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In reply, please refer to:

November 15, 2024

Rear Admiral Stephen Barnett
Navy Closure Task Force – Red Hill
850 Ticonderoga Street, Suite 110
Joint Base Pearl Harbor-Hickam, Hawaii 96860
[via email only: stephen.d.barnett.mil@us.navy.mil]

Dear Rear Admiral Barnett:

SUBJECT: DOH Expectations for Reporting Pre-Pilot Study Data Collection

On October 2, 2024, the Hawai'i Department of Health (DOH) received the Navy Closure Task Force – Red Hill's (NCTF-RH's) revised *Draft Technical Memorandum Site Assessment Pilot Study Work Plan* (Pilot Study WP), dated October 2024, and responses to our comments on the original version of the Pilot Study WP.

The purpose of this pilot study is to demonstrate that the passive soil vapor monitoring technology proposed for site assessment will effectively detect historical releases from the underground storage tank system that includes the Red Hill Facility. As the NCTF-RH has stated before, this technology has never been used in porous lava rock similar to the Red Hill environment. Due to the uncertainty of this method's appropriateness, the DOH disapproved the NCTF-RH's Site Assessment Work Plan (*Draft Tank Closure Plan, Supplement 3: Phase 1 Site Assessment, Red Hill Bulk Fuel Storage Facility*) required under our May 2022 Emergency Order. The DOH will not be able to approve the Site Assessment Work Plan until the proposed site assessment technology and locations account for site-specific factors, as required by Hawai'i Administrative Rules §11-280.1-72.

Despite our concerns about the pilot study design, we understand the NCTF-RH proceeded to collect data (pre-pilot study) before submitting the revised Pilot Study WP or the information requested in our September 3, 2024 comment letter. It was not made clear to us, even upon inquiry, which version of the Pilot Study WP, if any, was followed during data collection. Therefore, the DOH is not providing comments on the Pilot Study WP at this time, as the pre-pilot study data will likely lead to another revision of the Pilot Study WP. Instead, we are providing our expectations for how the NCTF-RH will report the results of its pre-pilot study data

collection to regulators. At a minimum, provide the data collected with the following information within 30 days of receiving all pre-pilot study unvalidated results:

1. A detailed description of the sample collection methodologies used.
2. Data tables and associated figures providing sample collection time, coordinates, and results of all data collected during the pre-pilot study data collection.
3. Figures illustrating the locations and concentrations of analytes detected during the pre-pilot study data collection for the petroleum source areas identified. Include the soil, groundwater, and light non-aqueous phase liquid data (in data table call-outs on the figure) used to define the petroleum source areas, similar to Figures 6-1, 8-1 to 8-5, in the *Site Characterization Report November 2021 JP-5 Release in Adit 3, Operable Unit 1 Red Hill Bulk Fuel Storage Facility*, received May 19, 2023. Present the data visually both vertically and horizontally within the study area. Evaluate the pre-pilot study data collection results in the context of all existing data.
4. Evaluation of surrounding differential pressure measurements.
 - a. The location(s) where differential pressure measurements were collected in relation to the locations where soil vapor measurements were collected during the pre-pilot study data collection.
 - b. The frequency at which differential pressure measurements were collected.
 - c. Because air dilution/leakage was indicated in the data presented in the *Draft Soil Vapor Extraction System, Step and Constant Rate Testing Technical Memorandum*, dated July 2024, evaluate the relationship between differential pressure and vapor concentrations, as well as any other effects that differential pressure may have had.
 - i. This should include evaluating the closest differential pressure measurement(s) collected at the same time as each active soil vapor sample was collected.
5. Recommended changes to the pilot study design based on the pre-pilot study data collection results. The DOH anticipates that a revised Pilot Study WP will be submitted for our review and approval following submission of the pre-pilot study data collection results.

If you have any questions regarding this letter, please contact Kelly Ann Lee, DOH Red Hill Project Coordinator, at KellyAnn.Lee@doh.hawaii.gov or (808) 586-4226.

Sincerely,



KATHLEEN S. HO
Deputy Director for Environmental Health

Rear Admiral Stephen Barnett
November 15, 2024
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