



## REGION 9

SAN FRANCISCO, CA 94105

### **VIA ELECTRONIC MAIL – READ RECEIPT REQUESTED**

Rear Admiral Marc Williams  
Deputy Commander  
Navy Closure Task Force – Red Hill  
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Re: EPA Comments on Pipeline Removal Work Plan, Environmental Protection Plan, and Demolition Work Plan

Dear Rear Admiral Williams,

On October 24, 2024, the United States Environmental Protection Agency Region 9 (EPA) received three submissions from Navy Closure Task Force – Red Hill (NCTF-RH) related to the removal of fuel pipelines from the Red Hill Bulk Fuel Storage Facility (RHBFSF). The Pipeline Removal Work Plan, Environmental Protection Plan, and Demolition Work Plan describe NCTF-RH's intentions to remove an estimated 4,000 gallons of residual fuel, then deconstruct and remove the three fuel product pipelines (JP-5, F-24, and F-76) from the Tank Gallery to the Underground Pump House (approximately 56,860 linear feet of pipe). EPA understands that the start of pipeline removal work is planned for January 27, 2025, based on NCTF-RH's Integrated Master Schedule and the proposed pipeline removal work schedule.

In response to EPA's initial comments, NCTF-RH provided a sampling report for asbestos and lead in paint on October 31, 2024, and the unredacted, Controlled Unclassified Information (CUI) versions of the three plans were submitted on November 1, 2024.

EPA has completed its review of all three plans and prepared the enclosed comments seeking additional information related to pipeline removal. EPA is unable to provide approval of the Work Plan, Environmental Protection Plan, and Demolition Work Plan until EPA has deemed these comments have been adequately addressed.

Should you have any questions regarding this letter or seek clarification, please contact Drew Suesse (808-539-0545, [suesse.andrew@epa.gov](mailto:suesse.andrew@epa.gov)).

Sincerely,

/s/

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

Enclosures: (1) Comments on Red Hill Pipeline Removal – Work Plan  
(2) Comments on Red Hill Pipeline Removal – Environmental Protection Plan  
(3) Comments on Red Hill Pipeline Removal – Demolition Work Plan

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Mr. Jamie Marincola, Environmental Protection Agency [email only]  
Mr. Drew Suesse, Environmental Protection Agency [email only]

## Enclosure 1 – Comments on Red Hill Pipeline Removal – Work Plan

1. **Section 5.1**, “*APTIM is in process of replacing the existing 6,000-pound capacity trolley hoist system at Adit 2 with a less than 20,000 pound capacity trolley hoist system*” – The Work Plan does not provide installation details of the new trolley hoist system. Please describe where and how the hoist will be mounted, and what kind of anchoring system will be used. Additionally, please specify the maximum anticipated weight of the valves and pipe segments that will be removed with this hoist system.
2. **Section 5.1**, “*Multiple sets of electric locomotives, passenger cars and rail flat cars are projected to be the main mode of transporting work crews to work sites within the tunnel*” – While the potential for release has been significantly reduced following the defueling of free-flowing fuel, the use of the rail system still presents a risk of release in the event a rail car strikes or otherwise damages facility infrastructure carrying oily product (such as the Fuel Oil Reclamation (FOR) line or low points of fuel pipelines containing residual product). Please describe what measures will be taken to mitigate the risks associated with operating the electric locomotives and rail cars.
3. **Section 5.2**, “*Pigging the pipes to a clean and dry state and receiving a safe for hot work certificate from a certified marine chemist or certified industrial hygienist allows the pipe removal phase to proceed without concern of a fuel release*” – EPA does not agree with the statement that no concern of fuel release exists. There is a potential for some residual fuel to remain in the lines following pigging. As stated in Section 5.5, even if pipes are believed to be dry internally, spill containment measures should still be used under cuts or openings as a precaution.
4. **Section 5.3**, “*...before beginning any demolition work, APTIM will develop and submit an Existing Conditions report*” – EPA has not been provided an Existing Conditions report. Please state when the report will be made available for review.
5. **Section 5.4.1** – Details are not provided on how the asbestos coating will be removed. The Work Plan indicates that an asbestos hazard abatement plan will be prepared. However, no such plan was provided for review. EPA requests that the asbestos hazard abatement plan be included as an appendix to the Work Plan.
6. **Section 5.4.2 (2)**,
  - a. The paragraph indicates that lead remediation will occur “*if the area has coatings with heavy metals*”. Later in the paragraph it is established that “*all piping is assumed to have coating with lead-based paint established during sampling*”. Therefore, it follows that any hot work on or near pipe coating will first require lead remediation. Please confirm this assumption.
  - b. Given the pipelines have a hazardous coating, what actions will be taken to manage and control any potential vapors generated during hot work?
7. **Section 5.4.2**, “*Setup spill containment and response measures*”... The contractor “*will determine best way to remove each valve*” – EPA understands that the location, valve orientation, and surrounding facility infrastructure may impact which methods can be used when removing valves. However, it is not clear how residual fuel draining will be accomplished during valve removal. Navy should specify in detail what spill containment measures will be taken and how residual fuel will be safely drained into drums.

