



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

In reply, please refer to:
File:

January 4, 2024

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]

Dear Vice Admiral Wade:

SUBJECT: DOH Conditional Approval of Non-Destructive Residual Fuel Removal
Red Hill Bulk Fuel Storage Facility

On December 14, 2023, the Hawai'i Department of Health (DOH) received via email from the Joint Task Force – Red Hill (JTF-RH) the *Residual Fuel Draining* concept of operations (CONOP). Based on the U.S. Department of Defense's *Defueling Plan Supplement 3*, dated November 14, 2023, we understand this CONOP describes how the JTF-RH plans to remove through non-destructive means approximately 60,000 of the estimated 64,000 gallons of residual fuel remaining in the Red Hill Bulk Fuel Storage Facility after gravity defueling was completed on December 14, 2023.

On December 20, 2023, the DOH provided comments and questions on the *Residual Fuel Draining* CONOP to the JTF-RH via email, to which the JTF-RH responded on December 21, 2023. Based on the CONOP and the responses to our comments and questions, the DOH approves non-destructive residual fuel removal, on the conditions that:

1. Before the operation begins, the JTF-RH hosts a site visit for the DOH to view spill containment measures. The DOH's comments must be addressed.
2. The fuel oil reclamation (FOR) line from the main containment sump to Adit 3 passes pressure testing with the DOH's concurrence prior to residual fuel movement from the Tank Gallery area that uses the FOR line.
3. If additional residual fuel is identified that can be removed through non-destructive means, for which the JTF-RH has not previously provided a CONOP, a CONOP shall be submitted with planned spill mitigation, containment, and response measures for the DOH to review and approve prior to implementation.
4. The JTF-RH provides daily updates during the operation, including locations and estimated amounts of fuel removed and any changes to the schedule.
5. Upon completion of the non-destructive residual fuel removal, the JTF-RH and Navy Closure Task Force – Red Hill (NCTF-RH) confirm that, to the extent practicable through

non-destructive means, all residual fuel is removed from the main fuel tank and surge tank systems. Any remaining residual fuel that can only be removed through destructive means must be addressed by the NCTF-RH in the Closure Phase of the Closure Plan required under the DOH's May 6, 2022 Emergency Order. A list of locations and estimated quantities of fuel remaining for destructive removal must be included.

6. Once the JTF-RH and NCTF-RH develop plans and a schedule for managing fuel in the FOR line after residual fuel movement, provide a copy to the DOH for review and approval.
7. The DOH must be permitted to observe non-destructive residual fuel removal. Please continue to 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: Evan Osborne, U.S. Environmental Protection Agency [via email only]
Andrew Suesse, U.S. Environmental Protection Agency [via email only]
Jamie Marincola, U.S. Environmental Protection Agency [via email only]
Ash Nieman, U.S. Environmental Protection Agency [via email only]
BG Michelle Link, Joint Task Force – Red Hill [via email only]
LTC Noor James, Joint Task Force – Red Hill [via email only]
RDML Marc Williams, Navy Closure Task Force – Red Hill [via email only]