



REGION 9

SAN FRANCISCO, CA 94105

March 18, 2024

Sent via electronic mail only

Brigadier General M. 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: Preliminary Request for Information Regarding the Interim Defueling Completion Inspection

Dear Brigadier General M. Link:

Between March 5 and March 8, 2024, the Environmental Protection Agency, Region 9 (EPA) conducted an Interim Defueling Completion Inspection (“the Inspection”) of the Red Hill Bulk Fuel Storage Facility (RHBFSF). The purpose of this Inspection was to evaluate the status of remaining fuel in the facility as reported by the Joint Task Force-Red Hill (JTF-RH).

Due to the impending departure of JTF-RH as the Department of Defense authority for oversight of the RHBFSF at the end of March 2024, EPA is providing an initial request for information in response to the completion of the Inspection. EPA requests that JTF-RH fulfil this information request before completing transition of authority to the Navy Closure Task Force-Red Hill (NCTF-RH). For comments that cannot be addressed prior to the departure of JTF-RH, please confirm that NCTF-RH will provide a complete response.

1. EPA witnessed manual gauging of Red Hill Tanks 6 and 20 which involved the use of a plumb bob coated in fuel paste, lowered to the bottom of the tank, and retrieved. JTF-RH has since stated that fuel paste will detect both fuel and sludge material. Prior to the Inspection, JTF-RH submitted a Response to EPA’s Interim Defueling Completion Inspection Requirements which, in Enclosure 1, indicated that the estimated total volume of residual fuel currently in the Red Hill tanks is 4,758 gallons. In multiple other documents submitted by JTF-RH, the total estimated amount of sludge remaining in the Red Hill tanks is 28,000 gallons. Please explain how the remaining volume of sludge has

been estimated, clarify whether this estimate is based on manual gauging or other methods, and provide a final “best estimate” of remaining fuel and sludge in the Red Hill tanks. EPA acknowledges that there are challenges acquiring an exact measurement due to the scale of the tanks, inability to go inside the tanks, and inexact nature of the gauging process.

2. EPA identified two barrels in Building 313 labeled as containing fluid drained from a low point drain on the Aqueous Film Forming Form (AFFF) Retention Line. Please share the total number of barrels and estimated volume of material stored at this location. Provide all remaining plans for sampling, transporting, and disposing of this material.

Has a hazardous waste determination been made for these barrels? If not, provide a hazardous waste determination by March 29, 2024. Hazardous waste should be managed and stored in accordance with all regulatory requirements and moved to the appropriate hazardous waste storage area and/or disposed off-site consistent with regulatory requirements.

3. EPA identified multiple barrels or drums in the Lower Access Tunnel Red Hill Tank 1 bay labeled as containing fluid drained from the AFFF Retention Line during residual fuel removal. Provide all remaining plans for sampling, transporting, and disposing of this material. Please share the total number of barrels and estimated volume of material stored at this location.

Has a hazardous waste determination been made for these barrels/drums? If not, provide a hazardous waste determination by March 29, 2024. Hazardous waste should be managed and stored in accordance with all regulatory requirements and moved to the appropriate hazardous waste storage area and/or disposed off-site consistent with regulatory requirements.

4. Tank 311, located outside Adit 3 and the main receiving tank for the Fuel Oil Recovery system in the Lower Access Tunnel, was observed at the time of the inspection to have a leak in the side of the tank at a height of approximately twelve feet. Tank 311 must be repaired and inspected to ensure future leaks do not occur prior to transferring more material into Tank 311. Provide plans and anticipated dates for any necessary repairs to and future inspection of this tank. Confirm that the inspection report and documentation of repairs will be shared with EPA prior to transferring more material into Tank 311.
5. EPA inspected the AFFF Retention Line and determined that there is a buried portion of this line that runs from Adit 3 to the AFFF aboveground tank. Please explain how JTF-RH determined that this underground pipeline does not contain fuel, and share all records of fluid drained from this line from the time period of November 20, 2021, to the date of the inspection.
6. Provide photos of the blind-flange isolating the FOR line between the surge tanks and the Underground Pumphouse (UGPH) sump.

7. Provide the Quality Validation reports for air gapping the JP-5, F-24, and F-76 pipelines between the Red Hill tanks and the UGPH.

EPA confirmed during its inspection that over 99% of the fuel contained within the RHBFSF (over 104 million gallons) has been removed, though, a small quantity remains in difficult-to-access areas of the facility. JTF-RH clarified in Supplement 3 of the Defueling Plan that this remaining fuel will be removed by the NCTF-RH as part of facility closure. Supplement 3 also establishes eleven exit criteria that the JTF-RH to accomplish before the NCTF-RH assumes responsibility for the facility. EPA's comments, above, are intended to ensure that JTF-RH meets all eleven exit criteria based on preliminary findings from the inspection. This does not in any way absolve the Navy and the Defense Logistics Agency from meeting the requirements of the 2023 Consent Order, which requires a final Defueling Completion Inspection once all fuel has been removed from the facility. Based on the organizational structure and timelines submitted, EPA assumes that this responsibility will fall to the NCTF-RH once all residual fuel is removed.

EPA continues to compile and review the results of the Inspection, and in approximately two weeks will deliver a subsequent request for information to the NCTF-RH to address remaining post-inspection requests. These questions will focus on, primarily, confirming timelines and processes for the total removal of fuel from the facility. Following the completion of this post-inspection information request period, EPA will prepare a final report for public disclosure. As agreed upon by EPA and JTF-RH, this final report will be shared with the Navy and DLA for the sole purpose of identifying any controlled unclassified information.

Thank you for considering this request and preparing your team to take on what is likely to be one of the final regulatory objectives of JTF-RH. I stand by to respond to any of your questions or concerns related to this request. Please have your team contact Evan Osborne (206-552-1747, osborne.evan@epa.gov) with any technical concerns or requests.

Sincerely,

Jamie Marincola, Acting Deputy Director
Enforcement and Compliance Assurance
Division

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