation” submission, which is discussed below.

We note that the dates in the letter are slightly different from those in Enclosure 1 (page 3), and that the list is limited to submissions related to cleaning (e.g. it does not address submissions for tank disposition or closure site assessment). Given that the letter is more current, we will follow the schedule in the letter. Please submit an updated schedule that addresses all closure requirements, including execution of work and regulatory review times, as requested in our July 26, 2023 response to *Tank Closure Plan – Supplement 2 (Supplement 2)*.

In addition, the schedule in the August 16, 2023 letter indicates that an "Air Emissions Approval for Generators and Ventilation" was submitted to the DOH on July 30, 2023. Rather, in a letter dated July 18, 2023, the Navy's contractor, APTIM, requested that the DOH, Clean Air Branch (CAB) make a determination as to whether an air permit would be required for three diesel engine generators. In another letter dated August 17, 2023, APTIM also requested a determination as to whether an air permit would be required for degassing activities.

The DOH-CAB advised APTIM that an air permit would be required for the three diesel engine generators, and that an air permit application should be submitted. An application has not yet been received. The DOH-CAB is evaluating the applicability of air permitting for the degassing activities.

The DOH's ability to issue an air permit by October 31, 2023, will depend on the timeliness and quality of the Navy's submission, as well as the Navy's ability to demonstrate compliance with state and federal air regulations.

2. "[T]he proposed use of the existing FOR [fuel oil recovery] system as a means of removing cleaning rinsate from the tanks."

The DOH concurs in concept with using the FOR system to remove rinsate from the tanks during cleaning, with the understanding that:

- a. "[T]anks" refers to the main fuel tanks only. We understand that rinsate from the surge tanks will not be removed through the FOR system.
- b. The Navy will assess Repair No. INC-025, which was not pursued by the Joint Task Force – Red Hill (JTF-RH) because the portion of the FOR line from pipe support 101 to Adit 3 was not required for defueling. The repair description states "FOR line show minor pitting, corrosion, and bare piping. Need to ensure proper cleaning and re-coating on all bare, rusting, corroding or pitting piping." In addition, Brice Risktec's August 14, 2023 memo states that "a pressure test of the line is currently underway," however, it is the DOH's understanding that the test has not occurred. A copy of the quality validation report deferring the repair is enclosed. The Navy will provide the DOH a copy of its assessment report through a similar quality validation process used by the JTF-RH. Any repairs required will be performed, with quality validation reports submitted to the DOH documenting a third-party engineer's acceptance and validation that repairs were completed as intended, including confirmation of the repairs' quality control and quality assurance.
- c. The Navy will provide, for the DOH's review and approval, the cleaning contractor's work plan for tank cleaning and use of the FOR line, which will explain how the Navy will prevent rinsate and surfactants used during cleaning from being released into the environment.

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3. “[T]he Navy’s proposal to remove the three fuel pipelines between the Red Hill Underground Storage Tanks and the underground pump house as identified in Closure Supplement 2.”

The DOH concurs in concept with removing the three fuel pipelines between the Red Hill fuel tanks and the underground pumphouse, with the understanding and expectations that:

- a. The Navy will provide, for the DOH’s review and approval, the pipeline removal contractor’s work plan detailing how this work will be executed.
- b. Prior to removal, the pipelines will be drained and ventilated, as stated in *Supplement 2* (page 5).
- c. The Navy will provide details, for the DOH’s review and approval, on how sludge found in the pipelines (if any) will be properly contained and disposed of.
- d. The Navy will provide details, for the DOH’s review and approval, on how the pipelines will be disposed of.
- e. The extent of infrastructure to be removed for closure will not necessarily be limited to the three fuel pipelines.

As stated in our response to *Supplement 2*, the DOH prefers that all infrastructure not necessary for structural integrity or inspection be removed, as practicable. We also recommend that the main nozzle of each tank be filled with concrete.

Nothing in this letter should be interpreted as approval or conditional approval of any part of the Closure Phase of the Closure Plan required under the DOH’s May 6, 2022 Emergency Order. 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

Enclosure

- c: Mr. Grant Scavello, U.S. Environmental Protection Agency (w/enclosure) [via email only]
Mr. Joshua Stout, U.S. Department of the Navy (w/enclosure) [via email only]

QUALITY VALIDATION (QV) REPORT

Red Hill Bulk Fuel Storage Facility Defuel

Validation Firm	HDR Environmental, Operations and Construction, Inc.	Repair No.	INC-025
Address	9781 S. Meridian Blvd., Suite 400, Englewood, CO 80112	Repair ID	(b) (3) (A)
Contract No.	FA890315D0007, D.O. FA8903-19-F-0027	Report Date	21 AUG 2023
QV Engineer	(b) (6)		

VALIDATION

Source	PDF Page No.	Facility Geographic Area	Location Reference
(b) (4)	N/A	(b) (3) (A)	
Repair Description	FOR line shows minor pitting, corrosion, and bare piping. Need to ensure proper cleaning and re-coating on all bare, rusting, corroding or pitting piping.		Source Contract Reference N/A
Description of Contractor QC Method(s) Used	N/A		Contractor QC Records Reviewed N/A
Description of QA Validation and Observations	N/A - No repair, What-If Analysis and (b) (4) Analysis. For the purposes of repacking and defueling (b) (4), (b) (5)		
Final acceptance by government. Date: 14 AUG 2023			
Rework Needed		Photo Record Attached	Repair Work Validated as Complete
<input type="radio"/>	Yes	<input checked="" type="radio"/>	No
N/A		<input checked="" type="radio"/>	Yes
<input checked="" type="radio"/>		<input type="radio"/>	No

Comments
 At the request of NAVSUP FLC, (b) (4) was engaged to evaluate the need for completing maintenance coating of the FOR line. (b) (3) (A)
 (b) (3) (A) (b) (4) (b) (3) (A), (b) (5) (b) (3) (A)
(b) (3) (A), (b) (5)

CERTIFICATION

I hereby certify that repair work validated in this report was personally substantiated and this report is true.	QV ENGINEER SIGNATURE	(b) (6)
	DATE	21 AUG 2023

(b) (4)

TO: **(b) (6)**

DATE: August 14, 2023

BY: **(b) (6)**

RE: Risk Assessment for Incremental Recommendation #25 - **(b) (3) (A), (b) (5)**
(b) (3) (A), (b) (5)

(b) (3) (A)

(b) (3) (A)

(b) (5)

(b) (3) (A), (b) (5)

(b) (6)