8. **Section 5.4.2**, “*APTIM and subcontractors will use practical methods of checking visually for residual fuel at all valves, spools and piping*” – Please clarify what is meant by “practical methods”.
9. **Section 5.4.2**, “*RFP Part Three has a contractual ceiling for 4,000 gallons of residual fuel and sludge from the pipelines*” – The exact quantity of fuel remaining in the pipelines is unknown and could potentially exceed the estimated volume of 4,000 gallons. EPA understands that this estimate is used for planning and contracting purposes. However, Navy should clarify how they intend to handle fuel in excess of 4,000 gallons.
10. **Section 5.4.4**, “*As necessary, install ceiling anchors and load test if hoists are needed to lower items. Duct jacks, gantries and other devices could also be used depending on the configuration of the piping at each location*” – What criteria will be used to determine if it is necessary to use ceiling anchors, and how will they be load tested for adequacy and fitness for service?
11. **Section 5.4.5** – Similar to Comment #8, no detail is provided on how fuel will be captured during pigging or what spill containment measures will be used during this process. The Work Plan should specify these details.
12. **Section 5.4.5 (3)**, “*Cable pull pigs through as many times as necessary to establish visual cleanliness as well as <15 ppm corrected on PID*”
  - a. Please provide the rationale for measuring VOCs in the pipe following pigging. It is unclear if this metric is being used to ensure cleanliness of the pipe interior or if it is related to worker health and safety concerns.
  - b. A description of how the PID measurement will be taken should be provided (i.e. where will PID measurements be taken and at what point(s) during the pigging process?).
13. **Section 5.4.5**, Sections 5.4.6 and 5.4.7 both describe using a fiberoptic borescope camera to confirm interior of the pipe is free of residual fuel, however it is not mentioned in this section. Will a camera also be used to verify the tank laterals are clean?
14. **Section 5.4.7**, “*The 32” line from PS-103 to PS-203 at Adit 3Y is not part of the Government RFP as it was re-purposed as an AFFF retention surge line*” – EPA understands that the use of this section of the 32” line is currently being evaluated as part of the facility’s fire suppression system. Regardless of whether this line will remain in place for fire water collection or will be removed, all residual fuel must be removed from the 32” product line in accordance with the 2023 Administrative Consent Order. Please clarify Navy’s plans to clean the interior of the 32” line.
15. **Section 5.4.8 (3)**, “*Mitigate rail and grating hazards as necessary*” – Please clarify what rail and grating hazards are expected and what actions will be taken to mitigate these hazards.
16. **Section 5.4.8**, “*All piping will be cut as close to 9 foot 6 inches long as much as possible to facilitate maximum amount of piping which can be loaded into a 20’ intermodal container*” – The estimated weight of the 16”, 18”, and 32” pipe segments should be specified.
17. **Section 5.4.10**, “*It is APTIM’s intention to store all the drums of residual oil in containment areas until the air pigging has been completed and then remove all drums in one continuous operation*” – Previous surveys of the product pipelines have estimated that more than half of the remaining residual fuel in the facility is located in the Tank Gallery. Assuming drums are filled two-thirds full, there may be approximately 50

