



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

ENFORCEMENT AND
COMPLIANCE ASSURANCE
DIVISION

VIA ELECTRONIC MAIL – READ RECEIPT REQUESTED

Vice Admiral John 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 the RHBFSF Defueling Plan and Response to Supplement 2

Dear Vice Admiral Wade:

The U.S. Environmental Protection Agency, Region 9 (EPA) has received Supplement 2 of the Red Hill Bulk Fuel Storage Facility (RHBFSF) Defueling Plan (Defueling Plan), submitted by the Joint Task Force – Red Hill (JTF) on May 16, 2023. EPA has expedited our thorough review of this document to avoid affecting the defueling timeline as established by the Integrated Master Schedule (IMS), included as Enclosure (8) of Supplement 2. We appreciate the clear and definite timeline of events provided in the Integrated Master Schedule and have found Supplement 2 to be a clearly written document that helps regulators and other stakeholders better understand the actions that will occur before and during defueling.

Submission of Supplement 2 is an important step towards defueling the Red Hill Bulk Fuel Storage Facility (RHBFSF) under the oversight of EPA and the Hawai'i Department of Health (DOH). The finalization in June of the Consent Order (2023 Consent Order) among EPA, the Navy, and the Defense Logistics Agency (DLA) provides EPA a formal approval role for the Defueling Plan, including all of its supplements. Under the 2023 Consent Order and associated Statement of Work, EPA must approve the Defueling Plan, as supplemented, before JTF, on behalf of the Navy and DLA, may defuel the RHBFSF.

Considering all portions of the Defueling Plan that have been submitted to date, EPA is issuing a conditional approval of the Defueling Plan that allows JTF to continue pursuing an accelerated defueling timeline while also clarifying future requirements that must be met to ensure defueling occurs safely. EPA's conditional approval considered all submissions forming the Defueling Plan:

- **Defueling Plan (Initial)**, submitted on June 30, 2022.
- **Supplement 1.A**, submitted on September 7, 2022,
- **Supplement 1.B**, submitted on September 28, 2022,
- **Consolidated Repair and Enhancement List**, submitted on October 24, 2022,

- **Independent Third-Party Quality Validation Plan**, submitted on November 1, 2022
- **Supplement 2**, submitted on May 16, 2023.
- Written responses to issue-specific topics, updates to the critical path method planning documents, initial IMS submittals, and other information considered for the planned defueling of the RHBFSF submitted since June 30, 2022.

EPA understands that Supplement 2 supersedes previously iterations of the Defueling Plan. For example, the June 30, 2022, Defueling Plan states that "December 31, 2024, as the earliest date that is consistent with the safe defueling of the facility..." This statement has since been superseded by the information in Supplement 2 which presents a defueling start date of October 16, 2023. This same logic applies to any part of the Plan. For this reason, the majority of the comments enclosed within this letter are applicable to Defueling Plan Supplement 2.

EPA is in general agreement with the methods, timeline, and approach to defueling presented by JTF. The conditional approval granted by this letter does not represent approval in totality or without conditions; nor does it mean that JTF can move any fuel at this facility without further approval by EPA.

EPA is requiring the following actions and subsequent approvals as specified below. Many of these conditions reference "Defueling Phases," which are hereby defined as: Surge Tank Drainage, Repacking, Tank Mains Defueling, Tank Bottoms Defueling, Unpacking, and the final removal of residual fuel that will remain in the system after Unpacking ("Residual Fuel Drainage"). Based on new information concerning the timeline for Surge Tank Drainage, EPA has attempted to arrange these conditions in sequential order as appropriate:

