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In reply, please refer to:

February 5, 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: DOH Comments on NCTF-RH Asbestos Removal Plan

On December 27, 2024, the Hawai'i Department of Health (DOH) received the Navy Closure Task Force – Red Hill's (NCTF-RH's) *Asbestos Removal Plan*. After reviewing the plan, we have the following questions and comments.

- Page 1, Scope of Work:** Confirm that the removal of tar and felt coating is Class II work. This is an Occupational Safety and Health Administration (OSHA) requirement. We suggest soliciting Hawai'i Occupational Safety and Health Division's (HIOSH's) input. Class II work is the removal of asbestos containing material that is not surfacing or thermal system insulation. Examples are removal of mastics, wallboard, roofing, floor tiles, etc. While the Red Hill pipeline removal appears to be Class II work, this is an OSHA requirement and should be reviewed by HIOSH.
- Page 2, Notifications:** Hawai'i Administrative Rules (HAR) §11-501 requires "10 working days" notification, not 10 days. "Working days" are Monday through Friday, including holidays.
- Page 2, Personal Protective Equipment:** States, "[p]ersonal protection will be required outside of the work area on the Project Site at all times...." What about inside the work area?
- Page 3, Protective Clothing:** The sign should read, "avoid" creating dust. Not "avid."

5. **Page 4, Work Area Preparation**

- a. **Item 2:** States, “[a]ll ventilation must be disconnected through lock out/tag out (LO/TO) of HVAC [heating, ventilation, and air conditioning] system.” This may not be possible because the tunnels need to be ventilated. Any negative enclosure systems should be constructed separate from the ventilation system. This applies more to a containment constructed in an apartment, in which case the ventilation ducts are covered and/or the AC is turned off. Unitek's Certified Industrial Hygienist will most likely be monitoring oxygen, but based on past experiences inside the tunnels, we do not expect that ventilation can be safely deactivated for very long.
- b. **Item 4, Regulated Area:** How far away from the regulated area (or active work) will non-protected personnel be required to stay?

6. **Page 5, Removal Operations:** HIOSH should review this because these are OSHA requirements. In addition, the DOH has the following comments.

- a. **Pipe gaskets:** More information should be provided to clarify “wrapped continuously,” which is vague.
- b. **Removal of tar and felt coatings from 16’ piping:** Include, “negative air enclosure shall be kept at -0.02 inches of water negative air pressure, in accordance with HAR §11-501.”

7. **Page 5, Glove Bag Removal:** States, “[t]he pipe surface will be brushed, washed and wiped clean.” If pipes are to be recycled, they should be non-porous, thoroughly decontaminated, visibly clean, and encapsulated. Porous items cannot be decontaminated and should be disposed of as asbestos contaminated. Nonporous items can be decontaminated. The recycler should be consulted for approval of items to be recycled that were decontaminated of asbestos.

8. **Page 5, Negative Pressure Enclosure Removal**

- a. **Item 2:** Include, “negative air pressure containment shall be maintained at -0.02 inches of water negative air pressure, as required by HAR §11-501.”
- b. **Item 6:** States, “[t]ar and felt shall be removed intact to extent feasible using scrapers.” Would this not generate some friable material? The Scope of Work on page 1 states no work that could produce friable material will be done unless this plan is amended.

9. **Page 6, Accidental Spills:** What does “regulate the area” mean?

10. **PDF page 9:** The State of Hawai'i Asbestos Certification is expired. Provide updated documentation of certification.

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11. **PDF pages 10 and 11:** Based on the drawing, it appears asbestos will only be removed from two sections of piping. How did the NCTF-RH determine these sections contain asbestos and others do not? Provide supporting documentation.
12. **PDF Page 14:** The AIHA Laboratory Accreditation is expired. Provide updated documentation of accreditation.

Should you have any questions regarding this letter, please contact Ms. Kelly Ann Lee, Red Hill Project Coordinator, at (808) 586-4226 or kellyann.lee@doh.hawaii.gov.

Sincerely,

Kathleen Ho

KATHLEEN S. HO
Deputy Director for Environmental Health

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