Red Hill Defueling DOH & EPA Oversight

- Prepared for the Fuel Tank Advisory Committee
- March 7, 2024



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



Defueling Plan Progress

<u>DOH's Emergency Order</u> and <u>EPA's 2023</u> <u>Consent Order</u> require comprehensive plans for defueling. Both agencies have an approval role for these submissions.

The Defueling Plan has been reviewed in sections, as received:

- Unpacking Pipelines for Repairs
- Quality Assurance Plan for Repairs
- Quality Validation Reports of Repairs
- Spill Mitigation Plans and Exercises
- Defueling Operations (Mains and Bottoms)
- Pipeline Unpacking
- Non-Destructive Residual Fuel Removal



Key Events

- October 3, 2023 Tank Mains, bottoms, and fuel pipelines defueled.
- November 14, 2023 JTF-RH submits
 Supplement 3 of the Defueling Plan.
- January 15, 2024 present JTF-RH conducts residual fuel removal.
- March 5-8, 2024 EPA and DOH Conduct an "Interim Defueling Completion Inspection."



On a regular basis, DOH and EPA...

- Discuss plans with JTF-RH and NCTF-RH
- Review and comment on submittals
- Inspect unanticipated repairs and tests
- Observe defueling activities

Most recently, DOH and EPA have...

- Witnessed fuel removal and spill response exercises
- Reviewed and commented on proposed repair/maintenance plans
- Performed the Interim Defueling Completion Inspection

Upcoming work includes...

- Finalize Interim Defueling Completion Inspection
- Oversee transition from JTF-RH to NCTF-RH in preparation for tank cleaning and pipeline removal.

Ongoing Work