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.
2. Prior to conducting Repacking, JTF must submit:
 - a. A letter requesting approval to Repack, 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. Submission of Operation Orders (OPORDS) for Repacking, and demonstration that analysis of hazards and possible risks have been considered and addressed.
 - 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, including those included in the Consolidated Repair and Enhancement List as well as any other repairs occurring in the RHBFSH affecting defueling, have gone through quality validation and were approved by EPA.
3. Prior to conducting Tank Mains Defueling, JTF must complete the following:
- a. JTF must complete, submit, and seek approval of the Defueling Preparedness Report as described in EPA's 2023 Consent Order prior to conducting Tank Mains Defueling. This includes:
 - i. Navy and DLA have implemented repairs, operational changes, training, and other actions described in the approved Defueling Plan (and any additional supplements);
 - ii. Third-party quality assurance documenting the adequacy of repairs has been completed;
 - iii. Navy and DLA have addressed the findings from EPA's August 17, 2021, Spill Prevention, Control and Countermeasure (SPCC) Plan Inspection Report for the Facility Subject to Defueling;
 - iv. EPA has approved the Facility Response Plan (FRP) that covers the Facility Subject to Defueling; and
 - v. Navy and DLA have performed tank tightness testing on the Zone 7 Sump for FOR and the Main Containment, and any concerns associated with such tank tightness testing have been addressed.
 - b. JTF must also complete the following:
 - i. Within the Defueling Preparedness Report, JTF shall state a specific day on which the activity is planned to occur and offer EPA the opportunity to witness the planned activity.
 - ii. Submission of Operation Orders (OPORDS), and demonstration that analysis of hazards and possible risks have been considered and addressed. Submission may occur at any time and does not need to be coordinated with the Defueling Preparedness Report.

- iii. Adequate public engagement, which must include, at a minimum, a press release or equivalent distribution to the public describing the start of Tank Mains Defueling issued at least seven calendar days before fuel moves.
 - iv. Confirmation that all QV reports for repairs affecting Tank Mains Defueling have been approved by EPA.
4. Prior to beginning the subsequent Defueling Phases (Tank Bottoms Defueling, Unpacking, and the final removal of residual fuel that will remain in the system after Unpacking), JTF must submit:
 - a. A letter requesting approval to begin each Defueling Phase, 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. Submission of Concept of Operations (CONOPS) and OPORDS for each activity, if not already submitted, and demonstration that analysis of hazards and possible risks have been considered and addressed.
 - 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.
5. Table 5 of Supplement 2 will be the required schedule for Defueling pursuant to the 2023 Consent Order. In addition to the items already in this Table, including the submission of the Defueling Preparedness Report by September 1, 2023, the following deliverables shall be added to Table 5:
 - a. Request for Final Approval of Surge Tank Drainage by a date determined by JTF, currently projected for July, 2023.
 - b. Request for Final Approval of Repacking by August 14, 2023.
 - c. OPORDS for Tank Mains Defueling by a date determined by JTF, no later than July 15, 2023.
 - d. OPORDS for Tank Bottoms Defueling by a date determined by JTF, no later than July 15, 2023.
 - e. OPORDS for Unpacking by July 27, 2023.
 - f. Start of Tank Mains Defueling within 15 days of EPA's approval of the Defueling Preparedness Report. (EPA expects to approve the Defueling Preparedness Report on October 1, 2023).
 - g. Request for Final Approval of Tank Bottoms Defueling by November 24, 2023.
 - h. Submittal of a Residual Fuel Drainage Supplement by December 15, 2023.
 - i. Request for Final Approval of Unpacking by January 5, 2024.

6. JTF will submit a subsequent Defueling Plan supplement (Residual Fuel Drainage Supplement) that includes:
 - a. A description of how JTF will remove the estimated 100,000-400,000 gallons of fuel that is expected to remain within the facility following the completion of Unpacking. Please provide details on possible uncertainties, whether fuel will be contaminated or product quality, and any specific challenges to removing residual fuel.
 - b. A summary of Spill prevention and response preparation for the activity.
 - c. Details on when and how the transition between JTF and Navy Region Hawaii (NRH) will occur.
7. Prior to EPA approval of the **Independent Third-Party Quality Validation Plan**, JTF shall:
 - a. Not replace the third-party QV contractor without first seeking and gaining EPA approval.
 - b. Provide QV reports for all repairs that take place at the RHBFSF in preparation for defueling, which includes repairs not on the original list of 253 consolidated repairs/enhancements (*see* Condition 8.a., below).
 - c. Provide EPA sufficient time to review QV reports taking into account the incremental repairs beyond the 253 initial planned in the Consolidated Repair and Enhancement List.
 - d. Provide opportunity for EPA and EPA contractors to review repair information, including on-site visual review of repairs and review of quality assurance/QV background documents not otherwise included in monthly QV distributions, within reasonable request.
8. Prior to EPA approval of the **Consolidated Repair and Enhancement List**, JTF shall:
 - a. Provide an update or supplement to the Consolidated Repairs List that includes a list of all repairs added, and all repairs removed, to the total list of 253 repairs initially planned. This list should include a brief description of each repair and the reason for the addition/removal. *[Note: Repairs on the original list of 253 that were determined to require no physical work through the quality validation process should not be on the “removed” list. Only those repairs on the original list of 253 that were never included in the quality validation process should be included.]*
 - b. Submit a final plan for either repair, replacement, or retrofitting of the Aqueous Film Forming Foam (AFFF) Retention Line and provides EPA at least 14 calendar days to review and comment on the final plan before initiating any work.
 - c. Address Comment 9 of the enclosure regarding repurposing of the F-76 pipeline.

