



**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: Fitness-for-Service Clarification and Approval of RHBFSF Repair/Enhancement Quality Validation Reports -June (I) Packets

Dear CAPT Sullivan,

The Environmental Protection Agency, Region 9 (EPA) has completed its review of additional Quality Validation (QV) Reports submitted by the Joint Task Force – Red Hill (JTF-RH). EPA reviewed these QV Reports pursuant to the 2023 Consent Order between EPA, the Department of Navy, and the Defense Logistics Agency. EPA conditionally approves the QV reports described below:

- The “April Reports,” submitted on May 4, 2023, including sixty-four repairs: #32, 33, 42, 111, 114, 116, 117, 120, 126, 127, 130, 132 through 143, 187, 189 through 193, 195 through 220, and 222 through 230.
- The “May Reports,” submitted on May 31, 2023, including thirty-eight repairs: #6, 17, 37, 43, 44, 49 through 51, 53, 86 through 88, 90, 93, 94, 100 through 103, 105, 107, 109, 112, 113, 115, 118, 119. 121, 123, 124, 129, 131, 144, 233 through 235, 237, and 245.
- The “June (III)<sup>1</sup>” Reports” submitted on June 30, 2023, including thirteen repairs: #9, 31, 39, 96, 128, 169, 194, 221, 231, 232, 246, 247, and 248.

EPA’s approval is predicated on the condition that EPA may, at a later date, require additional information as needed to clarify or supplement the Fitness-for-Service (FFS) assessment process.

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<sup>1</sup> JTF has submitted three packets of QV reports in June 2023. EPA has used the notation, (I-III), to identify the first, second, and third packets based on the chronological date of submission. EPA continues to review June (I) and June (II) packets.

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, addressing EPA's questions. EPA is currently reviewing the FFS response and looks forward to reviewing the final FFS report, expected by July 31, 2023.

EPA is using this memorandum as an opportunity to share additional recommendations outside the scope of specific repair approvals. This information is being shared for JTF's awareness and does not impact the conditional approval of the repairs described above:

- All components having gone through repair or replacement should be monitored closely during the Repacking phase of Defueling to ensure system integrity.
- The Comments section of the QV report for repair #31 states, "Contractor replaced fireproofing materials...[a] specialized jacket was designed for the coupling and installed..." JTF should consider the potential effects of intense heat that could soften coupling bolts and allow the pipe to separate in the event of a fire. Prevention of a fire by ensuring no fuel is released to the tunnel will ensure health and safety of the system and those working in the tunnel. EPA does not have a regulatory role in approval of fire suppression measures related to Red Hill and shares this comment for JTF's consideration regarding fire suppression tactics.

EPA has now approved 171 QV reports and has 82 reports remaining to review. Please ensure all QV reports are submitted to EPA no later than July 31, 2023, to receive a response on all QV reports by August 7, 2023. If you have any questions, please contact our staff lead on this matter, Evan Osborne ([osborne.evan@epa.gov](mailto:osborne.evan@epa.gov), 206-553-1747).

Sincerely,

/s/ July 21, 2023

Jamie Marincola  
Red Hill 2023 Consent Order Coordinator  
EPA R9 ECAD

cc: Kathleen Ho, HDOH [email only]  
Lene Ichinotsubo, HDOH [email only]  
BG Michelle Link, JTF-RH [email only]  
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