

**Naval Facilities Engineering Systems Command Hawaii**

**Air Quality Monitoring Consolidated Plan**  
**Red Hill Bulk Fuel Storage Facility**  
**Joint Base Pearl Harbor-Hickam, Oahu, Hawai‘i**

June 2024



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## **Enclosures**

1. DOH Conditional Approval of NCTF-RH Tank Cleaning Ventilation Air Quality Monitoring Plan; 2 MAY 2024
2. Air Quality Monitoring (AQM) Notification and Triggers Operation Order (OPORD); 31 MAY 2024
3. Tank Ventilation Operational Overview and Risk Management
4. Notification Tree – Emergency
5. Notification Tree - Operational
6. Air Quality Modeling Report; 28 MAY 2024
7. RH Tank Ventilation Modeling Results; 28 MAY 2024
8. Aptim Transmittal letter; 10 MAR 2024
9. Additives U.S. Navy COPC List



## ***Acronyms and Abbreviations***

AQM	Air Quality Monitoring
DOH	State of Hawaii Department of Health
EPA	U.S. Environmental Protection Agency
NAAQS	National Ambient Air Quality Standards
NIOSH	National Institute for Occupational Safety and Health
PID	Photoionization detector
PPM	Parts Per Million
PPMV	Parts Per Million By Volume
QAPP	Quality Assurance Protection Plan
REL	Recommended Exposure Limit
VOC	Volatile Organic Compound(s)





## **1.0 Introduction and Purpose**

The following project is proposed to develop and implement an air quality monitoring (AQM) system at the Red Hill Bulk Fuel Storage Facility (Facility) for the purpose of monitoring during tank cleaning efforts. In response, the Navy agrees with the State of Hawaii Department of Health (DOH) request to implement this system for tank cleaning and site closure. The Navy will continue AQM focused directly at the Facility during an estimated three-year period. A total of eight (8) perimeter AQM stations systems have been installed around the perimeter of the Facility to monitor and evaluate air quality, with an additional AQM station on Halawa Correctional Facility property. These perimeter AQM stations also have meteorological stations to record weather data such as barometric pressure, wind speed, wind direction, temperature and humidity. Additionally, three photoionization detectors (PID) are located within the ventilation system: one at the bottom of the tank, one in the duct work inside the (b) (3) (A) and a final PID placed at the exhaust/vent stack outside of (b) (3) (A)

The perimeter AQM systems are housed in weatherproof enclosures on a stand or rack, and all stations run exclusively on solar and battery power. All systems are checked daily and tested along with manufacturer's recommended maintenance schedule.

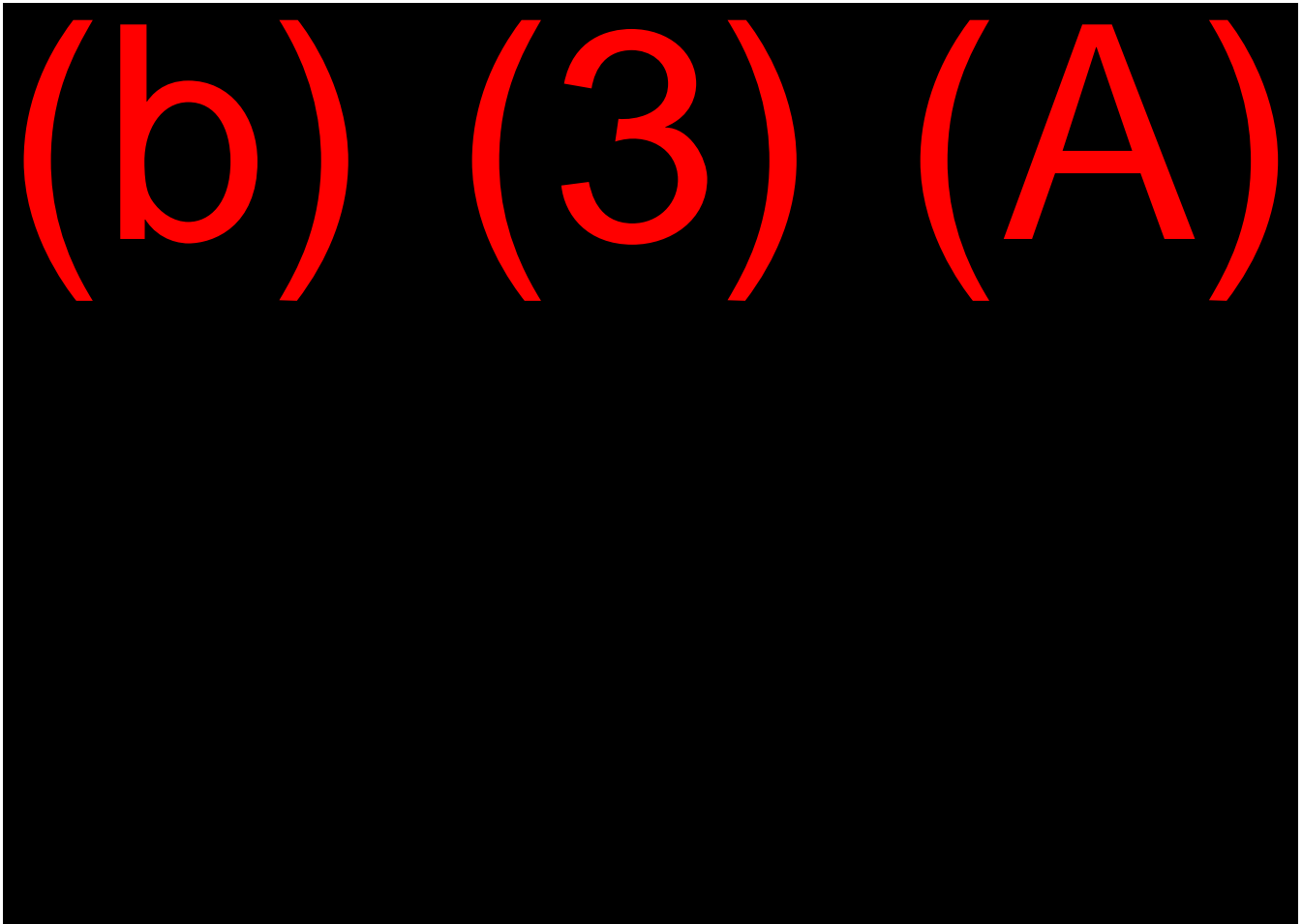
The AQM systems are intended for monitoring, detection, and environmental surveillance of volatile organic compounds (VOCs) along with the potential for additional pollutants depending on the type of system chosen for this effort. This plan:

- Documents the logistics, operating procedures, and methodologies already in place and running to accomplish this task.
- Includes nine (9) enclosures used as guidance and reference by the Navy to demonstrate compliance with Hawaii Department of Health (DOH) requests for their approval to proceed with forced ventilation.

## **2.0 AQM Site Locations**

Perimeter AQM locations were reviewed by DOH and the Navy, and represent the best monitoring grid based on the air model and exhaust rate at the stack. AQM placement is also based on current AQM weather data that has been collected since October 2023, including wind direction, which typically follows the ridge line, blowing northeast to southwest. Figure 1 is a map of the nine perimeter AQM locations with a baseline AQM (RH-AQM-9) at the top of the ridge (b) (3) (A), and RH-AQM-4 located across from the exhaust/vent stack. RH-AQM 6 and 7 are situated as close to the gate/fence adjacent to the community as terrain allows. The remaining AQM locations are situated downwind, with some proximal to Adit entrances and adjacent communities to establish an effective monitoring zone.

**Figure 1: Perimeter AQM Locations**



### ***3.0 Background and Overview***

The original AQM program was part of the Navy's plan to establish a baseline of current air quality conditions at the Facility and the surrounding community to possibly identify potential future changes in air quality. While pursuing this baseline effort from October 2023 to March 2024, the Navy also realized an inherent capability to enhance response readiness with an AQM system.

It should be noted that there are no regulatory requirements for outdoor VOCs. Official correspondence from DOH to the Navy's contractor APTIM Federal Services (b) (3) (A), (b) (6) dated 04 October 2023 acknowledged receipt of the Navy's request on air permitting requirements, and determined that an air permit was not required for the forced ventilation project.

From October 2023 to present, there have been no reported VOC readings exceeding the National Institute for Occupational Safety and Health (NIOSH) recommended exposure limit (REL) of approximately 14.4 parts per million (ppm) based on a 10-hour time-weighted average.

However, in the absence of outdoor VOC regulatory requirements, the Navy, DOH and EPA collaborated to establish thresholds for the protection of human health and the environment, and

help assuage public concerns of potential fumes/odors during the tank closure project. Using the EPA’s Acute Exposure Guideline Levels (AEGLs) as a basis, along with an air model to demonstrate compliance, the Navy received DOH approval on May 29, 2024 to proceed with forced ventilation at Tank 8 (Enclosure 1). That correspondence establishes the framework and metrics the Navy is using to meet air quality requirements jointly accepted by EPA, DOH and the Navy.

The enclosures included with this AQM Consolidated Plan are critical documents used as references, guidance, and direction for this plan, and provide greater detail with respect to action levels, notification procedures, strategies, and compliance. The Navy will continue using requirements/guidance stated in the enclosures.

- **Enclosure 1:** DOH Conditional Approval – provides direction and requirements the Navy must meet in order to continue forced ventilation.
- **Enclosure 2:** AQM OPOD – provides a general synopsis of operations, trigger thresholds and corresponding actions.
- **Enclosure 4:** Notification Tree (Emergency)
- **Enclosure 5:** Notification Tree (Operational)
- **Enclosure 6:** Air Quality Modeling Report; 28 MAY 2024
- **Enclosure 7:** RH Tank Ventilation Modeling Results; 28 MAY 2024
- **Enclosure 8:** Aptim Transmittal letter; 10 MAR 2024
- **Enclosure 9:** Additives U.S. Navy COPC List

Additionally, NCTF provided an email response on 29 MAY 2024 to DOH regarding a query and request about potential fuel additives (fuel additives list is Enclosure 9) NCTF-RH previously identified eighteen potential additives for jet and diesel fuel and confirmed the additives were not included in APTIM’s calculations. However the de minimis amounts added to each gallon of fuel do not have a measurable effect on the calculations provided nor the output of the model.

For example it is understood that benzene is a constituent of concern. In the list of potential additives, benzene is minor constitute in a corrosion inhibitor & lubricity improver additive for F-24 and JP-8 jet fuels. (b) (3) (A)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(b) (3) (A)

Review of all the VOC concentrations in the additives confirm VOCs are in the additives but de minimus amounts are in the remaining fuel. This small amount additives in the remaining fuel will have a negligible effect on the actual VOC lbs/hour generated.

#### ***4.0 AQM System Design Capabilities***

The perimeter AQM consists of a weather station and a MiniRAE 3000+ PID equipped with a 10.6 eV lamp, capable of measuring approximately 200 VOCs. As previously stated, this project may incorporate additional pollutants, some of which may be a part of the National Ambient Air Quality Standards (NAAQS).

The AQM will also include an automatic summa canister air sample collection system at each station using. The summa canister will have the ability to collect an air sample when the AQM registers a VOC reading of 3.8 parts per million by volume (ppmv) for a 1-hour time weighted average (TWA). Those summa canister air samples will be sent to a Navy-approved laboratory for analysis. Currently, summa canister samples are manually taken until the automatic system is procured and in place.

As previously stated, each perimeter AQM includes a meteorological station that will collect, at a minimum:

- Temperature
- Barometric pressure
- Relative humidity
- Wind direction
- Wind speed

#### ***4.1 Perimeter AQM Work Requirements***

Contractor will perform the following:

- Provide all equipment, materials, and labor necessary to complete the project.
- Collect air samples via summa canister at a set trigger threshold (TBD).
- AQM will continue with an onsite alarm and alert system in the event of a trigger, and will follow the established AQM notification chart.
- Monitor and continuously record data at each AQM location.
- Meet the reporting requirements that are specified in Section 5.
- Total monitoring duration will be dependent on NCTF work schedules for tank cleaning.

## 5.0 Data Evaluation, Validation and Reporting

Contractor will collect and evaluate air monitoring data for the duration defined in the contract which is expected to be approximately a three year period of performance. The equipment will be calibrated in accordance with manufacturer recommendations, and calibration will be performed at least monthly with the likelihood of daily bump testing. The accuracy of each AQM will be checked daily with a bump-test, and will be recalibrated when results are outside established limits.

Contractor will include a strategy to establish a baseline of air quality conditions based on equipment, as well as alert the Navy of any indications of potential exceedances/releases due to readings that are typically outside of established normal ranges. As stated previously, the Navy has identified VOCs and other potential air pollutants depending on equipment. This is subject to change and may include additional nuisance monitoring parameters as directed.

- Perimeter air monitoring equipment and/or database will provide a running 1-hour time-weighted average and 8-hour time-weighted average concentration.
- Contractor will utilize a networked system when practical, depending on the limitations of the location. Any direct reading instruments used shall have an audible alarm to indicate an immediate exceedance over a set trigger level (TBD).
- Fuel odor may be used to determine presence/release, but it will not be used exclusively to evaluate potential concentrations or issues.
- AQM system is expected to provide continuous monitoring during ventilation, which is expected to run during the tank cleaning effort.
- Per DOH's request in the March 08, 2024 official correspondence to the Navy; at a minimum, the following data is requested to be reported **for each hour of degassing**:
  - Total VOC concentrations in ppmv, averaged on an hourly basis.
    - That data shall be made available to the public by posting on Navy-hosted website (e.g., Safe Waters).
    - Hourly AQM data is currently being posted on the AQM tab of the NCTF-RH app. Data is also available on the Navy website: [www.navyclosuretaskforce.navy.mil/tank-ventilation](http://www.navyclosuretaskforce.navy.mil/tank-ventilation) for daily updates.
- Data retrieval frequency at perimeter stations will be collected seven days a week and will be reviewed daily at external stations, which are capable of cellular uploads to a cloud-based data base, with password-keyed security, and user specified permissions for data use. Data from both in-tunnel stations and external broad area stations will be stored in a single cloud-based data system that will be customized for this project, based on project requirements.
- Data will be made available to NCTF-RH within 24 hours. In the event remote data transmission is unavailable, the data will be retrieved manually via direct instrument download and disseminated to NCTF-RH. In the event that a reading elicits concern, NCTF-RH will require immediate notification to enact proper response measures. At a

minimum, any detected exceedance that triggers a response/sampling action will need to address:

- Notification of designated personnel/response contacts provided by the Navy, along with the Contractor Site-Specific Health and Safety Plan
- Upon completion of monitoring requirements, contractor will remove all equipment and return the site locations to their original condition.

Contractor shall include support to review data from each AQM system on a daily basis. Data will be validated according to procedures described in the project Quality Assurance Protection Plan (QAPP). Data that needs to be invalidated due to various reasons (such as bump test failure, weather issues/humidity, etc.) will be flagged by the data validator with input from the field operation team and oversight from a quality control manager. Data will be validated routinely.

Contractor shall include support to save all data from the project into a secure database. Activities covered in this task include creating and maintaining the database. This should also cover daily or weekly maintenance (as needed) and uploading raw and validated data from the data validator. A secure, permanent copy of the data set may be used for current reporting and any future data needs. The contractor has also included support in this task to produce data sets of the time averaging intervals required for Navy reporting requirements.

For data collected outside the forced ventilation events, the contractor will prepare a baseline report presenting data collected during the first month, a completion report, summarizing all activities and results; weekly data reports; and exceedance reports as described below:

- Immediate reporting of any exceedances beyond an established Action Limit
- One baseline report after an agreed upon date.
  - Draft with Navy comment and contractor response to comments and final report submittal
- Monthly documentation reports including tables showing instrument results along with any relevant statistical analyses, including summaries of parameters and meteorological data.
  - Reports shall include a summary of 1-hour running average air monitoring results for each monitoring station and instrument, and the 1-hour block average meteorological data.
- One completion report summarizing activities and results.
  - Draft with Navy comment and contractor response to comments and final report submittal
- Raw electronic data files and reports will be uploaded to EDMS and/or Safe Waters per Navy direction and approval.

Due dates for these reports are not specified and assumes they will be determined in the project kick-off meeting.

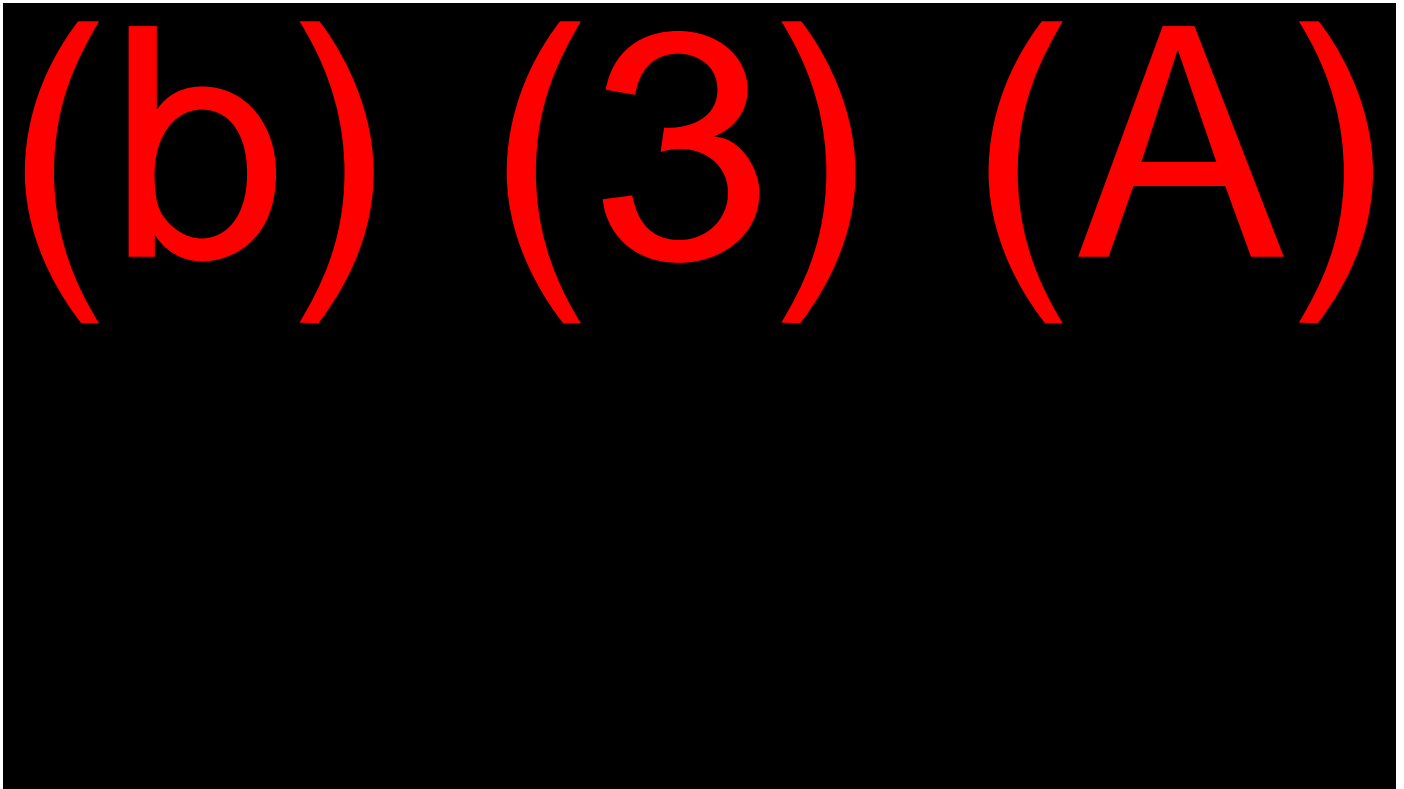
## **6.0 Setup and Installation**

Contractor shall procure all necessary equipment to satisfy requirements of this work plan. Upon contract issue, Navy assumes that installation should be relatively routine and fairly quick because of the simplicity of the set up. Figure 2 represents the current setup with the MiniRAE 3000+, stand, weather station, marine batteries, and solar panels.

The contractor shall ensure all AQM systems are in good working condition prior to use, and upon confirmation of working condition, installation for six locations should not exceed one week.

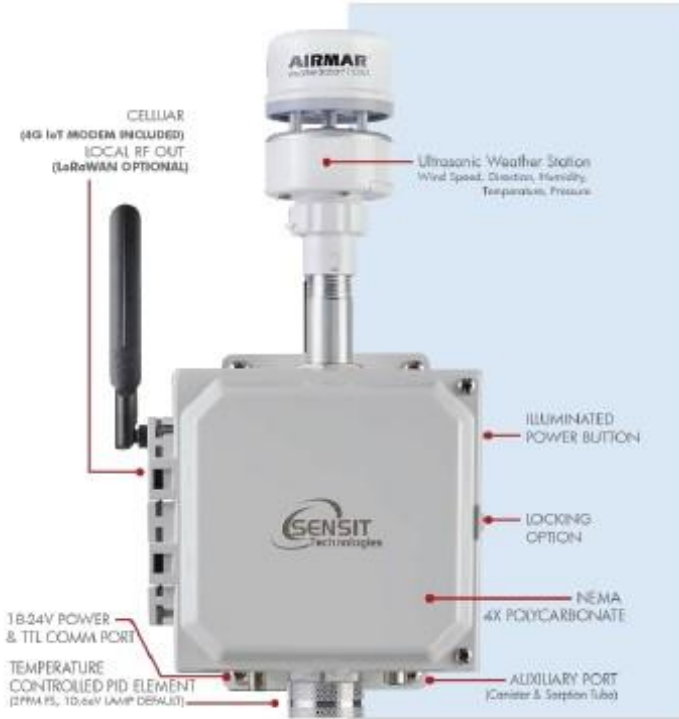
Using the existing AQM contract during defueling that ended on March 31, 2024, the Navy transitioned from that original effort to the current NCTF effort on April 01, 2024. The Navy is continuing AQM efforts with an extension of the current AQM contract using existing equipment at nine locations. Upon completion and acceptance of the new contract, the current systems may be replaced as needed with any new equipment identified in the new contract.

**Figure 2: RH-AQM-4 station at Red Hill**



## **7.0 Potential Equipment Upgrades**

There are other air monitoring systems that are better suited for outdoor use compared to the existing stations. The Navy has been researching several units including the Sentsit SPOD system shown on the following page. The SPOD, or similar equipment, can be used to achieve the monitoring goals previously stated in Section 4.0, and will be evaluated to potentially replace the current system.



**STANDARD KIT**

- USB Adapter
- Charging Cable

**OPTIONAL HARDWARE:**

- Solar Panel
- Tripod
- Ultrasonic Anemometer
- Outdoor Power Supply
- Canister Valve Controller
- Expansion Battery Pack
- Particulate Matter



**PRODUCT SPECIFICATIONS**

<b>Size:</b> Fully assembled without anemometer or antenna D x W x H (6" x 8" x 16")
<b>Weight:</b> Base unit: 6.5 lbs
<b>Operational Temp:</b> -10°C to 50°C
<b>Mounting:</b> Attached Mounting Flanges
<b>Voltage Requirements:</b> 18V – 24V DC Charging (wired adapter or solar panel)
<b>Current Requirements:</b> 2A Max Current Draw when Charging
<b>Operating Runtime:</b> 2-5 Days Battery Backup
<b>Operating Temp:</b> -20°C to 50°C
<b>Data Outputs:</b> Digital Wired Output (5.1V TTL-USB)   Wireless (4G LTE Cellular Included)   Optional Analytics on Server   SD Card Data Backup

**SENSOR SPECIFICATIONS**

SENSORS	DETECTION METHOD	LAMP ENERGY (eV)	RANGE (STANDARD)	ACCURACY (STANDARD)	RESPONSE TIME (STANDARD)
ION - H5	PID	10.6	10 - 3000 ppb*	±20 ppb min or 20%	30-60 sec
ION - XF	PID	10.6	0.1 - 30 ppm*	±0.2 ppm min or 20%	30-60 sec
ION - 10.0	PID	10	0.5 - 100 ppm*	±1 ppm min or 20%	30-60 sec
ION - 11.7	PID	11.7**	1-1000 ppm*	±5 ppm min or 50%	30-60 sec
MOS	Metal Oxide	-	Variable	-	15-30 sec
CO	Electrochemical	-	100-2000 ppm	±5 ppm min or 50%	60-90 sec
PM2.5	Laser Scattering	-	1-1000 µg/m3	±10 µg min or 50%	15-30 sec

\* Range defined at 1% humidity | \*\* Reduced lifetime for high energy lamp (~3 month)



## **8.0 References**

State of Hawaii Department of Health. 2024. *Official Correspondence to Department of the Navy; Rear Admiral Stephen Barnett*. SUBJECT: Red Hill Bulk Fuel Storage Facility Degassing Activity. March 08.

State of Hawaii Department of Health. 2023. *Official Correspondence to Department of the Navy contractor APTIM Federal Services, LLC; (b) (6)* SUBJECT: Underground Storage Tanks Degassing Project, Seven (7) Jet Fuel (JP-5), Five (5) Jet Fuel (F-24), Two (2) Diesel Fuel (F-76) Storage Tanks, and Four (4) Diesel/Jet Fuel Surge Tanks Located at: Red Hill Bulk Fuel Storage Facility (RHBFSF) and Joint Base Pearl Harbor-Hickam (JBPHH), Aiea, Island of Oahu. DOH File 23-406E CAB. October 04.

