



DEPARTMENT OF THE NAVY
COMMANDER
NAVY REGION HAWAII
NAVY CLOSURE TASK FORCE - RED HILL
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Ser N0/039
May 2, 2024

Kathleen S. Ho
Deputy Director for Environmental Health
Department of Health
P.O. Box 3378
Honolulu, HI 96801-3378

Dear Ms. Ho:

SUBJECT: NAVY RESPONSE TO DEPARTMENT OF HEALTH APRIL 22, 2024
COMMENTS ON NAVY CLOSURE TASK FORCE - RED HILL APRIL 12, 2024
TANK CLEANING VENTILATION AIR QUALITY MONITORING PLAN

The Hawaii Department of Health's (DOH) May 6, 2022 Emergency Order (EO)'s authority rests on the finding of an imminent peril to human health from the threat of the contents of the 20 underground storage tanks leaking into the ground and water, not from air emissions. Despite this, to address recently raised community concerns, DOH is requiring the Department of the Navy (Navy), under the auspices of the EO, to submit an additional Air Quality Monitoring Plan as part of its phased plan for permanent closure (Closure Plan) of the Red Hill Bulk Fuel Storage Facility (RHBFSF).

The Navy submitted its Tank Cleaning Plan portion of the Closure Plan on December 15, 2023, which DOH conditionally approved on January 18, 2024. Notably, this Tank Cleaning Plan, included detailed descriptions of the degassing of the tanks and forced-air ventilation of the tanks through the duration of the tank cleaning process. DOH did not raise any concerns or pose any questions regarding emissions, as the degassing and force-air ventilation proposed by the Navy was similar to that used in the Clean, Inspect, Repair process the Navy has employed at RHBFSF in the recent past without issue. Additionally, DOH made a determination on October 4, 2023, that the work proposed constitutes maintenance of a grandfathered facility and no air permit is required.

However, on March 8, 2024, after the Community Representation Initiative raised the specter of "toxic fumes" from the ventilation of the tanks at their February meeting, DOH introduced for the first time a new requirement for community air quality monitoring as part of the Closure Plan. Per DOH's April 22, 2024 letter, this late-breaking requirement is ostensibly to protect "the health and safety of the public" despite DOH's determination that no permit was required. In addition, the underground storage tanks at RHBFSF have been cleaned in a similar manner as they will be cleaned under the Tank Cleaning Plan and DOH required no such air quality monitoring in the past, the Navy has never received a complaint from the public during

tank cleaning, and has never been required by DOH to have an air permit to conduct tank cleaning.

The Emergency Order's authority rests on the finding of an imminent peril to human health and the environment. That imminent peril is from the threat of the contents of the 20 underground storage tanks leaking into the ground and water, not from emissions from the cleaning of those tanks. Accordingly, the Navy is anxious to begin removing the sludge that remains 100 feet over one of Oahu's most important aquifers. As requested by DOH in its January 18, 2024 conditional approval of the Navy's Tank Cleaning Plan, the Navy has worked to find every opportunity to expedite its cleaning schedule. The Navy is ready to begin cleaning on May 6, 2024, but due to DOH's introduction of a new and ever-shifting requirement for air quality monitoring, this requirement is now likely to delay the Navy's proposed tank cleaning schedule substantially.

The Navy in good faith has provided DOH with two separate proposed Air Quality Monitoring Plans since DOH first introduced this requirement in March. Navy's first plan was based on the National Institute for Occupational Safety and Health (NIOSH) standards of 15 parts per million by volume (ppmv) based on the occupational exposure standard of a 10-hour time weighted average (TWA). DOH rejected this plan. Next, after discussion with DOH and the U.S. Environmental Protection Agency (EPA), and based on the regulator's suggestion, the Navy proposed a plan using the Acute Exposure Guideline Levels (AEGL), EPA, and National Oceanic and Atmospheric Administration-developed Protective Action Criteria (PAC) of 38 ppmv. DOH rejected this plan even though it was based on the regulator suggested standards. The air monitoring system needed to meet the requirements of both plans has been installed and is ready to implement. All the Navy is awaiting is DOH approval.

Though the Navy's Tank Cleaning will take place over a three-year period, the degassing and ventilation will not be a constant emission over that time, such as one would see from a production plant. The 14 tanks that currently contain sludge, will be cleaned in sets of two. The degassing stage will be the most acute level of emission during the tank cleaning process that is only estimated to last approximately 10 days per tank. With 14 tanks that recently contained fuel and would have to be degassed, this means that the most acute emissions will occur approximately 140 days spread over the three years of tank cleaning. As discussed today, Navy Closure Task Force - Red Hill could reduce ventilation to a single tank at a time. However, it must be recognized that this increase in time to clean the tanks would involve a corresponding increase in time the aquifer will be exposed to imminent peril to human health from the threat of the contents of the 20 underground storage tanks.

During these peaks of degassing, the air emission levels will dissipate quickly, as the Navy will be actively pumping clean air into the tank for worker safety. As tank cleaning continues, no new air emissions will be generated, so the air quality levels will only continue to improve over time from the acute levels at the beginning of degassing. Accordingly, utilizing

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acute exposure criteria such as the EPA AEGL-1 and PAC-1 standard of 38 ppmv is appropriate in this case. The Navy reiterates our request that DOH affirm to the community that the scientifically-based action level of 38 ppmv at the facility boundary is a level protective of human health and the environment.

The Navy appreciates DOH's input during the April 30, 2024 and May 2, 2024 meetings where DOH provided clarification on the type of air modeling that the Navy is being asked to perform. This clarification of the requirement is appreciated, but we all must recognize these new and changing requirements will jeopardize the tank cleaning timeline.

The Navy is ready and willing to immediately execute an Air Quality Monitoring Plan once DOH provides an action level that can be shared with the public and approves the Navy's air model. Should you have any questions about this letter, please contact Mr. Milton Johnston, Environmental Director, Navy Closure Task Force - Red Hill at milton.l.johston3.civ@us.navy.mil.



M. F. WILLIAMS
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