



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'OKELE

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

In reply, please refer to:

November 25, 2024

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

Dear Rear Admiral Barnett:

**SUBJECT: DOH Comments on Red Hill Pipeline Removal Work Plan, Demolition Work Plan, and Environmental Protection Plan**

The Hawaii Department of Health (DOH) received redacted versions of the following documents on October 24, 2024 via email. We received unredacted versions of the same documents via email on November 1, 2024.

1. *Work Plan, DE23-1592 Red Hill Pipeline Removal, Red Hill Bulk Fuel Storage Facility*, dated August 2024;
2. *Demolition Work Plan, DE23-1592 Red Hill Pipeline Removal, Red Hill Bulk Fuel Storage Facility*, dated August 2024; and
3. *Environmental Protection Plan, Red Hill Pipeline Removal, RHBFSF*, dated October 2024.

These plans were submitted by the Navy Closure Task Force – Red Hill for the DOH's review and approval in accordance with Item 8 of the DOH's May 2022 Emergency Order. We are not able to approve these plans for implementation at this time for the reasons explained in the enclosed comments.

Provide revised versions of the above plans based on our enclosed comments and responses to our comments within 30 calendar days of receiving this letter.

Rear Admiral Stephen Barnett  
November 25, 2024  
Page 2 of 2

Should you have any questions regarding this letter or its enclosure, 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

Enclosure

c (w/encl.) [via email]:  
Jamie Maricola, EPA  
Ash Nieman, EPA  
Tonya Russi, EPA  
Noor James, NCTF-RH  
Joshua Stout, NCTF-RH

**Enclosure**  
**DOH Comments on Red Hill Pipeline Removal Work Plan, Demolition Work Plan,  
and Environmental Protection Plan, Received October 24, 2024**  
November 25, 2024 Letter to Rear Admiral Stephen Barnett  
Page 1 of 6

**WORK PLAN, DE23-1592 RED HILL PIPELINE REMOVAL, RED HILL BULK FUEL  
STORAGE FACILITY, DATED AUGUST 2024**

**General Comments**

1. The Hawai'i Department of Health (DOH) May 2022 Emergency Order (EO) requires the Navy Closure Task Force – Red Hill's (NCTF-RH's) Closure Plan to address the "ultimate disposition of any accumulated sludge or waste material from the 20 Tanks, four surge tanks, and associated piping." For piping outside of the subject plan's scope of work, provide a list of future plans and which pipes they will address. Piping not addressed in this plan includes, but is not limited to, the surge tank pipes, underground pumphouse pipes, AFFF (aqueous film forming foam) concentrate and retention lines, the old telltale system, steam pipes, and unused nozzles protruding from the wall face at the bottom of the main fuel storage tanks and other previously abandoned lines at the facility.
2. Provide detailed CONOPs (concept of operations) to the DOH for all operations that pose a risk of release to the environment, for example, spool drops, valve removals, and pigging. CONOPs must include details on spill containment measures and how residual fuel checks will be conducted. The DOH must approve or conditionally approve the CONOP before the operation begins. If an operation will deviate from a previously approved general CONOP, a separate CONOP must be approved by the DOH before implementation.

**Specific Comments**

3. **Page 7 (document page #s), Section 5.1:** What is the maximum load the trolley hoist system is expected to be used for?
4. **Page 8, Section 5.3:** Provide a copy of the Existing Conditions report. Will the final methods be determined based on this report?
5. **Page 8, Section 5.4.1:** Provide a copy of the "asbestos hazard abatement plan."
6. **Pages 9 and 10, Section 5.4.2, No. 2:** Provide details on how "Hawaii Administrative Rules 11-260.1-279.1 (Hazardous Waste Management General Provisions) will be complied with."
7. **Page 12, Section 5.4.2, No. 5:** How does PCS plan to "assess the recyclability of oil in each drum"?

**Enclosure**  
**DOH Comments on Red Hill Pipeline Removal Work Plan, Demolition Work Plan, and  
Environmental Protection Plan, Received October 24, 2024**

November 25, 2024 Letter to Rear Admiral Stephen Barnett

Page 2 of 6

8. **Page 17, Section 5.4.5:**
  - a. **No. 4:** What kind(s) of “spill protection” will be under the tank nozzles that are left open?
  - b. **No. 5:** What kind(s) of “appropriate secondary containment” will be under the drums with fuel-soaked pigs?
  
9. **Pages 18 and 19, Section 5.4.6, No. 4:** The last sentence states, “[f]iberoptic or equivalent may be employed by APTIM to verify cleanliness”. Would there be a case when verification is not employed? If yes, when would this occur, and how would this be documented?
  