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'OKOLE

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

In reply, please refer to:  
File:

May 29, 2024

Rear Admiral Stephen Barnett  
Commander, Navy Closure Task Force – Red Hill  
850 Ticonderoga Street, Suite 110  
Joint Base Pearl Harbor Hickam, Hawaii'i 96860  
[via email only: [stephen.d.barnett.mil@us.navy.mil](mailto:stephen.d.barnett.mil@us.navy.mil)]

Dear Rear Admiral Barnett:

**SUBJECT: DOH Conditional Approval of NCTF–RH Tank Cleaning Ventilation Air Quality Monitoring Plan; and Tanks 7 & 8 Ventilation CONOP and OPORD**

Under the Hawai'i Department of Health's (DOH's) May 6, 2022 Emergency Order (EO), the U.S. Department of the Navy is required to submit and receive the DOH's approval for an air quality monitoring plan prior to commencing tank cleaning ventilation activities at the Red Hill Facility. The DOH acknowledges receipt of the Navy Closure Task Force-Red Hill's (NCTF-RH's) *Air Modeling Demonstration*, dated May 13, 2024, submitted as part of the *Red Hill Tank Cleaning Ventilation Air Quality Monitoring Plan (AQM Plan)* and *Request for DOH Approval to Commence Tank Ventilation at Red Hill Bulk Fuel Storage Facility*, dated May 28, 2024.

#### AQM Plan

Based on the May 13 and May 28, 2024 submittals and previous information submitted, the DOH approves the AQM Plan on the conditions that:

1. NCTF-RH adheres to the supporting documents submitted with the May 28, 2024 request for DOH approval.
2. According to the *AQM Notification and Triggers Operation Order (OPORD)* included in NCTF-RH's May 28, 2024 submittal, NCTF-RH's internal standard for ceasing ventilation is when the 1-hour Time Weighted Average (TWA) of total volatile

Rear Admiral Barnett

May 29, 2024

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organic compounds (VOCs) from the installed meter exceeds 20 parts per million by volume (ppmv) at the exhaust vent. NCTF-RH shall **immediately** notify the DOH of all occurrences when active ventilation is ceased and restarted as a result of exceeding 20 ppmv at the exhaust vent. Notification shall be provided by email to [cab.general@doh.hawaii.gov](mailto:cab.general@doh.hawaii.gov).

3. As proposed by the NCTF-RH, no more than six (6) tanks shall be actively vented in any calendar year.
4. No more than two (2) tanks shall be actively vented at any time. The start of ventilation for each of the two (2) tanks shall be staggered and:
  - a. Only one (1) tank shall be vented initially.
  - b. Venting of the second tank shall begin only when total VOC emissions from the first tank are reduced to 4.82 pounds per hour (lbs/hr) or less.
  - c. Written notification by email to [cab.general@doh.hawaii.gov](mailto:cab.general@doh.hawaii.gov) shall be provided to the DOH **prior to the start of venting** of each tank. Notification of the start of venting of the second tank shall include a statement that the VOC emissions from the first tank are at or below 4.82 lbs/hr.

A second written notification by email shall be provided to the DOH **within 24 hours** of the start of venting of the second tank and shall include the following information to demonstrate total VOC emissions from the first tank has reached 4.82 lbs/hr or less. The demonstration shall include:

- i. Total VOC concentration from the exhaust vent over a 1-hour averaging period, in ppmv, and the date and time the concentration was measured.
  - ii. Total flow rate from the exhaust vent for this period, in cubic feet per hour (cubic feet/hr).
  - iii. Total VOC emitted from the exhaust vent for this period, in lbs/hr. The molecular weight used in the calculation shall be provided.
  - d. **Notification to the public shall be provided 12 hours prior to the start of venting of each tank.**
5. At all times during active tank ventilation, actual total VOC emissions from the exhaust vent shall not exceed 48.2 lbs/hr, the maximum potential emission rate used in the modeling assessment.

If actual total VOC emissions from the exhaust vent exceed 48.2 lbs/hr:

- a. Active ventilation shall immediately stop.

- b. Written notification by email to [cab.general@doh.hawaii.gov](mailto:cab.general@doh.hawaii.gov) shall **immediately** be provided to the DOH that includes:
      - i. The date and time of the exceedance.
      - ii. The date and time active ventilation was stopped.
      - iii. Exceedance information, including the 1-hour average total VOC concentration at the exhaust vent (in ppmv), total flowrate from the exhaust vent during this period (in cubic feet/hr), and total VOC emissions from the exhaust (in lbs/hr) during this period.
    - c. The NCTF-RH must evaluate the cause of the exceedance.
    - d. DOH approval is required prior to restarting active venting. A written request to restart active ventilation shall be emailed to [cab.general@doh.hawaii.gov](mailto:cab.general@doh.hawaii.gov). The request shall include the reason for the exceedance and corrective measures taken to ensure total VOC emissions will not exceed 48.2 lbs/hr.
6. NCTF-RH shall continuously monitor and record the exhaust vent exit for 1-hour average total VOC concentrations (in ppmv) and flowrate (in cubic feet per minute; cfm) and shall provide the DOH near real time data of the following information, for each hour:
  - a. The date, time, and the 1-hour average total VOC concentration, in ppmv.
  - b. The flowrate from the exhaust vent, in cubic feet/hr.
  - c. Total VOC emissions, in lbs/hr. The molecular weight used in the calculation shall be provided.
7. A minimum of nine (9) air monitors shall be used to continuously measure and record total VOC concentrations, in ppmv, at locations approved by the DOH. A map showing the locations (including Universal Transverse Mercator (UTM) Coordinates in horizontal North American Datum-83), and identification numbers (e.g., RH-AMS-1) of the air monitors shall be shared with the public via the NCTF-RH app and NCTF-RH website.
8. Sampling by Summa cannister at a specific air monitor shall be triggered if total VOC concentrations at that monitor exceed 3.8 ppmv (10% of Acute Exposure Guideline Levels) on a 1-hour TWA as provided in the April 22, 2024 DOH letter.
  - a. Written notification by email to [cab.general@doh.hawaii.gov](mailto:cab.general@doh.hawaii.gov) shall be provided to the DOH **within twenty-four (24) hours** of the start of sample collection that includes the location and identification number of the monitor, and date and time the Summa cannister began sample collection.

- b. NCTF-RH shall submit the results of the Summa canister analysis by email to the DOH at [cab.general@doh.hawaii.gov](mailto:cab.general@doh.hawaii.gov) within twenty-four (24) hours of the NCTF-RH receiving the results of the analysis.

9. At all times during active tank ventilation, total VOC concentrations measured at each of the air monitors shall not exceed 38 ppmv on a 1-hour TWA.

If the total VOC concentration at any air monitor exceeds 38 ppmv on a 1-hour TWA:

- a. Active ventilation shall immediately stop.
  - b. Written notification by email to [cab.general@doh.hawaii.gov](mailto:cab.general@doh.hawaii.gov) shall immediately be provided to the DOH that includes:
    - i. The date and time of the exceedance(s), and total VOC concentration (in ppmv) on a 1-hour TWA.
    - ii. The date and time active ventilation was stopped.
  - c. NCTF-RH shall immediately provide notification of an exceedance to the public.
  - d. The NCTF-RH must evaluate the cause of the exceedance.
  - e. DOH approval is required prior to restarting active venting. A written request to restart active ventilation shall be emailed to [cab.general@doh.hawaii.gov](mailto:cab.general@doh.hawaii.gov). The request shall include the reason for the exceedance and corrective measures taken to ensure total VOC concentrations will not exceed 38 ppmv on a 1-hour TWA.
10. The NCTF-RH shall make near real time air monitoring data available to the public by posting on a website hosted by the NCTF-RH. If this is not immediately feasible, the NCTF-RH shall initially make this data available to the public by posting the data on the NCTF-RH mobile app. Following website modifications, this data shall be available through both the NCTF-RH app and the NCTF-RH website. The information provided to the public shall include the date, time, and total VOC concentration, in ppmv, for each 1-hour averaging period.
11. This approval is contingent on NCTF-RH confirming that the VOC and hazardous air pollutant (HAP) emissions from the tanks takes into consideration impacts from any fuel additives that may have been added to the fuel stored in the tanks.
12. Using the maximum potential gram per second emission rate rather than the maximum potential lbs/hr emission rate, NCTF-RH shall revise Enclosures (1) and

(2) from the May 13, 2024 NCTF-RH submittal to correct the calculated maximum pollutant concentrations (in micrograms per cubic meter). NCTF-RH shall update all information in Enclosures (1) and (2) affected by the change and resubmit the Enclosures to the DOH prior to the start of venting to demonstrate ambient air concentrations will be at or below the threshold screening levels.

13. No later than seven (7) days after receipt of this letter, NCTF-RH is required to submit a complete and detailed AQM Plan that encompasses and combines all previous submittals, including but not limited to, details of the venting operations, air monitoring equipment and locations (UTM coordinates), a map/plot showing the location of the nine (9) monitoring stations overlaid on the modeled 1-hour VOC concentrations, Navy response actions and notifications, and all modeling, calculations, and assumptions. The AQM Plan shall identify all of the DOH requirements and how the NCTF-RH will comply with these requirements. In accordance with the EO, a redacted version of the AQM Plan must be submitted to the DOH no later than ten (10) business days after the unredacted version is submitted.

#### Concept of Operations (CONOP) and OPORD

Lastly, the DOH received the NCTF-RH's Tanks 7 and 8 CONOP and OPORD for active ventilation. We received the initial *Tank 7 & 8 Tank Forced Ventilation CONOP* on April 17, 2024; responses to regulator comments on May 2 and 17, 2024; and a revised CONOP on May 17, 2024. We received the *NCTF Tank Venting Operations Order* on May 21, 2024; responses to regulator comments on May 23, 2024; and a revised OPORD on May 28, 2024. Based on the information provided, the DOH approves the CONOP and OPORD on the conditions that:

14. The NCTF-RH hosts a walkthrough for the DOH to observe spill diversion and control measures before executing the OPORD Start (Day 2) 20-inch and 12-inch motor operated valves removal. Any comments from the DOH must be addressed before the valve removal operations.
15. Per the DOH's January 18, 2024 conditional approval of tank cleaning, the NCTF-RH shall provide weekly written updates, including a summary of completed work and any updates to the cleaning schedule.

Rear Admiral Barnett  
May 29, 2024  
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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](mailto:kellyann.lee@doh.hawaii.gov).

Sincerely,

*Kathleen Ho*

KATHLEEN S. HO  
Deputy Director for Environmental Health

cc via email only:

Amy Miller, U.S. Environmental Protection Agency  
Roshni Brahmbhatt, U.S. Environmental Protection Agency  
Claire Trombadore, U.S. Environmental Protection Agency  
Andrew Suesse, U.S. Environmental Protection Agency  
Matthew Cohen, U.S. Environmental Protection Agency  
Ash Nieman, U.S. Environmental Protection Agency  
Jamie Marincola, U.S. Environmental Protection Agency  
RDML Marc Williams, NCTF-RH  
CAPT James Sullivan, NCTF-RH  
CAPT Milton Washington, NCTF-RH  
CAPT Steven Stasick, NCTF-RH  
Sherri Eng, NCTF-RH  
Milton Johnston, NCTF-RH  
Joshua Stout, NCTF-RH



**AIR QUALITY MONITORING (AQM)  
NOTIFICATION AND TRIGGERS  
OPERATION ORDER (OPORD)**

**31 May 2024**



## Section 1 - Operational Overview

The Navy Closure Task Force – Red Hill (NCTF) is in the process of cleaning the fuel storage tanks in the Red Hill Bulk Fuel Storage Facility (RHBFSF). The closure process will involve 3 phases:

- 1) Floating the sludge. This process involves adding water to the sludge still contained in the bottom of the tanks. The water will help to lift the sludge for easier removal and to help float any residual fuel trapped within the sludge. The water will remain in the tank for approximately The water and fuel residue will be piped to a storage tank for sent for disposal at a permitted treatment facility. This process will be repeated a second time.
- 2) The second water fill will be maintained in the tank and the ventilation started to evacuate the VOCs from the tank until air quality levels are achieved to ensure human safety during the manual removal of the sludge. When air quality levels have been reached the water will be drained in preparation for the manual removal of the sludge.
- 3) The ventilation will cease once all the sludge has been removed and the tank washed.

## Section 2 - Tank Ventilation and Air Quality Monitoring (AQM) Overview

- 1) **Tank Ventilation.** The tanks will be connected to a fan in the Lower Tunnel (LT) that will force air into the bottom of the tank, circulate the air inside the tank and force the air out of the tank through the attached air ducts in the Upper Tunnel (UT) out (b) (3) (A)
- 2) **Air Monitors.** Air monitoring is continuously occurring inside the Red Hill (RH) facility and around the perimeter of RH to ensure the VOC limits are within established limits.
  - a. **Internal AQMs.** There will be 3 AQMs monitoring each tank throughout the tank cleaning. They are located inside the tank, along the vent line in the UT and outside on the stack. The monitors are set to alert if VOC concentrations exceed 30 parts per million by volume (ppmv).
  - b. **External AQMS.** NCTF-RH will have a total of 9 operational air quality monitors prior to executing Tank Ventilation operations. Currently 6 AQM are installed and will complete installation of the additional 2 by COB 24 MAY 24. The final AQM will be installed in the vicinity of the Halawa Correctional Facility by COB 28 MAY 24. NCTF-RH is working closely with DOH to determine the exact locations for the 3 additional AQM. A graphical depiction of locations will be available after 28 MAY 2024.

## Section 3 - Air Quality Monitoring (AQM) Operations

**Hours of Operation:** Ventilation system will be operational between the hours of 0600 and 2000 daily.

### Monitoring:

#### Internal AQM – Normal Operations:

- 1) Active operations between the hours of 0600 and 2000.
- 2) Data is checked and verified continuously throughout the day.
- 3) After 2000, no personnel will be onsite. Data will be reviewed prior to operation start-up the next day.

#### Internal AQM – Troubleshooting and Notifications:

- 1) The DOH criteria to cease operation of the ventilation system is when VOC lbs/hr emitted exceeds the modeled VOC lbs/hr.
- 2) NCTF's internal standard for ceasing ventilation is when the 1-hour TWA of VOC's from the installed meter exceeds 30 ppmv at the stack.

#### Perimeter AQM Normal Operational Status:

- 1) AQMs are actively monitoring 24/7.
- 2) Data is checked and verified for discrepancies only when alarm sounds.

#### Perimeter AQM – Troubleshooting and Notification

- 1) **First trigger.** Perimeter AQM station exceeds 20 ppm VOC.
- 2) **First AQM System Notification Alert.** The AQM system will automatically notify NCTF EV staff when 20 ppmv is reached.
- 3) NCTF contractors will go to the monitors to check on the cause, make repairs if needed and communicate with the Ventilation System Operators to see if there is an issue.
- 4) Consider this the troubleshooting phase and it will require communication between the ventilation system operators and NCTF staff to evaluate the cause and potentially institute corrective actions.
- 5) **Second AQM system notification** to NCTF-RH staff will be made when an AQM station reaches 38 ppmv initially.
- 6) **Third system notification alert** will be made by the system when an AQM station reaches a 1 hour TWA of 38 ppmv VOCs.
- 7) An exceedance of a 1 hour TWA >38 ppm will require the cessation of ventilation activities, notification to DOH and public notification.
- 8) It is the responsibility of NCTF's Air Manager, Compliance Lead or as back up the EV Director to institute the call tree exercised yesterday.
- 9) The Commander or Deputy Commander are the second level Notifiers to Honolulu DEM and HI EMA to ask to use the established electronic public safety notification

system to transmit information quickly and efficiently to a geographically targeted audience.

- 10) Additionally public notification will be made through the NCTF website, app and press releases and by phone to DOH and DOC.



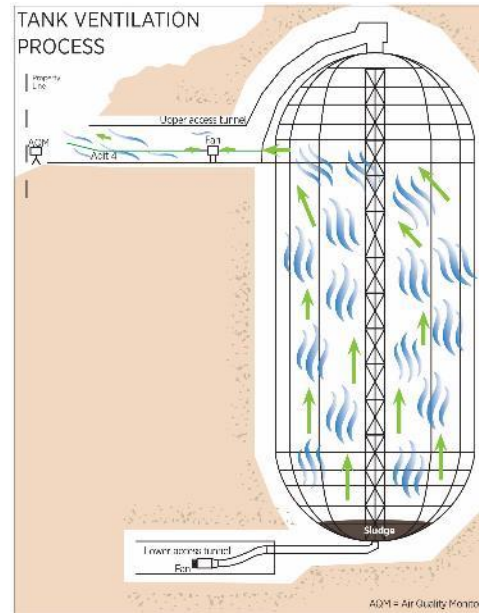
# Tank Ventilation Operational Overview & Risk Management

APTIM Office - Adit 4

(b) (3) (A)

- Daily AQM Calibration at 0600
- N45 and Aptim will monitor VOC
- AECOM will provide hourly AQM readings to N6 for processing and PAO public release via App

(b) (3) (A)

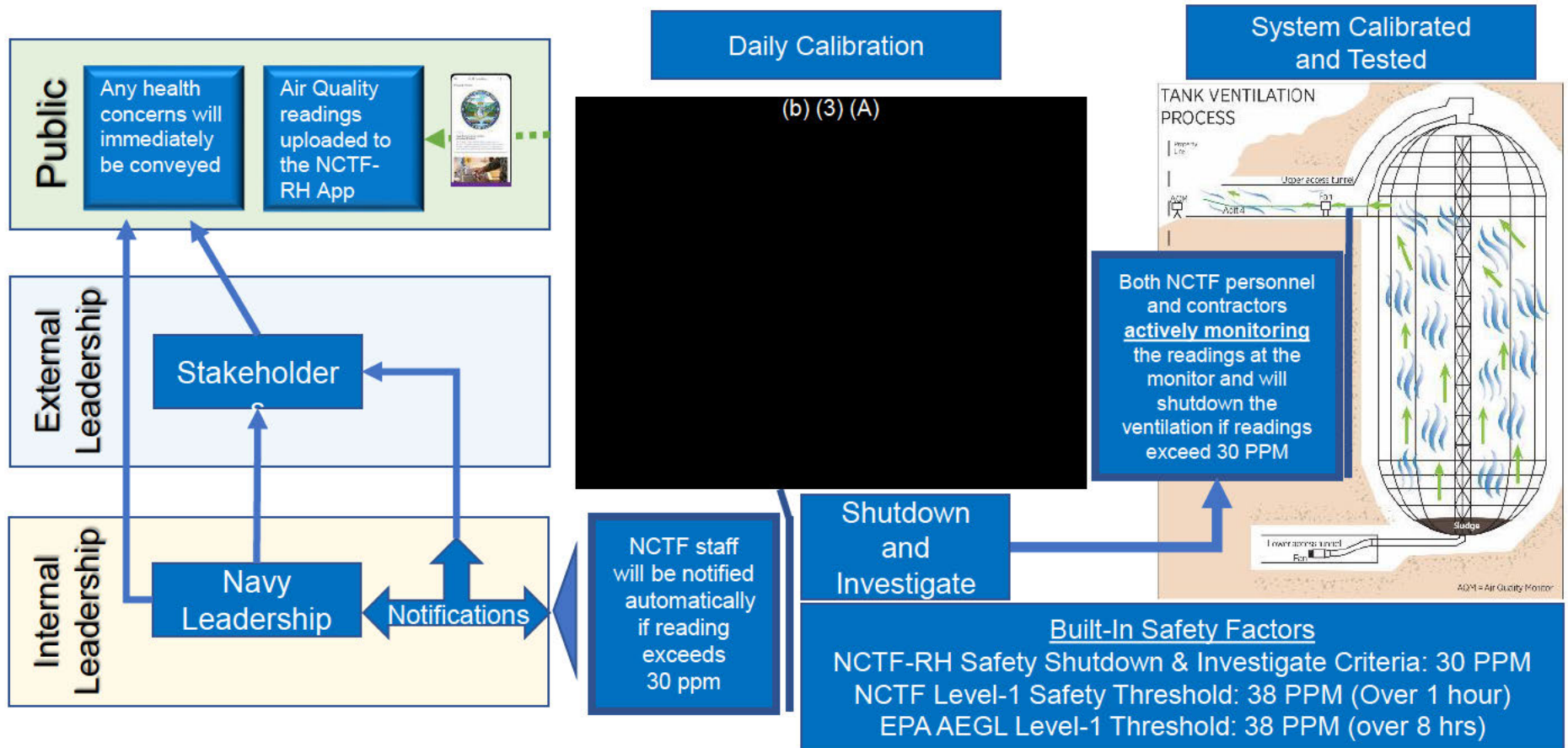


- Sensors will be calibrated on 5/28
- Computer is hardwired
- N45, N4 Aptim Expert will monitor VOC and flow rate
- N4 email DOH hourly requirements from Stack

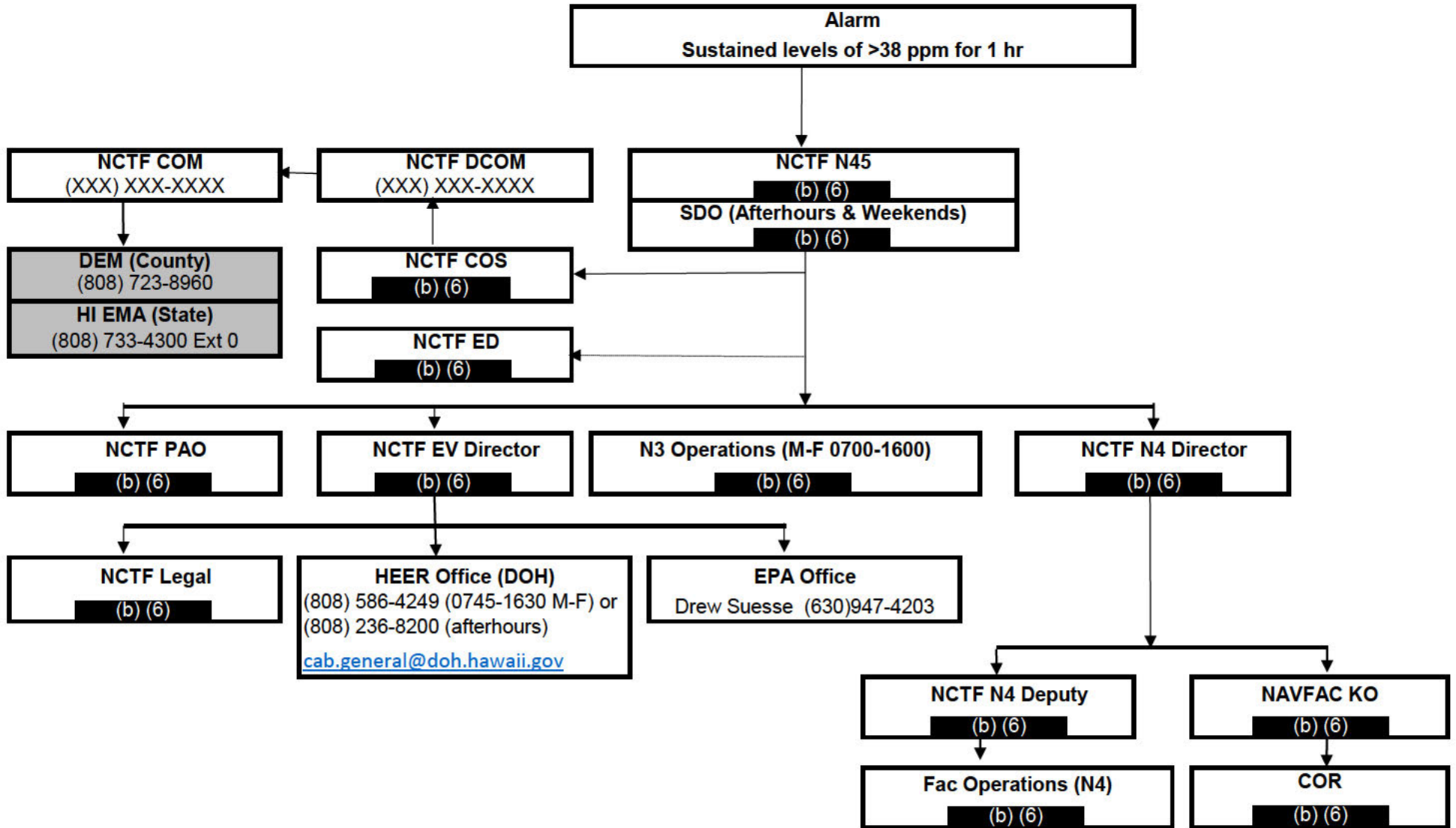
**SAFE.DELIBERATE.ENGAGED.COMMITTED.**



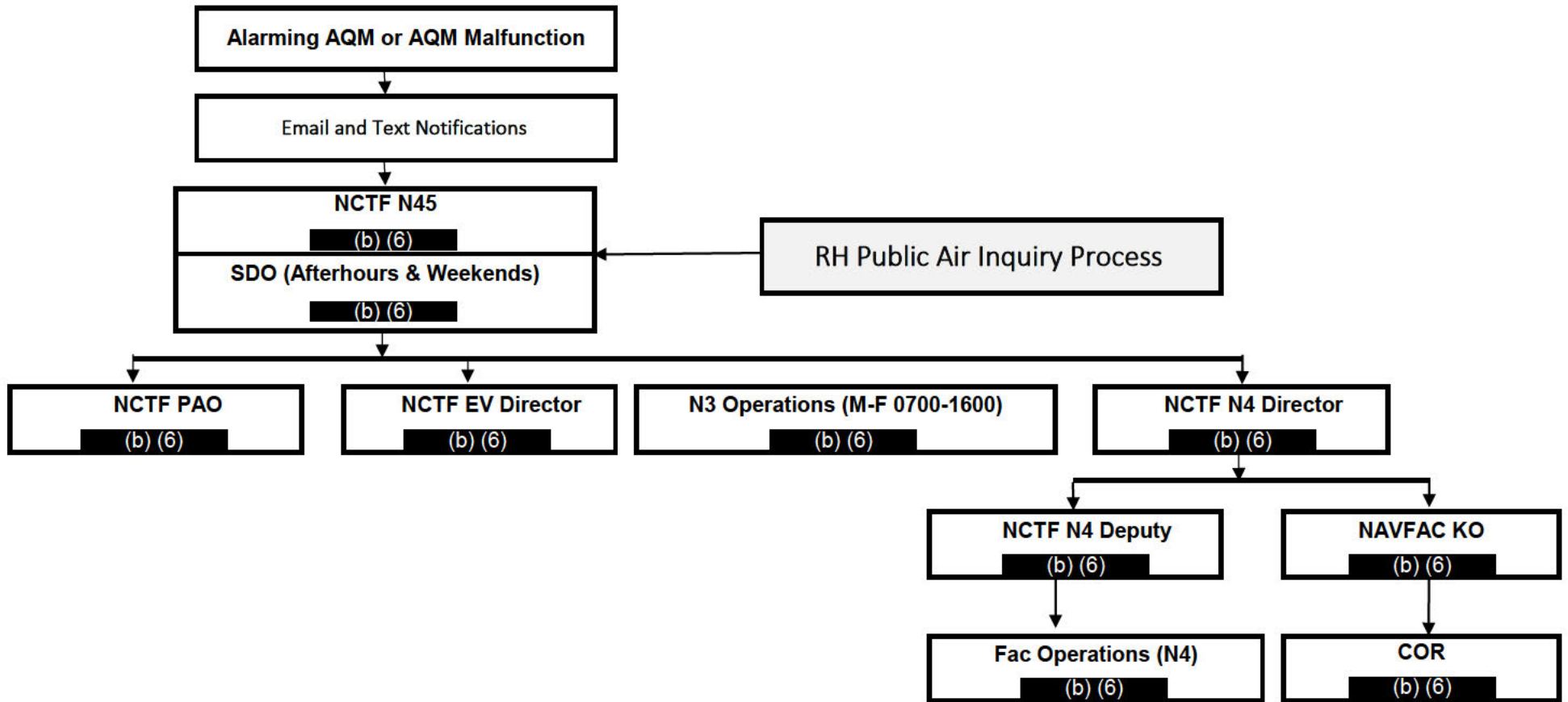
# Tank Ventilation Operational Overview & Risk Management



