



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

January 18, 2024

Rear Admiral Stephen Barnett
Navy Closure Task Force – Red Hill
850 Ticonderoga Street, Suite 110
Joint Base Pearl Harbor-Hickam, Hawaii 96860
[via email only: stephen.d.barnett.mil@us.navy.mil]

Dear Rear Admiral Barnett,

**SUBJECT: DOH Conditional Approval of Tank Cleaning and
Comments on December 15, 2023 Submission**

On December 15, 2023, the Hawai'i Department of Health (DOH) received the U.S. Department of the Navy's (Navy's) updated schedule for closure of the Red Hill Bulk Fuel Storage Facility, titled *Navy Closure Task Force – Red Hill Integrated Master Schedule (IMS)*. We are hopeful that the Navy Closure Task Force – Red Hill (NCTF-RH) will use the IMS to identify ways to expedite the closure timeline.

In addition to the IMS (**Attachment 1**), we received the documents below on December 15, 2023. We received unredacted versions of Attachments 4, 5, and 6 on December 22, 2023.

- **Attachment 2a:** *Responses to DOH Concerns Regarding Red Hill Closure;*
- **Attachment 2b:** *Response to DOH 15 November 2023 Letter Enclosure Comments on the Project Work Plan, Clean Red Hill Tanks JBPHH, Hawaii (Work Plan), dated September 2023;*
- **Attachment 3:** *Post Award Kickoff (PAK) Meeting Agenda, Clean Red Hill Tanks (redacted);*
- **Attachment 4:** *Project Work Plan, Clean Red Hill Tanks JBPHH, Hawaii (redacted), dated December 2023;*
- **Attachment 5:** *Environmental Protection Plan, Clean Red Hill Tanks, JBPHH, Hawaii (redacted), dated January 2024;*
- **Attachment 6:** *Waste Management Plan, Clean Red Hill Tanks, JBPHH, Hawaii (redacted), dated January 2024; and*
- **Attachment 7:** *Tank 1 Hydrotest Water Lab Analysis, dated January 7, 2022.*

After reviewing this submission, the DOH is providing the enclosed comments. Additionally, in order to expedite the removal of sludge and fuel residue from the tanks, we are providing our conditional approval to proceed with cleaning of the main fuel tanks, four surge tanks, and two sumps, provided that:

1. Cleaning occurs according to the *Tank Cleaning Plan*. For purposes of this conditional approval, the *Tank Cleaning Plan* refers to Attachments 2A, 2B, 4, 5, and 6; and the cleaning schedule submitted on December 13, 2023. Where these documents conflict, Attachments 2A, 2B, and the cleaning schedule apply. Per the *Tank Cleaning Plan*, cleaning will include "all internal structures," including the tank walls, standpipes, and other infrastructure and equipment currently in the tanks. We are awaiting the NCTF-RH's proposal, for our review and approval, of what infrastructure will remain in place (with justification) or be removed (with associated waste management process).
2. The DOH is notified of any changes or omissions to the *Tank Cleaning Plan* in writing as soon as practicable. Significant changes or omissions must be submitted to the DOH for review and approval before execution.
3. The NCTF-RH addresses all enclosed comments within 30 days of receipt of this letter, including updating the IMS and *Project Work Plan, Clean Red Hill Tanks JBP HH, Hawaii*, and making copies available to the public.
4. The DOH approves or conditionally approves a NCTF-RH plan to verify the tanks, sumps, and other infrastructure remaining in the tanks are sufficiently cleaned.
5. The DOH approves or conditionally approves a NCTF-RH spill exercise plan for tank cleaning and is permitted to observe the exercise. If the DOH is not satisfied with the exercise, additional exercise(s) shall be conducted before cleaning, as necessary, to address the DOH's concerns.
6. The NCTF-RH submits concept of operations (CONOPs) with spill mitigation measures for the DOH's review and approval for activities that may result in releases for which a detailed spill mitigation plan has not been provided. For example, sump cleaning and removal of floatable fuel and sludge from the tanks.
7. Before waste removal begins (e.g., sludge, rinsate) from each main fuel tank, surge tank, and sump, the NCTF-RH hosts a site visit for the DOH to view spill containment measures. The DOH's comments from site visits must be satisfactorily addressed.
8. The DOH receives unredacted and redacted copies of the final report confirming the fuel oil reclamation (FOR) line to be used for cleaning passed the pressure testing in January 2024.
9. As stated in the Joint Task Force – Red Hill's December 20, 2023 responses to our *Defueling Plan Supplement 3* comments, rovers will be utilized during cleaning to ensure there are no leaks in the FOR line and to initiate a release response, if necessary.
10. The NCTF-RH provides weekly updates during cleaning, including a summary of completed work; volumes of sludge, fuel, and rinsate collected and from where; any accidental releases; and any changes to the cleaning schedule.
11. The DOH must be permitted to observe cleaning and our staff must be accommodated.

