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In reply, please refer to:
File:

November 6, 2025

Rear Admiral Brad Collins
Commander, Navy Closure Task Force – Red Hill
850 Ticonderoga St., Ste. 110
Joint Base Pearl Harbor Hickam, HI 96860-5101
[via email only: brad.j.collins.mil@us.navy.mil]

Dear Rear Admiral Collins:

SUBJECT: DOH Comments on *Draft Final Site Characterization Work Plan, Holding Tank Leach-Tank, Red Hill Bulk Fuel Storage Facility*, dated May 2025

On April 30, 2025, the Hawai'i Department of Health (DOH) provided comments on the Navy Closure Task Force – Red Hill's (NCTF-RH's) *Draft Site Characterization Work Plan, Holding Tank-Leach Tank, Red Hill Bulk Fuel Facility*, dated February 2025. On June 25, 2025, the NCTF-RH submitted a letter responding to our comments, enclosed with:

- *Enclosure (1) - Response to DOH Comments on Draft Site Characterization Work Plan, Holding Tank-Leach Tank (February, 2025)*, hereinafter "Enclosure (1)," and
- *Draft Final Site Characterization Work Plan, Holding Tank Leach-Tank, Red Hill Bulk Fuel Storage Facility*, dated May 2025, hereinafter "HT-LT Work Plan."

These documents were submitted to comply with release response and closure requirements for the underground storage tank (UST) system that includes the Red Hill Bulk Fuel Storage Facility in accordance with DOH's May 2022 Emergency Order and Hawai'i Administrative Rules Chapter 11-280.1. The purpose of the HT-LT Work Plan is to outline the NCTF-RH's procedures to determine the magnitude and extent of releases from the UST system in the holding tank-leach tank area.

The NCTF-RH coordinated a site visit for regulators to view the holding tank-leach tank area on September 12, 2025 and met with regulators to discuss the HT-LT Work Plan on September 22, 2025. After reviewing the HT-LT Work Plan and information from the site visit and meeting, the DOH has the following comments. Please provide responses within 60 calendar days of receiving this letter.

1. In reference to Section 4.3, Enclosure (1) states that, "the collection of incremental subsurface soil samples at the site is impractical due to numerous cobbles and boulders in this area (refusal was frequently encountered during the previous phase of sampling and it

is very unlikely that additional borings than those currently proposed could be completed)." In the event of refusal, conduct step-out borings and document the refusals.

2. Make the following revisions to the HT-LT Work Plan Section 4.4 (PDF page 18) (*red italicized indicates new text*, ~~strikethrough~~ indicates text to remove).

    1. If COPC concentrations in *the* subsurface *are not detected at a concentration above the most conservative DOH Tier 1 Environmental Action Level (EAL)* ~~soil do not exceed PSLs~~ in any sampling location, then recommend ~~no further action~~ *no further sampling unless reasonable evidence indicates additional sampling is needed (e.g. data gaps remaining, field observations, etc.).*

        If COPC concentrations in subsurface soil are detected *at concentrations above the most conservative DOH Tier 1 EALs* ~~exceed PSLs~~, then evaluate if exceedances are delineated laterally and vertically with additional borings. If exceedances are delineated, then no additional subsurface soil sampling will be conducted *unless other reasonable evidence or reasoning indicates additional sampling is needed (e.g. data gaps remaining, field observations, etc.)*. If exceedances are not delineated, then conduct step-out borings to further delineate the lateral extent of contamination, or deeper borings to further delineate the vertical extent of contamination.

    2. If *none of the* COPC concentrations in *perched* groundwater samples collected during 1 year of quarterly monitoring ~~do not exceed PSLs~~ *are detected above the most conservative DOH Tier 1 EALs,* then recommend no further ~~action~~ *sampling unless reasonable evidence indicates additional sampling is needed.*"

        If COPC concentrations in perched groundwater exceed *most conservative DOH Tier 1 EALs* ~~PSLs~~, then conduct a longer temporal study or install additional step-out perched groundwater monitoring wells down gradient of the source area to define the extent of perched groundwater impacts.

        If COPC concentrations in basal groundwater exceed *most conservative DOH Tier 1 EALs* ~~PSLs~~, then conduct an expanded study to include more existing basal wells at the Facility and install more basal groundwater monitoring wells downgradient of the source area to define the extent of basal groundwater impacts.

    3. If quarterly perched groundwater level monitoring for 1 year indicates that the elevation of South Halawa Stream is higher than the elevation of the perched groundwater (i.e., the stream is not receiving water from the perched groundwater due to relative elevation), then recommend no further action unless other reasonable evidence indicates that further action is needed.

~~If the elevations of South Halawa Stream and perched groundwater indicate that the stream is gaining (i.e. perched groundwater is seeping into the stream).~~ If water levels indicate that the perched groundwater is seeping into the stream, then collect surface water samples at the locations most likely influenced by this seepage for analysis of COPCs.

If you have any questions regarding this letter, please contact me at KellyAnn.Lee@doh.hawaii.gov or (808) 586-4226.

Sincerely,

KELLY ANN L. LEE
Acting Red Hill Project Coordinator

c [via email only]:
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