# EMERGENCY AIR RELEASE NOTIFICATION TREE



# OPERATIONAL AIR RELEASE NOTIFICATION TREE



# AIR QUALITY MODELING

FOR

## NAVY CLOSURE TASK FORCE - RED HILL TANK CLEANING VENTILATION AIR QUALITY MONITORING PLAN

*Prepared by*



NAVFAC PACIFIC

258 Makalapa Drive, JBPHH, HI 96860, USA

May 28, 2024 (update)

Enclosure (1)



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## **BACKGROUND**

The Hawai'i Department of Health (DOH), citing authority under the May 6, 2022 Superseding Emergency Order (EO), asked the U.S. Department of the Navy (Navy) to submit and receive DOH's approval for an Air Quality Monitoring Plan prior to commencing forced air ventilation in preparation for the cleaning of the underground fuel storage tanks at the Red Hill Bulk Fuel Storage Facility (RHBFSF). The forced air ventilation and cleaning is required as part of the ultimate closure of the fuel tanks and decommissioning of RHBFSF.

Navy Closure Task Force - Red Hill (NCTF-RH) Tank Cleaning Ventilation Air Quality Monitoring Plan (the Plan), dated April 12, 2024, was submitted to DOH for approval prior to commencing forced ventilation activities at RHBFSF. Tank forced ventilation activities will exhaust air pollutants into the atmosphere through a single stack. Subsequently, on April 22, 2024 DOH, in consultation with EPA, directed NCTF-RH to demonstrate the forced air ventilation activities will not cause or contribute to the endangerment of human health through air quality modeling using maximum potential pound per hour emission rates. The air modeling results outlined in this report include the model input and output files along with a depiction of where the highest concentrations are projected to occur.

DOH's April 22, 2024 letter and May 2, 2024 clarifying email requires NCTF-RH to demonstrate ambient concentrations of volatile organic compounds (VOC), naphthalene, and benzene caused by forced ventilation activities are within specified thresholds using air quality modeling (see Table 1).

**Table 1. Pollutant Thresholds**

<b>Pollutant</b>	<b>Averaging Period</b>	<b>Threshold (mg/m<sup>3</sup>)</b>	<b>Basis (DOH)</b>
VOC	15-day	2	Sub-chronic health risk from the Agency for Toxic Substances and Disease Registry
	Annual	0.13	April 2024 DOH Total Petroleum Hydrocarbon (TPH) Environmental Action Level (EAL) for vapors from middle distillate fuels
Naphthalene	8-hr	0.520	1/100th of the threshold limit value-time weighted average (TLV-TWA) (sub-chronic health risk) [52 mg/m <sup>3</sup> ]
	Annual	0.124	1/420th of the TLV-TWA (chronic health risk) [52 mg/m <sup>3</sup> ]
Benzene	24-hr	0.029	EPA Dose-Response Assessment Tables, Table 2. Acute Dose-Response Values for Screening Risk Assessments, ATSDR minimal risk levels for no adverse effects
	Annual	0.0063	April 2024 DOH EAL

## DISPERSION MODEL

Air quality impacts were estimated with the AERMOD Modeling System: AERMOD (23132), AERMAP (18081), and BPIPFRM (04274). AERMET and AERSURFACE were not executed for this analysis because AERMOD-ready meteorological data was provided by DOH.

## EMISSION SOURCE

Air pollutants will be exhausted from the tank at a maximum flow rate of 10,000 cubic feet per minute (CFM) and mixed with fresh air before exhausting into the atmosphere through a stack with flow rates ranging between 40,000 CFM and 80,000 CFM. The exhaust flow was modeled at ambient temperature due to the proportion of fresh air to tank air (3:1 to 7:1). The stack was modeled as a point source with diameter of (b) (3) (A) for a range of flow rates, with horizontal or vertical orientations, and three (3) heights (see Table 2).

Table 2. Stack Data

Scenario ID	Flow Rate (CFM)	Orientation	Height
HRZ40	40,000	Horizontal	(b) (3) (A)
HRZ50	50,000		
HRZ60	60,000		
HRZ70	70,000		
HRZ80	80,000		
VRT40	40,000	Vertical	
VRT50	50,000		
VRT60	60,000		
VRT70	70,000		
VRT80	80,000		
V5_40	40,000		
V10_40			

The stack coordinates and elevation are (b) (3) (A), respectively. The elevation was determined using AERMAP and 3D Elevation Program (3DEP) 1 arc-second digital elevation model (DEM), downloaded from The National Map Viewer in compressed GeoTIFF and converted to uncompressed GeoTIFF using the Geospatial Data Abstraction Library. The stack location is shown in Figure 2 and Figure 3.

The modeled emission rates for ventilating jet fuel (JP-5 and F-24) tanks and diesel fuel (F-76) tanks are based on calculations by APTIM Federal Services (APTIM), which were previously submitted to DOH (see Attachment 1). NCTF-RH obtained clarification from APTIM that the maximum daily average emissions are equivalent to maximum potential 1-hr emission rates, i.e., maximum concentration at maximum flow rate for all hours of the day. Modeled maximum potential 1-hr emission rates vary by cleaning scenario: one tank at a time or 2 tanks concurrently (see Table 3).

**Table 3. Maximum Potential 1-Hr Emission Rates**

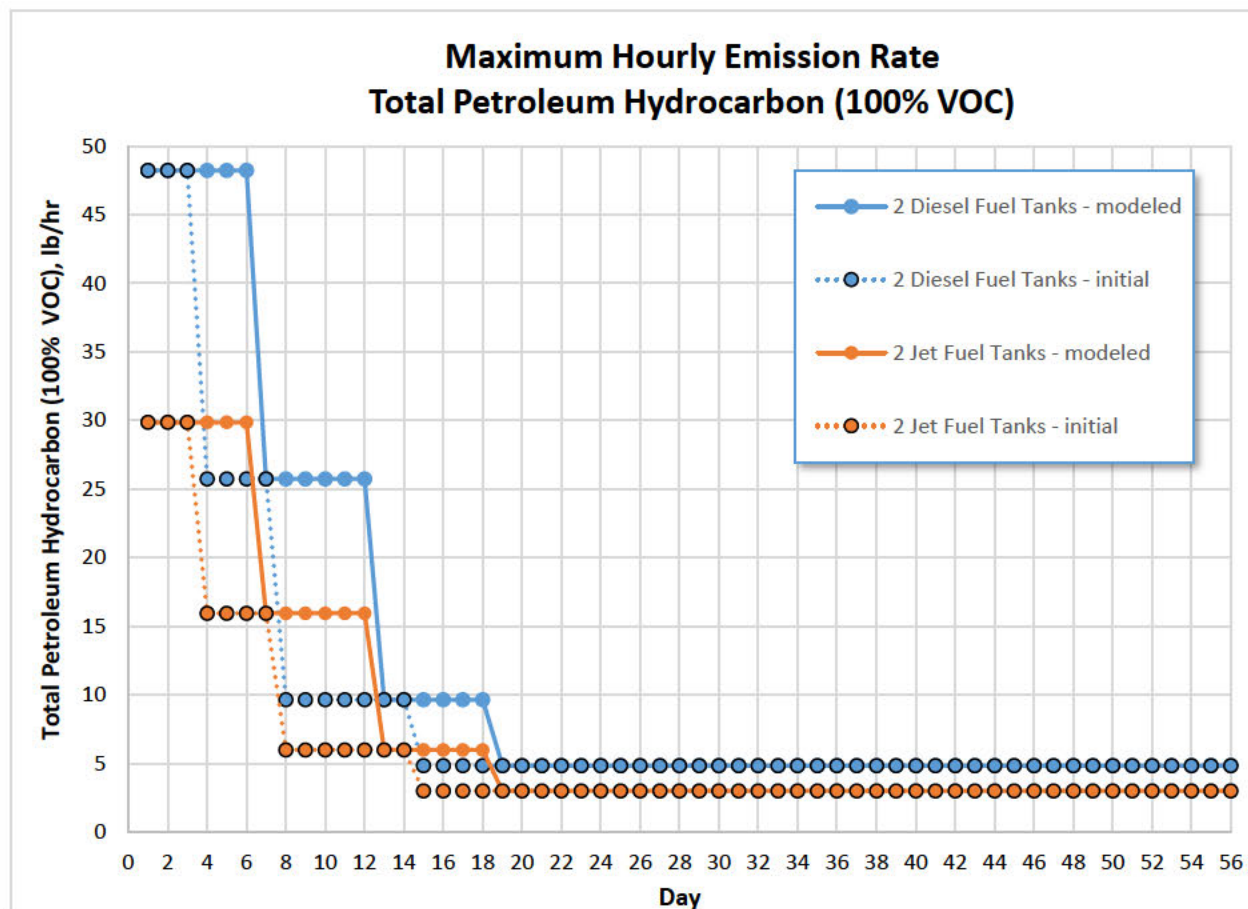
Scenario ID	# Tanks Cleaned Concurrently	Modeled Maximum Potential 1-Hr Emission Rate (lb/hr)					
		Diesel Fuel Tank			Jet Fuel Tank		
		VOC	Naphthalene	Benzene	VOC	Naphthalene	Benzene
HRZ40, HRZ50, HRZ60, HRZ70, HRZ80	1	24.1	0.051	0.132	15.0	0.011	0.19
VRT40, VRT50, VRT60, VRT70, VRT80, V5_40, V10_40	2	48.2	0.10	0.264	29.9	0.021	0.39

The proposed plan is to ventilate six (6) tanks per year. Modeled annual emissions for six tanks are based on maximum hourly emissions expected for completing cleaning in 56 days. For modeling, conservatism was added to APTIM’s initial estimates by increasing the number of days at higher emission levels (parts per million by volume, ppmv) (see Table 4 and Figure 1), e.g., the number of days at 75 ppmv was doubled from three (3) days to six (6) days.

**Table 4. Calculation of Annual Emission Rates**

Day	Initial VOC (ppmv)	Modeled VOC (ppmv)	Modeled Maximum Potential 1-hr Emission Rate (lb/hr)					
			2 Diesel Fuel Tanks			2 Jet Fuel Tanks		
			VOC	Naphthalene	Benzene	VOC	Naphthalene	Benzene
1	75	75	48.2	0.10	0.26	29.9	0.021	0.39
2	75	75	48.2	0.10	0.26	29.9	0.021	0.39
3	75	75	48.2	0.10	0.26	29.9	0.021	0.39
4*	40	75	48.2	0.10	0.26	29.9	0.021	0.39
5*	40	75	48.2	0.10	0.26	29.9	0.021	0.39
6*	40	75	48.2	0.10	0.26	29.9	0.021	0.39
7	40	40	25.7	0.054	0.14	15.9	0.011	0.21
8*	15	40	25.7	0.054	0.14	15.9	0.011	0.21
9*	15	40	25.7	0.054	0.14	15.9	0.011	0.21
10*	15	40	25.7	0.054	0.14	15.9	0.011	0.21
11*	15	40	25.7	0.054	0.14	15.9	0.011	0.21
12*	15	40	25.7	0.054	0.14	15.9	0.011	0.21
13	15	15	9.7	0.020	0.053	6.0	0.0042	0.077
14	15	15	9.7	0.020	0.053	6.0	0.0042	0.077
15*	7.5	15	9.7	0.020	0.053	6.0	0.0042	0.077
16*	7.5	15	9.7	0.020	0.053	6.0	0.0042	0.077
17*	7.5	15	9.7	0.020	0.053	6.0	0.0042	0.077
18*	7.5	15	9.7	0.020	0.053	6.0	0.0042	0.077
19-56	7.5	7.5	4.8	0.010	0.026	3.0	0.0021	0.039
Annual ER – 2 tanks (lb/yr)			16436	34	90	10174	7	131
<b>Annual ER - 6 tanks (lb/hr)</b>			<b>5.6</b>	<b>0.012</b>	<b>0.031</b>	<b>3.5</b>	<b>0.0025</b>	<b>0.045</b>
Notes: *= day modeled with higher emission level [column 3] than APTIM's initial estimate [column 2]; ER = emission rate; Annual ER - 2 tanks (lb/yr) = Sum 56 days (Modeled Maximum Potential 1-hr Emission Rate (lb/hr) x 24 hr/day); Annual ER - 6 tanks (lb/hr) = Annual for 2 tanks (lb/yr) x 3 (for 6 tanks) ÷ 8760 hr/yr.								

Figure 1. Maximum Hourly Emission Rates for Total Petroleum Hydrocarbon by Day



**BUILDINGS/STRUCTURES**

Buildings and structures that could cause downwash of the exhaust plume were identified. Heights and elevations of the buildings and structures are listed in Table 5. Elevations were determined with AERMAP and 1 arc-second 3DEP DEM. Downwash parameters for the stack were determined with BPIPPRM (04274).

Table 5. Building/Structure Heights and Elevations

Buildings/Structure	Height (ft)	Elevation (m)
(b)	(3)	(A)

**AMBIENT AIR RECEPTORS**

Ambient air receptors (height = 0 m) were placed outside of the fenced property at the following spacing (see [Figure 4](#)). Receptors elevations were estimated with AERMAP and 1 arc-second 3DEP DEM.

- Along the fenceline – approximately and no greater than 25 m;
- ~ 500 m from the stack – 25 m;
- ~ 500 m to ~1 km from the stack – 50 m.

**METEOROLOGICAL DATA**

AERMOD-ready meteorological data for Daniel K. Inouye International Airport (HNL) was provided by DOH. This five (5) year dataset, 2019 – 2023, was processed with Lihue Airport upper air data using AERMET (23132) and the ADJ\_U\* option. The wind rose for this dataset is presented in [Figure 5](#).

**MODEL OPTIONS**

AERMOD was executed with RURAL dispersion only.

**SUMMARY AND CONCLUSIONS**

A unit emission rate of 1 gram per second (g/s) was modeled to allow for development of operational scenarios by varying activity emission rates. Table 7 summarizes 8-hr, 24-hr, month, and annual concentrations per the unit emission rate. Concentrations for the unit emission rate are multiplied by the emission rate in Table 3 and Table 4 to obtain ambient air impacts for each scenario in Table 2, which are compared to the pollutant thresholds in Table 1.

The impact concentrations for each scenario are presented in Table 7. All scenarios have impacts below the pollutant thresholds in Table 1. The highest impacts occur along the fence, which can be seen in Figure 6 through Figure 9 for scenario HRZ40, a horizontal stack with a flow rate of 40,000 CFM.

The results presented in Table 7 demonstrate ambient concentrations of VOC, naphthalene, and benzene are within the specified thresholds in Table 1 for the tank cleaning and forced ventilation configurations summarized in Table 8.

**Table 6. Modeled Concentrations for Emission Rate = 1 g/s**

Scenario ID	Maximum Modeled Concentration ( $\mu\text{g}/\text{m}^3$ ) per 1 g/s			
	8-hr	24-hr	Month	Annual
HRZ40	184.0277	117.64846	30.33921	22.92953
HRZ50	183.97384	117.37655	30.33332	22.92337
HRZ60	183.92529	117.13858	30.32815	22.91795
HRZ70	183.88072	116.9255	30.32349	22.91308
HRZ80	183.83928	116.73167	30.31924	22.90863
VRT40	181.75507	76.22718	27.82828	20.72115
VRT50	181.69737	74.58021	27.03157	20.11773
VRT60	181.65529	73.57739	26.40392	19.62445
VRT70	181.62104	72.94469	25.86912	19.20453
VRT80	181.59129	72.53071	25.37962	18.82936
V5_40	130.23315	63.09945	26.5445	19.67768
V10_40	118.49713	58.77909	25.02102	18.46582



**Table 7. Ambient Air Pollutant Concentrations**

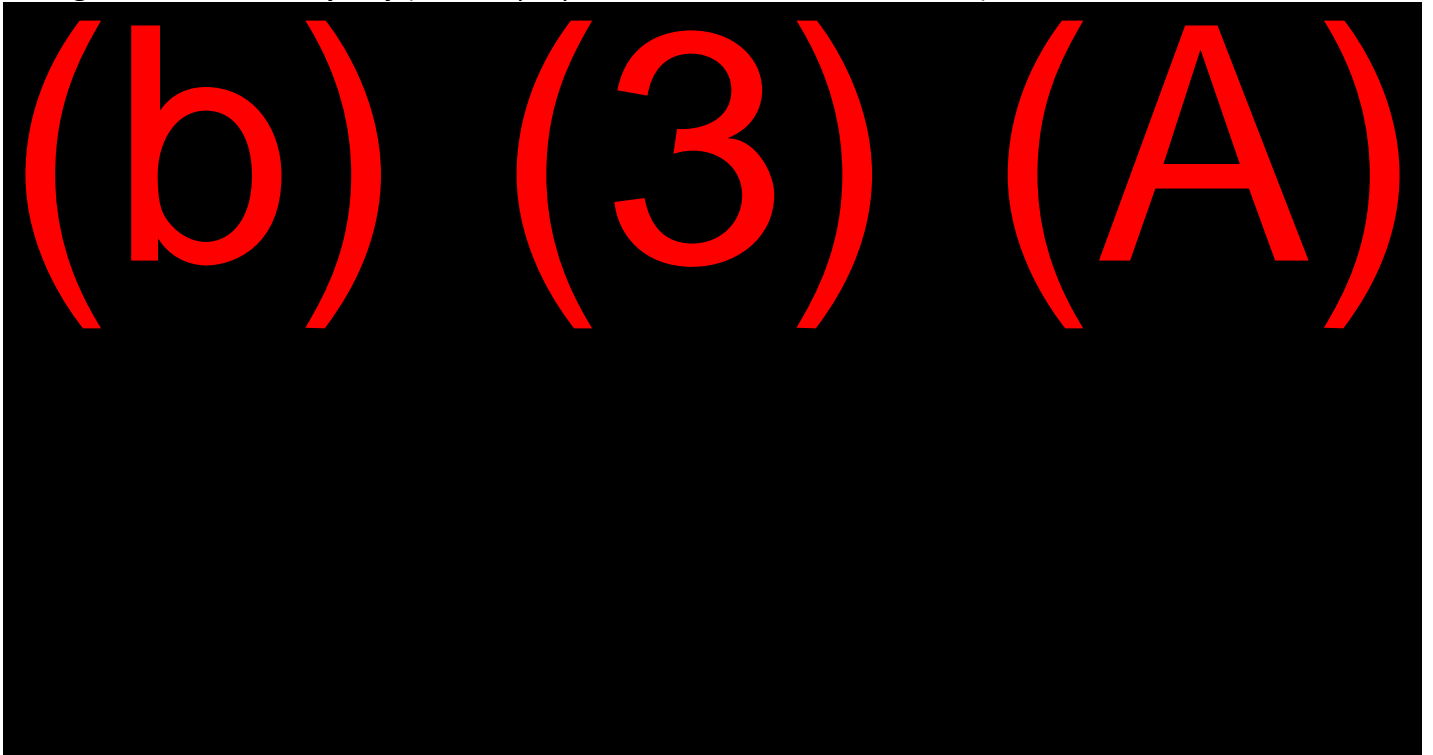
Scenario ID	Ambient Air Concentration ( $\mu\text{g}/\text{m}^3$ ) for Diesel Tanks / Jet Fuel Tanks						All Pollutants $\leq$ Threshold?
	VOC		Naphthalene		Benzene		
	Month	Annual	8-hr	Annual	24-hr	Annual	
HRZ40	184.3 / 114.3	16.3 / 10.1	2.3 / 0.5	0.03 / 0.01	3.9 / 5.7	0.1 / 0.1	YES
HRZ50	184.2 / 114.3	16.3 / 10.1	2.3 / 0.5	0.03 / 0.01	3.9 / 5.7	0.1 / 0.1	YES
HRZ60	184.2 / 114.3	16.3 / 10.1	2.3 / 0.5	0.03 / 0.01	3.9 / 5.7	0.1 / 0.1	YES
HRZ70	184.2 / 114.2	16.2 / 10.1	2.3 / 0.5	0.03 / 0.01	3.9 / 5.7	0.1 / 0.1	YES
HRZ80	184.1 / 114.2	16.2 / 10.1	2.3 / 0.5	0.03 / 0.01	3.9 / 5.7	0.1 / 0.1	YES
VRT40	169 / 104.8	14.7 / 9.1	2.3 / 0.5	0.03 / 0.01	2.5 / 3.7	0.1 / 0.1	YES
VRT50	164.2 / 101.8	14.3 / 8.8	2.3 / 0.5	0.03 / 0.01	2.5 / 3.6	0.1 / 0.1	YES
VRT60	160.4 / 99.5	13.9 / 8.6	2.3 / 0.5	0.03 / 0.01	2.4 / 3.6	0.1 / 0.1	YES
VRT70	157.1 / 97.5	13.6 / 8.4	2.3 / 0.5	0.03 / 0.01	2.4 / 3.5	0.1 / 0.1	YES
VRT80	154.1 / 95.6	13.4 / 8.3	2.3 / 0.5	0.03 / 0.01	2.4 / 3.5	0.1 / 0.1	YES
V5_40	161.2 / 100	14 / 8.6	1.7 / 0.3	0.03 / 0.01	2.1 / 3.1	0.1 / 0.1	YES
V10_40	152 / 94.3	13.1 / 8.1	1.5 / 0.3	0.03 / 0.01	2 / 2.9	0.1 / 0.1	YES
Threshold	2000 (15-day)*	130	520	124	29	6.3	-

Note: \*DOH confirmed use of a month average for comparison to the 15-day (sub-chronic) threshold.