- d. Submit the results of the hydrotesting of the PVC Fuel Oil Reclamation (FOR) line to EPA and JTF responds to any comments from EPA, should they be necessary.
9. JTF must address separate required approvals for the Spill Prevention, Control, and Countermeasures (SPCC) and Facility Response Plan (FRP).
 - a. The SPCC plan must address the findings in EPA's August 17, 2021 SPCC Inspection Report and be certified by a Professional Engineer.
 - b. The FRP will be final upon approval by the EPA Federal On-Scene Coordinator.
 10. JTF addresses all comments enclosed in this letter to the satisfaction of EPA and expressly incorporates the above conditions into the Defueling Plan in its response.

Pursuant to the 2023 Consent Order, EPA requests a response to this letter and the enclosed comments within 30 days. EPA is committed to providing responses to any future inquiries and submittals in a timely manner. Please send any questions or responses to our Defueling and Closure Lead, Evan Osborne (osborne.evan@epa.gov).

Sincerely,

/s/ June 16, 2023

Amy C. Miller-Bowen, Director
Enforcement and Compliance Assurance Division

Enclosure (1) – Comments on The Defueling Plan (Supplement 2)

cc: Kathleen Ho, Hawai'i Department of Health
RDML Stephen Barnett, U.S. Navy Region Hawaii
RDML Jeffrey J. Kilian, NAVFAC Pacific
David Kless, Defense Logistics Agency

Enclosure (1) – Comments on Supplement 2 of The Defueling Plan

1. Please explain what will happen if the tankers are contracted, but defueling cannot commence by October 16.
2. JTF states that "[t]he fuel from the...surge tanks...will be transferred into tankers and relocated...." Elsewhere in the plan, JTF indicates that fuel from the surge tanks will be moved to storage vessels on Joint Base Pearl Harbor-Hickam. Please clarify.
3. Will the Lock-Out/Tag-Out Program established under the purview of JTF continue under Navy Region Hawaii (NRH) after hand-off? Similarly, will NRH assume enhanced procedures to protect health and welfare as described in the last bullet point on page 3?
4. Under the Table of Submitted Deliverables and Completed Events, includes the item, "Repacking Spill Response Drill Complete." EPA understands that the Repacking Spill Response Drill took place on June 8, 2023.
5. JTF claims that "214 of 253 SGH-recommended repairs and projects..." Please correct to clarify that repairs originated from multiple assessments.
6. JTF states that a Defueling Fire Protection Plan was submitted to EPA on April 14, 2023. EPA has not received a final Defueling Fire Protection Plan - the document submitted on this date was marked "DRAFT AND PRE-DECISIONAL."
 - a. Will JTF prepare a "FINAL" version of this plan, and if so, when will it be submitted to EPA? Please highlight any changes from the proposed plan.
 - b. EPA does not have an approval role for fire suppression systems and does not intend to approve or disapprove the Defueling Fire Protection Plan, or any plan establishing a fire suppression strategy. However, EPA expects to be party to any discussion of environmental risks related to the fire suppression decision and would like a copy of updated plans to better understand the potential environmental risks.
7. Will AFFF be returned to the AFFF system at any point before or during defueling? If so, how will the AFFF system be readied and operated during defueling? What scenarios would trigger use of the AFFF system? As noted above, EPA will not be making a recommendation on whether to return AFFF to the fire suppression system because EPA does not have an approval role in the fire suppression plan.
8. How will repairs to the AFFF retention system be factored into the list of 253 repairs? Will these repairs/enhancements go through the quality validation process in a manner identical to the 253 repairs?
9. EPA is aware that JTF may re-purpose the F-76 line as a fluid storage vessel for spill response capabilities. EPA previously approved a waiver to all F-76 repairs since, at that time, JTF did not intend to use the pipeline for fuel movement or for any other purpose. Please explain why each repair originally slated for the F-76 line is not needed in light of

