



REGION 9

SAN FRANCISCO, CA 94105

January 23, 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

Subject: Supplement 3 of the RHBFSF Defueling Plan – No Further Comments

Dear BG M. Link,

On December 15, 2023, The U.S. Environmental Protection Agency, Region 9 (EPA) received a letter from the Joint Task Force – Red Hill (JTF-RH) responding to EPA’s comments on Supplement 3 of the Red Hill Bulk Fuel Storage Facility (RHBFSF) Defueling Plan. JTF, in this response, clarified that:

- Defueling, as defined within the 2023 Consent Order, will not be complete until all fuel has been removed from the RHBFSF; this includes fuel that can only be removed by “destructive means” during removal of the pipelines.
- JTF-RH agrees with EPA performing an “Interim Defueling Completion Inspection” before the transition from JTF-RH to Navy Closure Task Force – Red Hill (NCTF-RH).
- JTF-RH will submit a safety and lift plan as part of the Consent of Operations for the removal of the air gap piping near the underground pumphouse.
- NCTF will submit a “Closure Supplement” that addresses fuel removal operations and a spill response strategy covering the remainder of defueling.
- NCTF-RH will complete a final Defueling Completion Inspection once all fuel has been removed from the facility.

Thank you for providing this information that allows EPA to determine that defueling will progress on a course acceptable to the conditions contained within the 2023 Consent Order. EPA has no further questions or comments concerning Supplement 3. If you have any questions about the points reiterated in this letter, please contact me or have your staff contact Evan Osborne (osborne.evan@epa.gov, 206-553-1747).

Sincerely,

/s/

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

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