**Table 8. Tank Cleaning and Forced Ventilation Configurations**

# Tanks Cleaned Concurrently	Stack		Exhaust Flow Rate (CFM)
	Orientation	Height	
2	Horizontal	(b) (3) (A)	40,000 – 80,000
2	Vertical	(b) (3) (A)	40,000 – 80,000
2	Vertical	(b) (3) (A)	40,000 – 80,000
2	Vertical	(b) (3) (A)	40,000 – 80,000

**Figure 2. Fenced Property** (fence = purple, red = stack, blue = structure)



**Figure 3. Stack Location and Structure Footprints (red = stack; footprint = blue rectangle)**

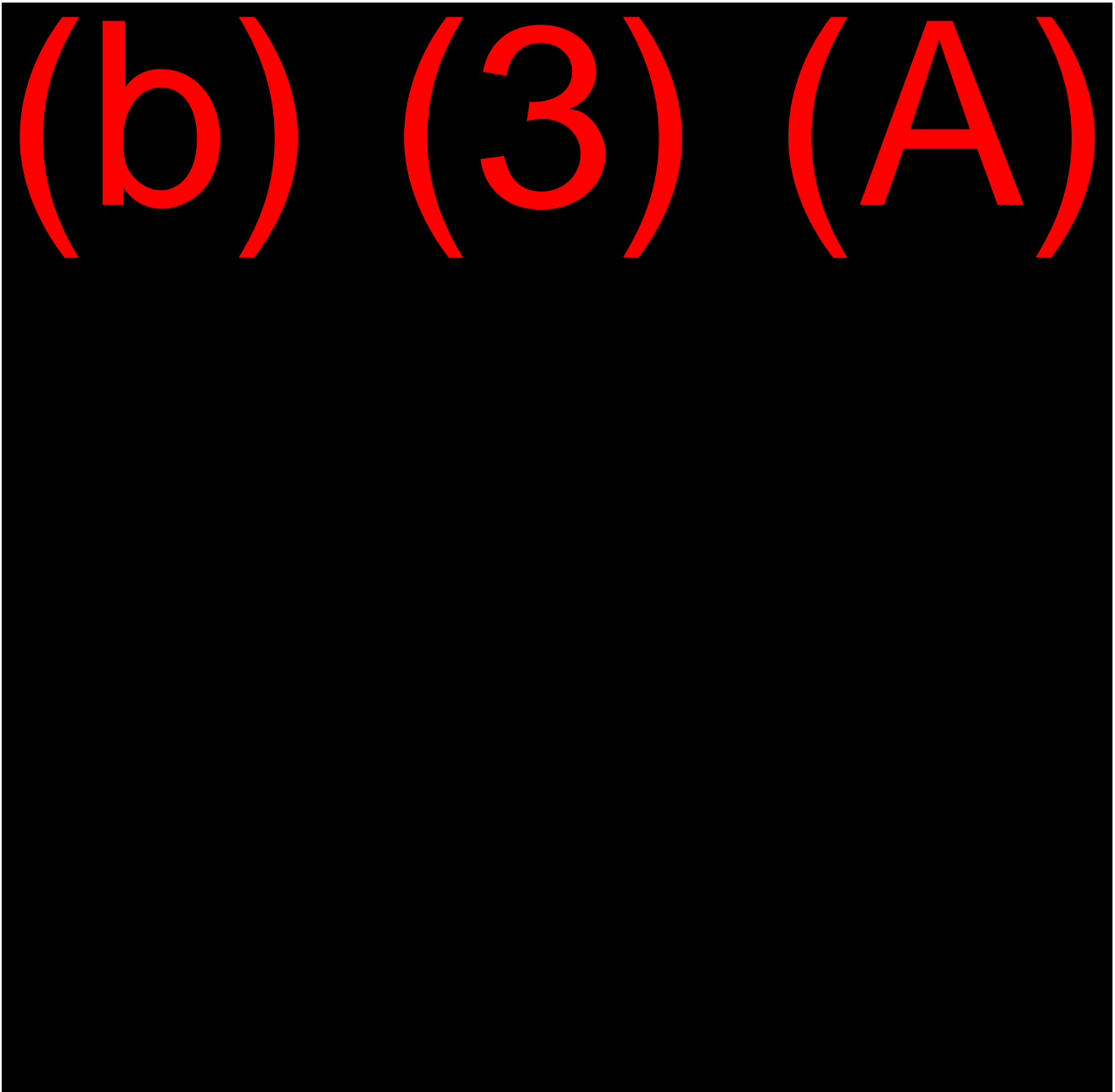


Figure 4. Ambient Air Receptors (yellow crosses)

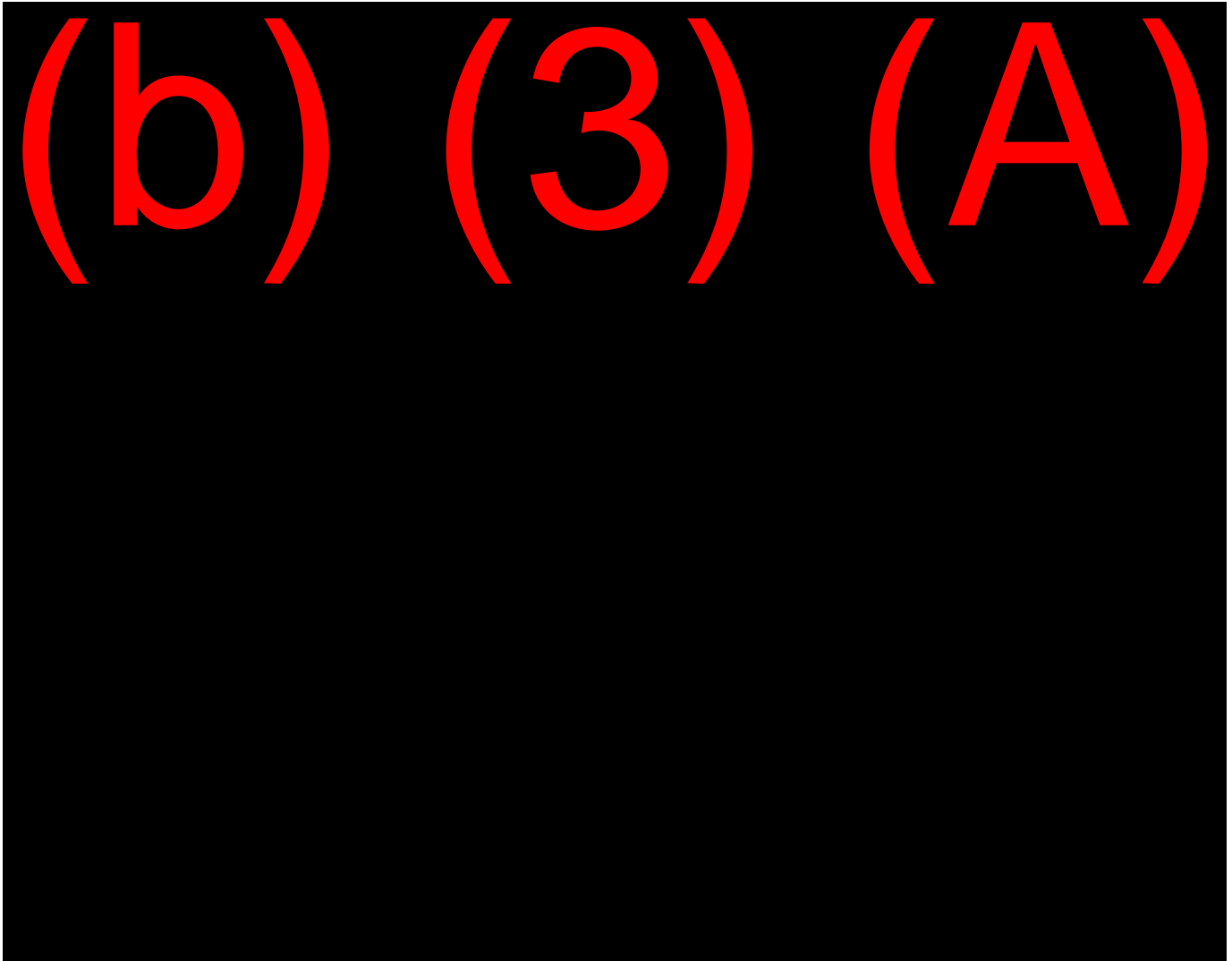


Figure 5. PHNL 2019-2023 Wind Rose

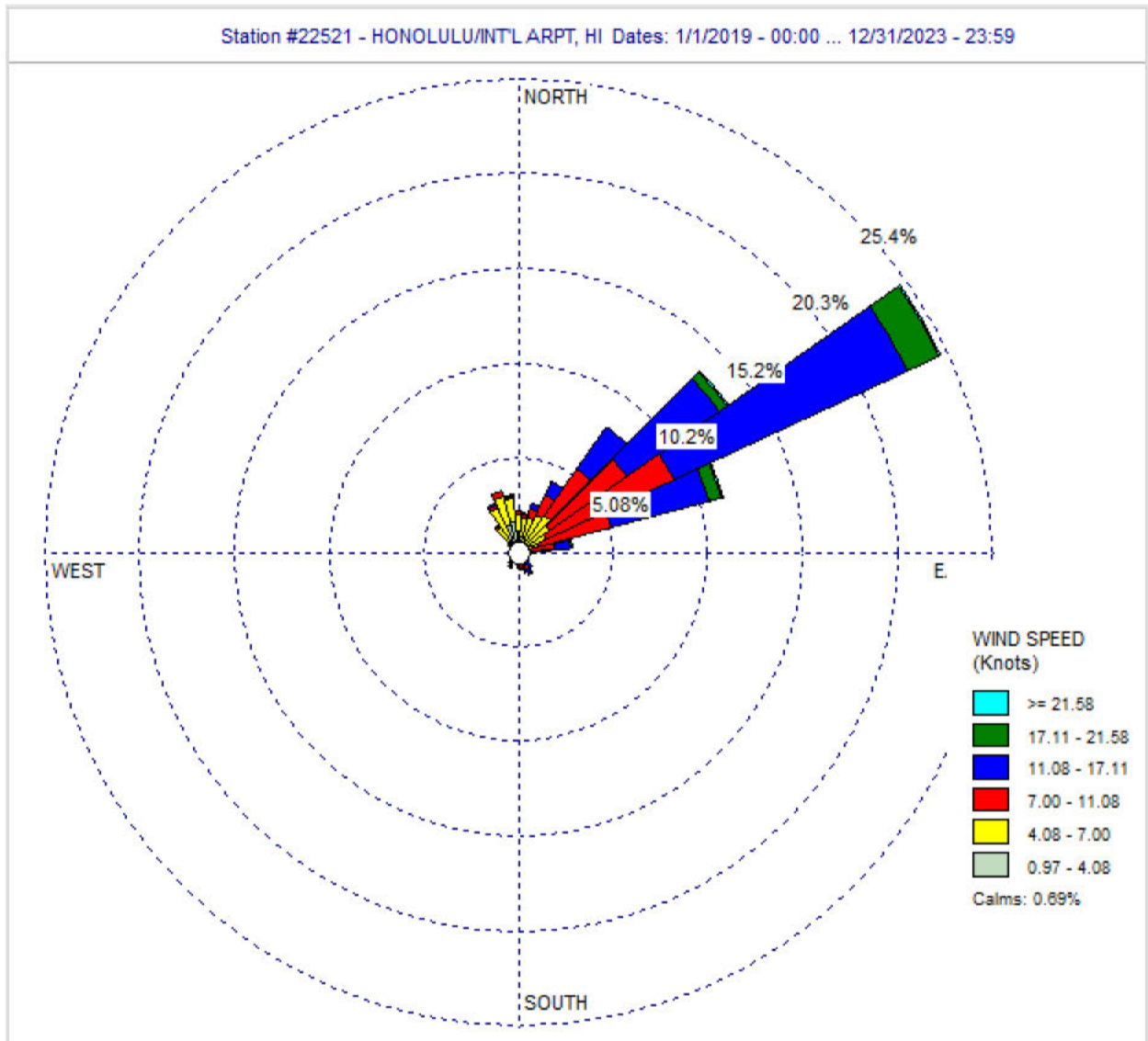
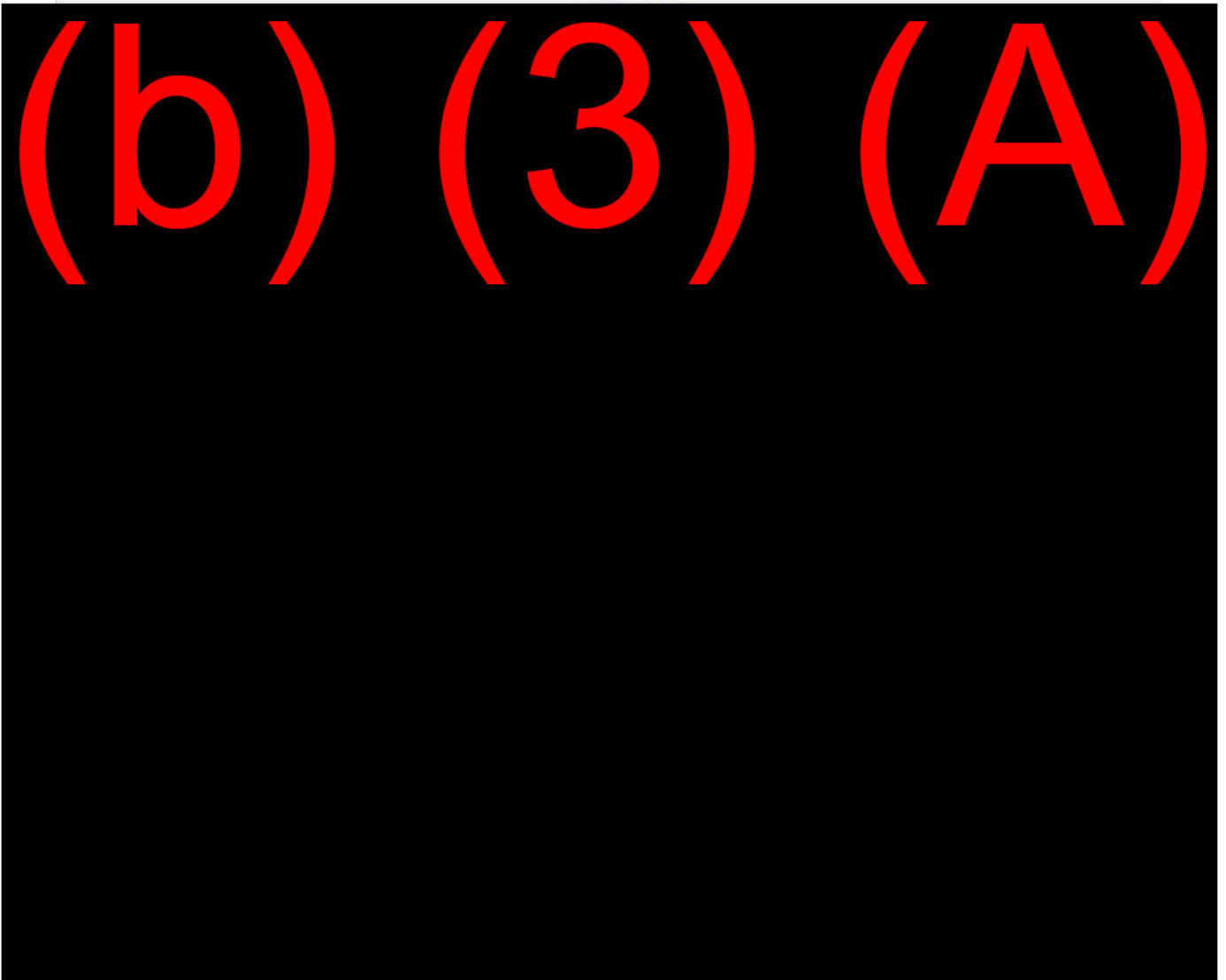
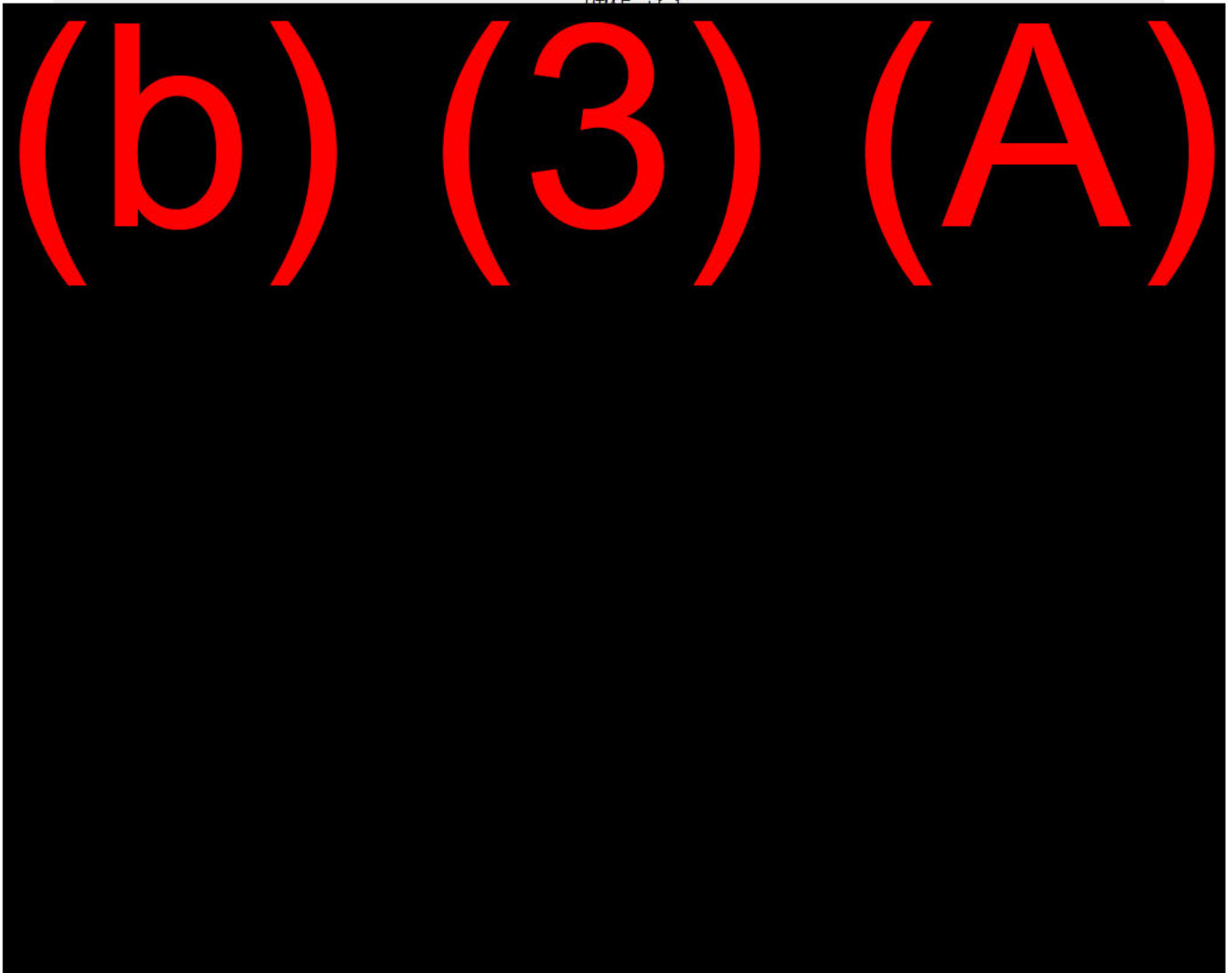


Figure 6. Location of Maximum 8-hr Impacts ( $\mu\text{g}/\text{m}^3$ ) for Scenario HRZ40 with Emission Rate = 1 g/s\*



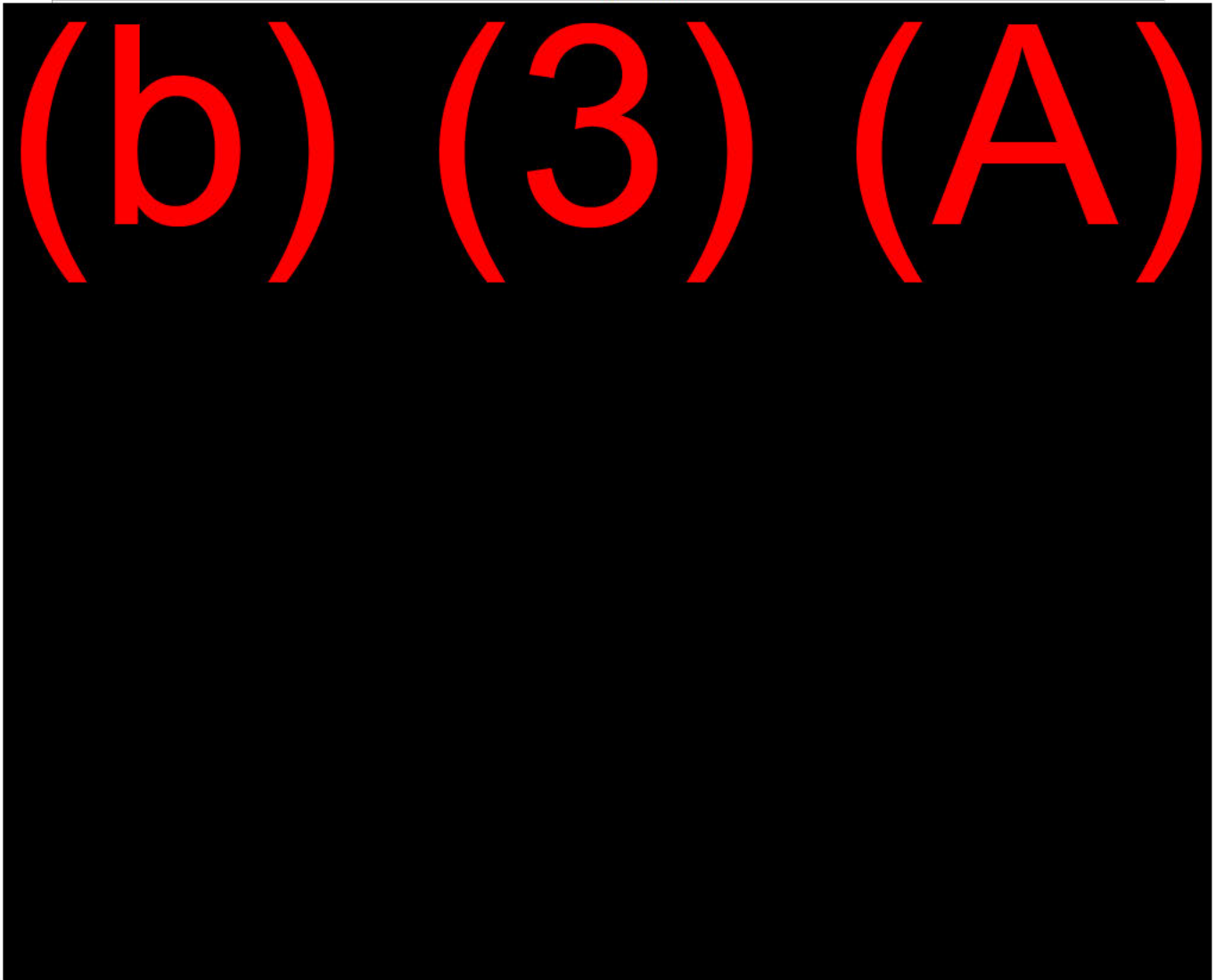
\*Multiply concentrations by emission rates in Table 3 to determine pollutant impacts.

Figure 7. Location of Maximum 24-hr Impacts ( $\mu\text{g}/\text{m}^3$ ) for Scenario HRZ40 with Emission Rate = 1 g/s\*



\*Multiply concentrations by emission rates in Table 3 to determine pollutant impacts.

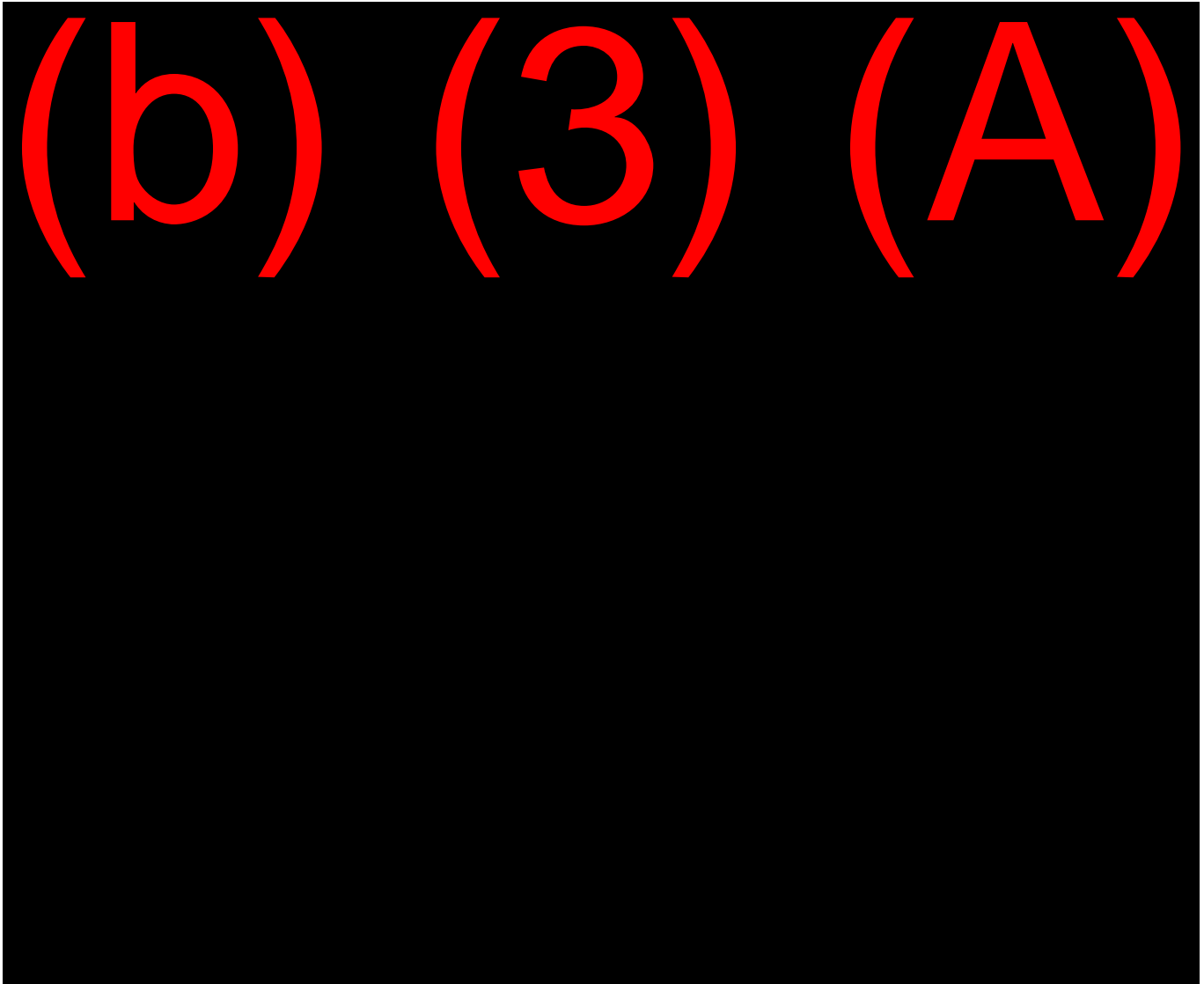
Figure 8. Location of Maximum Month Impacts ( $\mu\text{g}/\text{m}^3$ ) for Scenario HRZ40 with Emission Rate = 1 g/s\*



\*Multiply concentrations by emission rates in Table 3 to determine pollutant impacts.