10. **Page 23 and 24, Section 5.4.10:**
  - a. Roughly how many drums will accumulate?
  - b. Where will the accumulation area be?
  - c. For how long will the drums stay in the accumulation area?
  - d. How far will the drums be filled?
  - e. Will the drums contain materials other than oil for disposal? If yes, what materials?
  
11. **Page 25, Section 5.5.2:** Why is a section of the 32-inch pipeline being left in-place? How will this remaining section be cleaned?
  
12. **Page 26, Section 5.5.3, No. 1:** Will secondary containment be needed in this area during pigging?
  
13. **Page 27-31, Section 5.5.4:**
  - a. The flow of water from the sump should be verified, so appropriate spill mitigation measures can be put in-place.
  - b. This section states the recent re-opening of the groundwater drains in Adit 2 “appears to have significantly reduced the amount of standing water in Adit 2”. Does this mean a release in the tunnel could discharge directly into the storm drain? If so, what spill mitigation measures are planned for this?
  - c. **No. 4:** Will disabling power to the sump pump system cause the tunnel to start filling with water, making work more difficult?
  - d. **No. 7:** What is the maximum expected inflow rate of groundwater accumulation during heavy rains?
  - e. **No. 9.B.ii:** Where is Table 2?
  - f. **No. 10:** Approximately how many totes of water are expected? If a sheen is detected, how will the water be disposed of?

**Enclosure**  
**DOH Comments on Red Hill Pipeline Removal Work Plan, Demolition Work Plan, and  
Environmental Protection Plan, Received October 24, 2024**  
November 25, 2024 Letter to Rear Admiral Stephen Barnett  
Page 3 of 6

**14. Appendix C, Red Hill Pipeline Demolition Sampling and Analysis Plan**

- a. **Page 7, Section 3.1:** Where is Table 3-1?
- b. **Page 10, Section 5.2:** States, “[d]ebris/soil sampling will be conducted....” However, Section 4.1 Soil Sampling and Section 4.2 Sediment Sampling on page 8 state *no* soil or sediment sampling will occur. Provide clarification.

**15. Appendix D:** Provide Appendix D, which is missing.

***DEMOLITION WORK PLAN, DE23-1592 RED HILL PIPELINE REMOVAL, RED HILL BULK FUEL STORAGE FACILITY, DATED AUGUST 2024***

**16. PDF page 7, Section 3.0:** Confirm the branch fuel piping for Tanks 2 through 12, 15, 16, and 20 will be removed under the APTIM Tank Cleaning contract, and is therefore not part of this pipeline removal work plan. If not, who will perform this work?

**17. PDF page 101 and 102 , Appendix D:**

- a. What is the load rating for Ant Type Electric Forklift?
- b. What is the load rating for the Duct Jack?

***ENVIRONMENTAL PROTECTION PLAN, RED HILL PIPELINE REMOVAL, RHBFSF, DATED OCTOBER 2024***

**General Comments**

**18.** Regulatory references are incorrect, and some appear incomplete (e.g., reference to 40 Code of Federal Regulations [CFR] part 273 but not part 263 when discussing transportation of hazardous waste). All references to hazardous waste and used oil regulations should be to Hawai'i Administrative Rules (HAR) chapters 11-260.1 to 11-279.1. The state hazardous waste rules are effective in lieu of the federal rules because the state's hazardous waste program is authorized by the U.S. Environmental Protection Agency (EPA). Some examples of differences are that chapter 11-262.1, HAR, requires documentation of weekly inspections of hazardous waste container storage areas by small quantity generators, and chapter 11-279.1, HAR, requires used oil transporters to have a permit. Neither are required in the corresponding federal rules.

**Enclosure**  
**DOH Comments on Red Hill Pipeline Removal Work Plan, Demolition Work Plan, and Environmental Protection Plan, Received October 24, 2024**

November 25, 2024 Letter to Rear Admiral Stephen Barnett

Page 4 of 6

19. In addition to “areas where hazardous materials may be stored[,]” will spill kits also be available around operating equipment? For example, page 11 mentions that handling equipment will be fueled on-site via fuel truck.
20. The plan states in several places that spill containment capacity will be, at minimum, the volume of the largest container, plus 10%. For uncovered areas outside, capacity should also include expected rainfall.