the new proposal to repurpose the pipeline for spill response. EPA will reevaluate whether any repairs to the F-76 line are necessary after receiving JTF's response regarding the need for the repairs for spill response.

10. JTF states, in the Fire Suppression plan at the RHBFSF, that repairs are being made to the AFFF pipe from the pump house to the Adit 6 tunnel "...should the use of AFFF be mandated by regulatory agencies." Please clarify which agencies are considered by the phrase, "regulatory agencies." EPA does not have a role in approval of fire suppression plans and/or fire suppression systems.
11. On page 3 of Enclosure 1 in the "Dry Chemical Specifications" the statement is made that "Easy-rolling semi-pneumatic rubber tire wheels for single-person transport". Please add the clarification along the lines of, "...positioned at a point higher than the potential use point..." if applicable.
12. Supplement 2 does not contain a description of atmospheric testing and monitoring, which are typically an integral part of the procedures and protocols for this kind of activity. The procedures associated with atmospheric monitoring should be developed, deployed, and executed prior to any operation where the potential for fire is possible. The fact that the defueling involves only NFPA 30 Class II liquids does not mean that there is no potential for flammable vapors which can result in ignition of these liquids. Examples of sources of flammable vapors are:
 - Spilling of diesel onto hot surfaces which makes it temporarily a Class I liquid.
 - Decaying organic matter where vapors seep through the tunnel walls.
 - Past spills by contractors operating equipment that uses Class 1 liquid fuels.
 - Off spec fuels, human error, mistakes.
 - Bacterial decomposition of fuel.
 - Equipment fuel leaks.
 - Geological conditions producing methane, carbon dioxide, or hydrogen sulfide.
 - Local pockets of poor ventilation.

We recommend incorporating atmospheric monitoring into the defueling processes. The protocol for atmospheric monitoring should include qualification of people and equipment.

13. When will JTF complete the epoxy liner on the Zone 7 FOR sump? Please include information on any further testing on this sump and when final reports will be submitted.
14. JTF lists remaining work items requiring regulatory approval, including, "Fire Watch Personnel." EPA reiterates that the Agency does not have a role in approving fire suppression plans.

15. EPA submitted comments on the proposed Repacking Plan to the Repair Directorate of JTF on May 18, 2023. We look forward to reviewing all responses, including a detailed plan for operation of the tank bypass lines that are being installed to mitigate possible surge conditions.
16. A NAVFAC – EXWC report from October 2021, “Red Hill Bulk Fuel Storage Facility JP-5 Piping Mitigations Report,” proposed improvements to avoid surge scenarios, including improvements to the AFHE system. Please report whether these improvements have been made, and whether they are still needed:
 - a. Modify the AFHE system software to detect and actuate an audible or visual alarm on gains and losses in tanks involved in an evolution when isolation valves are closed and fuel should not be moving.
 - b. Increase the fidelity of the system to detect smaller out of balance situations.
 - c. Update Operations Orders to require monitoring of out of balance readings and to address alarm response."
17. For Tank Mains Defueling, JTF plans to "utilize the maximum allowable operating pressures for the pipelines to move fuel out of RHBFSF...[and that] estimated flowrates indicate that each tanker requires only three days to reach maximum capacity." EPA reiterates its recommendation made in a May 13, 2023, memorandum to Captain Stasick regarding surge mitigation, copied below for reference: "Make a table that shows the maximum flow rate that will be allowed for each fuel movement operation. The table should list a maximum value—rather than a range of possible values—in either barrels per hour or gallons per hour. Explain how this number will be measured or monitored during operations." If flow rates will differ from the 210,000 gallons per hour rate used to estimate total defueling time in Table 3 of Supplement 2, please update this Table.
18. Please provide the estimated date for hosting a briefing for the CONOP and OPORDs for Tank Mains Defueling.
19. Please provide a complete summary of all integrity testing performed on the FOR pipeline system between RHBFSF tank connection and the JP-5 pipeline. Provide information on planned integrity testing that will occur before defueling, should future testing exist.
20. Describe how JTF considered the risk of hydraulic surges occurring in the FOR pipeline during Tank Bottoms defueling and any other fuel movement activities utilizing this system.
21. Please clarify, "JTF-RH estimates unpacking both lines in one day." Will JTF attempt to unpack both lines in a single day, or will each pipeline require one day to unpack?
22. EPA agrees that mitigative measures, such as installation of Pressure Indicator Transmitters (PITs), updated operational procedures, and other controls will reduce the likelihood of a catastrophic leak and at the RHBFSF in comparison with the system under operation prior to implementation of these controls. Though, it should be clarified that

