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In reply, please refer to:

January 13, 2025

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]

Dear Rear Admiral Barnett:

SUBJECT: NCTF-RH Proposed *Principal Physical Modifications* for Red Hill Fuel Storage Tanks

On December 16, 2024, the Hawai'i Department of Health (DOH) received the Navy Closure Task Force – Red Hill's (NCTF-RH's) proposed *Principal Physical Modifications* for the 14 Red Hill fuel storage tanks that were recently defueled. We understand this submission is part of the NCTF-RH's overall proposal to close the 20 Red Hill fuel storage tanks and 4 surge tanks in-place. The NCTF-RH has also stated it will provide additional details on this proposal in *Tank Closure Plan Supplement 4*, currently scheduled for submission in mid-2025 (based on the December 2024 integrated master schedule). As stated in previous *Closure Plan* comment letters, the DOH will consider the NCTF-RH's proposal to close in-place when the NCTF-RH has fully defined:

- 1. Infrastructure to be removed versus left in-place (with justification):** The NCTF-RH provided some information on which pipelines it plans to remove in its *Work Plan, Red Hill Pipeline Removal*, received October 24, 2024. The DOH is reviewing the NCTF-RH's December 23, 2024 responses to our comments on this plan and associated demolition and waste management plans. In the subject document, the NCTF-RH also provided some information on which components in 14 of the 20 Red Hill fuel storage tanks it plans to remove or leave in-place. However, no justification was provided as to why some unnecessary components may not be removed. Our enclosed comments contain additional questions and concerns regarding this proposal. No information has been provided on

proposed modifications in the 6 main fuel tanks that were not recently defueled and the 4 surge tanks.

2. **Long-term operations and maintenance to ensure structural integrity:** We understand from meetings with the NCTF-RH that this information will be included in *Tank Closure Plan Supplement 4*.
3. **Measures taken to render the Red Hill Facility (Facility) unusable for fuel and other hazardous substances storage:** In March 2024, the Joint Task Force – Red Hill finished air gapping the main fuel pipelines, which physically disconnected the Red Hill main fuel tanks from the operational system. In October 2024, the NCTF-RH also disconnected the surge tanks using this method. We understand the NCTF-RH will continue to remove connecting spools and valves for each tank prior to cleaning, as it has already done for 4 of the Red Hill main fuel tanks and all 4 surge tanks. In September 2023, the DOH concurred in concept with the U.S. Department of the Navy’s proposal to remove the three fuel pipelines, which the NCTF-RH’s *Work Plan, Red Hill Pipeline Removal* provides more information on. We support these efforts and the NCTF-RH’s stated commitment to ensure the Facility will never be used to store hazardous substances again. We encourage the NCTF-RH to continue to identify ways to demonstrate this commitment to regulators and the public.

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.

Sincerely,

Kathleen Ho

KATHLEEN S. HO
Deputy Director for Environmental Health

Enclosure

c (w/encl.) [via email only]:

Jamie Marincola, EPA
Ash Nieman, EPA
Tonya Russi, EPA
RDML Marc Williams, NCTF-RH
Noor James, NCTF-RH
Milton Johnston, NCTF-RH
Joshua Stout, NCTF-RH