drums. Please specify where secondary containment areas will be staged so that drums are away from active work areas (including ongoing environmental monitoring) and not at risk of being damaged or spilled.

18. **Section 5.5.4**, “*The first operation will be to use fuel hoses connected to Adit 2 pig receivers...*” – Similar to Comments #8 and #12, very little detail is provided on how pigging in the Harbor Tunnel will be accomplished. The Work Plan should describe in detail the pig receiving stations, the spill containment measures, and how the vacuum truck hoses will be used to safely transfer fuel from the receiving station.
19. **Section 5.5.4**, “*The second operation is to remove all fuel in drums out Adit 2 door*” – The means and methods in Section 5.5.4 do not mention capturing fuel in drums, so it is unclear which drums this statement is describing. Please clarify if the drums of fuel originate from a different location (i.e. Tank Gallery) or from a Harbor Tunnel operation not clearly described in the Work Plan.
20. **Section 5.5.4**, “*The main concern of releasing fuel to the environment is a sump located at the foot of the loading dock at Adit 2...*” – Additional measures such as installing berms around storm drains with sorbent material and having readily available drain covers should be taken to prevent spills within the tunnel from entering the stormwater system.
21. **Section 5.5.4** – “*NCTF has recently re-opened the ground water drains in Adit 2 and this appears to have significantly reduced the amount of standing water in Adit 2*” – The text indicates the function of the “ground water drains” is to drain the tunnel of accumulated water. To prevent a fuel release in the tunnel from draining into the formation, the groundwater drains should be closed during pigging operations. Water accumulation in the tunnel can be addressed temporarily by pumping and dewatering.
22. **Section 5.5.4** – “*Bring fuel in drums on train to adit 2Y rail offload area*” – What measures will be taken to ensure no fuel will be released during of the transport of the drums to Adit 2.
23. **Section 5.5.4, A (ii)**, “*Upper flammability for JP-8 is 7000 ppm*” – This appears to be a typo. “Upper” should be replaced with “Lower”.
24. **Section 5.5.5**, the contractor “*will drill a hole on top of 18” pipe at each of the lowest elevation cuts and check that line is dry with borescope or equivalent*” – Given the potential for the pipe to still contain some amount of fuel before being verified dry, what precautions will be taken during drilling to a.) prevent the release of any unexpected residual fuel, and b.) minimize the chance of sparking as the drill bit enters the pipe?
25. **Appendix C, Section 3.2**, “*DQOs for each of the tasks for which sampling is required will be developed in the supporting plans*” – It is unclear which supporting plans this statement refers to and when they will be available for review.

