

Red Hill Defueling DOH & EPA Oversight

Prepared for the Fuel Tank Advisory Committee Meeting
November 15, 2023



Regulatory Authorities – Defueling & 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 **Administrative 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' has been reviewed in sections, as received:
 - Unpacking Pipelines for Repairs (completed)
 - Quality Assurance Plan for Repairs (completed)
 - Quality Validation Reports of Repairs (completed)
 - Spill Mitigation Plans and Exercises (completed)
 - Defueling Operations (ongoing)
- Reviewing in sections allow multiple tasks to occur concurrently, expedites review, and keeps the project on schedule.



Regulatory Agency Oversight – Defueling

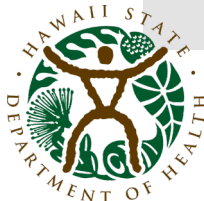
- [EPA's 2023 Consent Order](#) requires the Navy to address any comments submitted by EPA on the Defueling Plan and Plan Supplements.
- EPA conditionally approved the Defueling Plan on June 16, 2023. Navy was still required to submit a Defueling Preparedness Report.
- Navy submitted a Defueling Preparedness Report on September 27, 2023.
- EPA approved the Defueling Preparedness Report on October 3, 2023.
- EPA has placed staff on Oahu for witnessing defueling through completion.



Regulatory Agency Oversight – Defueling

To promote environmental protection and timely implementation, the Regulatory Agencies:

- Meet with DOD multiple times per week to provide expectations and discuss regulatory concerns.
- Carefully review and comment on submittals.
- Inspected select repairs and testing.
- Observed, participated in, and commented on spill exercises, including planning and dry runs.
- Required and inspected placement of spill control and diversion measures (i.e., "spill mitigation measures").
- Are observing defueling activities.



Regulatory Agency Oversight – Defueling

Items under review at DOH & EPA offices:

- Daily defueling Situation Reports (SITREPs)
- On-site witnessing of defueling activities and proposed changes to operations.

Upcoming work includes:

- Continued oversight of tank mains defueling
- Final tank bottoms defueling walkthrough on Nov. 30, 2023
- Oversight of tank bottoms defueling
- Review of quality validation for any needed repairs
- Review of Operation Orders (OPORDs) if changes are planned
- Review and approval of Defueling Plan Supplement 3
 - Plan to remove residual fuel
 - Transition from JTF-RH to Navy for closure