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General Comments

1. Will tank modifications undergo the same quality validation process that the Joint Task Force – Red Hill and Navy Closure Task Force – Red Hill (NCTF-RH) and regulators have used for infrastructure repairs and enhancements?
2. The “Scope” section states, “Tank Closure Plan Supplement 4 [Supplement 4] will include a more detailed discussion of the Navy’s planned and proposed approach to closure for all 20 bulk-fuel USTs [underground storage tanks].” Supplement 4 should also address the following subjects, to meet the requirements of the Hawai’i Department of Health’s (DOH’s) 2022 Emergency Order (EO) and the Hawai’i Administrative Rules (HAR) for USTs:
 - a. Closure of the surge tanks and piping associated with all tanks (surge and main), as specified in the DOH’s 2022 EO.
 - b. Emptying and permanent closure of all infrastructure associated with the UST system that was previously abandoned without being emptied and cleaned. Under HAR 11-280.1-73, the DOH can require permanent closure, including cleaning, for previously abandoned infrastructure, if a release may pose a threat to human health and the environment. In letters dated January 30 and March 27, 2024, the DOH asked the NCTF-RH to identify and address old abandoned infrastructure to eliminate sources of future releases.
3. As noted above, the DOH is concerned about potential environmental contaminants being abandoned in-place. All piping should be checked to ensure there are no contents prior to capping. If liquid is found, it should be removed, and the source should be identified and removed as well. How does the NCTF-RH plan to verify that the following components inside the tanks are empty?
 - a. Tell Tale system
 - b. Steam lines
 - c. Old fuel oil reclamation (FOR) line
 - d. Instrumentation wells
 - e. Has the NCTF-RH identified any other components in the tanks that may contain contaminants? If so, how will those components be addressed?

Specific Comments

4. **PDF page 1:** States, “[t]he Navy’s approach to tank closure is based on the following considerations: 1. Components that cannot be verified clean will be removed when practicable; ...”
 - a. Which items does the NCTF-RH expect to fit the description of “cannot be verified clean”?
 - b. Is “when practicable” before or after the tanks are washed?

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5. **PDF page 1:** States, “2. Disconnected components will not be abandoned in the tanks or tunnels when practicable; ...” How is it determined which components are not “practicable” to remove from the tanks?
6. **PDF page 2, Tank Venting System:**
 - a. Provide drawings of the venting system outside of what was is depicted in Figure 1 on PDF page 6, including the atmospheric manifold, direct vents to the ridgeline, and the 16-inch pipe that was manifolded to the main line to Adit 5.
 - b. Clarify whether all venting systems will remain open. If not, identify where and when the venting system will be closed.
7. **PDF page 2, Manway Hatch:** We understand from a meeting in December 2024, that the NCTF-RH considered replacing the plywood lockable door with a permanent vented metal lockable door to secure the upper tunnel manway hatch opening. Does the NCTF-RH plan to do this? If so, update Table 1 on PDF page 4.
8. **PDF page 3, 32” -> 20” Fuel Pipe(s):**
 - a. States, “[t]he diffuser and cut pipe will be removed from the tank as practicable.” How will “practicable” be determined?
 - b. States, “[t]he remaining pipe segment between the tank floor and lower access tunnel will be pressure-washed.” How will the wash water be collected and managed for this section of piping?
9. **PDF page 3, 18” -> 12” Fuel Pipe(s):**
 - a. States, “[i]f the pipe is equipped with a diffuser, it will be removed from the pipe and the tank (if practicable).” How will “practicable” be determined?
 - b. States, “[t]he remaining pipe segment between the tank floor and lower access tunnel will be pressure-washed and capped on both ends.” How will the wash water be collected and managed for this section of piping?
10. **PDF page 4, Fuel Oil Recovery (FOR) line(s):**
 - a. States, “[a]s each tank was also equipped with a 6-inch diameter steam-line casing that was never used, it was put into service to replace the compromised 8-inch diameter bottom drain line in some of the tanks.” Which tanks have an abandoned 8-inch line? How were these abandoned, and how can these lines be confirmed as empty and clean?
 - b. States, “Tank 5 utilizes this 18-inch line as a FOR line, but it will require a modification to allow it to function as a low-point bottom drain.” However, Table 1 on PDF page 4 lists “no modification” for this secondary 18-inch line used for the Tank 5 FOR line. Correct this discrepancy. If modification is needed, what type of modification?

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11. **PDF page 4, Sample Lines:** If sample lines are routed through a pipe between the tank floor and the lower access tunnel, assuming the interstitial space has not been filled with concrete or similar, can the sample piping be removed? If not, can these lines be pigged to ensure they are empty? Although they were gravity drained, there could still be residual fuel, and these lines have not otherwise been cleaned. In addition, if there is interstitial space between the sample lines and the outer casing, the outer casing should also be checked to ensure there is no fuel inside. If fuel is found, it should be removed.