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This conditional approval applies only to tank and sump cleaning, and does not include cleaning verification. We will respond to the NCTF-RH's *Tank Cleaning Verification Plan*, received on January 11, 2024, under a separate cover. In accordance with the DOH's May 6, 2022 Emergency Order, we are also awaiting the NCTF-RH's plans for pipeline cleaning, including destructive residual fuel removal, a cleaning method for pipes and nozzles, and associated spill mitigation plans.

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. In addition, please ensure that a copy of all submittals, including those transmitted via DoD SAFE, are given to Ms. Lee and Mr. Hugh Myers, Red Hill Project Engineer, at hugh.myers@doh.hawaii.gov.

Sincerely,

Kathleen Ho

KATHLEEN S. HO
Deputy Director for Environmental Health

Enclosure

c: RDML Marc Williams, NCTF-RH (w/enclosure) [via email only]
Ash Nieman, U.S. Environmental Protection Agency (w/enclosure) [via email only]
Jamie Marincola, U.S. Environmental Protection Agency (w/enclosure) [via email only]
Joshua Stout, NCTF-RH (w/enclosure) [via email only]

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Attachment 1: Navy Closure Task Force – Red Hill [NCTF-RH] Integrated Master Schedule (IMS), dated December 15, 2023

General Comments

1. Please submit, and make publicly available, an updated IMS that addresses the specific comments below.
2. We understand the IMS is a living document and may change as new information becomes available. The DOH may also request schedule changes based on new information.

Specific Comments

3. Tank Cleaning
 - a. At the NCTF-RH's request, the DOH is providing conditional approval for cleaning nearly three weeks ahead of schedule. How does this expedited review benefit the overall closure timeline? Update the IMS accordingly.
 - b. Add the expected date for tank entry. Currently, there appears to be a one-month pause between the "Spill Exercise" on February 23, 2024, and the start of tank cleaning on March 27, 2024. We understand based on meetings with the NCTF-RH that this time will actually be used to prepare the tanks for cleaning, which could start earlier than March 27, 2024, if preparations do not take the full month.
 - c. Are the quality validation (QV) reports for tank cleanliness described in the *Tank Cleaning Verification Plan* submitted on January 11, 2024, the same as the "Tanks Cleaning Report[s]" listed in the IMS? The QV reports must be submitted before the inspections with enough time for regulatory review. Please include dates for when we can expect these reports.
 - d. What will the reports for Tanks 1, 13, 14, 17, 18, and 19 include? Based on the IMS, we understand these tanks will not be cleaned further, unless they do not pass verification.
 - e. We understand the NCTF-RH is planning to inspect the tanks that have undergone clean, inspect, repair (CIR) for condensation to help determine whether the vent lines should be kept open after cleaning and to possibly test condensate to further assess the cleaning process. Is this what the "Condensation Inspection" on March 1, 2027, refers to? If so, 2027 seems late. Another condensation inspection for the CIR tanks can and should be scheduled in the near future.
4. Pipeline Deconstruction and Defueling
 - a. The IMS states the NCTF-RH will submit "draft requirements" to the regulatory agencies in January 2024. We may provide comments on this portion of the schedule when we receive the "draft requirements."

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5. Facility Closure Design and Execution
 - a. We understand that a meeting will be scheduled around January 29, 2024, for the NCTF-RH to brief the DOH on the proposed facility closure design. We may have additional comments on this portion of the schedule after the brief.
6. Site Assessment
 - a. In a meeting with the NCTF-RH and U.S. Environmental Protection Agency (EPA) on December 8, 2023, we were told the NCTF-RH would submit a technical memo on historical data in a couple of weeks to discuss with the DOH and EPA during scoping meetings. We have not received this technical memo, and it is not on the IMS. When will we receive it?
 - b. We understand that a scoping meeting will be scheduled around January 29, 2024, as a follow-on to our first scoping meeting in May 2023. We may provide comments on this portion schedule after the second scoping meeting.

Attachment 2A: Responses to DOH Concerns Regarding Red Hill Closure

7. **Page 1, paragraph 5:** States, “[i]n the absence of state and federal regulatory drivers, the NCTF-RH is willing to take an additional step to verify the tanks as clean. The NCTF-RH proposes rinsate sampling and comparison to the environmental action levels (EALs) for DOH and EPA consideration.” The *Tank Cleaning Verification Plan*, received on January 11, 2024, no longer proposes to test rinsate. In addition, the current validation proposal does not provide sufficient detail to understand the basis for decision-making on whether the tanks are clean. Further discussion on verification will be provided under a separate cover in response to the NCTF-RH’s January 11, 2024 submission.
8. **Page 4, paragraph 2:** States “APTIM will use the FOR system only if the FOR system inspections and tests indicate that the rinsate will be contained completely to reduce the risk of a release from the FOR system into the environment.” Currently, it is the DOH’s understanding that only the FOR line in the tank gallery will be used. If the underground pumphouse FOR lines will be used, the NCTF-RH shall submit repair and testing methods, associated quality validation reports, and spill mitigation and operational plans for the DOH’s review and approval prior to use.
9. **Page 4, paragraph 4:** Based on the IMS, there is a 1.5-year gap between the briefing to regulators on the final disposition of ancillary systems around January 29, 2024, and the actual proposal submission on May 30, 2025. We assume this timeline will be explained during the January 29, 2024 brief. In the meantime, we have the following concerns:
 - a. This paragraphs states: “In parallel, NCTF plans to submit a basis of design report (BODR) to propose the final disposition of ancillary systems in the Red Hill facility.” Please clarify what is being done “in parallel.” Based on meetings with the NCTF-RH, we understand the BODR will be submitted with or around Supplement 4 in May 2025. It seems excessive to allot ~1.5 years to prepare a BODR. This should be expedited.

