



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

ENFORCEMENT AND
COMPLIANCE ASSURANCE
DIVISION

VIA ELECTRONIC MAIL ONLY

Brigadier General Michelle Link
Deputy Commander
Joint Task Force, Red Hill
1025 Quincy Avenue, Suite 900
Joint Base Pearl Harbor Hickam, Hawaii 96860-5101
michelle.a.link2.mil@mail.mil

Re: Quality Validation Approvals for Repacking at Red Hill Bulk Fuel Storage Facility

Dear Brigadier General Link,

The Environmental Protection Agency, Region 9 (EPA) has received your August 7, 2023, request that repairs INC#29 and INC#31 from the Incremental Repair List (F-76 cross-connect and Fuel Oil Recovery (FOR) bypass repairs, respectively) be removed as conditions for approval of Repacking JP-5 and F-24 fuel lines at the Red Hill Bulk Fuel Storage Facility (RHBFSF). Joint Task Force – Red Hill (JTF-RH) has requested that these repairs before Tank Mains Defueling. EPA has reviewed your request and requires additional information before issuing a response. Please address the following:

1. Will any hot work be required to complete the FOR bypass and FOR (Zone 7) bypass repairs?
2. Please confirm that the Aqueous Film Forming Foam (AFFF) retention line from the tank gallery to Adit 3 will be operational for Repacking.
3. If a spill occurs in the Lower Access Tunnel (LAT) during Repacking, please explain response plans focusing on the use of the AFFF retention line and associated sump pumps. Include an explanation of how response actions will differ between small spills addressed by spill response kits and larger spills requiring use of the AFFF sump pumps; a description of whether the AFFF sump pumps would pressurize the retention line; and a description of how fuel would be removed from the AFFF retention line should it be activated.
4. A Simpson Gumpertz & Hegler (SGH) memo on the topic of the AFFF retention system bypass to F-76 pipeline and repair methods, dated May 18, 2023, states that, "...[c]aulking of the AFFF retention pipeline PVC joints may not be an effective method of repairing high-risk joints." What is a "high risk joint," and where do they exist within the AFFF retention line?

5. JTF-RH plans to conduct a hydraulic leakage test of the AFFF retention line in the Tank Gallery, currently scheduled for August 11, 2023. Has JTF evaluated leak testing methods to evaluate the entire AFFF retention line that could occur before Repacking?
6. Please provide a summary of repairs/enhancements that have occurred on the AFFF retention line that reduce the likelihood of leakage or spillage, should fuel be pumped into this line.

This information will allow EPA to evaluate whether repairs INC#29 and INC#31 from the Incremental Repair List must occur before Repacking. Please feel free to contact me directly. If your staff has specific technical questions, please contact our staff lead on this matter, Pete Reich (Reich.Peter@epa.gov, 415-972-3052).

Sincerely,

/s/ August 11,
2023

Jamie Marincola
Red Hill 2023 Consent Order Coordinator
EPA R9 ECAD

cc: Kathleen Ho, HDOH
Lene Ichinotsubo, HDOH
CAPT Patrick Sullivan, JTF-RH
CAPT Steve Stasick, JTF-RH