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In reply, please refer to:
File:

April 15, 2024

Rear Admiral Stephen Barnett
Commander, 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 Response to NCTF-RH's *Technical Memorandum, Scoping Basis for Red Hill Tank Closure Plan Supplement 3: Site Assessment Work Plan*

The Hawaii Department of Health (DOH) is in receipt of the Navy Closure Task Force – Red Hill's (NCTF-RH's) February 9, 2024 *Technical Memorandum, Scoping Basis for Red Hill Tank Closure Plan Supplement 3: Site Assessment Work Plan*, hereinafter referred to as the "Tech Memo." After reviewing the Tech Memo, the DOH has the following comments and clarifications regarding the information provided.

1. **General comment:** The Tech Memo cites "informal verbal guidance" from the regulatory agencies throughout. While the DOH is open to technical discussions with the NCTF-RH regarding proposed environmental work, we will make final decisions (e.g., submission approvals and disapprovals) in writing.
2. **Page 1, Section 1:** The last paragraph states, "the Navy continues gathering and reviewing historical information related to past investigations of fuel storage facilities at Joint Base Pearl Harbor-Hickam (JBPHH)." As mentioned in our letters dated January 30 and March 27, 2024, the NCTF-RH should also identify and empty (if not already empty) historical infrastructure previously abandoned in place, such as formerly attached pipelines or other systems, to ensure these structures do not contain contaminants or fuel that could eventually be released into the environment.
3. **Page 2, Section 2.1:** This section states, "[i]n response to [DOH's May 6, 2022 Emergency Order], the Navy committed to conducting 'a site assessment and release investigation and response for soil and groundwater cleanup in accordance with Subchapter 6 of HAR [Hawaii Administrative Rules] §11-280.1' in the Tank Closure

Plan.” The DOH concurs with this statement that site assessment, site investigation, and remedial response actions are required to be included in the Closure Plan.

However, the following sentence states, “[i]t is the Navy’s understanding that all three parties (DOH, EPA, and Navy) agree that completion of the Site Assessment will meet DOH’s requirements for Tank Closure and that associated release response actions (release characterization and remediation) will be handled separately.” The DOH disagrees with this statement. As stated in the previous sentence, and in our December 19, 2023 letter describing our expectations for the Site Assessment Plan (Expectations Letter), the DOH is requiring that steps associated with site investigation and remediation also be included in the Site Assessment Plan portion of the Closure Plan. Therefore, these actions are also part of the Emergency Order and will not be handled separately.

4. **Pages 4-6, Section 3.1:** While Michael Baker International (MBI) may have only included the UST system up until the jurisdictional valve, the DOH does not limit our oversight to only a portion of the UST system. In our Expectations Letter, we state that the site assessment shall include the pipeline system from the underground pump house to the piers. The pipeline services other piers in addition to Hotel Pier.
5. **Page 9, Section 5.0:** Total petroleum hydrocarbons as oil (TPH-o) is included as a soil vapor analyte for middle distillate fuels. However, TPH-o is not readily volatile and most soil vapor analytical methods cannot detect carbon chains greater than 18-20 carbons in length.
6. **Page 12, Section 6.0:** Table 2 provides a list of past investigations but does not state whether any releases were identified. The NCTF-RH also claims these investigations satisfy the HAR 11-280.1-72 requirements for site assessment in “the tank farm area, the former slop tank, Adit 6, and groundwater,” but does not define the boundaries of these areas. Please note, “groundwater” is not an area of the underground storage tank (UST) system.

The Expectations Letter requires a “map(s) illustrating the locations of all previous site assessments throughout the entire UST system, potential sources of contamination ... and areas of contaminant impact in both the vadose zone and saturated zone.”

Provide a map(s) clearly defining each area the NCTF-RH feels has been assessed in accordance with HAR 11-280.1-72. For each report in Table 2, state whether a release(s) was identified, provide details about the release(s), and illustrate the previous site assessment results to justify why the NCTF-RH believes the area was adequately assessed. For example, show where samples were taken, what contaminants were found (including depths) and where, dates samples were taken, extent of identified release(s), etc. Simply attaching a figure illustrating where samples were collected is not sufficient to show the requirements have been met.

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Please note, as the UST system was operational until recently, previously collected data may not be sufficient to determine there was no release from the UST system. Only identify areas of the UST system the Navy feels were adequately assessed to identify potential releases from the system itself.

7. **Page 13, Section 8.0:** The recommended actions rely primarily on collecting soil vapor samples to identify releases from the UST system; however, this does not address the contaminants of potential concern (COPCs) that may not be readily volatile, such as TPH-o and lead. Ensure that the site assessment work plan addresses both volatile and non-volatile COPCs.

Since the Tech Memo was provided, the NCTF-RH has asked the DOH on several occasions to “partner” with the NCTF-RH and draft portions of the Site Assessment Plan. As a regulatory agency and enforcing party to the Emergency Order, the DOH’s role is to review the NCTF-RH’s work products and provide feedback, approval, or disapproval. Therefore, we are unable to “partner” with the NCTF-RH in authoring any of its required submittals. The NCTF-RH is responsible for completing its own work. We continue to ask the NCTF-RH to provide draft work products before meetings and come prepared to answer questions, so we can provide useful feedback ahead of formal submittals.

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

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