

# Red Hill Closure DOH & EPA Oversight

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— Closure

**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 Closure Phase of the 'Closure Plan' is being reviewed in sections as received and in order of work to be performed. We anticipate the work occurring in these stages:
  - Tank Cleaning and associated waste management, spill mitigation, release response
  - Tank Disposition and associated waste management
  - Site Assessment
- Reviewing in sections allows multiple tasks to occur concurrently, expedites review, and keeps the project on schedule.



# Regulatory Agency Oversight— Closure

## EPA's 2023 Consent Order requires that the Navy's Closure Plan include:

- A description of the sequence and process in which the 20 USTs, and the rest of the Facility Subject to Closure, will be emptied and cleaned,
- The infrastructure and procedures needed to perform the work,
- The method of permanent Closure,
- Management and disposition of waste material,
- Site assessment and release response action activities to be completed as part of Closure,
- A schedule for performing each activity



# 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.
- Anticipate conducting periodic inspections during tank cleaning, deconstruction, and site assessment.
- Will document completion of each stage of work.



# Regulatory Agency Oversight— Closure

## Updates and work currently under review at DOH/EPA offices:

- Navy submitted the original Closure Plan on Nov. 1, 2022. Supplement 1 was submitted Feb. 28, 2023.
- EPA and DOH has submitted multiple comment letters based on review of the Closure Plan and Supplement.
- Will receive Supplement 2 for review and comment. Supplement 2 is expected to address, among other concerns, updates to the proposed cleaning and tank cleanliness testing.