event probabilities included in Supplement 2 are estimated and do not represent exact likelihoods. For transparency to the public, EPA wishes to clarify that these figures represent relative degrees of risk considered under orders of magnitude. The value of this information is to help stakeholders understand that the proposed system upgrades are intended to drastically reduce the risk of a spill relative to a scenario in which the upgrades are not made.

23. Note 3 under the Event Probability Tree states that, "the general level of acceptable risk frequency from the EPA is less than 1×10^{-7} ..." Please provide the source of this information. EPA cannot necessarily support this statement - acceptable risk frequency is a complicated issue that involves the degree of risk, the impact of risk, and acceptable of risk by those affected by an event, among other considerations.
24. If fuel is released in the LAT or HT piping during repacking, is JTF prepared to immediately unpack pipelines if that may reduce the impact of the release? What containment measures will be in place below repairs that may be affected by repacking? Please address this comment in the Repacking CONOP/OPORDS.
25. EPA does not have an approval role in whether the oil pressure door will be open or closed during defueling. EPA notes that groundwater is at risk the longer fuel is allowed to contact the Lower Access Tunnel above the oil pressure door. Since the decision to leave this door open or closed in a worst-case release event hinges on the protection of worker safety, EPA defers to JTF on this issue.
26. How will the PITs be tested prior to repacking?
27. Repacking will involve the initial operation of the bypass lines installed for pressure equalization purposes. Please provide a detailed operation plan that will be used by on-site personnel to operate the bypass lines. Explain what will happen if the bypass lines begin leaking after operation. It is acceptable if this information is included in future CONOP/OPORDS.
28. EPA will withhold comments on the Tank Mains Defuel CONOP, and instead provide comments in a separate correspondence. JTF must seek approval of this CONOP and associated OPORDS before beginning Tank Mains Defueling.
29. EPA will withhold comments on the Flowable Tank Bottoms Draining CONOP, and instead provide comments in a separate correspondence.
30. EPA will withhold comments on the Unpacking CONOP, and instead provide comments in a separate correspondence.
31. The 2023 Consent Order requires JTF to adhere to an approved Defueling Plan, including reference to a schedule within the Plan. The IMS presented by JTF presents a clear view of all future events occurring before and during defueling. It would be impractical and, in some cases, outside the scope of EPA's role to require approval of every event on the

IMS. It would be potentially detrimental to approve the entire IMS in its entirety at this date for two reasons: 1) necessary schedule deviations would complicate the status of approval, and 2) there are future events that have not been fully described/certified as complete. EPA's conditional approval of the Defueling Plan, including Supplement 2, is an indication of general support for the timeline presented in the IMS. In addition, EPA expects JTF to expand Table 5 from Supplement 2 as the Defueling Schedule.

