



## REGION 9

SAN FRANCISCO, CA 94105

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

Rear Admiral Marc Williams  
Deputy Commander  
Navy Closure Task Force – Red Hill  
850 Ticonderoga Street, Suite 110  
Joint Base Pearl Harbor-Hickam, Hawaii 96860-5101  
[marc.f.williams.mil@us.navy.mil](mailto:marc.f.williams.mil@us.navy.mil)

Re: Conditional Approval of Revised Tank Cleaning Verification Plan

Dear Rear Admiral Williams,

On July 26, 2024, United States Environmental Protection Agency Region 9 (EPA) received a revised Tank Cleaning Verification Plan from Navy Closure Task Force – Red Hill (NCTF-RH). The original version of the plan was submitted on January 10, 2024, and was revised on February 8, April 12, and June 13, 2024, in response to comments and discussions with EPA and Hawaii Department of Health.

The revised plan describes a four-tier process for verifying the bulk fuel storage tanks, surge tanks, and two sumps are free from residual fuel and sludge. NCTF-RH has also agreed to use a third-party inspector certified by the Association for Materials Protection and Performance (AMPP). The AMPP inspector provides the verification process with an independent entity and expertise in evaluating tank cleanliness in accordance with the Surface Preparation Standard No. 1 (SP-1).

EPA has reviewed the Revised Tank Cleaning Verification Plan and is issuing approval provided the following conditions are met:

1. NCTF-RH shall routinely update EPA on tank cleaning and inspection progress. Updates shall consist of, but are not limited to, a weekly situation report (SITREP) documenting the locations of the tank interior that have been inspected, along with a summary of preliminary findings.
2. Each area inspected by cloth rub test shall be photographed prior to the test being administered. Doing so will provide EPA a correlation between the physical cloth rub

sample and the visual evidence of the photo. This request is meant to supplement other visual lines of evidence and is not intended to be a replacement of other photographic documentation described in the Tank Cleaning Verification Plan.

3. Cloth rub samples shall be appropriately labeled and stored in a manner that can be made accessible to EPA for visual inspection upon request. Cloth rub samples shall be retained through the completion of the Interim Closure Inspection of each tank and only disposed of once the tank has been deemed sufficiently clean by EPA.
4. The six tanks that are currently out of service (Tanks 1, 13, 14, 17, 18, and 19) must undergo a verification process regardless of historic cleanings and/or inspections. In the interest of a safe and expeditious closure of the Red Hill bulk fuel tanks, EPA concurs with prioritizing the cleaning, inspection, and closure of the 14 tanks that recently held fuel, while NCTF-RH continues to evaluate the condition of the six out of service tanks. It is EPA's expectation, however, that the QV methods described in this revised Tank Cleaning Verification Plan shall also be applied to these six tanks, unless doing so poses a significant and insurmountable risk to the health and safety of the inspectors. NCTF-RH will be required to provide justification for any request to modify the plan, and any alternative verification plan must be approved by EPA.
5. An accounting of the volume of rinsate removed from Tank 311 shall be included in the quality validation report in addition to the volume measured at the distribution meter (as was previously agreed to by NCTF-RH in the conditional approval of the Tank Cleaning Work Plan).
6. The use of blacklight as described in Section 3.1 shall not be used as a primary method of verification. The third-party inspector may choose to use blacklight to supplement their inspection, however, blacklight alone shall not be used as evidence that the tank is clean (i.e. an additional method such as cloth rub testing must also indicate the area is free from residual fuel products). As described in Section 1.1, NCTF-RH has not found UV light to be a reliable method to identify JP-5 or residual fuel less than 5 mils thick.
7. In the event the third-party certified inspector discovers evidence of residual fuel, the follow items should be documented and shared with EPA: 1.) Date and location of where the fuel product was discovered, as documented on a tank shell roll out diagram. 2.) Method in which the residual fuel was discovered and confirmed. 3.) Date and description of the corrective action taken by the tank cleaning contractor. 4.) Evidence that the location has been sufficiently cleaned and the location is now free of residual fuel products.
8. EPA reserves the right to request modifications to the Tank Cleaning Verification Plan at any time. Given the scale and complexities of the Red Hill Bulk Fuel Storage Facility, unforeseen circumstances may require the need to amend the plan to ensure the tanks have been cleaned in a manner protective of public health and the environment.

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 Miller-Bowen, Director  
Enforcement and Compliance Assurance Division

cc: RADM Stephen Barnett, Navy Closure Task Force – Red Hill [email only]  
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