



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'ŌKELE

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

In reply, please refer to:

December 4, 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 Conditional Approval to Start Pressure Washing Red Hill Tanks**

On January 18, 2024, the Hawai'i Department of Health (DOH) conditionally approved the Navy Closure Task Force – Red Hill's (NCTF-RH's) *Project Work Plan, Clean Red Hill Tanks JBPHH, Hawaii*, dated December 2023 (hereinafter *Tank Cleaning Work Plan*), which provides the NCTF-RH's overall plan to pressure wash the Red Hill tanks, surge tanks, and sumps. On August 6, 2024, the DOH conditionally approved the *Navy Closure Task Force – Red Hill Revised Tank Cleaning Verification Plan*, dated July 26, 2024, which describes how third-party industry-certified inspectors will verify the infrastructure is clean. These plans were submitted under the DOH's May 2022 Emergency Order, which requires the NCTF-RH to submit a Closure Plan that includes a “[d]escription of the sequence and process in which the tanks and pipelines are planned to be cleaned” and the “ultimate disposition of any accumulated sludge or waste material from the 20 Tanks, four surge tanks, and associated piping....”

As a condition to our approval of the *Tank Cleaning Work Plan*, the NCTF-RH must provide and receive the DOH's approval on detailed CONOPs (concept of operations) with spill mitigation measures for all operations that pose a risk of release to the environment. Under this condition, the NCTF-RH provided its current *Tank Cleaning CONOP* on October 27, 2024. The DOH provided comments on November 4, 2024, and received NCTF-RH's responses on November 5, 2024. Given the information provided, the DOH approves the *Tank Cleaning CONOP* received on October 27, 2024, for implementation, on the conditions that:

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1. If the NCTF-RH reuses GAC (granular activated carbon) unit water for cleaning, the Navy potable water supply line must be air gapped before the GAC booster pumps are activated to ensure GAC water does not enter the potable water system.
2. If the NCTF-RH uses potable water for cleaning and to ensure GAC water does not enter the potable water system, the GAC water supply line must be air gapped before pressure washing starts. If the NCTF-RH switches from using GAC water to potable water, the GAC water supply line must be air gapped before switching.
3. The NCTF-RH provides DOH an opportunity to confirm spill mitigation measures are in-place before pressure washing starts and that Conditions 1 and 2 have been met. The NCTF-RH must address all DOH concerns before pressure washing starts.
4. Cleaning and verification must be conducted in accordance with the DOH's January 18, 2024 conditional approval of the *Tank Cleaning Work Plan* and August 6, 2024 conditional approval of the *Navy Closure Task Force – Red Hill Revised Tank Cleaning Verification Plan*.
5. If the infrastructure of a tank necessitates a deviation from the *Tank Cleaning CONOP* received on October 27, 2024, the NCTF-RH must provide a separate CONOP for the DOH's review and approval before cleaning that tank.
6. The DOH is permitted to observe cleaning and verification. Please continue to accommodate our staff.

As a reminder, the DOH's January 18, 2024 conditional approval of the *Tank Cleaning Work Plan* and August 6, 2024 conditional approval of the *Navy Closure Task Force – Red Hill Revised Tank Cleaning Verification Plan* require both plans to be updated based on our comments and be made available to the public. We are unable to find either of the updated plans on a NCTF-RH website. The updated plans must be made available before pressure washing starts.

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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

c [via email only]:

Jamie Marincola, EPA

Ash Nieman, EPA

Tonya Russi, EPA

RDML Marc Williams, NCTF-RH

Noor James, NCTF-RH

Joshua Stout, NCTF-RH