Figure 9. Location of Maximum Annual (2021) Impacts ( $\mu\text{g}/\text{m}^3$ ) for Scenario HRZ40 with Emission Rate = 1 g/s\*



\*Multiply concentrations by emission rates in Table 4 to determine pollutant impacts.

**ATTACHMENT 1**

**APTIM Federal Services, LLC letter dated March 19, 2024**

RH Tank Ventilation Modeling - Jet Fuel

Enter data

> Threshold

Scenario*	Exhaust Configuration			Maximum Potential Emission Rate (lb/hr)						Maximum Modeled Concentration ( $\mu\text{g}/\text{m}^3$ )				VOC		Naphthalene		Benzene		All Pollutants $\leq$ Threshold?
				VOC		Naphthalene		Benzene		for 1 g/s emission rate				Concentration ( $\mu\text{g}/\text{m}^3$ )		Concentration ( $\mu\text{g}/\text{m}^3$ )		Concentration ( $\mu\text{g}/\text{m}^3$ )		
	Flow Rate (CFM)	Height (ft)	Direction	1-hr	Annual	1-hr	Annual	1-hr	Annual	8-hr	24-hr	month	Annual	month	Annual	8-hr	Annual	24-hr	Annual	
HRZ40	40,000	67(510)	horizontal	29.9	3.48	0.0211	0.00247	0.385	0.0449	184.0277	117.64846	30.33921	22.92953	114.3	10.1	0.5	0.01	5.7	0.1	YES
HRZ50	50,000	67(510)	horizontal	29.9	3.48	0.0211	0.00247	0.385	0.0449	183.97384	117.37655	30.33332	22.92337	114.3	10.1	0.5	0.01	5.7	0.1	YES
HRZ60	60,000	67(510)	horizontal	29.9	3.48	0.0211	0.00247	0.385	0.0449	183.92529	117.13858	30.32815	22.91795	114.3	10.1	0.5	0.01	5.7	0.1	YES
HRZ70	70,000	67(510)	horizontal	29.9	3.48	0.0211	0.00247	0.385	0.0449	183.88072	116.9255	30.32349	22.91308	114.2	10.1	0.5	0.01	5.7	0.1	YES
HRZ80	80,000	67(510)	horizontal	29.9	3.48	0.0211	0.00247	0.385	0.0449	183.83928	116.73167	30.31924	22.90863	114.2	10.1	0.5	0.01	5.7	0.1	YES
VRT40	40,000	67(510)	vertical	29.9	3.48	0.0211	0.00247	0.385	0.0449	181.75507	76.22718	27.82828	20.72115	104.8	9.1	0.5	0.01	3.7	0.1	YES
VRT50	50,000	67(510)	vertical	29.9	3.48	0.0211	0.00247	0.385	0.0449	181.69737	74.58021	27.03157	20.11773	101.8	8.8	0.5	0.01	3.6	0.1	YES
VRT60	60,000	67(510)	vertical	29.9	3.48	0.0211	0.00247	0.385	0.0449	181.65529	73.57739	26.40392	19.62445	99.5	8.6	0.5	0.01	3.6	0.1	YES
VRT70	70,000	67(510)	vertical	29.9	3.48	0.0211	0.00247	0.385	0.0449	181.62104	72.94469	25.86912	19.20453	97.5	8.4	0.5	0.01	3.5	0.1	YES
VRT80	80,000	67(510)	vertical	29.9	3.48	0.0211	0.00247	0.385	0.0449	181.59129	72.53071	25.37962	18.82936	95.6	8.3	0.5	0.01	3.5	0.1	YES
V5_40	40,000	67(510)	vertical	29.9	3.48	0.0211	0.00247	0.385	0.0449	130.23315	63.09945	26.5445	19.67768	100.0	8.6	0.3	0.01	3.1	0.1	YES
V10_40	40,000	67(510)	vertical	29.9	3.48	0.0211	0.00247	0.385	0.0449	118.49713	58.77909	25.02102	18.46582	94.3	8.1	0.3	0.01	2.9	0.1	YES

\* two tanks at a time, 6 tanks annually

Threshold ( $\mu\text{g}/\text{m}^3$ )  
 2000 130 520 124 29 6.3  
 15-day

RH Tank Ventilation Modeling - Diesel

Enter data

> Threshold

Scenario*	Exhaust Configuration			Maximum Potential Emission Rate (lb/hr)						Maximum Modeled Concentration ( $\mu\text{g}/\text{m}^3$ )				VOC		Naphthalene		Benzene		All Pollutants $\leq$ Threshold?
				VOC		Naphthalene		Benzene		for 1 g/s emission rate				Concentration ( $\mu\text{g}/\text{m}^3$ )		Concentration ( $\mu\text{g}/\text{m}^3$ )		Concentration ( $\mu\text{g}/\text{m}^3$ )		
	Flow Rate (CFM)	Height (ft)	Direction	1-hr	Annual	1-hr	Annual	1-hr	Annual	8-hr	24-hr	month	Annual	month	Annual	8-hr	Annual	24-hr	Annual	
HRZ40	40,000	(b) (3) (A)	horizontal	48.2	5.63	0.101	0.0118	0.264	0.0308	184.0277	117.64846	30.33921	22.92953	184.3	16.3	2.3	0.03	3.9	0.1	YES
HRZ50	50,000	(b) (3) (A)	horizontal	48.2	5.63	0.101	0.0118	0.264	0.0308	183.97384	117.37655	30.33332	22.92337	184.2	16.3	2.3	0.03	3.9	0.1	YES
HRZ60	60,000	(b) (3) (A)	horizontal	48.2	5.63	0.101	0.0118	0.264	0.0308	183.92529	117.13858	30.32815	22.91795	184.2	16.3	2.3	0.03	3.9	0.1	YES
HRZ70	70,000	(b) (3) (A)	horizontal	48.2	5.63	0.101	0.0118	0.264	0.0308	183.88072	116.9255	30.32349	22.91308	184.2	16.2	2.3	0.03	3.9	0.1	YES
HRZ80	80,000	(b) (3) (A)	horizontal	48.2	5.63	0.101	0.0118	0.264	0.0308	183.83928	116.73167	30.31924	22.90863	184.1	16.2	2.3	0.03	3.9	0.1	YES
VRT40	40,000	(b) (3) (A)	vertical	48.2	5.63	0.101	0.0118	0.264	0.0308	181.75507	76.22718	27.82828	20.72115	169.0	14.7	2.3	0.03	2.5	0.1	YES
VRT50	50,000	(b) (3) (A)	vertical	48.2	5.63	0.101	0.0118	0.264	0.0308	181.69737	74.58021	27.03157	20.11773	164.2	14.3	2.3	0.03	2.5	0.1	YES
VRT60	60,000	(b) (3) (A)	vertical	48.2	5.63	0.101	0.0118	0.264	0.0308	181.65529	73.57739	26.40392	19.62445	160.4	13.9	2.3	0.03	2.4	0.1	YES
VRT70	70,000	(b) (3) (A)	vertical	48.2	5.63	0.101	0.0118	0.264	0.0308	181.62104	72.94469	25.86912	19.20453	157.1	13.6	2.3	0.03	2.4	0.1	YES
VRT80	80,000	(b) (3) (A)	vertical	48.2	5.63	0.101	0.0118	0.264	0.0308	181.59129	72.53071	25.37962	18.82936	154.1	13.4	2.3	0.03	2.4	0.1	YES
V5_40	40,000	(b) (3) (A)	vertical	48.2	5.63	0.101	0.0118	0.264	0.0308	130.23315	63.09945	26.5445	19.67768	161.2	14.0	1.7	0.03	2.1	0.1	YES
V10_40	40,000	(b) (3) (A)	vertical	48.2	5.63	0.101	0.0118	0.264	0.0308	118.49713	58.77909	25.02102	18.46582	152.0	13.1	1.5	0.03	2.0	0.1	YES

\* two tanks at a time, 6 tanks annually

Threshold ( $\mu\text{g}/\text{m}^3$ )

2000

130

520

124

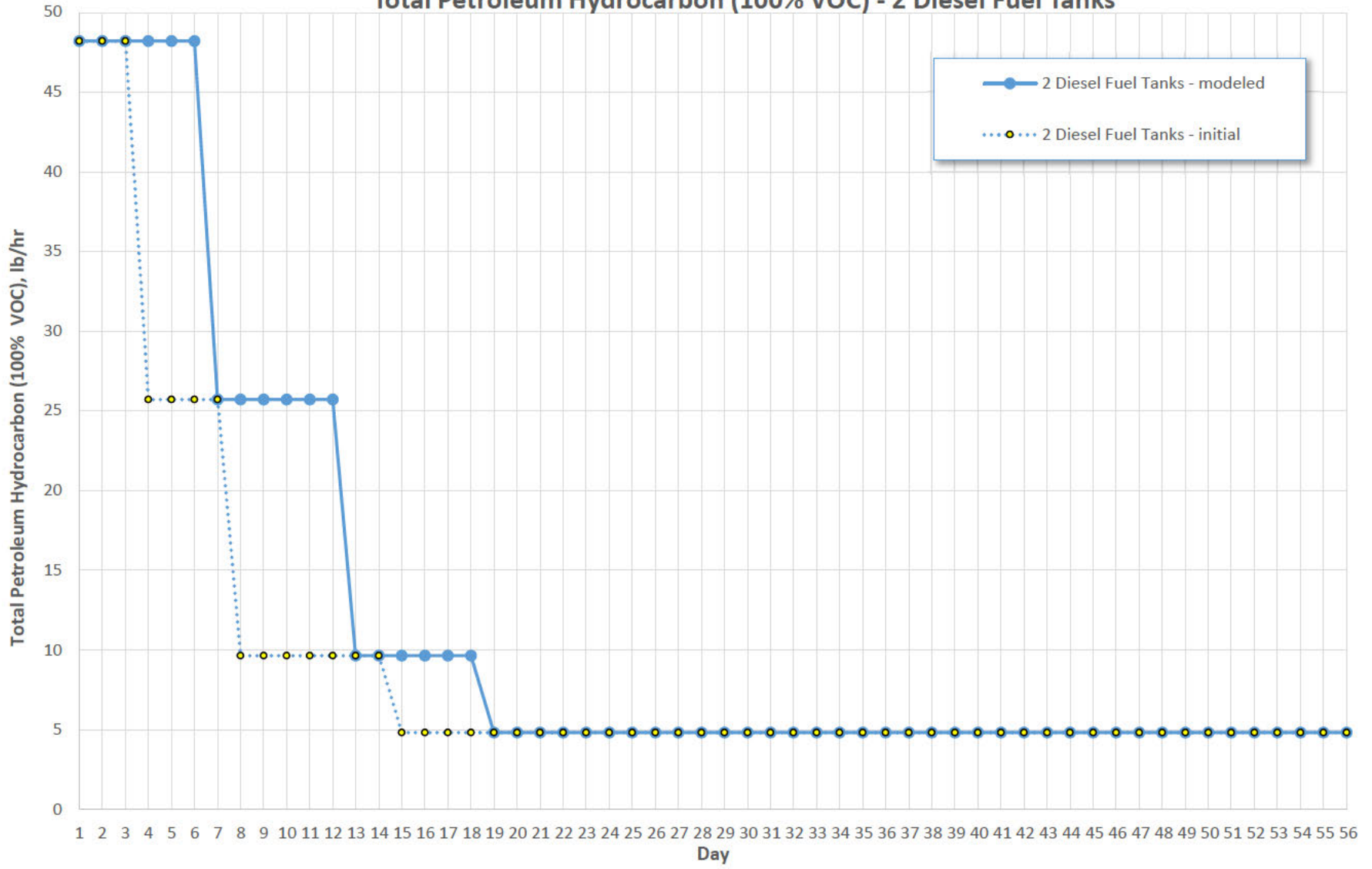
29

6.3

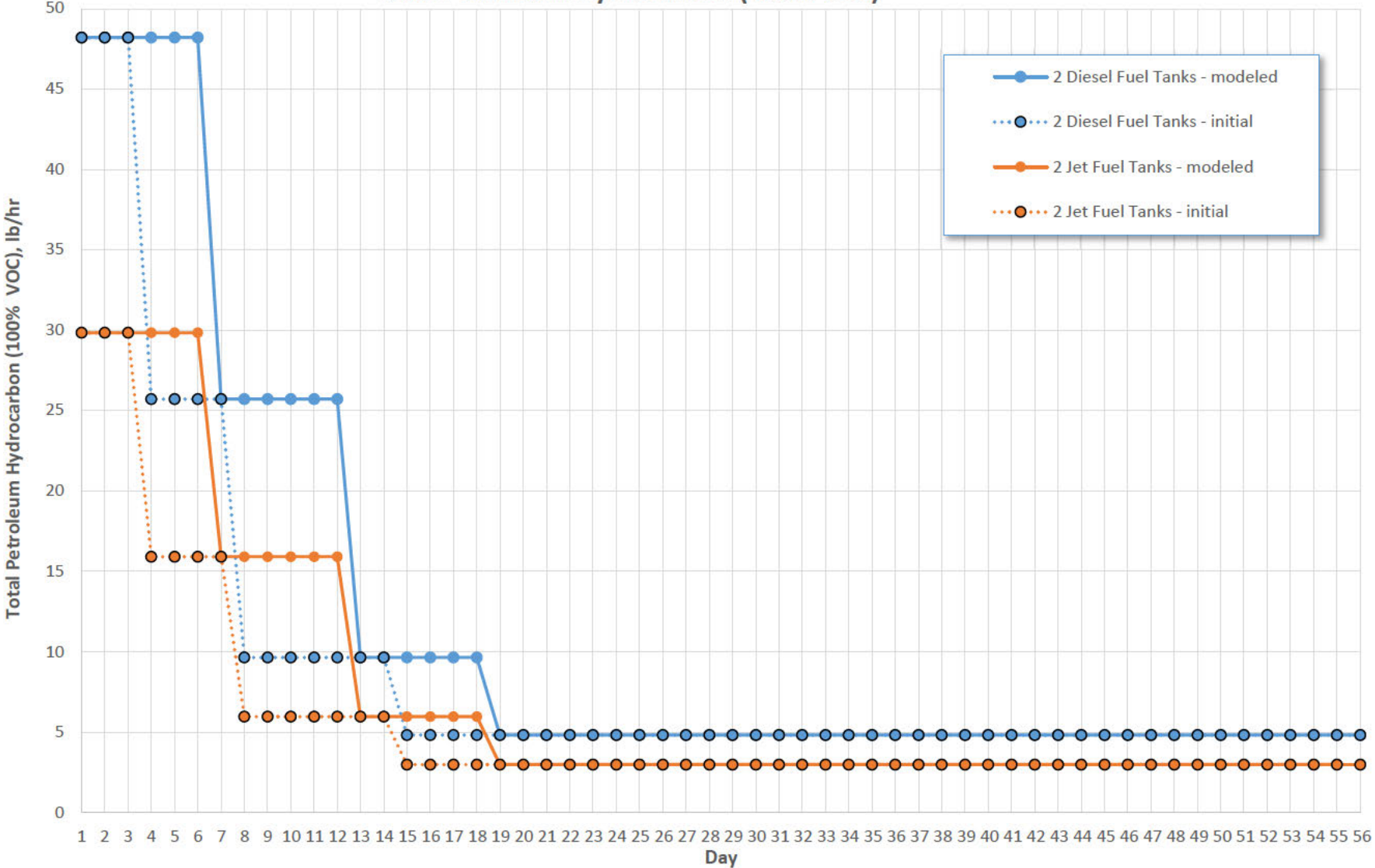
15-day

(b) (3) (A)

Maximum Hourly Emission Rate  
Total Petroleum Hydrocarbon (100% VOC) - 2 Diesel Fuel Tanks



### Maximum Hourly Emission Rate Total Petroleum Hydrocarbon (100% VOC)



DOH specified thresholds

Need to verify

Benzene	24-hr	0.029 mg/m <sup>3</sup>	29 µg/m <sup>3</sup>	<a href="#">Dose-Response Assessment for Assessing Health Risks Associated With Exposure to Hazardous Air Pollutants   US EPA</a> updated April 2024 DOH EAL for benzene, Table C-3 in Appendix 1
Benzene	Annual	6.3 µg/m <sup>3</sup>	6.3 µg/m <sup>3</sup>	
Naphthalene	8-hr	0.52 mg/m <sup>3</sup>	520 µg/m <sup>3</sup>	8-hr TLV-TWA = 52 mg/m <sup>3</sup> 1/100th TLV-TWA (sub-chronic health risk); American Conference of Governmental Industrial Hygienists; <a href="https://www.acgih.org/science/tlv-bei-guidelines/tlv-chemical-substances-introduction/">https://www.acgih.org/science/tlv-bei-guidelines/tlv-chemical-substances-introduction/</a> 8-hr TLV-TWA = 52 mg/m <sup>3</sup> 1/420th TLV-TWA (chronic health risk); American Conference of Governmental Industrial Hygienists; <a href="https://www.acgih.org/science/tlv-bei-guidelines/tlv-chemical-substances-introduction/">https://www.acgih.org/science/tlv-bei-guidelines/tlv-chemical-substances-introduction/</a>
Naphthalene	Annual	0.12 mg/m <sup>3</sup>	124 µg/m <sup>3</sup>	
VOC	15 days	2 mg/m <sup>3</sup>	2000 µg/m <sup>3</sup>	ATSDR; <a href="https://www.atsdr.cdc.gov/toxprofiles/tp121.pdf">https://www.atsdr.cdc.gov/toxprofiles/tp121.pdf</a> updated April 2024 DOH Total Petroleum Hydrocarbon (TPH) Environmental Action Level (EAL) for vapors from middle distillate fuels, see summary Table C EAL Surfer 1 and Table C-3 in Appendix 1
VOC	Annual	0.13 mg/m <sup>3</sup>	130 µg/m <sup>3</sup>	





APTIM Federal Services, LLC  
Contract No. N39430-20-D-2225  
Task Order: N39430-23-F-4645

**March 19, 2024**

Prepared and delivered to NAVFAC Hawaii  
via DOD SAFE to Contracting Officer, (b) (6)

**Response to Hawaii Department of Health letter dated March 8<sup>th</sup>, 2024**

**SUBJECT: Red Hill Fuel Storage Facility Degassing Activity**

Dear (b) (6)

Contained within this document is the information requested per Sections 1 and 2 of the referenced above Hawaii Department of Health (HDOH) letter.

In reference to section 1, the following information is being provided:

1. Exhaust information and on-site/operating conditions:
  - b. For each exhaust vent, provide\*:
    - 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
      - **Provided as Attachment 1 of this document, calculations of the maximum estimated potential emissions requested by HDOH are provided.**
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.
  - **A hard copy in PDF format is being provided as Attachment 2 of this document. This document has been produced utilizing the Excel workbook used to calculate estimated emission levels for the tank de-gassing operations.**
  - **Provided separately to the project NAVFAC Contracting Officer via a DOD Safe document upload service, the Excel workbook file has been delivered for controlled dissemination to the requested party.**

## **ATTACHMENT 1**

**Estimated lbs/hr Emissions Addressing Hawaii Department  
of Health's Concern Letter dated 3/8/2024**

### Attachment 1: Estimated lbs/hr Emissions

#### Addressing Hawaii Department of Health’s Concern Letter dated 3/8/2024

The 8/16/2023 tank ventilation document provided the methodology and emission calculations described in chapter “Liquid Storage Tanks. (2020),” in AP-42: Compilation of Air Pollutant Emission Factors (5th ed., Vol.1, pp. 1–203) from the United States Environmental Protection Agency. The degassing rate was based on THC vapor concentrations measured while cleaning a previous Red Hill underground storage tank of identical size (Tank 18). A ventilation rate per tank of 10,000 CFM is assumed based on the calculations by (b) (6) using the previous results. (See Table 1.)

The expected cleaning and degassing schedule (Table 1) for a single Red Hill Tank is 56 days. It is assumed that each tank will be continuously ventilated 24 hours a day.

There are 14 tanks to be cleaned consisting of 2 tanks containing Diesel (2 tanks of F-76) and 12 tanks containing Jet Fuel (7 tanks of JP-5 and 5 tanks of F-24).

**Table 1.** Assumed Degassing Schedule Per Tank for Tank Cleaning at the Red Hill Bulk Fuel Storage Facility (RHBFSF), Joint Base Pearl Harbor Hickam, Hawaii

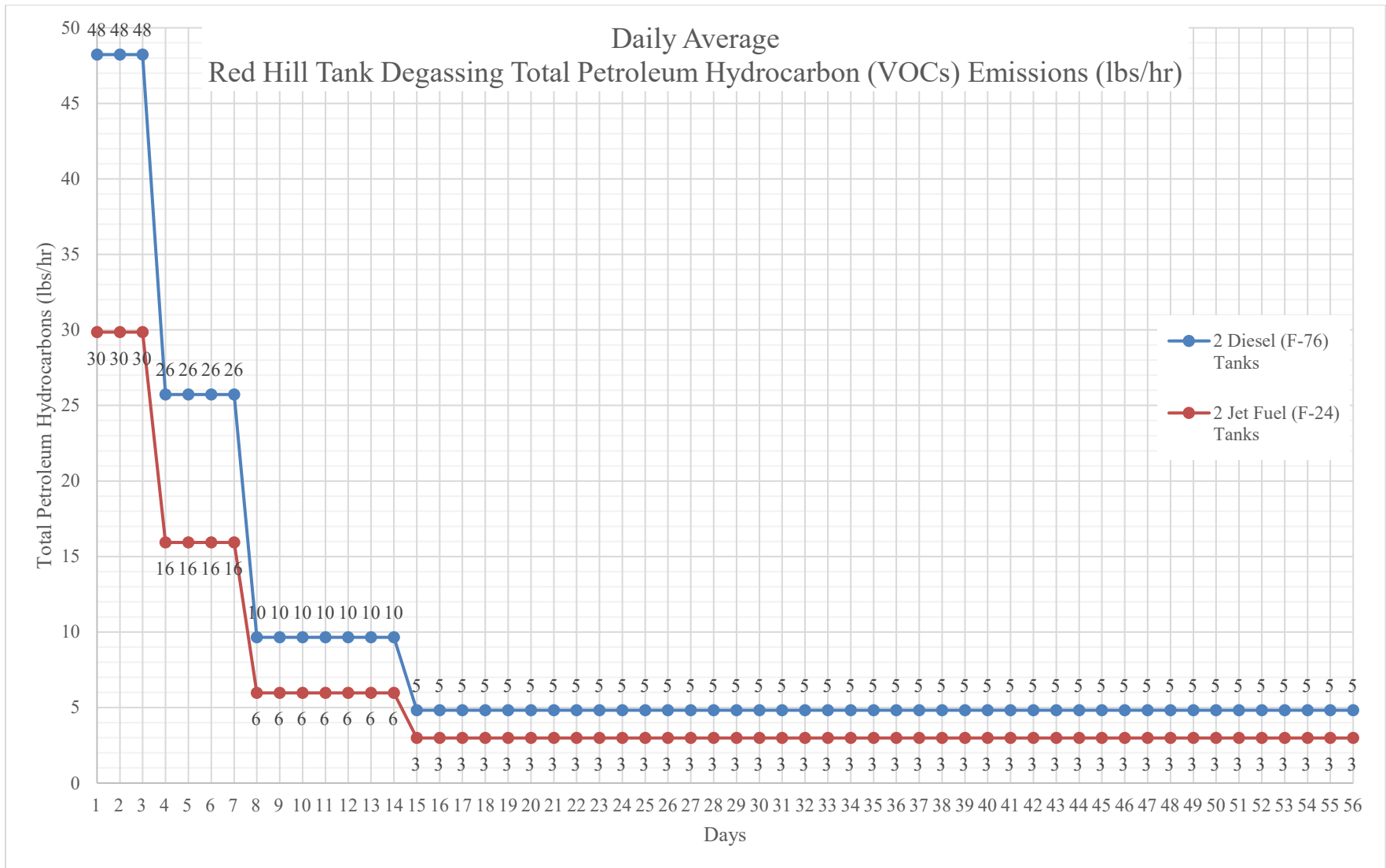
Number of Days	Total Hydrocarbon (THC) Vapor Concentration
3	75 PPMV
4	40 PPMV
7	15 PPMV
42	7.5 PPMV

Under the current cleaning schedule, 2 tanks will be degassed at the same time. The emission calculations were repeated using the same August 16, 2023, Excel file for degassing two tanks diesel (F-76) or two tanks jet fuel (F-24). Using the degassing schedule in Table 1, the maximum values for the Total Petroleum Hydrocarbons and HAPS are shown in Table 2.