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- b. This paragraph also states: “If DOH and EPA are willing to provide written concurrence to the proposed approach following the brief in January 2024, NCTF will proceed directly to design and forgo development of a formal report.” We cannot provide written concurrence on something that has not been submitted. According to the IMS, we will not receive a submission until ~1.5 years after the brief. Therefore, the NCTF-RH should not expect to receive written concurrence for ~1.5 years, as we wait for the written proposal.

Attachment 2B: Response to DOH 15 November 2023 Letter Enclosure Comments on the Project Work Plan, Clean Red Hill Tanks JBPHH, Hawaii (Work Plan), dated September 2023

General Comments

10. **Repairs:** Thank you for the information regarding repairs. Please submit the designs for any repairs to the remaining system for use that may impact human health and the environment to the DOH for review and approval (e.g., repairs to the FOR line used to transport rinsate during cleaning).
11. **Redactions:**
 - a. Why is “APTIM” redacted from some documents? It is clear from the NCTF-RH's comment responses, which are posted on the U.S. Department of the Navy's website, that APTIM is the cleaning contractor.
 - b. The NCTF-RH submitted redacted documents to the DOH on December 15, 2023, followed by unredacted copies on December 22, 2023. In the future, submit unredacted documents at the same time or ahead of the redacted versions.

Specific Comments

12. **Comment 1:** Please confirm which tanks have undergone CIR and will not be cleaned prior to verification. *Supplement 1* stated that only “Tanks F-13, F-14, F-17, and F-18 have been through the Clean, Inspect, Repair (CIR) process[.]” while “Tanks F-1 and F-19 have been empty for many years, but they were not documented as clean under the CIR process.” This statement conflicts with comment 1's response, which refers to “six tanks that have already undergone clean inspect repair[.]” Why is it now six tanks and not four?
13. **Comment 3.b:** This response and the Joint Task Force Red Hill's (JTF-RH) December 20, 2023 responses to our *Defueling Plan Supplement 3* comments state the NCTF-RH will use a “similar” repair quality validation process to the one established with the JTF-RH. Please elaborate. What will the difference(s) be?
14. **Comment 7.b:** States “[t]he requested information is shown on the IMS dated 15 December 2023. Sump cleaning is scheduled to take place in October and November of 2026.” The IMS shows “Sumps Cleaning Start” on April 30, 2026. Please clarify.

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15. **Comment 7.c:** As discussed in meetings with the NCTF-RH and EPA, one day allotted for each tank cleaning inspection should be sufficient, so long as the supporting documents are provided beforehand with enough time for review. At each inspection, the DOH and EPA must be permitted to view the cleaned infrastructure in a method to be determined by the regulators. This may include viewing tank walls from the basket, walking on the tank floor, and/or viewing live video captured by drone.
16. **Comment 10:** The Work Plan still contains Section 4.1.2 describing a pre-construction meeting, which does not apply according to the NCTF-RH's response. Remove it from the Work Plan.
17. **Comment 17.c:** We understand the FOR line will be left in-place to remove potential condensate from the tanks. How will the FOR line be verified as clean? For example, will the rinsate from the third rinse be tested?
18. **Comment 20.a:** What type of coating is inside the tanks? Does the coating contain any contaminants that could be released into the environment later?

Attachment 4: *Project Work Plan, Clean Red Hill Tanks JBPHH, Hawaii, (Tank Cleaning Work Plan)* dated December 2023

19. Will the standpipes and nozzles be cleaned using the same methods described in the Work Plan for "all internal structures"? If not, describe in detail how the standpipes and nozzles will be cleaned. If the cleaning method differs for the standpipes, this change to the conditionally approved submission requires the DOH's approval.
20. The Work Plan was not updated to reflect the dates in APTIM's cleaning schedule submitted on December 13, 2023. For example, page 4 of the Work Plan still indicates tank cleaning will begin on January 16, 2024. This will confuse stakeholders. Revise all dates in the Work Plan that are no longer accurate and make an updated copy available to the public.

Attachment 7: *Tank 1 Hydrotest Water Lab Analysis*, dated January 7, 2022

21. We note that this attachment is mislabeled as Attachment 1.1.