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

Enforcement and
Compliance Assurance Division

VIA ELECTRONIC MAIL ONLY

VADM John F. Wade
Commander
Joint Task Force - Red Hill
1025 Quincy Avenue, Suite 900
Joint Base Pearl Harbor Hickam, Hawaii 96860-5101
john.f.wade2.mil@us.navy.mil

Re: Conditional Approval of Surge Tank Drainage

Dear VADM Wade,

On July 6, 2023, the Environmental Protection Agency, Region 9 (EPA) received your request as Commander of the Joint Task Force -Red Hill (JTF-RH) to begin removal of fuel product from the surge tanks at the Underground Pumphouse (UGPH) associated with the Red Hill Bulk Fuel Storage Facility (RHBFSF). EPA is issuing a conditional approval that will allow JTF-RH to begin this activity once adequate public engagement is conducted.

This process, which has been referred to as, "Surge Tank Drainage" or, "Surge Tank Defueling," is an important Defueling Phase proposed by JTF-RH in their Defueling Plan. As established by EPA's 2023 Consent Order and clarified in EPA's June 16, 2023 Conditional Approval for Defueling, JTF must meet the following condition prior to conducting Surge Tank Drainage:

1. *Prior to beginning Surge Tank Drainage, JTF must submit:*

    a. *A letter requesting approval to begin Surge Tank Drainage, stating a specific day on which the activity is planned to occur. This letter must offer EPA the opportunity to witness the planned activity.*
    b. *Response to EPA's May 31, 2023 comments regarding the Concept of Operations (CONOP) and Operation Orders (OPORDS).*
    c. *Adequate public engagement, which must include, at a minimum, a press release or equivalent distribution to the public describing the proposed activity that is issued at least seven calendar days before the activity is set to begin.*
    d. *Confirmation that all repairs that impact the portions of the facility involved in Surge Tank Drainage have been completed, quality validated, and approved by EPA.*

JTF-RH accomplished Condition 1.a. by submitting the July 6, 2023 "Request…the Commence Surge Tank Defueling."

JTF-RH accomplished Condition 1.b. by submitting a response to EPA's comments on the CONOP and OPORDS, received by EPA on June 23, 2023. EPA has no further comments regarding the CONOP and OPORDS for Surge Tank Drainage.

JTF-RH has met Condition 1.d. since EPA has received all quality validation (QV) reports for repairs that impact the portion of the RHBFSF related to Surge Tank Drainage. EPA has found no issues upon review the QV reports for repairs #34, #94, #109, #110 from the Consolidated Repair/Enhancement List and #32 from the Incremental Repair List. By this notice, EPA is approving the specific QV reports listed in this paragraph. EPA continues to review the monthly QV report packets prepared by JTF-RH and will be issuing separate batch approvals for these submissions.

As of the date of this letter, JTF-RH has not met Condition 1.c. JTF-RH must carry out public engagement including, at a minimum, a press release. This release must be shared broadly so that all stakeholders with an interest in updates at the RHBFSF are made aware of this activity. Once this action is taken, Condition 1.c. will be met and JTF-RH may proceed with Surge Tank Drainage.

EPA is arranging personnel to be on-location by July 17, 2023, to witness initial stages of Surge Tank Drainage. We appreciate your commitment to conducting this work in an open and transparent manner and request full access to portions of JBPHH that will be involved in this activity. If you have any concerns or questions, please feel free to contact me directly. Members of your team should contact our staff lead on this matter, Evan Osborne (osborne.evan@epa.gov, 206-553-1747), for more information.

Sincerely,

/s/ July 10, 2023

Jamie Marincola
Red Hill 2023 Consent Order Coordinator
EPA R9 ECAD

cc: Kathy Ho, HDOH [email only]
Lene Ichinotsubo, HDOH [email only]
BG Michelle Link, JTF [email only]