**Table 2. Red Hill Tank Cleaning Maximum Daily Average Emissions (lbs/hr)**

<b>Pollutant</b>	<b>2 Diesel (F76) Tanks</b>	<b>2 Jet Fuel (F24) Tanks</b>	<b>HAP</b>
Total Petroleum Hydrocarbons (VOCs) (lbs/hr)	4.82E+01	2.99E+01	No
Benzene (lbs/hr)	2.64E-01	3.85E-01	Yes
Toluene (lbs/hr)	7.66E-01	1.61E+00	Yes
Ethylbenzene (lbs/hr)	1.68E+00	5.82E-01	Yes
m,p-Xylene (lbs/hr)	6.53E+00	1.82E+00	Yes
o-Xylene (lbs/hr)	1.55E+00	2.08E-01	Yes
1,2-Dimethylbenzene (lbs/hr)	N/A	7.48E-01	Yes
Isopropylbenzene (lbs/hr)	1.20E-01	1.27E-01	Yes
Biphenyl (lbs/hr)	N/A	2.42E-03	Yes
Naphthalene (lbs/hr)	1.01E-01	2.11E-02	Yes
2-Methylnaphthalene (lbs/hr)	N/A	2.40E-02	Yes
1-Methylnaphthalene (lbs/hr)	N/A	3.15E-02	Yes
1-Ethylnaphthalene (lbs/hr)	N/A	3.30E-03	Yes
2,3-Dimethylnaphthalene (lbs/hr)	N/A	2.89E-04	Yes
2,6-Dimethylnaphthalene (lbs/hr)	N/A	2.13E-03	Yes
Styrene (lbs/hr)	N/A	N/A	Yes
n-Hexane (lbs/hr)	3.33E-01	N/A	Yes
2,2,4-Trimethylpentane (lbs/hr)	2.79E-01	N/A	Yes

Figure 1, below, depicts the daily average (lbs/hr) Total Petroleum Hydrocarbons (VOCs) emitted over the 56-day degassing schedule.



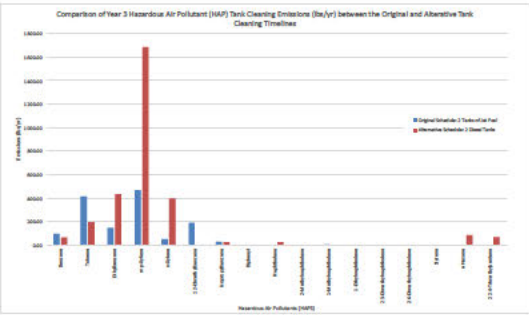
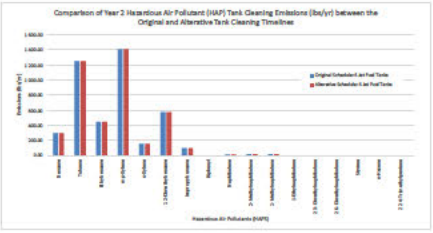
**Figure 1.** Daily Average Red Hill Degassing Total Hydrocarbon (VOCs) Emissions (lbs/hr).

## **ATTACHMENT 2**

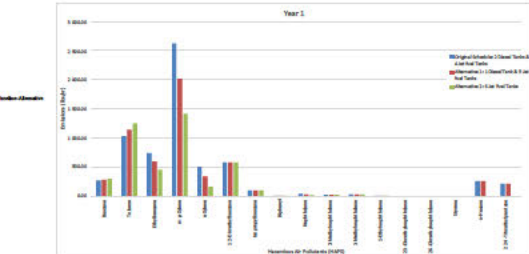
### **Red Hill Degas Emissions Excel File Product**



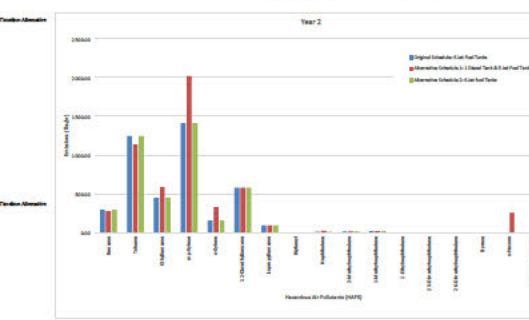
Year	Year 1 31 Feb 2024 3 Tanks of Air Fuel	Year 2 31 Feb 2024 3 Tanks of Air Fuel	Year 3 31 Feb 2024 3 Tanks of Air Fuel	Total 480.23
Release	1,077.19	1,077.19	1,077.19	3,231.57
Toluene	451.27	451.27	451.27	1,353.81
Methylenecyclohexane	302.34	302.34	302.34	907.02
n-Butane	187.58	187.58	187.58	562.74
1,2-Dichlorobenzene	198.23	198.23	198.23	594.69
Acetylene	18.75	18.75	18.75	56.25
Propylene	18.75	18.75	18.75	56.25
1-Methylcyclohexane	18.75	18.75	18.75	56.25
1-Ethylcyclohexane	18.75	18.75	18.75	56.25
1,3-Dichlorobenzene	1.87	1.87	1.87	5.61
1,4-Dichlorobenzene	1.87	1.87	1.87	5.61
Methane	NA	NA	NA	0.00
n-Pentane	NA	NA	NA	0.00
1,2,4-Trichlorobenzene	NA	NA	NA	0.00
Total Hydrocarbons (THC) (lb/yr)	1,315.71	1,315.71	1,315.71	3,947.13
Total Hydrocarbons (THC) (lb/yr)	11.34	11.34	11.34	34.02



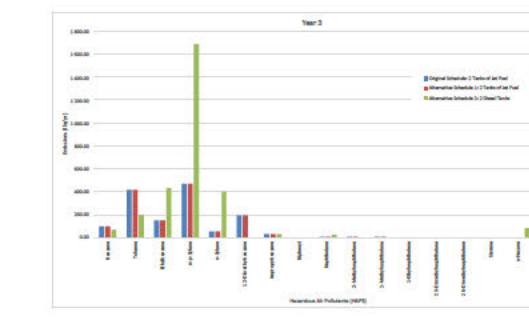
Year 1	Original Schedule 2 Clean Tanks & 4 Air Fuel Tanks of Air Fuel	Alternative Schedule 2 Clean Tanks & 4 Air Fuel Tanks of Air Fuel	Year 2	Original Schedule 3 Tanks of Air Fuel	Alternative Schedule 3 Tanks of Air Fuel
Release	587.45	587.45	587.45	587.45	587.45
Toluene	1,077.19	1,077.19	1,077.19	1,077.19	1,077.19
Methylenecyclohexane	702.91	702.91	702.91	702.91	702.91
n-Butane	1,489.27	1,489.27	1,489.27	1,489.27	1,489.27
1,2-Dichlorobenzene	348.38	348.38	348.38	348.38	348.38
Acetylene	198.23	198.23	198.23	198.23	198.23
Propylene	198.23	198.23	198.23	198.23	198.23
1-Methylcyclohexane	18.75	18.75	18.75	18.75	18.75
1-Ethylcyclohexane	18.75	18.75	18.75	18.75	18.75
1,3-Dichlorobenzene	1.87	1.87	1.87	1.87	1.87
1,4-Dichlorobenzene	1.87	1.87	1.87	1.87	1.87
Methane	NA	NA	NA	NA	NA
n-Pentane	NA	NA	NA	NA	NA
1,2,4-Trichlorobenzene	NA	NA	NA	NA	NA
Total Hydrocarbons (THC) (lb/yr)	3,231.57	3,231.57	3,231.57	3,231.57	3,231.57
Total Hydrocarbons (THC) (lb/yr)	11.34	11.34	11.34	11.34	11.34



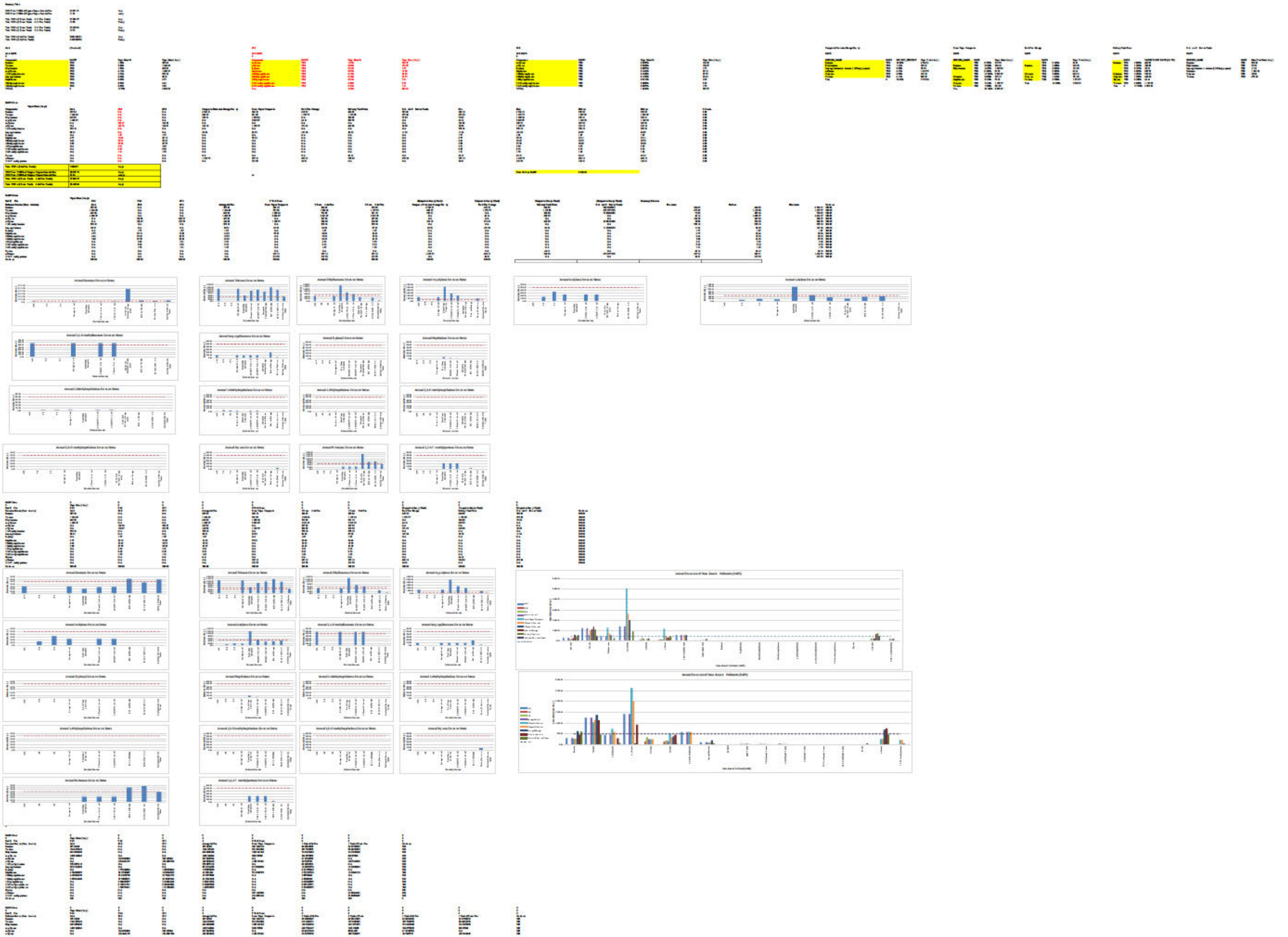
Year 1	Original Schedule 3 Tanks of Air Fuel	Alternative Schedule 3 Tanks of Air Fuel	Year 2	Original Schedule 4 Air Fuel Tanks	Alternative Schedule 4 Air Fuel Tanks
Release	587.45	587.45	587.45	587.45	587.45
Toluene	1,246.49	1,246.49	1,246.49	1,246.49	1,246.49
Methylenecyclohexane	849.50	849.50	849.50	849.50	849.50
n-Butane	1,489.27	1,489.27	1,489.27	1,489.27	1,489.27
1,2-Dichlorobenzene	348.38	348.38	348.38	348.38	348.38
Acetylene	198.23	198.23	198.23	198.23	198.23
Propylene	198.23	198.23	198.23	198.23	198.23
1-Methylcyclohexane	18.75	18.75	18.75	18.75	18.75
1-Ethylcyclohexane	18.75	18.75	18.75	18.75	18.75
1,3-Dichlorobenzene	1.87	1.87	1.87	1.87	1.87
1,4-Dichlorobenzene	1.87	1.87	1.87	1.87	1.87
Methane	NA	NA	NA	NA	NA
n-Pentane	NA	NA	NA	NA	NA
1,2,4-Trichlorobenzene	NA	NA	NA	NA	NA
Total Hydrocarbons (THC) (lb/yr)	3,231.57	3,231.57	3,231.57	3,231.57	3,231.57
Total Hydrocarbons (THC) (lb/yr)	11.34	11.34	11.34	11.34	11.34



Year 1	Original Schedule 3 Tanks of Air Fuel	Alternative Schedule 3 Tanks of Air Fuel	Year 2	Original Schedule 3 Tanks of Air Fuel	Alternative Schedule 3 Tanks of Air Fuel
Release	451.27	451.27	451.27	451.27	451.27
Toluene	892.54	892.54	892.54	892.54	892.54
Methylenecyclohexane	587.45	587.45	587.45	587.45	587.45
n-Butane	1,489.27	1,489.27	1,489.27	1,489.27	1,489.27
1,2-Dichlorobenzene	198.23	198.23	198.23	198.23	198.23
Acetylene	18.75	18.75	18.75	18.75	18.75
Propylene	18.75	18.75	18.75	18.75	18.75
1-Methylcyclohexane	18.75	18.75	18.75	18.75	18.75
1-Ethylcyclohexane	18.75	18.75	18.75	18.75	18.75
1,3-Dichlorobenzene	1.87	1.87	1.87	1.87	1.87
1,4-Dichlorobenzene	1.87	1.87	1.87	1.87	1.87
Methane	NA	NA	NA	NA	NA
n-Pentane	NA	NA	NA	NA	NA
1,2,4-Trichlorobenzene	NA	NA	NA	NA	NA
Total Hydrocarbons (THC) (lb/yr)	2,684.97	2,684.97	2,684.97	2,684.97	2,684.97
Total Hydrocarbons (THC) (lb/yr)	5.61	5.61	5.61	5.61	5.61





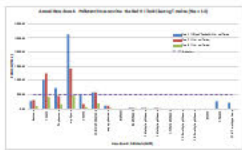


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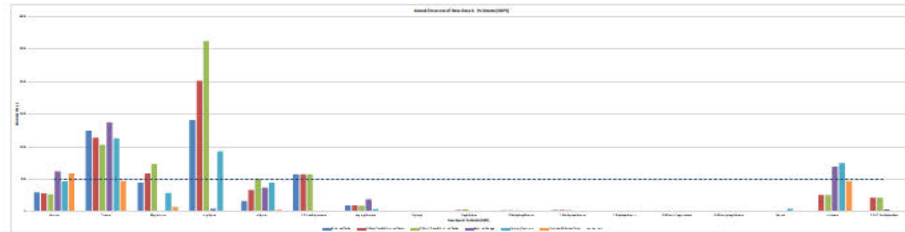
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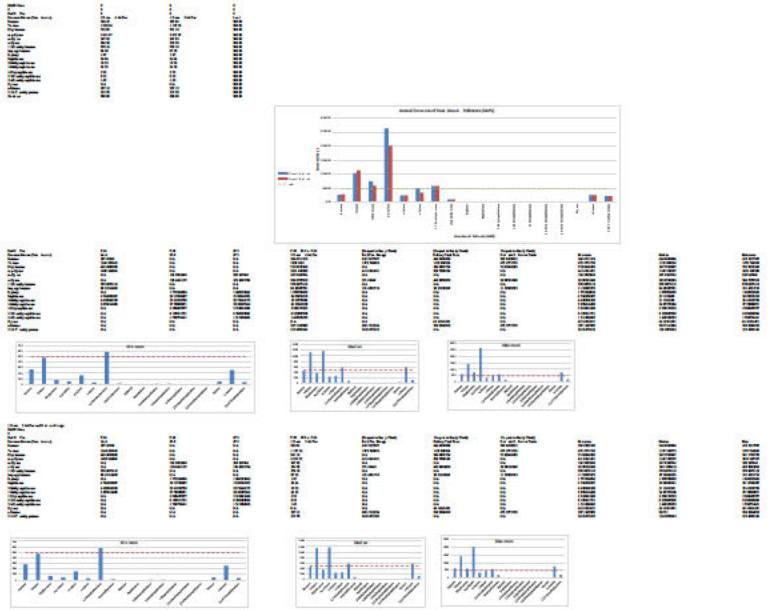
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Reference: Risher, J., Faron, O., Llados, F., & Citra, M. (2017). CHEMICAL AND PHYSICAL INFORMATION. In TOXICOLOGICAL PROFILE FOR JP-5, JP-8, AND JET A FUELS (pp. 145–155). United States Department of Health and Human Services. <https://www.cdc.gov/TSP/ToxProfiles/ToxProfiles.aspx?id=773&tid=150>  
 Document Link: <https://www.atsdr.cdc.gov/ToxProfiles/tp121.pdf>

JP-5, JP-8, AND JET A FUELS

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Characteristic	JP-5	JP-8	Jet A
Chemical name	JP-5	JP-8	Jet A
Synonym(s)	NATO F-44; AVCAT; aviation kerosene; kerosene; fuel oil no. 1; jet kerosene; turbo fuel A; straight run kerosene; distillate fuel oils, light <sup>{a,b,c,d}</sup>	NATO F-34; AVTUR; MIL-DTL-83133H; aviation kerosene; kerosene; fuel oil no. 1; jet kerosene; turbo fuel A; straight run kerosene; distillate fuel oils, light <sup>{a,b,c,d,e}</sup>	No data
Registered tradename(s)	No data	No data	No data
Chemical formula <sup>{f}</sup>	No data	No data	No data
Chemical structure <sup>{f}</sup>	No data	No data	No data
Identification numbers:			
CAS registry	8008-20-6 <sup>{g}</sup> / 70892-10-3 <sup>{h}</sup>	8008-20-6 <sup>{g}</sup> / 70892-10-3 <sup>{h}</sup>	8008-20-6 <sup>{g}</sup> / 70892-10-3 <sup>{h}</sup>
NIOSH RTECS	OA5500000 <sup>{b}</sup> (kerosene)	OA5500000 <sup>{b}</sup> (kerosene)	OA5500000 <sup>{b}</sup> (kerosene)
EPA hazardous waste	No data	No data	No data
OHM/TADS	7217063 <sup>{g}</sup> (kerosene)	7217063 <sup>{g}</sup> (kerosene)	7217063 <sup>{g}</sup> (kerosene)
DOT/UN/NA/IMDG	UN 1223; IMO 3.3 <sup>{b}</sup>	UN 1223; IMO 3.3 <sup>{b}</sup>	UN 1223; IMO 3.3 <sup>{b}</sup>
shipping	(kerosene)	(kerosene)	(kerosene)
HSDB	632 <sup>{b}</sup> (kerosene)	632 <sup>{b}</sup> (kerosene)	632 <sup>{b}</sup> (kerosene)
NCI	No data	No data	No data

<sup>{a}</sup> RTECS 1998<sup>{b}</sup> HSDB 2012<sup>{c}</sup> IARC 1989<sup>{d}</sup> Army 1988<sup>{e}</sup> DOD 2013<sup>{f}</sup> Fuel oils are mixtures of various hydrocarbons designed to meet specifications set forth by the American Society for Testing and Materials (DOD 1992); therefore, chemical structure and chemical formula cannot be determined.<sup>{g}</sup> NTP/NIH 1986<sup>{h}</sup> OHM/TADS 1985

CAS = Chemical Abstracts Service; DOT/UN/NA/IMDG = Department of Transportation/United Nations/North America/International Maritime Dangerous Goods Code; EPA = Environmental Protection Agency; HSDB = Hazardous Substances Data Bank; NCI = National Cancer Institute; NIOSH = National Institute for Occupational Safety and Health; OHM/TADS = Oil and Hazardous Materials/Technical Assistance Data System; RTECS = Registry of Toxic Effects of Chemical Substances

Degassing Schedule for 1 Tank

Degassing Schedule Constructed based on a degassing schedule provided by the Red Hill Client.