32. The June 30, 2022, Defueling Plan listed "Safety Planning and Training" as an area of improvement prior to defueling. This included a "supplemental safety review." Please provide a general update on the status and accomplishments of this supplemental review.
33. Please provide Hazard and Operability (HAZOP) documents for each of the "Defueling Phases."
34. EPA suggests that JTF develop a standardized daily report template formatted for distribution to regulators that will be used during fuel movement activities. This report could include, at a minimum, the following information: date and time of report, a summary of fuel types and volumes moved, where fuel movement occurred, whether fuel of any volume was spilled, any "near misses" that occurred during operations, and a proposal for work to take place the following day. EPA found it acceptable to receive email updates during daily fuel evolutions (e.g., during Unpacking), but finds a standardized daily situational update to present additional benefits in efficiency and consistency.
35. How will operators be able to interpret PIT data during fuel movement? For example, how will operators know if a vacuum condition exists, or if pressures begin to exceed the expected maximum operation pressure? Please include this information here, or in the Main Tank OPORDS.
36. Throughout the document, EPA found instances where JTF notes necessary approval by the DOH. For future submissions, EPA's approval role for defueling must be reflected in the Defueling Plan Supplement 2. For example, please modify Table 5 on page 24 to add "and EPA" in the Table's Title --"Due to DOH and EPA"/ "Concurrence from DOH and EPA" to indicate concurrence from both EPA/DOH. In Table 5, please also add DOH/EPA next to "Surge Tank Defuel CONOP" and to "Defuel[sic] Preparedness Report" which makes these two items consistent with the rest of the Table. Also, to avoid any confusion, please add "ing" after "Defuel" as that is the name of the report in the 2023 Consent Order Statement of Work. See also, page 15, B.1 under "Regulatory Approval" no. 1 in the listing: DOH and EPA approval of DoD Defueling Plan as supplemented, pages 15 and 16, nos. 5-15 (except 7) and on page 18, first full paragraph, to avoid any confusion please substitute EPA and DOH approval for "regulatory approval."
37. EPA HQs and R9 Program staff reviewed the amended SPCC Plan and provided comments to the JTF on April 28, 2023. EPA stands ready to answer any additional questions or provide technical assistance and guidance on the SPCC and FRP

amendments to finalize both documents. The SPCC plan is finalized once a Professional Engineer has certified it, and the FRP will be final upon approval by the Federal On-Scene Coordinator.

38. Regarding types of releases considered in spill response planning, the term “dangerous” is qualitative and would perhaps be better expressed as, “largest likely volume release” or “release with highest likelihood of...”
39. In Scenario 5, “Most Dangerous Release” there is a discussion of how a water hammer causes a pipe rupture that releases 4.3 million gallons of fuel over 30 hours. How was this volume determined when a total tank capacity is larger than 4.3 million gallons? The section discusses how the worst-case scenarios UGPH would be overwhelmed by the flow of 13,800 gallons per minute. Has the UGPH pumping system or sumps ever been flooded? If so, describe the effects and responses. If not, what kind of preparation has been done to assume that fuel fills up the UGPH and is flowing below onto the floors of the UGPH as well as submerging running pumps and instrumentation with fuel? Please describe what happens when the level rises above the UGPH sump and continues to rise, and ultimately how high it can rise above the main floor of the UGPH.
40. The JTF claims that there is discretionary decision-making for Red Hill defueling and fuel relocation on page 14 – “In accordance with the National Environmental Policy Act (NEPA), JTF-RH is preparing an EA/OEA to analyze the potential environmental effects associated with JTF and DLA’s discretionary decision-making for Red Hill **defueling and** fuel relocation (emphasis added).” The statement is written too broadly. Please delete "defueling and."
41. On page 15, it states the following: “JTF-RH is conducting monthly risk assessments to evaluate the feasibility of executing an earlier, conditions-based start for defueling on October 16, 2023.” Instead of "evaluate, " substitute "confirm."
42. EPA suggests adding opportunities for members of the community to influence decision-making to the IMS. The Community Representation Initiative from the 2023 Consent Order is a possible target for inclusion. One of the roles of the Community Representation Initiative will be to review defueling progress and provide input on Defueling Phases. Please contact EPA’s Environmental Justice Community Engagement Coordinator to determine how JTF can collaborate with the Community Representation Initiative.