



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

March 28, 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: Air Monitoring Plan
Red Hill Bulk Fuel Storage Facility Degassing Activity**

The Hawaii Department of Health (DOH) acknowledges receipt of the Navy Closure Task Force – Red Hill's (NCTF-RH) letter with enclosures dated March 18, 2024, in response to the DOH's letter dated March 8, 2024. The DOH's March 8, 2024 letter required the NCTF-RH to submit an Air Monitoring Plan for the subject activity under the DOH's May 2022 Emergency Order (EO). While an Air Monitoring Plan was not submitted, the DOH reviewed the information provided and offers the following questions and comments for the NCTF-RH to respond to and incorporate into an Air Monitoring Plan.

1. **NCTF-RH response 1.a. (Enclosure 1, page 1)** – Provide a map showing all of the following:
 - a. The location of the exhaust vent exit to the atmosphere.
 - b. The location of the Red Hill Shaft Chlorination Building and all temporary structures requested in 1.b.viii. of the DOH's March 8, 2024 letter.
 - c. Distinct lines/markings on the map showing a fence line or similar physical barrier surrounding the property on which the vent exit is located, that prevents outside access to the storage tank facility.
 - d. The location of the six (6) photo-ionization detector (PID) monitors, six (6) National Ambient Air Quality meters, and six (6) weather stations mentioned in the NCTF-RH's response 4.b.
2. **NCTF-RH response 1.b.(4) (Enclosure 1, page 1)** – The NCTF-RH's response states the exhaust duct is still being constructed, so the final height may vary slightly. Provide the minimum height that the exhaust vent exit will be constructed to, in feet, from ground elevation to top of exhaust vent exit.

3. **NCTF-RH response 1.b.(8) (Enclosure, page 2)** – Provide the UTM (Universal Transverse Mercator) coordinates, in NAD-83 (North American Datum-83), and dimensions (length, width, and height) of the Red Hill Shaft Chlorination Building and all temporary structures within 100 meters of the exhaust vent exit.
4. **NCTF-RH response 3.a. (Enclosure 1, page 2)** – Explain the basis for the NCTF-RH selecting a maximum target level of 50 parts per million (ppm), rather than 15 ppm, at the exhaust exit. According to the NCTF-RH’s response:
 - “The project schedule is based upon a 10-hour working day, so has elected to use the more stringent 15 PPM for VOC [volatile organic compounds] concentrations of the vapors that exit the exhaust.”
 - “Using this data along with having the capability of applying dilution air from an odor control device of the exhaust system, a maximum target level of 50 PPM was selected.”
5. **NCTF-RH response 3.b. (Enclosure 1, page 3)** – The DOH required the NCTF-RH to “Provide information on what actions will be implemented should the concentrations exceed the identified levels of 15-50 ppmv [part per million by volume], or if the levels near or beyond the property boundary exceed odor thresholds.” In part, the NCTF-RH responded that “Dependent upon the potency of ~50 PPM, contractor may elect to increase dilution air to get levels to comfortable levels.”

Identify the odor thresholds being used, in ppmv. What actions will the Navy take to reduce total VOC concentrations if the monitoring stations near the facility boundary show exceedances of the odor thresholds?

6. **NCTF-RH response 4.b. (Enclosure 1, page 3)** --
 - a. Provide the UTM coordinates, in NAD-83, for the six (6) PID monitors with Summa Cannisters. What total VOC concentration will trigger the collection of an air sample with the Summa Canisters? What pollutants will the Summa Cannister air samples be tested for?
 - b. Provide the UTM coordinates, in NAD-83, for the six (6) National Ambient Air Quality meters. Provide a description of the National Ambient Air Quality meters and identify what information the meters will collect. Provide the make and model numbers of the meters.
 - c. Provide the UTM coordinates, in NAD-83, for the six (6) weather stations.
 - d. The DOH previously stated that the monitoring locations should provide coverage of the neighboring military housing and off-base facilities identified in Figure 1 of APTM Federal Services’ August 17, 2023, letter. Why are monitors not being placed at the nearby military housing and off-base facilities?

7. **Submit the following information as the identified in the NCTF-RH response no later than March 28, 2024:**
 - a. Maximum potential pound per hour VOC and hazardous air pollutant emissions and supporting calculations that show how pound per hour emissions were derived.
 - b. A hard copy and electronic copy of the Excel file or files mentioned in the August 17, 2023 submittal.

8. **Submit the following information within one week after the fuel storage facility venting system is activated:**
 - a. Final UTM coordinates, in NAD-83, of the exhaust vent exit.
 - b. Final constructed height, in feet, of the exhaust vent exit from ground elevation to top of exhaust vent exit.
 - c. Final constructed direction of the exhaust vent exit, vertical or horizontal.
 - d. Temperature of the exhaust, in degrees Kelvin.
 - e. Final constructed stack diameter (if circular) or dimensions of the vent at the exhaust exit, in feet.

9. The NCTF-RH's response states the NCTF-RH is working with the contractor to evaluate the ability to post real time data hourly. Provide an update on the progress of the work.

10. If the DOH receives complaints related to the degassing activity, we would like to direct the complaint to a Navy contact.
 - a. Provide the contact information (telephone number and email address) where the DOH can direct complaints.
 - b. The NCTF-RH shall post this information on a website along with the air monitoring data.

A response to the follow up questions above, including a progress update on the posting of near real time data, together with the consolidated Air Monitoring Plan, shall be submitted to the DOH no later than April 5, 2024. The NCTF-RH shall not proceed with tank ventilation until the DOH approves or conditionally approves the Air Monitoring Plan in accordance with the 2022 EO.

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

Rear Admiral Stephen Barnett
March 28, 2024
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