

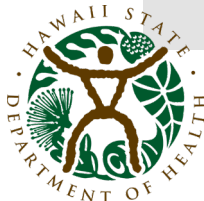
# Red Hill Closure DOH & EPA Oversight

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 – 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:
  - Cleaning Plan (submitted Oct. 2023, Agencies reviewing)
  - Site Assessment Plan (Navy estimates June 2024)
  - Closure Design (Navy estimates 2025)
- Agencies continue to ask for an updated, expedited schedule.
- According to Navy's existing schedule, submitted Feb. 2023, closure will conclude at the end of 2027.



# Regulatory Agency Oversight – Closure

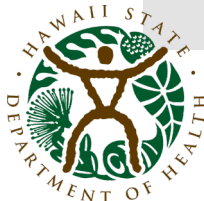
- **EPA's 2023 Consent Order** requires that the Navy's Closure Plan include:
  - A description of the sequence and process in which the 20 USTs, and the rest of the Facility Subject to Closure, will be emptied and cleaned,
  - The infrastructure and procedures needed to perform the work,
  - The method 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 – Closure

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.
- Concurred in concept with Navy's proposal to remove 3 fuel pipelines.
- In Oct. 2023, DOH granted an air permit for generator use during tank cleaning.
- Will conduct periodic inspections during cleaning, deconstruction, and site assessment.



# Regulatory Agency Oversight – Closure

## Items under review at DOH & EPA offices:

- Tank cleaning documents, submitted Oct. 4, 2023:
  - Work Plan
  - Waste Management Plan
  - Spill Response Plan

## Upcoming work includes:

- Observation of tank cleaning spill response exercise
- Review and approval of tank cleaning verification method
- Oversight of tank cleaning and verification
- Review and approval of full closure design and site assessment plan

