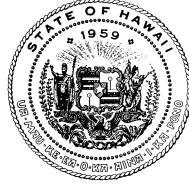


JOSH GREEN, M.D.
GOVERNOR OF HAWAII
KE KIA'ĀINA O KA MOKU'ĀINA 'O HAWAII'



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, HAWAII 96801-3378

In reply, please refer to:
File:

March 8, 2024

Rear Admiral Stephen Barnett
Commanding Officer
Navy Closure Task Force – Red Hill
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: Red Hill Bulk Fuel Storage Facility Degassing Activity

On January 18, 2024, the Hawai'i Department of Health (DOH) issued a conditional approval for tank cleaning. Since that time, concerns have been raised regarding air emissions during ventilation of the tanks. Therefore, in accordance with the DOH's May 2022 Emergency Order, the DOH requires the submission of an air monitoring plan to be included as part of the closure component of the Closure Plan. We understand from our recent meetings between the DOH and representatives of the Navy Closure Task Force – Red Hill (NCTF-RH), Joint Task Force – Red Hill (JTF-RH), APTIM Federal Services, and U.S. Environmental Protection Agency, that the NCTF-RH is developing an air monitoring program that includes monitoring at the exhaust vent exit and at locations away from the exhaust vent exit.

At a minimum, the following information shall be included in the air monitoring plan (Air Monitoring Plan):

1. Exhaust information and on-site/operating conditions:
 - a. A map showing the location of each exhaust vent exit to the atmosphere, the nearby structures identified in 1.b.viii (below), and identification of the fence line surrounding the property on which the vent exit is located.

- b. For each exhaust vent, provide*:
 - i. UTM (Universal Transverse Mercator) coordinates in NAD-83 (North American Datum of 1983) of the exhaust vent exit;
 - ii. The minimum and maximum flow rate at the exhaust vent exit, in cubic feet per minute;
 - iii. The inside diameter (if circular) or dimensions of the vent at the exhaust exit, in feet;
 - iv. The height of the exhaust vent exit from ground elevation to top of exhaust, in feet;
 - v. The exhaust temperature, in degrees Kelvin;
 - vi. The direction of the exhaust vent exit, vertical or horizontal;
 - vii. Maximum potential pound per hour volatile organic compound (VOC) and hazardous air pollutant emissions and supporting calculations that show how pound per hour emissions were derived; and
 - viii. The location (UTM coordinates in NAD-83) and dimension (length, width, and height) of all structures within 100 meters of the exhaust.

* The DOH understands that the specifications in 1.b.ii through 1.b.vi are not available at this time, thus, this information shall be submitted prior to operation, as soon as the design is finalized.

2. A letter from APTIM Federal Services, dated August 17, 2023, was submitted to the DOH's Clean Air Branch with attachments. Attachment 1 states "Full calculations can be found in the included Excel File." Provide a hard copy and electronic copy of the Excel file or files mentioned in the August 17, 2023 submittal.
3. Basis for the target odor threshold level at the vent exhaust exit and at the property line. During a February 27, 2024 meeting it was mentioned the goal would be to achieve levels below odor thresholds near the property line.
 - a. Explain how the target levels of 15 – 50 parts per million by volume (ppmv) total VOC concentrations at the exhaust vent exit were selected and how it was determined that these levels will achieve the above stated goal.
 - b. Provide information on what actions will be implemented, should the concentrations exceed the identified levels of 15-50 ppmv, or if the levels near or beyond the property boundary exceed odor thresholds.
4. Description of the proposed air monitoring, including:
 - a. Type of monitoring units and parameters to be monitored at the exhaust vent exit.
 - b. Location of monitors that will be placed away from the ventilation exhaust exit, type of monitoring units, and parameters to be monitored. Monitoring locations should provide coverage of the neighboring military housing and off-base facilities as identified in Figure 1 of APTIM Federal Services' August 17, 2023 letter.

5. Data collection and reporting.
At a minimum, the following data shall be reported for each hour of degassing:
- a. As measured from the exhaust vent exit:
 - i. Total VOC concentrations in ppmv, averaged on an hourly basis; and
 - ii. The exhaust flow rate, in cubic feet per hour.

The data shall be reported to the DOH no less than weekly.

- b. For each air monitoring location away from the exhaust vent exit:
 - i. Total VOC concentrations in ppmv, averaged on an hourly basis.

Data shall be made available to the public by posting on a website hosted by the Navy. Near real time data shall be updated hourly, unless it can be demonstrated that posting at this frequency is not possible. Historical data of the hourly averages shall be maintained and accessible on the website.

6. All information and data collected pursuant to the approved air monitoring plan shall be emailed to kellyann.lee@doh.hawaii.gov.

The requested air monitoring plan shall be submitted no later than Monday, March 18, 2024.

After receipt of your proposed air monitoring plan, the DOH will review and either approve, approve in part or disapprove the plan. Once approved, the air monitoring plan shall be incorporated into and made part of the Closure Plan.

Should you have any questions regarding this letter, please contact Ms. Kelly Ann Lee, Red Hill Project Coordinator, at (808) 586-4226 or at kellyann.lee@doh.hawaii.gov.

Sincerely,

Kathleen Ho

KATHLEEN S. HO
Deputy Director for Environmental Health

- c: Ash Nieman, EPA [via email only]
Jamie Marincola, EPA [via email only]
RDML Marc Williams, NCTF-RH [via email only]
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