



STATE OF HAWAII  
DEPARTMENT OF HEALTH  
KA 'OIHANA OLAKINO  
P. O. BOX 3378  
HONOLULU, HI 96801-3378

In reply, please refer to:  
File:

November 18, 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](mailto:stephen.d.barnett.mil@us.navy.mil)])

Dear Rear Admiral Barnett:

- Subject: DOH Request for Work Plan in Response to:**
- 1. Response to Comments – Draft Final Technical Memorandum, Phase 2 Holding Tank Site Characterization (Nov 2022) and Draft Closure Report, Concrete Tank Removal (Jan 2023), received August 8, 2024;**
  - 2. Technical Memorandum, Revised Phase 2 Holding Tank and Leach Tank Characterization, November 2021 Pipeline Release, Red Hill Bulk Fuel Storage Facility, dated August 8, 2024; and**
  - 3. Draft Final Closure Report, Concrete Tank Removal, Red Hill Bulk Fuel Storage Facility, dated July 2024**

The Hawai'i Department of Health (DOH) has reviewed the subject documents, including the *Response to Comments – Draft Final Technical Memorandum, Phase 2 Holding Tank Site Characterization (Nov 2022) and Draft Closure Report, Concrete Tank Removal (Jan 2023)*, dated August 7, 2024, hereinafter referred to as the "RTCs." We understand these documents were submitted as part of the Navy Closure Task Force – Red Hill's (NCTF-RH's) Closure Plan for the underground storage tank (UST) system that includes the Red Hill Facility, in accordance with DOH's 2022 Emergency Order (EO).

The RTCs state the NCTF-RH intends to conduct a data gap evaluation using existing data, and only if critical data gaps are identified, prepare a work plan to address the gaps. The DOH's June 24, 2024 letter already identifies critical data gaps that necessitate additional work to fully determine the magnitude and extent of the release from the UST system, as required under Hawai'i Administrative Rules Section 11-280.1-65. Because a formal data gap analysis is not needed, submit a work plan to completely assess the lateral and vertical extent of the release(s)

and outline how this work plan fits into the overall Closure Plan required under the DOH 2022 EO. Submit this work plan within 45 calendar days of receipt of this letter.

Below, we will repeat some of the data gaps identified in our June 24, 2024 letter and describe additional data gaps noted in our review of the subject documents.

1. The magnitude and extent of the contamination identified in the perched aquifer and sediment has not been determined.
2. The NCTF-RH did not provide a figure overlaying the results of the site characterization and the limits of the remedial excavation conducted, as requested in our June 24, 2024 letter. The NCTF-RH responded to our comment by stating “*All activities performed as part of the Phase 1 and Phase 2 site characterization activities were performed separately from the interim removal action activities summarized in the Closure Report.*” Consequently, for us to evaluate whether the magnitude and extent of the release(s) had been determined and subsequently excavated as part of the removal activities, the DOH used the information available in EDMS and easily prepared the enclosed figure (coordinates for borings LT-W50, LT-N55, HT-35W-ALT were unable to be located). Based on the enclosed figure, the following data gap has also been identified.
  - a. The lateral and vertical extent of the release has not been determined in the northwest direction. TPH-o was detected at concentrations above the DOH Tier 1 Environmental Action Level (EAL) in discrete soil samples collected during the site characterization from LT-N35 and LT-N40, as well as in Multi Increment soil samples collected following the removal action from decision unit (DU) 9 and DU 10. In addition, very limited field data was collected from boring HT-W35, and no samples were collected for laboratory analysis from this boring.
3. Additionally, based on the enclosed figure and the *Draft Final Closure Report, Concrete Tank Removal, Red Hill Bulk Fuel Storage Facility*, dated July 2024, soil contamination was identified in borings LT-S10, HT-N10, LT-S15, HT-E10 located outside of the final remedial excavation. Although contaminants were not detected at concentrations above the DOH Tier 1 EALs in the confirmation soil samples collected from eastern, western, and southern sidewalls of the final remedial excavation, the detection of contaminants above the DOH Tier 1 EALs or elevated photoionization detector readings in these borings indicates further investigation is warranted in these areas. Release(s) may have occurred not only from the holding and leach tanks, but also from the pipeline leading to them.

While the DOH recognizes the limited scope of the initial response action, the final versions of the subject reports should clearly state that the full extent and magnitude of the release, both laterally and vertically, has not yet been determined and further investigation is necessary.

Rear Admiral Stephen Barnett  
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If you have any questions regarding this letter or its enclosure, please contact me, at [KellyAnn.Lee@doh.hawaii.gov](mailto:KellyAnn.Lee@doh.hawaii.gov) or (808) 586-4226.

Sincerely,



KELLY ANN L. LEE  
Red Hill Project Coordinator

Enclosure

c via email only:

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