



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
stephen.d.barnett.mil@us.navy.mil

Re: Conditional Approval of Tank 6 Degassing

Dear Rear Admiral Marc Williams,

On August 28, 2024, United States Environmental Protection Agency Region 9 (EPA) was notified by Navy Closure Task Force – Red Hill (NCTF-RH) of their intention to begin degassing Tank 6 on September 4, 2024. A Tank Forced Ventilation Concept of Operation (CONOP) and revised Tank 6 Ventilation Operation Order (OPORD) were provided to EPA on August 23, 2024. These documents describe a similar process to the one used by NCTF-RH during the successful degassing of Tanks 7 and 8. In addition to the aforementioned CONOP and OPORD, EPA has received the following information in support of the planned operation for the safe removal of tank vapors:

1. Air Emissions Response Notification OPORD (May 23rd) and NCTF-RH email response to EPA comments (May 23rd)
2. Air Release Notification Exercise (May 23rd)
3. Air Quality Monitoring Notification and Triggers OPORD (May 28th)
4. Operational degassing walkthroughs (May 21st and May 28th)

EPA has reviewed the CONOPS and OPORDS and grants NCTF-RH approval to begin degassing Tank 6 provided the following conditions are met:

1. EPA understands tank skin valves will be removed to accommodate ventilation from the lower access tunnel. Secondary containment must be utilized during the removal of tank skin valves. EPA shall be provided the opportunity to observe spill containment measures prior to the removal of valves and removal of residual fuel from the nozzles.
2. NCTF-RH shall provide an estimate of the volume of fuel pumped from the tank nozzles once skin valves are removed. EPA understands that the fuel will not be metered during

pumping. However, a volumetric estimate based on the depth of fuel and geometry of the nozzle shall be reported to EPA in a weekly situational report (SITREP).

3. EPA shall be notified if ventilation will occur outside of normal working hours. NCTF-RH intends to limit ventilation to the hours of 0600 to 2000 during the initial degassing of Tank 6. The decision to operate outside these hours shall be supported by air monitoring stack data.
4. Time-weighted hourly emission data from the stack shall be made available to EPA upon request.
5. As documented in the Air Emissions Response Notification OPOD, EPA shall be immediately notified in the event total VOC emissions exceed the 1-hour time weighted average of 38 ppmv at any air quality monitoring stations.
6. This approval is for ventilation of Tank 6 only. It is EPA's understanding that Tank 5 may contain elevated VOC levels within the tank due to its unique piping configuration. A separate Tank 5 OPOD shall require EPA's approval prior to the start of Tank 5 ventilation.
7. EPA shall be kept informed of any changes made to the CONOP. If those changes affect the form, fit, or function of the activity and/or facility, EPA must approve the proposed change.
8. EPA shall be granted access to the RHBFSF during Tank 6 ventilation unless prohibited by health and safety concerns.
9. EPA shall be immediately notified of any spills or releases that occur.

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

Sincerely,

/s/

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

cc: RADM Stephen Barnett, Navy Closure Task Force – Red Hill [email only]
CAPT Steve Stasick, Navy Closure Task Force – Red Hill [email only]
Mr. Milton Johnson, Navy Closure Task Force – Red Hill [email only]
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