## Enclosure 2 – Comments on Red Hill Pipeline Removal – Environmental Protection Plan

1. **Section 1.2, Separate Plans** – This list does not appear to be complete. The pipeline removal documents allude to a number of other plans required by the Request for Proposal but are not included.
2. **Section 1.2**, “*If APTIM will store greater than 1320 gallons of fuel or oil associated with this project, an SPCC plan will be required to be developed*” – Section 5.4.10 of the Work Plan indicates that fuel removed from the Tank Gallery will be stored until air pigging is complete. It is possible that the volume of fuel in the Tank Gallery will exceed the 1320 gallon threshold based on previous estimates. Please clarify if the contractor will be developing an SPCC plan for this work.
3. **Section 1.6, Laydown Areas** – There is ongoing environmental work taking place at or near the proposed laydown locations. This work includes, but is not limited to, investigations and remediations outside Adit 3, the PFAS Remedial Investigation, the Red Hill Site Assessment, and ongoing CNRH investigations and remediations. Please confirm that the pipeline removal work at the laydown areas will not disturb known soil contamination, prevent access to groundwater monitoring wells, or otherwise hinder any ongoing environmental work.
4. **Section 2.5**, “*Storm drain inlet structures in the vicinity of the work area are described in Section 4.3 of this document*” – This appears to be a typo. Section 4.3 does not discuss storm drain inlets.
5. **Section 5.1**, “*Residual fuel generated by the pigging process will be collected in totes inside the tunnel, and following a sample analysis will be pumped to a vacuum truck located outside the adjacent Adit*” – Please confirm that spill response kits will be staged outside the adits, and staff will be present during all fuel transfer operations to ensure no fuel is spilled, particularly in areas where there is a potential to migrate offsite. Additionally, operators should be trained on detecting spills and proper deployment of spill response materials and equipment.
6. **Section 5.1** – This section includes a discussion on the analytes to be tested “*for waste requiring a laboratory analysis prior to disposal*”. Polychlorinated biphenyls (PCBs) are mentioned in this list, however the sampling results provided to EPA for the pipe coating did not include PCB analysis. Will the pipe coating be tested for PCBs prior to disposal?
7. **Section 5.2 (9)**, “*Sampling and analysis will be handled in accordance with all applicable environmental regulations*” – Please clarify what tests and analytical methods will be used for hazardous waste determination.
8. **Section 6.3, Spill Diversion and Containment Measures**
  - a. The EPP should include a layout of the tunnels showing the location of storm water sumps, drains, and other features that represent routes for fuel released in the tunnels to enter the environment. The figures should also identify locations and specific types of spill mitigation measures.
  - b. Please describe the diversion and containment measures for soil vapor monitoring points.
  - c. The EPP should specify the monitoring requirements of the diversion and containment measures. This should include the frequency of inspection and how inspections will be documented.

9. **Section 6.3**, “*Groundwater accumulated in the sump will be pumped into totes or equivalent*” – Please provide the following additional information on the Adit 2 groundwater pumping:
- What is the capacity of the tote?
  - How frequently will the tote be monitored?
  - What is the expected duration of the pumping operation? (i.e. only during work hours, or continuously through the duration of pigging, etc.)
  - How does the pumping capacity of the temporary pump compare with the existing?
  - What does “cleaning of sumps, or areas near well heads” entail? What, if any, cleaning products will be used?
10. **Section 6.4, Table 3**
- Releases occurring during the uncoupling of transfer hoses is another potential source of spill. Please consider adding a precautionary method to address spills related to disconnecting hoses.
  - All operations related to the transfer of fuel should be attended by personnel trained in spill prevention, equipment deployment, and spill notification procedures.
  - Releases due to overfilling of generator, compressor, or AST fuel storage cell is another potential source of spill. Please consider adding to Table 3.
  - “*Movement of drums conducted with 4-wheel dolly only*” – Section 5.5.4 of the Work Plan indicates that the train will be used to transport drums. This appears to conflict with the information provided in Table 3 of the EPP. Please clarify.
11. **Attachment 4, Red Hill Contingency Plan, Sections 3.0 – 4.0** – Please confirm that field personnel will be made aware and have access to the communication flowchart and contact information for emergency coordinators.

### **Enclosure 3 – Comments on Red Hill Pipeline Removal – Demolition Work Plan**

1. **Section 6.3, Adit 3Y Water Pump Replacement** – It is unclear which pump is being referred to, its function, or how the associated text relates to the section title.
2. **Appendices A and B**– The schedules do not include timelines for individual tasks. EPA understands that specific dates may not be known at this time. However, please keep EPA informed as work activities are scheduled to ensure successful deconfliction with other environmental and facility closure work.