



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

ENFORCEMENT AND
COMPLIANCE ASSURANCE
DIVISION

VIA ELECTRONIC MAIL ONLY

CAPT Patrick Sullivan
Planning Director
Joint Task Force, Red Hill
1025 Quincy Avenue, Suite 900
Joint Base Pearl Harbor Hickam, Hawaii 96860-5101
Patrick.j.sullivan7.mil@us.navy.mil

Re: Approval of June (I, II) and July (I-IV) RHBFSF Repair Quality Validation Reports;
Fitness-for-Service Acceptance

Dear CAPT Sullivan,

The Environmental Protection Agency, Region 9 (EPA) has completed a review of additional Quality Validation (QV) reports and additional Fitness-for-Service information submitted by the Joint Task Force – Red Hill (JTF-RH). EPA reviewed these documents pursuant to the 2023 Consent Order between EPA, the Department of Navy, and the Defense Logistics Agency. With this notice, EPA is issuing approvals for certain QV reports, described herein. EPA is also clarifying that a condition previously applied to QV report approvals regarding Fitness-for-Service assessments no longer applies, since JTF-RH has addressed EPA’s concerns on this topic.

JTF-RH maintains two lists of repairs occurring at the Red Hill Bulk Fuel Storage Facility in preparation for Defueling: 1) a *Defueling Consolidated Repair/Enhancement List*, submitted on October 24, 2022 that includes 253 repair/enhancement items, and 2) the *Red Hill Incremental Repair List*, dated July 26, 2023. EPA is approving QV reports from both lists. To aid with clarity, EPA uses “INC#” before incremental repairs to differentiate between repairs that might otherwise be mistaken (e.g., #1 and INC#1 are two different repairs, the former being on the *Defueling Consolidated Repair/Enhancement List* and the latter on the *Red Hill Incremental Repair List*).

From the *Defueling Consolidated Repair/Enhancement List*, EPA is approving the following reports:

- The “June (I)” Reports,” submitted on June 7, 2023, including twenty repairs: #58-77.
- The “June (II) Reports,” submitted on June 22, 2023, including thirty-four repairs: #1, 8, 10, 11, 18-20, 25, 28, 30, 40, 41, 45-48, 54-57, 84, 85, 91, 92, 98, 99, 106, 108, 110¹, 236, and 240-243.
- The “July (I)” Reports,” submitted on July 6, 2023, including two repairs: #34¹, 35.
- The “July (II)” Reports,” submitted on July 17, 2023, including eighteen repairs: #5, 13-16, 21-24, 26, 27, 29, 95, 224, 250-253.
- The “July (III)” Reports,” submitted on July 20, 2023, including one repair: #2.
- The “July (IV)” Reports,” submitted on July 27, 2023, including two repairs: #238, 239.

EPA has now approved 248 of 253 QV reports for repairs on the *Defueling Consolidated Repair/Enhancement List*. EPA has not yet received final QV reports for five repairs: #182-184, 188, and 249. JTF-RH has indicated that these repairs are complete, pending the results of hydrotesting that should be completed imminently. EPA will immediately begin review of these reports upon receipt.

From the *Red Hill Incremental Repair List*, EPA is approving the following reports:

- The “July (IV)” Reports,” submitted on July 27, 2023, including fourteen repairs: INC#1, INC#23, INC#26, INC#33-43.

EPA has now approved 15 of 44 QV reports for repairs on the *Red Hill Incremental Repair List*. In addition to the fourteen report approvals listed above, EPA approved INC#32 on July 10, 2023, as part of a conditional approval for Surge Tank Drainage. EPA continues to review INC#2-22 and INC#24. EPA has not yet received INC#25, INC#27-31, and INC#44. EPA will immediately begin review of these reports upon receipt.

On July 10, 2023, and July 21, 2023, EPA issued conditional approvals for batches of QV reports contingent on the ability for EPA to “...require additional information as needed to clarify or supplement the Fitness-for-Service (FFS) assessment process.”. On July 13, 2023, EPA submitted a request for additional information on the FFS assessment process. JTF responded to EPA’s request on July 18, 2023. Following review, EPA has no further comments regarding this topic and JTF-RH may consider this condition to approvals removed. No conditions apply to the QV report approvals granted to date.

EPA has previously informed JTF-RH that all QV reports—including those from the *Defueling Consolidated Repair/Enhancement List* and from the *Red Hill Incremental Repair List*—must be submitted and approved before Repacking may take place. Please submit the remaining reports

¹ EPA approved QV reports for repairs #34, 94, 109, 110 on July 10, 2023, as part of a conditional approval for Surge Tank Drainage. They are listed in this correspondence for completeness and clarity.

twelve reports no later than August 16, 2023, to ensure EPA can complete its review. EPA acknowledges an August 7, 2023, request from Brigadier General Link to remove approval of INC#29 and INC#31 as conditions for Repacking. EPA is weighing this request and will respond under a separate cover.

If you have any questions, please contact our staff lead on this matter, Evan Osborne (osborne.evan@epa.gov, 206-553-1747).

Sincerely,

/s/ August 9, 2023

Jamie Marincola
Red Hill 2023 Consent Order Coordinator
EPA R9 ECAD

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