



STATE OF HAWAII
DEPARTMENT OF HEALTH
KA 'OIHANA OLAKINO
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File:

June 18, 2024

Rear Admiral Marc Williams
Navy Closure Task Force – Red Hill
440 Fuller Way Building 280
Pearl Harbor, Hawai'i 96860
[via email only: marc.f.williams.mil@us.navy.mil]

Dear Rear Admiral Williams,

SUBJECT: Navy Closure Task Force – Red Hill Request to Modify Air Reporting Requirements

The Hawai'i Department of Health (DOH) acknowledges receipt of the Navy Closure Task Force – Red Hill's (NCTF-RH's) letter dated June 11, 2024 and email dated June 17, 2024, requesting to modify air reporting requirements related to the venting of the Red Hill fuel storage tanks. The NCTF-RH is requesting approval from the DOH to reduce the reporting frequency, as follows:

- After a marine chemist has verified that the tank being exhausted/degassed is safe for entry, which is when total Volatile Organic Compound (VOC) emissions from the tanks are expected to be *de minimis* and calculated emissions are below 4.82 pounds per hour (lbs/hr), during the ongoing cleaning period.
- Reduce the frequency of reporting to the DOH from hourly to daily (report at 8:00 am the following workday) when reporting total VOC concentrations, emission rates, and supporting data from the exhaust vent.
- Reduce the frequency of reporting to the public (i.e., posting air quality monitoring data on the NCTF-RH mobile app and website) from hourly to daily (post at 8:00 am the following workday) when reporting total VOC concentrations from the nine (9) air monitoring stations.

The DOH acknowledges the significant reduction in total VOC emissions from the tanks that have been actively vented and approves your request to reduce the frequency of reporting on the conditions that:

1. The reduction in the frequency of reporting shall occur only after:
 - a. Total VOC emissions from the pair of tanks being vented are demonstrated to be below 4.82 lbs/hr and undiluted total VOC concentrations are demonstrated to be below 15 parts per million by volume (ppmv) based on a 1-hour time weighted average (TWA), for five (5) consecutive readings during forceful venting of the tanks, and
 - b. The first tank is determined safe for entry as verified by a marine chemist.

The NCTF-RH shall adhere to the original hourly reporting requirements when conducting initial exhausting/tank degassing for each tank.

2. Reduced reporting during this period will only be in effect when undiluted total VOC concentrations at the exhaust vent (station CH105 (pre-mix 0-50) AIT-173A) is maintained at < 15 ppmv on a 1-hour TWA. If undiluted total VOC concentrations from the exhaust vent equals or exceeds 15 ppmv on a 1-hour TWA, the NCTF-RH shall report the concentration for that hour in near real time.
3. As required by the DOH's May 29, 2024 Conditional Approval, the NCTF-RH shall continuously monitor and record data from the exhaust vent and the nine (9) air monitoring stations.
4. The NCTF-RH shall notify the DOH, by email to cab.general@doh.hawaii.gov and notify the public by a posting on the NCTF-RH mobile app and website, the day before reducing the reporting frequency to daily. The DOH notification shall include a statement that the NCTF-RH has met the requirements of condition no. 1.a above.
5. The NCTF-RH daily report shall include the same information that was previously required to be reported on an hourly basis.
6. The shutdown requirements in the DOH's May 29, 2024 Conditional Approval remain in effect and shall be adhered to.

Should 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 Marc Williams

June 18, 2024

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c: via email only:
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 Noor James, NCTF-RH
 Milton Johnston, NCTF-RH
 Joshua Stout, NCTF-RH