Reference for Jet Fuel Molecular Weight: Document Link:

Liquid Storage Tanks. (2020). In AP-42: Compilation of Air Pollutant Emission Factors (5th ed., Vol. 1, pp. 1-203). United States Environmental Protection Agency. https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-fifth-edition-volume-1-chapter-7-liquid-storage-0 https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-fifth-edition-volume-1-chapter-7-liquid-storage-0

Pressure	1 atm
Pressure	14.70 PSI
Temperature	77 F
Temperature	536.67 R
R (Ideal Gas Constant)	10.73 PSI*ft <sup>3</sup> /(Lbmol*R)
Molar Density of an Ideal Gas at 1 atm	2.55E-03 lbmols/ft <sup>3</sup>
Jet Fuel Molar Mass	130.00 lbs/lbmol
Convert Minutes to Days	1440.00 mins/day

Days	PPMV Reading (Average)	Mole Fraction	Volumetric Flow Rate (ft <sup>3</sup> /min)	Volumetric Flow Rate (ft <sup>3</sup> /day)	Total Stream Molar Flow Rate (Jet Fuel + Air) (lbmols/day) (if 100% of organic vapors from Jet Fuel)	Jet Fuel Molar Flow Rate (lbmols/day) (if 100% of organic vapors from Jet fuel)	Jet Fuel Mass Flow Rate (lbs/day) (if 100% of Organic Vapors from Jet fuel)
1	75	7.50E-05	10,000	14400000	36744.23866	2.755817899	358.2563269
2	75	7.50E-05	10,000	14400000	36744.23866	2.755817899	358.2563269
3	75	7.50E-05	10,000	14400000	36744.23866	2.755817899	358.2563269
4	40	4.00E-05	10,000	14400000	36744.23866	1.469769546	191.070041
5	40	4.00E-05	10,000	14400000	36744.23866	1.469769546	191.070041
6	40	4.00E-05	10,000	14400000	36744.23866	1.469769546	191.070041
7	40	4.00E-05	10,000	14400000	36744.23866	1.469769546	191.070041
8	15	1.50E-05	10,000	14400000	36744.23866	0.55116358	71.65126538
9	15	1.50E-05	10,000	14400000	36744.23866	0.55116358	71.65126538
10	15	1.50E-05	10,000	14400000	36744.23866	0.55116358	71.65126538
11	15	1.50E-05	10,000	14400000	36744.23866	0.55116358	71.65126538
12	15	1.50E-05	10,000	14400000	36744.23866	0.55116358	71.65126538
13	15	1.50E-05	10,000	14400000	36744.23866	0.55116358	71.65126538
14	15	1.50E-05	10,000	14400000	36744.23866	0.55116358	71.65126538
15	15	1.50E-05	10,000	14400000	36744.23866	0.55116358	71.65126538
16	15	1.50E-05	10,000	14400000	36744.23866	0.55116358	71.65126538
17	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
18	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
19	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
20	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
21	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
22	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
23	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
24	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
25	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
26	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
27	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
28	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
29	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
30	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
31	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
32	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
33	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
34	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
35	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
36	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
37	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
38	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
39	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
40	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
41	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269
42	7.5	7.50E-06	10,000	14400000	36744.23866	0.27558179	35.82563269

Total Degassing Days/Tank

56 Days/Tank

Mass of Jet Fuel Vapor Per Tank Tanks/Year  
Mass of Jet Fuel Vapor Per Year

3,845.28 lbs Jet Fuel / Tank  
6 Tanks/Year  
23,071.71 lbs Jet Fuel / Year



Reference: Risher, J., Faron, O., Llados, F., & Citra, M. (2017). CHEMICAL AND PHYSICAL INFORMATION. In TOXICOLOGICAL PROFILE FOR JP-5, JP-8, AND JET A FUELS (pp. 145–155). United States Department of Health and Human Services. <https://www.ncbi.nlm.nih.gov/books/NBK231234>  
 Document Link: <https://www.atsdr.cdc.gov/toxprofiles/tp121.pdf>

Minimum Vapor Pressure 1.12 mm Hg  
 Maximum Vapor Pressure 26.50 mm Hg

JP-8 Safety Data Sheet (2022) <https://www.epcshell.com/>  
 Vapor Pressure (kPa) 1 Vapor Pressure (PSI) 0.15 Vapor Pressure (mm Hg) 7.50  
 3.7 0.54 27.75

Edwards, J. T. (2020). JET FUEL PROPERTIES. AFRL-RQ-WP-TR-2020-0017 Interim Report. <https://apps.dtic.mil/sti/citations/AD1093317>

Temperature (F) Vapor Pressure (PSIA) Vapor Pressure (mm Hg)  
 50 3.54E-03 0.18  
 100 2.32E-02 1.20  
 75 0.01 0.69

AP, 2010 KEROSENE/JET FUEL CATEGORY ASSESSMENT DOCUMENT (2010) [https://www.petrochemhpv.org/-/media/PetrochemHPV/Documents/2010\\_sep21\\_kerosene\\_jet%20fuel%20CAD%20final.pdf?la=en&hash=3E9768C078C9B7D5A95F8C8977810A07DA5786](https://www.petrochemhpv.org/-/media/PetrochemHPV/Documents/2010_sep21_kerosene_jet%20fuel%20CAD%20final.pdf?la=en&hash=3E9768C078C9B7D5A95F8C8977810A07DA5786)

Vapor Pressure hPa 3.00 Vapor Pressure (PSI) 0.04 2.25  
 35.00 0.51 26.25

Jet A Aviation Fuel (2021) [www.CPCchem.com](http://www.CPCchem.com)

Vapor Pressure (mm Hg) Vapor pressure (PSIA)  
 0.4 0.01

Physical and Chemical Properties of Military Fuels (1996) In National Research Council (US) Subcommittee on Permissible Exposure Levels for Military Fuels National Academies Press (US) <https://www.ncbi.nlm.nih.gov/books/NBK231234>

Vapor Pressure (mm HG) Vapor Pressure (PSIA)  
 1.8 0.03

Liquid Storage Tanks (2020) In AP-42: Compilation of Air Pollutant Emission Factors (5th ed., Vol. 1, pp 1–203) United States Environmental Protection Agency <https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-fifth-edition-volume-1-chapter-7-liquid-storage-0>  
<https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-fifth-edition-volume-1-chapter-7-liquid-storage-0>

Assumed Temperature 77  
 Assumed Temperature 536.67

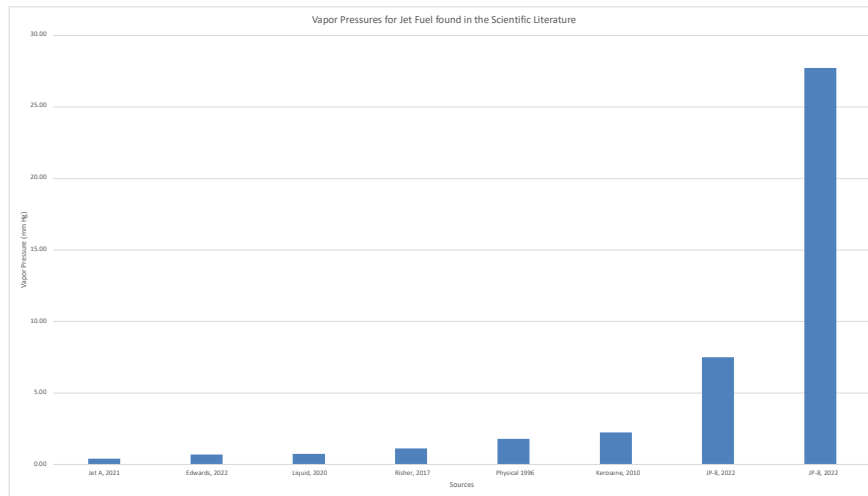
Vapor Pressure Equation Constant A Vapor Pressure Equation Constant B  
 12.39 8933

Vapor Pressure (PSIA) Vapor Pressure (mm Hg)  
 1.42E-02 0.73

Comparison Table

Vapor Pressure (mm Hg)	Vapor Pressure (PSI)	Citation
0.40	0.007734689	Jet A, 2021
0.69	0.0133826	Edwards, 2022
0.73	0.01418971	Liquid, 2020
1.12	0.02157128	Risher, 2017
1.80	0.03480698	Physical 1996
2.25	0.043511321	Kerosene, 2010
7.50	0.145037738	JP-8, 2022
27.75	0.53663963	JP-8, 2022

Reference  
 Jet A Aviation Fuel (2021) [www.CPCchem.com](http://www.CPCchem.com)  
 Edwards, J. T. (2020). JET FUEL PROPERTIES. AFRL-RQ-WP-TR-2020-0017 Interim Report. <https://apps.dtic.mil/sti/citations/AD1093317>  
 Liquid Storage Tanks (2020) In AP-42: Compilation of Air Pollutant Emission Factors (5th ed., Vol. 1, pp 1–203) United States Environmental Protection Agency <https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-fifth-edition-volume-1-chapter-7-liquid-storage-0>  
 Risher, J., Faron, O., Llados, F., & Citra, M. (2017). CHEMICAL AND PHYSICAL INFORMATION. In TOXICOLOGICAL PROFILE FOR JP-5, JP-8, AND JET A FUELS (pp. 145–155). United States Department of Health and Human Services. <https://www.ncbi.nlm.nih.gov/books/NBK231234>  
 Physical and Chemical Properties of Military Fuels (1996) In National Research Council (US) Subcommittee on Permissible Exposure Levels for Military Fuels National Academies Press (US) <https://www.ncbi.nlm.nih.gov/books/NBK231234>  
 KEROSENE/JET FUEL CATEGORY ASSESSMENT DOCUMENT (2010) [https://www.petrochemhpv.org/-/media/PetrochemHPV/Documents/2010\\_sep21\\_kerosene\\_jet%20fuel%20CAD%20final.pdf?la=en&hash=3E9768C078C9B7D5A95F8C8977810A07DA5786](https://www.petrochemhpv.org/-/media/PetrochemHPV/Documents/2010_sep21_kerosene_jet%20fuel%20CAD%20final.pdf?la=en&hash=3E9768C078C9B7D5A95F8C8977810A07DA5786)  
 JP-8 Safety Data Sheet (2022) <https://www.epcshell.com/>  
 JP-8 Safety Data Sheet (2022) <https://www.epcshell.com/>



Reference Liquid Storage Tanks. (2020). In AP-42: Compilation of Air Pollutant Emission Factors (5th ed., Vol. 1, pp. 1–203). United States Environmental Protection Agency.  
<https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-fifth-edition-volume-i-chapter-7-liquid-storage-0>

Document Link <https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-fifth-edition-volume-i-chapter-7-liquid-storage-0>

Assumed Temperature	77	F
Assumed Temperature	536.67	R
Vapor Pressure Equation Constant A	Vapor Pressure Equation Constant B	
12.39	8933	

**Input Jet Fuel Vapor Pressure for Excel Sheet:**

Jet Fuel Vapor Pressure	1.42E-02	PSIA
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Conversions for Reference

Jet Fuel Vapor Pressure	0.73	mmHg
Jet Fuel Vapor Pressure	97.83	Pascal
Jet Fuel Vapor Pressure	0.73	Torr
Jet Fuel Vapor Pressure	9.66E-04	atm



(b) (3) (A)

(b) (3) (A)

(b) (3) (A)





DATE	TIME	LOCATION	OPERATOR	INSTRUMENT	UNIT	CONCENTRATION	FLOW	EMISSION RATE	STATUS	REMARKS
2024-03-13	08:00	Red Hill	John Doe	GC-MS	ppm	10	100	1000	OK	Initial calibration check
2024-03-13	08:15	Red Hill	John Doe	GC-MS	ppm	12	110	1320	OK	Sample 1
2024-03-13	08:30	Red Hill	John Doe	GC-MS	ppm	11	105	1155	OK	Sample 2
2024-03-13	08:45	Red Hill	John Doe	GC-MS	ppm	13	115	1485	OK	Sample 3
2024-03-13	09:00	Red Hill	John Doe	GC-MS	ppm	10	100	1000	OK	Blank test
2024-03-13	09:15	Red Hill	John Doe	GC-MS	ppm	14	140	1960	OK	Sample 4
2024-03-13	09:30	Red Hill	John Doe	GC-MS	ppm	12	120	1440	OK	Sample 5
2024-03-13	09:45	Red Hill	John Doe	GC-MS	ppm	11	110	1210	OK	Sample 6
2024-03-13	10:00	Red Hill	John Doe	GC-MS	ppm	13	130	1690	OK	Sample 7
2024-03-13	10:15	Red Hill	John Doe	GC-MS	ppm	10	100	1000	OK	Blank test
2024-03-13	10:30	Red Hill	John Doe	GC-MS	ppm	15	150	2250	OK	Sample 8
2024-03-13	10:45	Red Hill	John Doe	GC-MS	ppm	12	120	1440	OK	Sample 9
2024-03-13	11:00	Red Hill	John Doe	GC-MS	ppm	11	110	1210	OK	Sample 10
2024-03-13	11:15	Red Hill	John Doe	GC-MS	ppm	13	130	1690	OK	Sample 11
2024-03-13	11:30	Red Hill	John Doe	GC-MS	ppm	10	100	1000	OK	Blank test
2024-03-13	11:45	Red Hill	John Doe	GC-MS	ppm	14	140	1960	OK	Sample 12
2024-03-13	12:00	Red Hill	John Doe	GC-MS	ppm	12	120	1440	OK	Sample 13
2024-03-13	12:15	Red Hill	John Doe	GC-MS	ppm	11	110	1210	OK	Sample 14
2024-03-13	12:30	Red Hill	John Doe	GC-MS	ppm	13	130	1690	OK	Sample 15
2024-03-13	12:45	Red Hill	John Doe	GC-MS	ppm	10	100	1000	OK	Blank test
2024-03-13	13:00	Red Hill	John Doe	GC-MS	ppm	15	150	2250	OK	Sample 16
2024-03-13	13:15	Red Hill	John Doe	GC-MS	ppm	12	120	1440	OK	Sample 17
2024-03-13	13:30	Red Hill	John Doe	GC-MS	ppm	11	110	1210	OK	Sample 18
2024-03-13	13:45	Red Hill	John Doe	GC-MS	ppm	13	130	1690	OK	Sample 19
2024-03-13	14:00	Red Hill	John Doe	GC-MS	ppm	10	100	1000	OK	Blank test
2024-03-13	14:15	Red Hill	John Doe	GC-MS	ppm	14	140	1960	OK	Sample 20
2024-03-13	14:30	Red Hill	John Doe	GC-MS	ppm	12	120	1440	OK	Sample 21
2024-03-13	14:45	Red Hill	John Doe	GC-MS	ppm	11	110	1210	OK	Sample 22
2024-03-13	15:00	Red Hill	John Doe	GC-MS	ppm	13	130	1690	OK	Sample 23
2024-03-13	15:15	Red Hill	John Doe	GC-MS	ppm	10	100	1000	OK	Blank test
2024-03-13	15:30	Red Hill	John Doe	GC-MS	ppm	15	150	2250	OK	Sample 24
2024-03-13	15:45	Red Hill	John Doe	GC-MS	ppm	12	120	1440	OK	Sample 25
2024-03-13	16:00	Red Hill	John Doe	GC-MS	ppm	11	110	1210	OK	Sample 26
2024-03-13	16:15	Red Hill	John Doe	GC-MS	ppm	13	130	1690	OK	Sample 27
2024-03-13	16:30	Red Hill	John Doe	GC-MS	ppm	10	100	1000	OK	Blank test
2024-03-13	16:45	Red Hill	John Doe	GC-MS	ppm	14	140	1960	OK	Sample 28
2024-03-13	17:00	Red Hill	John Doe	GC-MS	ppm	12	120	1440	OK	Sample 29
2024-03-13	17:15	Red Hill	John Doe	GC-MS	ppm	11	110	1210	OK	Sample 30
2024-03-13	17:30	Red Hill	John Doe	GC-MS	ppm	13	130	1690	OK	Sample 31
2024-03-13	17:45	Red Hill	John Doe	GC-MS	ppm	10	100	1000	OK	Blank test
2024-03-13	18:00	Red Hill	John Doe	GC-MS	ppm	15	150	2250	OK	Sample 32
2024-03-13	18:15	Red Hill	John Doe	GC-MS	ppm	12	120	1440	OK	Sample 33
2024-03-13	18:30	Red Hill	John Doe	GC-MS	ppm	11	110	1210	OK	Sample 34
2024-03-13	18:45	Red Hill	John Doe	GC-MS	ppm	13	130	1690	OK	Sample 35
2024-03-13	19:00	Red Hill	John Doe	GC-MS	ppm	10	100	1000	OK	Blank test
2024-03-13	19:15	Red Hill	John Doe	GC-MS	ppm	14	140	1960	OK	Sample 36
2024-03-13	19:30	Red Hill	John Doe	GC-MS	ppm	12	120	1440	OK	Sample 37
2024-03-13	19:45	Red Hill	John Doe	GC-MS	ppm	11	110	1210	OK	Sample 38
2024-03-13	20:00	Red Hill	John Doe	GC-MS	ppm	13	130	1690	OK	Sample 39
2024-03-13	20:15	Red Hill	John Doe	GC-MS	ppm	10	100	1000	OK	Blank test
2024-03-13	20:30	Red Hill	John Doe	GC-MS	ppm	15	150	2250	OK	Sample 40
2024-03-13	20:45	Red Hill	John Doe	GC-MS	ppm	12	120	1440	OK	Sample 41
2024-03-13	21:00	Red Hill	John Doe	GC-MS	ppm	11	110	1210	OK	Sample 42
2024-03-13	21:15	Red Hill	John Doe	GC-MS	ppm	13	130	1690	OK	Sample 43
2024-03-13	21:30	Red Hill	John Doe	GC-MS	ppm	10	100	1000	OK	Blank test
2024-03-13	21:45	Red Hill	John Doe	GC-MS	ppm	14	140	1960	OK	Sample 44
2024-03-13	22:00	Red Hill	John Doe	GC-MS	ppm	12	120	1440	OK	Sample 45
2024-03-13	22:15	Red Hill	John Doe	GC-MS	ppm	11	110	1210	OK	Sample 46
2024-03-13	22:30	Red Hill	John Doe	GC-MS	ppm	13	130	1690	OK	Sample 47
2024-03-13	22:45	Red Hill	John Doe	GC-MS	ppm	10	100	1000	OK	Blank test
2024-03-13	23:00	Red Hill	John Doe	GC-MS	ppm	15	150	2250	OK	Sample 48
2024-03-13	23:15	Red Hill	John Doe	GC-MS	ppm	12	120	1440	OK	Sample 49
2024-03-13	23:30	Red Hill	John Doe	GC-MS	ppm	11	110	1210	OK	Sample 50
2024-03-13	23:45	Red Hill	John Doe	GC-MS	ppm	13	130	1690	OK	Sample 51
2024-03-13	00:00	Red Hill	John Doe	GC-MS	ppm	10	100	1000	OK	Blank test









Component	Flow Rate (gpm)	Temperature (°F)	Pressure (psig)	Flow Rate (gpm)	Temperature (°F)	Pressure (psig)
1.0000	100.00	100.00	100.00	100.00	100.00	100.00
2.0000	100.00	100.00	100.00	100.00	100.00	100.00
3.0000	100.00	100.00	100.00	100.00	100.00	100.00
4.0000	100.00	100.00	100.00	100.00	100.00	100.00
5.0000	100.00	100.00	100.00	100.00	100.00	100.00
6.0000	100.00	100.00	100.00	100.00	100.00	100.00
7.0000	100.00	100.00	100.00	100.00	100.00	100.00
8.0000	100.00	100.00	100.00	100.00	100.00	100.00
9.0000	100.00	100.00	100.00	100.00	100.00	100.00
10.0000	100.00	100.00	100.00	100.00	100.00	100.00
11.0000	100.00	100.00	100.00	100.00	100.00	100.00
12.0000	100.00	100.00	100.00	100.00	100.00	100.00
13.0000	100.00	100.00	100.00	100.00	100.00	100.00
14.0000	100.00	100.00	100.00	100.00	100.00	100.00
15.0000	100.00	100.00	100.00	100.00	100.00	100.00
16.0000	100.00	100.00	100.00	100.00	100.00	100.00
17.0000	100.00	100.00	100.00	100.00	100.00	100.00
18.0000	100.00	100.00	100.00	100.00	100.00	100.00
19.0000	100.00	100.00	100.00	100.00	100.00	100.00
20.0000	100.00	100.00	100.00	100.00	100.00	100.00
21.0000	100.00	100.00	100.00	100.00	100.00	100.00
22.0000	100.00	100.00	100.00	100.00	100.00	100.00
23.0000	100.00	100.00	100.00	100.00	100.00	100.00
24.0000	100.00	100.00	100.00	100.00	100.00	100.00
25.0000	100.00	100.00	100.00	100.00	100.00	100.00
26.0000	100.00	100.00	100.00	100.00	100.00	100.00
27.0000	100.00	100.00	100.00	100.00	100.00	100.00
28.0000	100.00	100.00	100.00	100.00	100.00	100.00
29.0000	100.00	100.00	100.00	100.00	100.00	100.00
30.0000	100.00	100.00	100.00	100.00	100.00	100.00
31.0000	100.00	100.00	100.00	100.00	100.00	100.00
32.0000	100.00	100.00	100.00	100.00	100.00	100.00
33.0000	100.00	100.00	100.00	100.00	100.00	100.00
34.0000	100.00	100.00	100.00	100.00	100.00	100.00
35.0000	100.00	100.00	100.00	100.00	100.00	100.00
36.0000	100.00	100.00	100.00	100.00	100.00	100.00
37.0000	100.00	100.00	100.00	100.00	100.00	100.00
38.0000	100.00	100.00	100.00	100.00	100.00	100.00
39.0000	100.00	100.00	100.00	100.00	100.00	100.00
40.0000	100.00	100.00	100.00	100.00	100.00	100.00
41.0000	100.00	100.00	100.00	100.00	100.00	100.00
42.0000	100.00	100.00	100.00	100.00	100.00	100.00
43.0000	100.00	100.00	100.00	100.00	100.00	100.00
44.0000	100.00	100.00	100.00	100.00	100.00	100.00
45.0000	100.00	100.00	100.00	100.00	100.00	100.00
46.0000	100.00	100.00	100.00	100.00	100.00	100.00
47.0000	100.00	100.00	100.00	100.00	100.00	100.00
48.0000	100.00	100.00	100.00	100.00	100.00	100.00
49.0000	100.00	100.00	100.00	100.00	100.00	100.00
50.0000	100.00	100.00	100.00	100.00	100.00	100.00





Microsoft Word Document



Line Item	Material	Quantity	Unit	Weight	Volume	Concentration	Notes
1	...	...	...	...	...	...	...
2	...	...	...	...	...	...	...
3	...	...	...	...	...	...	...
4	...	...	...	...	...	...	...
5	...	...	...	...	...	...	...
6	...	...	...	...	...	...	...
7	...	...	...	...	...	...	...
8	...	...	...	...	...	...	...
9	...	...	...	...	...	...	...
10	...	...	...	...	...	...	...
11	...	...	...	...	...	...	...
12	...	...	...	...	...	...	...
13	...	...	...	...	...	...	...
14	...	...	...	...	...	...	...
15	...	...	...	...	...	...	...
16	...	...	...	...	...	...	...
17	...	...	...	...	...	...	...
18	...	...	...	...	...	...	...
19	...	...	...	...	...	...	...
20	...	...	...	...	...	...	...
21	...	...	...	...	...	...	...
22	...	...	...	...	...	...	...
23	...	...	...	...	...	...	...
24	...	...	...	...	...	...	...
25	...	...	...	...	...	...	...
26	...	...	...	...	...	...	...
27	...	...	...	...	...	...	...
28	...	...	...	...	...	...	...
29	...	...	...	...	...	...	...
30	...	...	...	...	...	...	...
31	...	...	...	...	...	...	...
32	...	...	...	...	...	...	...
33	...	...	...	...	...	...	...
34	...	...	...	...	...	...	...
35	...	...	...	...	...	...	...
36	...	...	...	...	...	...	...
37	...	...	...	...	...	...	...
38	...	...	...	...	...	...	...
39	...	...	...	...	...	...	...
40	...	...	...	...	...	...	...
41	...	...	...	...	...	...	...
42	...	...	...	...	...	...	...
43	...	...	...	...	...	...	...
44	...	...	...	...	...	...	...
45	...	...	...	...	...	...	...
46	...	...	...	...	...	...	...
47	...	...	...	...	...	...	...
48	...	...	...	...	...	...	...
49	...	...	...	...	...	...	...
50	...	...	...	...	...	...	...

Small, illegible text block in the top left corner, possibly a header or metadata.

A long, thin horizontal line or separator across the page.













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(b) (3) (A)

The image shows a table with a grid structure. The top-left cell contains the text "(b) (3) (A)". The rest of the table is covered by black redaction boxes of varying sizes, obscuring all data and headers. The redaction covers the entire width of the table for most rows, with some smaller boxes covering specific cells in other rows.

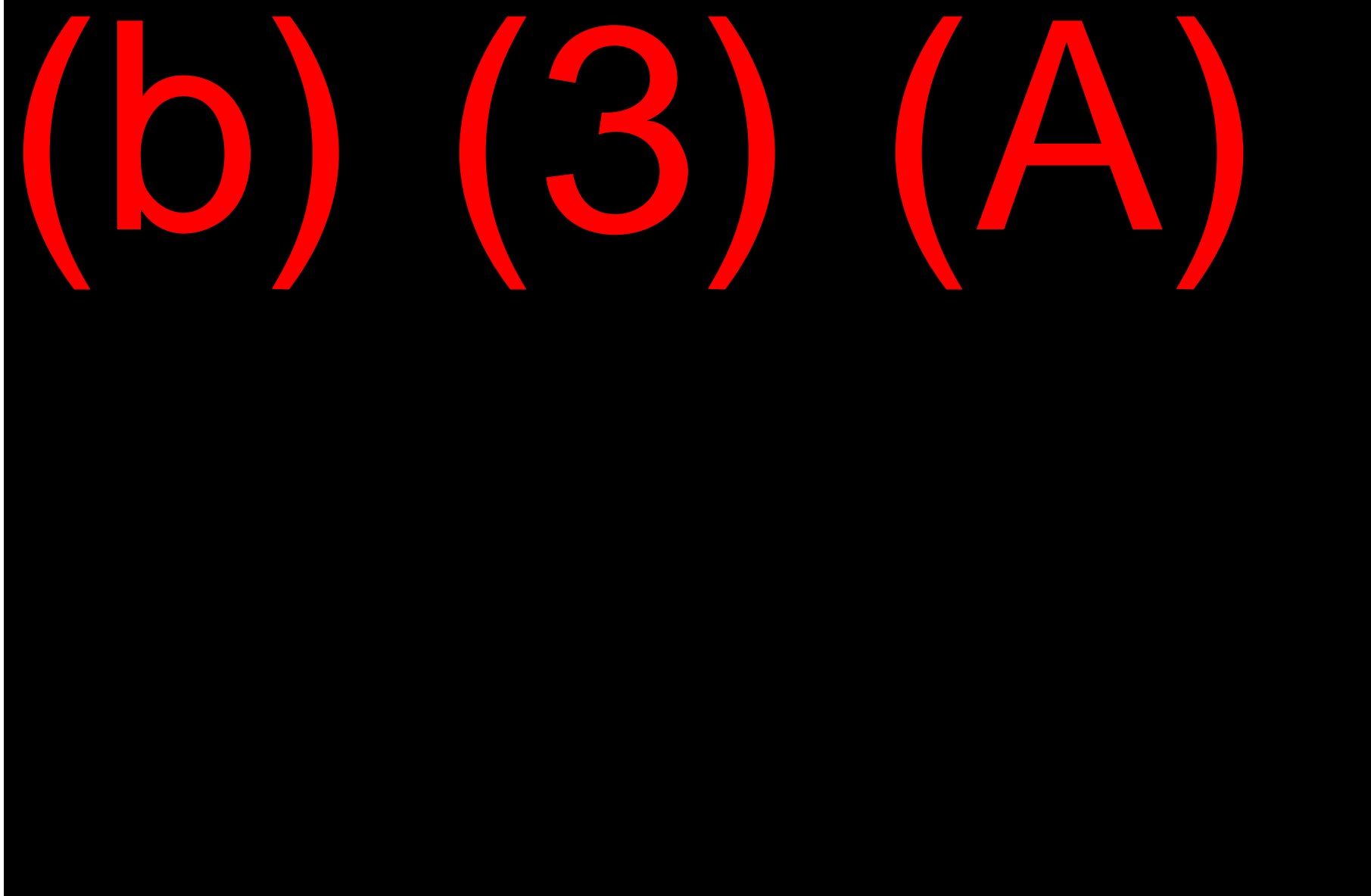
Unit/Description	Unit Name	Unit ID	Unit Type	Unit Status	Unit Capacity	Unit Location	Unit Coordinates	Unit Emissions	Unit Notes
FeedWater Tank - Commercial Feed Water	FW-001	1.0	Storage	Operational	100000	Area 1	33.0000, -78.0000	0.00	FeedWater Tank - Commercial Feed Water
FeedWater Tank - Commercial Feed Water	FW-002	1.0	Storage	Operational	100000	Area 1	33.0000, -78.0000	0.00	FeedWater Tank - Commercial Feed Water
FeedWater Tank - Commercial Feed Water	FW-003	1.0	Storage	Operational	100000	Area 1	33.0000, -78.0000	0.00	FeedWater Tank - Commercial Feed Water
FeedWater Tank - Commercial Feed Water	FW-004	1.0	Storage	Operational	100000	Area 1	33.0000, -78.0000	0.00	FeedWater Tank - Commercial Feed Water
FeedWater Tank - Commercial Feed Water	FW-005	1.0	Storage	Operational	100000	Area 1	33.0000, -78.0000	0.00	FeedWater Tank - Commercial Feed Water
FeedWater Tank - Commercial Feed Water	FW-006	1.0	Storage	Operational	100000	Area 1	33.0000, -78.0000	0.00	FeedWater Tank - Commercial Feed Water
FeedWater Tank - Commercial Feed Water	FW-007	1.0	Storage	Operational	100000	Area 1	33.0000, -78.0000	0.00	FeedWater Tank - Commercial Feed Water
FeedWater Tank - Commercial Feed Water	FW-008	1.0	Storage	Operational	100000	Area 1	33.0000, -78.0000	0.00	FeedWater Tank - Commercial Feed Water
FeedWater Tank - Commercial Feed Water	FW-009	1.0	Storage	Operational	100000	Area 1	33.0000, -78.0000	0.00	FeedWater Tank - Commercial Feed Water
FeedWater Tank - Commercial Feed Water	FW-010	1.0	Storage	Operational	100000	Area 1	33.0000, -78.0000	0.00	FeedWater Tank - Commercial Feed Water



