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

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



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

P. O. BOX 3378 HONOLULU, HI 96801-3378 In reply, please refer to: File:

January 30, 2024

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 Vice Admiral Wade:

SUBJECT: DOH No Further Comments on Defueling Plan Supplement 3

On December 20, 2023, the Hawai'i Department of Health (DOH) received the Joint Task Force – Red Hill (JTF-RH) and Navy Closure Task Force – Red Hill's (NCTF-RH's) responses to our comments on *Defueling Plan Supplement 3* (*Supplement 3*). After reviewing the responses, we have no further comments on *Supplement 3*.

However, we note that some of the dates in the NCTF-RH's December 15, 2023 Integrated Master Schedule (IMS) referenced in the responses have already been slightly delayed. The comment responses describe a Facility Closure Design and Execution Line of Effort brief to regulators (comment 10) and a tank cleaning spill exercise scenario submittal (comment 19.b) in January 2024. However, we understand from a hardcopy IMS delivered to us on January 26, 2024 that the NCTF-RH has rescheduled these tasks to February 15, 2024. While we do not expect these delays to affect the overall closure schedule, and will continue to expedite our reviews, we ask the NCTF-RH to be mindful of these delays and actively seek ways to shorten the overall closure timeline.

In addition, please be reminded that our January 4, 2024 conditional approval of the JTF-RH's concept of operations (CONOP) for non-destructive residual fuel removal remains applicable, with the exception that the DOH agrees to weekly updates on fuel removals, with more frequent updates as appropriate for schedule changes. Per condition 5, we expect the JTF-RH and NCTF-RH to confirm that, to the extent practicable through non-destructive means, all fuel is removed from the main fuel tank

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and surge tank systems. Any 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. The plan must include a list of locations and estimated quantities of fuel remaining for destructive removal. As discussed in our January 11, 2024 Defueling Technical Working Group Meeting, we believe it would be prudent to determine whether any pipelines in the Red Hill Facility were previously abandoned in place with fuel, in order to further eliminate future risk to the environment.

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: Ash Nieman, U.S. Environmental Protection Agency [via email only]
Jamie Marincola, U.S. Environmental Protection Agency [via email only]
BG Michelle Link, JTF-RH [via email only]
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