UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

OFFICE OF THE
REGIONAL ADMINISTRATOR

VIA ELECTRONIC MAIL – READ RECEIPT REQUESTED

Rear Admiral Stephen Barnett
Commander
U.S. Navy Region Hawaii
850 Ticonderoga Street, Suite 110
Joint Base Pearl Harbor-Hickam, Hawaii 96860-5101
stephen.d.barnett.mil@us.navy.mil

Re: Request for Clarification: EPA Comments on RHBFSF Pipeline Unpacking Plan

Dear Rear Admiral Barnett,

The U.S. Environmental Protection Agency Region 9 (EPA) has reviewed the Unpacking Plan for the Red Hill Bulk Fuel Storage Facility (RHBFSF) ("the Plan"). This Plan was provided as an enclosure to the Defueling Plan Supplement 1A, submitted to EPA on September 7, 2022. Thank you for sharing this document, which provides a detailed account of how the Navy will remove fuel currently contained within the three main fuel pipelines between the RHBFSF tanks and the line termini at Hotel Pier.

This letter transmits EPA's comments on the Unpacking Plan. Importantly, EPA finds that the current version of the Plan does not provide sufficient detail on how the Navy will engage with the public before, during, and after the unpacking process. While the unpacking process does not involve pressurized fuel movements that caused the May 6, 2021 release, it does involve movement of approximately 1.1 million gallons of fuel. The public is entitled to be aware of fuel movements that present risks to human health and the environment. EPA also seeks background information on the Navy's processes used to determine volumes of fuel to be removed, and evaluate risks associated with use of a vacuum truck to pump residual fuel from the pipelines. Other than one comment regarding the vacuum trucks, this letter does not address EPA's ongoing coordination regarding SPCC and FRP requirements. EPA looks forward to participating in the spill drills this week and will follow up separately during and after the drills to ensure that EPA's SPCC and FRP concerns are addressed prior to unpacking. Please respond to this letter at least two weeks prior to the beginning of fuel movement. Questions may be directed to Evan Osborne, at (206) 553-1747, or osborne.evan@epa.gov.

Sincerely,

KERRY DRAKE

Digitally signed by KERRY DRAKE
Date: 2022.09.21 15:22:49 -07'00'

for Deborah Jordan
Deputy Regional Administrator
U.S. Environmental Protection Agency, Region 9

Enclosure: EPA's Comments on the Unpacking Plan (September 7, 2022)

cc: CAPT Cameron Geertsema, NAVFAC Hawaii [email only]
Donald Panthen, NAVFAC Hawaii [email only]
Kathleen Ho, HDOH [email only]
COTP Aja Kirksey, USCG [email only]
Dustin Hubbard, US DOT PHMSA [email only]

Enclosure: EPA's Comments on the Unpacking Plan (September 7, 2022)

This enclosure contains EPA's comments on the Unpacking Plan submitted by the Navy on September 7, 2022.

1. The Unpacking Plan does not specify community engagement activities that will take place before, during, and after movement of fuel from the pipelines. The Critical Path Method network diagram, submitted as Enclosure 5b to the Defueling Plan Supplement 1A, contains two tasks related to public engagement surrounding the unpacking actions: a press release prior to unpacking, and a "Placeholder" for public engagement on October 26th, 2022, presumably after the completion of unpacking. Please describe all public engagement activities that will take place before and after the unpacking work, including a description of when, relative to fuel movement, public engagement will occur, what information will be shared, and whether the public will have an opportunity to ask questions and submit comments.
2. Provide a redacted version of the final Unpacking Plan that can be posted to EPA's website no later than two weeks prior to the start of unpacking.
3. The process of transferring fuel via the vacuum truck station is subject to the SPCC Rule's general containment and/or drainage control requirements (*See,* 40 CFR 112.7(c)). Please describe how the Navy will meet these requirements, including a description of the containment system to be installed and how it will be operated and monitored during all fuel transfers taking place during this process.
4. EPA identified factors that may generate significant uncertainty in fuel volume calculations. Please address the following:
    a. Pipe material can have significant variations in "nominal wall thickness" especially for older vintage piping. What method was used to estimate wall thickness of each pipeline? EPA suggests a process involving multiple direct measurements to produce a statistically sound average internal diameter for the pipe.
    b. What method was used to confirm the total length of the pipelines? How was error in assuming pipe length avoided?
5. How much fuel is estimated to be contained within the branches of connected fittings, lines, or piping connected to the pipelines, and has the Navy determined whether this fuel will drain during gravity–driven or pumping operations? State whether special actions for branch line drainage is required.
6. Please provide elevations for each valve and skillet identified on pages 3-11 of the Unpacking Plan. Be specific in reference to location (i.e. elevation to the bottom of tank, bottom or top of pipe, centerline of valve, centerline of hose connection, etc.).
7. Confirm vacuum truck operations will comply with best practices provided in API Recommended Practice 2219. In particular, address practices established to address risks related to fire from static discharge, ullage overfill, and inadequate containment.
8. Please describe where and when hazardous atmospheric testing is required during the unpacking process.
9. Please address the following requirements for clarity related to tank capacities:
    a. How will liquid level and ullage be determined?
    b. At which points in time during fill/drainage will liquid level and ullage be determined?

    c. Specify how these measurements are validated. This might be calibration, redundancy in instrumentation, etc.
10. Please state whether a Hazard and Operability Analysis (HAZOP) has been conducted on the following systems:
    a. Phase III gravity drain down for each line
    b. Vacuum truck operations for each line
    c. Piping and pumps connected to each receiving tank
    d. Each marine loading operation
11. Please provide the documented HAZOP for each of the above listed items.
12. Where and how will new pressure sensors be installed? Describe the function and intent of each sensor.
13. Please specify flow direction for each check valve in the schematic provided on page 155 of the Unpacking Plan, and whether any HAZOP has considered use of check valves in the unpacking processes.