Assume 100% of Liquid Evaporates

Conversion lbs to tons	2000	lbs/ton
Total Vapor Flow of Jet Fuel Vapor	29,000	lbs/yr
Total Vapor Flow of Jet Fuel Vapor	14.5	tons/yr

Table 4-2. Compositional Analysis of 14 Samples of Jet A Fuel







Registered trade name(s)	No data	No data	No data
Chemical formula <sup>1</sup>	No data	No data	No data
Chemical structure <sup>1</sup>	No data	No data	No data
Identification numbers:			
CAS registry	8008-20-6 <sup>2</sup> /70892-10-3 <sup>3</sup>	8008-20-6 <sup>2</sup> /70892-10-3 <sup>3</sup>	8008-20-6 <sup>2</sup> /70892-10-3 <sup>3</sup>
NIOSH RTECS	OA5500000 <sup>4</sup> (kerosene)	OA5500000 <sup>4</sup> (kerosene)	OA5500000 <sup>4</sup> (kerosene)
EPA hazardous waste	No data	No data	No data
OHM/TADS	7217063 <sup>5</sup> (kerosene)	7217063 <sup>5</sup> (kerosene)	7217063 <sup>5</sup> (kerosene)
DOT/UN/NA/IMDG shipping	UN 1223; IMO 3.3 <sup>6</sup> (kerosene)	UN 1223; IMO 3.3 <sup>6</sup> (kerosene)	UN 1223; IMO 3.3 <sup>6</sup> (kerosene)
HSDB	632 <sup>7</sup> (kerosene)	632 <sup>7</sup> (kerosene)	632 <sup>7</sup> (kerosene)
NCI	No data	No data	No data

<sup>1</sup>RTECS 1998

<sup>2</sup>HSDB 2012

<sup>3</sup>IARC 1989

<sup>4</sup>Army 1988

<sup>5</sup>DOD 2013

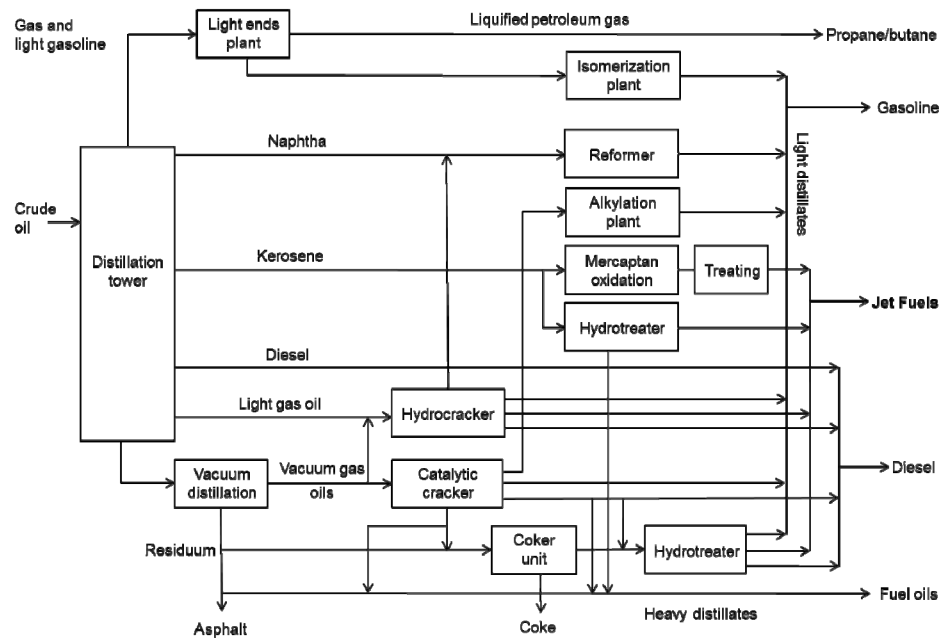
<sup>6</sup>Fuel oils are mixtures of various hydrocarbons designed to meet specifications set forth by the American Society for Testing and Materials (DOD 1992); therefore, chemical structure and chemical formula cannot be determined. <sup>7</sup>NTP/NIH 1986

<sup>8</sup>OHM/TADS 1985

CAS = Chemical Abstracts Service; DOT/UN/NA/IMDG = Department of Transportation/United Nations/North America/International Maritime Dangerous Goods Code; EPA = Environmental Protection Agency; HSDB = Hazardous Substances Data Bank; NCI = National Cancer Institute; NIOSH = National Institute for Occupational Safety and Health; OHM/TADS = Oil and Hazardous Materials/Technical Assistance Data System; RTECS = Registry of Toxic Effects of Chemical Substances

**Figure 4-1. Kerosene/Jet Fuel Processing**

Adapted from API 2010a; Chevron 2006



**Table 4-2. Compositional Analysis of 14 Samples of Jet A Fuel**

Component	Average weight percentage	Minimum weight percentage	Maximum weight percentage
Hydrocarbon types by mass spectrometry ASTM Method D2425			
Paraffins	46.66	32.60	59.10

Monocycloparaffins	26.19	13.80	34.20
Dicycloparaffins	5.89	4.10	8.50
Tricycloparaffins	0.77	0.40	1.40
Benzenes	12.99	9.50	16.50
Indanes/tetralins	4.05	2.50	6.60
C <sub>n</sub> H <sub>2n-10</sub>	0.96	0.60	1.80
Naphthalene	0.44	0.00	1.10
Naphthalenes	1.46	0.90	2.00
C <sub>n</sub> H <sub>2n-14</sub>	0.34	0.20	0.50
C <sub>n</sub> H <sub>2n-16</sub>	0.23	0.00	0.50
C <sub>n</sub> H <sub>2n-18</sub>	0.00	0.00	0.00
Total aromatics	21.18	17.90	27.20
Total olefins	0.00	0.00	0.00
Total paraffins + naphthenes	78.82	72.80	82.10

Total aromatics by gas chromatography /mass spectrometry ASTM Method D57 69

Benzene	0.01	0	0.02
Toluene	0.14	0.06	0.50
Ethylbenzene	0.15	0.08	0.26
m,p-xylene	0.54	0.24	1.25
1,2-Dimethylbenzene	0.27	0.11	0.51
Isopropylbenzene	0.07	0.05	0.11
Propylbenzene	0.14	0.06	0.25
1-Methyl-3-ethylbenzene	0.50	0.21	1.02
1-Methyl-4-ethylbenzene	0.13	0.04	0.24
1,3,5-Trimethylbenzene	0.25	0.11	0.65
1-Methyl-2-ethylbenzene	0.18	0.02	0.30
1,2,4-Trimethylbenzene	0.94	0.50	1.78
1,2,3-Trimethylbenzene	0.33	0.20	0.43
Indane	0.06	0.00	0.12
Alkyl Indanes	0.61	0.06	1.13
1,4-Diethyl + butylbenzene	0.32	0.11	0.50
1,2-Diethylbenzene	0.18	0.02	0.41
1,2,4,5-Trimethyl benzene	0.11	0.09	0.20
1,2,3,5-Tetramethylbenzene	0.46	0.08	0.72
Total C10 benzenes	1.34	0.08	2.76
Total C11 benzenes	2.88	0.10	4.53
Total C12 benzenes	0.18	0.69	0.34
Naphthalene	0.18	0.07	0.30
2-Methylnaphthalene	0.38	0.18	0.57
1-Methylnaphthalene	0.28	0.13	0.37

Source: API (2010b)

The U.S. military uses two kerosene-based aircraft fuels, JP-5 and JP-8. JP-8 is the military equivalent of Jet A-1; however, it contains a corrosion inhibitor and anti-icing additive that is not required in the ASTM specification of Jet A-1. The primary difference between the two military fuels is that the flash point temperature for JP-5 is higher (60°C) as compared to JP-8 (38°C). The higher flash point for JP-5 is more suitable for safe handling and fueling practices aboard aircraft carriers and this is the primary fuel used by the U.S. Navy (Chevron 2006). An important additive for military fuels is enhanced thermal stability additives. Jet fuels act as a heat sink for modern aircraft engines. They absorb heat from engine oil, hydraulic fluid and air conditioning apparatus (Chevron 2006). Jet fuels used for high performance military aircraft engines have even greater need of thermal stability as compared to commercial aviation fuels. In the late 1990s, the U.S. Air Force began development of an additive to increase the thermal stability of jet fuels. JP-8 fuel containing this additive package is usually referred to as JP-8+100 because this additive increased the thermal stability of the fuel by 100°F; however, this particular additive is not currently approved for use in commercial aircraft fuels (Chevron 2006). Beginning in 2013, the U.S. Air Force began using Jet A (plus additives) rather than JP-8 for continental flight usage in order to save on fuel costs (Air Force 2013).

Potter and Simmons provided general compositional data for JP-5 and JP-8 fuels and these data are provided in Tables 4-3 and 4-4, respectively.

#### 4.2. PHYSICAL AND CHEMICAL PROPERTIES

(b) (3) (A)

**Table 4-3. Compositional Data for JP-5<sup>a</sup>**

(b) (3) (A)

(b) (3) (A)

(b) (3) (A)

(b) (3) (A)

**RH Tank Cleaning - Degassing and Final/Finishing Venting Timelines in the 6/1/23 Schedule**

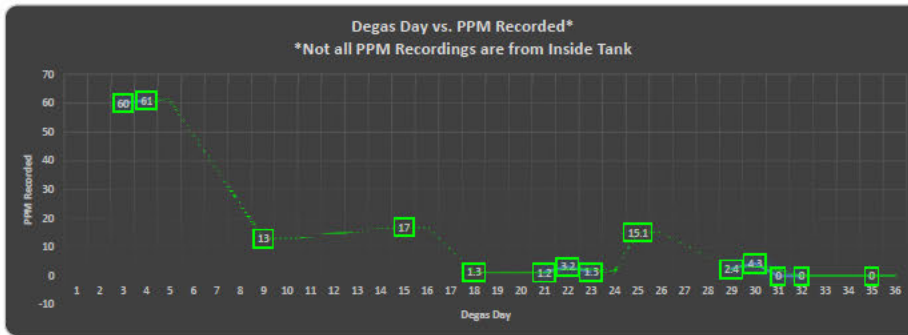
	<b>Initial Degassing to ~50PPM VOC</b>	<b>Final/Finishing venting to &lt;15 PPM VOC</b>
Tank 16 & Tank 12	26 FEB 2024 - 15 MAR 2024	Thru/till 16 APR 2024
Tank 15 & Tank 11	19 JUN - 10 JUL 2024	Thru/till 9 AUG 2024
Tank 10 & Tank 8	15 OCT - 4 NOV 2024	Thru/till 6 DEC 2024
Tank 9 & Tank 7	12 FEB - 5 MAR 2025	Thru/till 4 APR 2025
Tank 6 & Tank 4	9 JUN - 27 JUN 2025	Thru/till 25 JUL 2025
Tank 5 & Tank 3	2 OCT - 23 OCT 2025	Thru/till 25 NOV 2025
Tank 20 & Tank 2	2 FEB - 23 FEB 2026	Thru/till 25 MAR 2026
	Ave 15 wdays/ea interval for initial degassing	

(b) (3) (A)

Start	End	days	tanks
2/14/2024			
2/26/2024	3/14/2024	17	12.14285714
6/19/2024	7/10/2024	21	15
10/15/2024	11/4/2024	20	14.28571429
2/12/2025	3/5/2025	21	15
6/9/2025	6/27/2025	18	12.85714286
10/2/2025	10/23/2025	21	15
2/2/2026	2/23/2026	21	15
	days	Tanks	Year
2/26/2024	4/16/2024	50	2 1
6/19/2024	8/9/2024	51	2 1
10/15/2024	12/6/2024	52	2 1
2/12/2025	4/4/2025	51	2 2
6/9/2025	7/25/2025	46	2 2
10/2/2025	11/25/2025	54	2 2
2/2/2026	3/25/2026	51	2 3

760 14 54.2857

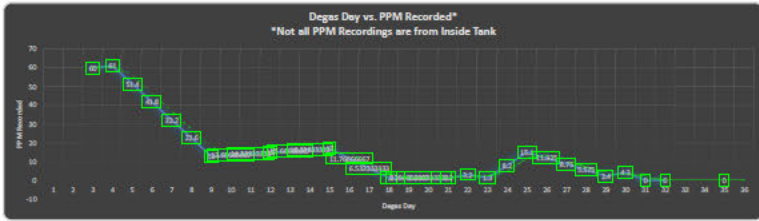




Assumed Total Degas Hours:	744
Workdays:	31

Tank 18 Degassing, Detailed Description of Degassing:

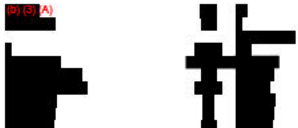
Date:	Degas Day:	PPM Reading	Activity:	Reading Location	Degas hours/day:
Thursday, May 21, 2020					
Friday, May 22, 2020					
Saturday, May 23, 2020					
Sunday, May 24, 2020					
Monday, May 25, 2020					
Tuesday, May 26, 2020	1				24
Wednesday, May 27, 2020	2				24
Thursday, May 28, 2020	3				24
Friday, May 29, 2020	4				24
Saturday, May 30, 2020	5				24
Sunday, May 31, 2020	6				24
Monday, June 1, 2020	7				24
Tuesday, June 2, 2020	8				24
Wednesday, June 3, 2020	9				24
Thursday, June 4, 2020	10				24
Friday, June 5, 2020	11				24
Saturday, June 6, 2020	12				24
Sunday, June 7, 2020	13				24
Monday, June 8, 2020	14				24
Tuesday, June 9, 2020	15				24
Wednesday, June 10, 2020	16				24
Thursday, June 11, 2020	17				24
Friday, June 12, 2020	18				24
Saturday, June 13, 2020	19				24
Sunday, June 14, 2020	20				24
Monday, June 15, 2020	21				24
Tuesday, June 16, 2020	22				24
Wednesday, June 17, 2020	23				24
Thursday, June 18, 2020	24				24
Friday, June 19, 2020	25				24
Saturday, June 20, 2020	26				24
Sunday, June 21, 2020	27				24
Monday, June 22, 2020	28				24
Tuesday, June 23, 2020	29				24
Wednesday, June 24, 2020	30				24
Thursday, June 25, 2020	31				24
Friday, June 26, 2020	32				24
Saturday, June 27, 2020	33				24
Sunday, June 28, 2020	34				24
Monday, June 29, 2020	35				24
Tuesday, June 30, 2020	36				24
Wednesday, July 1, 2020	37				24
Thursday, July 2, 2020					
Friday, July 3, 2020					
Saturday, July 4, 2020					
Sunday, July 5, 2020					
Monday, July 6, 2020					



Assumed Total Degas Hours:	744
Workdays:	31

Tank 18 Degassing, Detailed Description of Degassing:

Date:	Degas Day:	PPM Reading:	Activity:	Degassing Location:	Degas hours/day:
Thursday, May 21, 2020					
Friday, May 22, 2020					
Saturday, May 23, 2020					
Sunday, May 24, 2020					
Monday, May 25, 2020	1				24
Tuesday, May 26, 2020	2				24
Wednesday, May 27, 2020					
Thursday, May 28, 2020	3				24
Friday, May 29, 2020	4				24
Saturday, May 30, 2020	5				24
Sunday, May 31, 2020	6				24
Monday, June 1, 2020	7				24
Tuesday, June 2, 2020	8				24
Wednesday, June 3, 2020	9				24
Thursday, June 4, 2020	10				24
Friday, June 5, 2020	11				24
Saturday, June 6, 2020	12				24
Sunday, June 7, 2020	13				24
Monday, June 8, 2020	14				24
Tuesday, June 9, 2020	15				24
Wednesday, June 10, 2020	16				24
Thursday, June 11, 2020	17				24
Friday, June 12, 2020	18				24
Saturday, June 13, 2020	19				24
Sunday, June 14, 2020	20				24
Monday, June 15, 2020	21				24
Tuesday, June 16, 2020	22				24
Wednesday, June 17, 2020	23				24
Thursday, June 18, 2020	24				24
Friday, June 19, 2020	25				24
Saturday, June 20, 2020	26				24
Sunday, June 21, 2020	27				24
Monday, June 22, 2020	28				24
Tuesday, June 23, 2020	29				24
Wednesday, June 24, 2020	30				24
Thursday, June 25, 2020	31				24
Friday, June 26, 2020	32				24
Saturday, June 27, 2020	33				24
Sunday, June 28, 2020	34				24
Monday, June 29, 2020	35				24
Tuesday, June 30, 2020	36				24
Wednesday, July 1, 2020	37				24
Thursday, July 2, 2020					
Friday, July 3, 2020					
Saturday, July 4, 2020					
Sunday, July 5, 2020					
Monday, July 6, 2020					



Tank 18 Degassing, Detailed Description of Degassing:

Date:	Degas Day:	PPM Reading:	Mole Fraction:	Mass Flow Rate (lb/day):
5/28/2020	3	60		6.00E-05
5/29/2020	4	61		6.10E-05
5/30/2020	5	51.4		5.14E-05
5/31/2020	6	41.8		4.18E-05
6/1/2020	7	32.2		3.22E-05
6/2/2020	8	22.6		2.26E-05
6/3/2020	9	13		1.30E-05
6/4/2020	10	13.66666667		1.37E-05
6/5/2020	11	14.33333333		1.43E-05
6/6/2020	12	15		1.50E-05
6/7/2020	13	15.66666667		1.57E-05
6/8/2020	14	16.33333333		1.63E-05
6/9/2020	15	17		1.70E-05
6/10/2020	16	11.76666667		1.18E-05
6/11/2020	17	6.533333333		6.53E-06
6/12/2020	18	1.3		1.30E-06
6/13/2020	19	1.266666667		1.27E-06
6/14/2020	20	1.233333333		1.23E-06
6/15/2020	21	1.2		1.20E-06
6/16/2020	22	3.2		3.20E-06
6/17/2020	23	1.3		1.30E-06
6/18/2020	24	8.2		8.20E-06
6/19/2020	25	15.1		1.51E-05
6/20/2020	26	11.925		1.19E-05
6/21/2020	27	8.75		8.75E-06
6/22/2020	28	5.575		5.58E-06
6/23/2020	29	2.4		2.40E-06
6/24/2020	30	4.3		4.30E-06
6/25/2020	31	0		0.00E+00
6/26/2020	32	0		0.00E+00
6/27/2020	33	0		0.00E+00
6/28/2020	34	0		0.00E+00
6/29/2020	35	0		0.00E+00
6/30/2020	36	0		0.00E+00
7/1/2020	37	0		0.00E+00
7/2/2020	0	0		0.00E+00
7/3/2020	0	0		0.00E+00

Total VOC per tank	8749.4666	Lbs/Tank
Total VOC for 14 Tanks	123492.532	Lbs
Total VOC Per Year	61246.2662	Lbs/Year

# Chemicals of Potential Concern (COPCs) Recommendations Fuel Additives

## Red Hill Bulk Fuel Storage Fuel Facility

A meeting was held on May 10, 2016 to discuss the recommended approach to addressing the objectives of the Administrative Order on Consent (AOC) In the Matter of Red Hill Bulk Fuel Storage Facility (herein referred to as “the Facility”) Statement of Work (SOW) Section 6 and Section 7 with the Regulatory Agencies (State of Hawaii Department of Health [DOH] and United States Environmental Protection Agency Region IX [EPA]) and various subject matter experts (SMEs). The following attended the meeting: Parties of the AOC (Regulatory Agencies, Department of Navy [Navy], and Defense Logistics Agency [DLA]) and SMEs to the Regulatory Agencies (University of Hawaii [UH]; State of Hawaii Department of Land and Natural Resources [DLNR] Commission on Water Resources Management [COWRM]; United States Geological Survey [USGS] Pacific Islands Water Science Center; City and County of Honolulu Board of Water Supply [BWS]). Also in attendance were the Navy’s contractor, AECOM, and BWS’ contractor, Intera Geoscience & Engineering Solutions (Intera). One of the action items from the meeting was for the Navy and DLA to evaluate fuel additives and determine if additional analytes need to be included on the chemicals of potential concern (COPCs) list for the Facility, as previously agreed upon by the Parties of the AOC on February 4, 2016. The following discussion and table present the results of the fuel additives evaluation:

Table 1 summarizes 18 chemical constituents of additives associated with fuel stored at the Facility. Six groups of fuel additives were identified and evaluated: (1) metal deactivators; (2) corrosion inhibitors and lubricity improvers; (3) icing inhibitors; (4) static dissipaters; (5) lubricity improvers; and (6) antioxidants. To better assess and determine which chemical constituents could potentially pose a concern to the groundwater resource, the following attributes were evaluated for each additive group and associated chemical constituents: estimated/projected quantities of chemicals present per 10,000 barrels of fuel; physical, chemical, and toxicity properties; and associated EPA and DOH screening criteria (if available).

Based on the information gathered and data evaluated, Table 1 details the following results:

- Four of the 18 chemicals, while common, are proprietary (trade-secret) and permitted chemicals for which no information could be obtained at this time. These 4 chemicals are:

(b) (3) (A)

A large rectangular area of the document is redacted with black ink. The redaction covers several lines of text, obscuring the names and details of the four proprietary chemicals mentioned in the preceding list item.

- Five of the 18 chemicals are already included on the COPCs list for the Facility:
  1. benzene;

2. ethylbenzene;
  3. toluene;
  4. xylene; and
  5. naphthalene
- Seven of the 18 chemicals have no associated regulatory screening criteria, and are present at extremely dilute concentrations in fuel and/or have very low water-solubility. Therefore, these seven chemicals are not anticipated to pose concerns for the groundwater resource. These 7 chemicals are:
    1. solvent naphtha (petroleum; chemical component, (b) (3) (A) [redacted])
    2. dinonylnaphthylsulphonic acid (chemical component, (b) (3) (A) [redacted])
    3. propan-2-ol (chemical component, (b) (3) (A) [redacted])
    4. N,N-disalicylidene-1,2-propanediamine (the metal deactivator additive);
    5. tertiary butylated phenol;
    6. o-terbutylphenol; and
    7. 2,4,6-tri-terbutylphenol (chemical components of the antioxidant additive AO-37).

- (b) (3) (A), (b) (5) [redacted]

The half-lives of 2-[2-methoxyethoxy]-ethanol in water is 15 days and phenol in soil is less than 5 days. It is estimated that, at most, 26.4 gallons of 2-(2-methoxyethoxy)-ethanol may have been released as part of the (b) (3) (A) [redacted] fuel release in January 2014. Phenol is not a chemical constituent in additives used for the fuel type released in January 2014. Furthermore, these two chemicals have the following properties:

- readily biodegradable and water-soluble;
- only present in fuel at small concentrations (b) (3) (A) [redacted]
- each chemical has associated EPA Tap Water Regional Screening Levels (RSLs)

EPA Method 8270D will need to be added to the sampling and analysis program proposed in the May 4, 2016 Work Plan/Scope of Work for AOC SOW Section 6 and Section 7 in order to analyze for these two chemicals.

Table 1. Summary of Chemical Information and Estimated/Projected Quantities of Fuel Additives, Red Hill Bulk Fuel Storage Facility, Joint Base Pearl Harbor-Hickam, Oahu, Hawaii

(b) (3) (A), (b) (5)

(b) (3) (A), (b) (5)

(b) (3) (A), (b) (5)