**Specific Comments**

21. **Page 1, Section 1.1:** States, “[i]t is assumed that all-encompassing pipelines to be removed during the duration of this project, have no more than 4k gallons of residual fuel in the pipelines.” What will happen if this assumption is incorrect? Would work continue? Page 11 of the Pipeline Removal Work Plan mentions there is a contractual ceiling at 4,000 gallons.
22. **Page 1, Section 1.2:** Provide a copy of the Site Specific Spill Prevention, Control, and Countermeasures (SPCC) Plan.
23. **Page 1, Section 1.3:** What training does “[a]ll required training by contract” consist of?
24. **Page 2, Section 1.4:** Provide copies of the “[s]pecific AMS [APTIM Management System] documents applicable for this EPP” that are listed.
25. **Page 8, Section 2.1:** Will county or state roads be used to move waste, or only federal roads? The NCTF-RH should ensure that roads are clear, and there is a contingency plan in-place should there be a release.
26. **Page 10, Section 4.1:** Loading pipe sections outside of the adits prior to transportation should be added to the list of “[a]ctivities exposed to storm water with the potential for pollutant generation”.
27. **Page 11, Section 4.1.1.1:** Will fueling of material handling equipment on-site via fuel truck be done on a containment pad?
28. **Pages 12 and 13, Section 4.4:**
  - a. There should be a checklist of items for inspection to ensure there have been no releases.

**Enclosure**  
**DOH Comments on Red Hill Pipeline Removal Work Plan, Demolition Work Plan, and  
Environmental Protection Plan, Received October 24, 2024**  
November 25, 2024 Letter to Rear Admiral Stephen Barnett  
Page 5 of 6

- b. We recommend inspecting more often than weekly, especially after inclement weather. In particular, vehicles and equipment on-site should be inspected for leaks and spills at the beginning of each workday.
- c. Will the “impermeable plastic-lined berm” mentioned in the second to the last bullet be covered?

29. **Page 14, Section 4.5.1.3:** “Concrete or paved surfaces” are only considered acceptable secondary containment if there are no joints or cracks in the concrete.

30. **Pages 16 and 17, Section 5.2:**

- a. This section discusses the accumulation of less than 55 gallons of waste at the point of generation (called a “satellite accumulation area” in the hazardous waste regulations) and possible establishment of a “less than 90-day accumulation site” or “90-day accumulation site” (called a “central accumulation area” in the hazardous waste regulations). It then goes on to say, “[f]or less than 90-day accumulation sites, 40 CFR 260-268 requirements shall be met....” This implies most generator requirements only apply when a central accumulation area is established and not when all hazardous waste is managed using satellite accumulation areas. This is not entirely correct. The preparedness, prevention, and emergency procedures for small and large quantity generators apply based the amount of hazardous waste generated regardless of whether a central accumulation area is used. Different requirements apply based on the amount of waste *generated* in a calendar month *for the entire site* and cannot be avoided by managing all hazardous waste in satellite accumulation areas [see 40 CFR section 262.15(a)(7) and (8), as incorporated and amended in chapter 11-262.1, HAR]. If the site generates enough waste to be a large quantity generator, so that the contingency planning requirements that come with this status apply, these requirements also apply to satellite accumulation areas.
- b. **No. 3:** Instead of a general “description of the contents,” each hazardous waste container must be labeled with an “indication of the *hazards* of the contents.” This is required even for waste stored in satellite accumulation areas [40 CFR section 262.15(a)(5)(ii), as incorporated and amended in chapter 11-262.1, HAR].
- c. **No. 3:** Non-hazardous waste containers should also be dated and labeled with contents and a current emergency contact.
- d. **No. 10:** Note that Joint Base Pearl Harbor-Hickam has multiple EPA ID numbers for different sections. The number for Navy Region Hawai‘i – Halawa Red Hill should be used if waste is being removed and shipped from adit locations near the Red Hill tanks, as is described for other wastes, recyclable pipeline segments, etc. in the Pipeline Removal Work Plan.

**Enclosure**  
**DOH Comments on Red Hill Pipeline Removal Work Plan, Demolition Work Plan, and  
Environmental Protection Plan, Received October 24, 2024**  
November 25, 2024 Letter to Rear Admiral Stephen Barnett  
Page 6 of 6

31. **Page 18, Section 5.2.2:** On-island disposal of non-hazardous waste shall be at a DOH-permitted solid waste management facility.
32. **Page 21, Table 3:** For the aboveground storage tank containing diesel, what is the plan to prevent or manage potential releases from the pipes or pipelines?
33. **Page 26, Section 7.0:** In addition to the DOH Environmental Management Division, the DOH HEER (Hazard Evaluation and Emergency Response) Office should also be notified if there is a release of hazardous substances, including oil, lead, asbestos, and other chemicals, per Hawai'i Revised Statutes Chapter 128D.
34. **Attachment 3.1:** Add the DOH HEER Office. The phone number is 808-586-4249 during the day and 808-236-8200 after-hours.