

DOH and EPA Oversight of Red Hill Defueling

Prepared for the Fuel Tank Advisory Committee Meeting
June 6, 2023



Regulatory Authorities— Defueling and Closure

- Chapter 342L, Hawai'i Revised Statutes, *Underground Storage Tanks*
- Chapter 11-280.1, Hawai'i Administrative Rules, *Underground Storage Tanks*
- DOH's May 6, 2022 Emergency Order, Docket Number 22-UST-EA-01
- EPA's 2023 Consent Order, Docket Number RCRA 7003-R9-2023-001; PWS-AO-2023-001



Regulatory Agency Oversight— Defueling

- **DOH's Emergency Order** requires the Navy to submit "a phased plan for defueling and permanently closing the Red Hill Facility (the 'Closure Plan') to achieve the completion of defueling at the earliest date consistent with safe defueling"
- The Defueling Phase of the 'Closure Plan' is being reviewed in sections as received:
 - Unpacking (completed)
 - List of Repairs (live list, continued review)
 - Quality Assurance Plan (conditionally approved)
 - Completion of Repairs
 - Defueling (repacking, tank mains, tank bottoms, unpacking, surge tanks, residual)
- Reviewing in sections allows multiple tasks to occur concurrently, expedites review, and keeps the project on schedule.



Regulatory Agency Oversight— Defueling

- **EPA's 2023 Consent Order** requires the Navy to address any comments submitted by EPA on the Defueling Plan and Plan Supplements.
- The Order requires the Navy to submit a "Defueling Preparedness Report." This report must certify that:
 - Navy and Defense Logistics Agency (DLA) has implemented repairs, operation changes, training, and other actions...in the...Defueling Plan,
 - Third-party quality assurance has been completed,
 - EPA's Spill Prevention, Control, and Countermeasure inspection reports findings have been addressed,
 - EPA has approved the Facility Response Plan,
 - Navy and DLA have performed tank tightness testing on two sumps in the lower access tunnel.
- Navy must defuel after EPA approves the Defueling Preparedness Report.



Regulatory Agency Oversight

To promote environmental protection and timely implementation, the regulatory agencies:

- Attend multiple meetings per week to identify expectations and discuss regulatory concerns.
- Review and comment on submitted documents.
- Inspect select repairs and testing.
- Observe, participate in, and comment on spill exercises, including planning and dry runs.
- Require and inspect placement of spill control and diversion measures.
- Will be on-site during defueling activities.



Regulatory Agency Oversight – Current Status

Example work items under review at DOH/EPA offices:

- Defueling Plan Supplement 2, submitted May 16, 2023.
- Quality Validation Reports for repairs completed in February, March, and April 2023.
- Concept of Operations (CONOP) and Operation Orders (OPORD) for Repacking and Surge Tank Defueling.

Upcoming work includes:

- Oversight of surge tank defueling.
- Review and approval of repair alternatives.
- Oversight of spill response exercises.
- Review and approval of CONOPs/OPORDs for Defueling, Tank Bottoms, and Unpacking.
- Review of Defueling Preparedness Report (EPA) and final approval to defuel.

