



REGION 9

SAN FRANCISCO, CA 94105

VIA ELECTRONIC MAIL – READ RECEIPT REQUESTED

Rear Admiral Stephen Barnett
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 8 Sludge Removal

Dear Rear Admiral Barnett,

On June 18, 2024, United States Environmental Protection Agency Region 9 (EPA) received a concept of operation (CONOP) from Navy Closure Task Force – Red Hill (NCTF-RH) in preparation for Tank 8 sludge removal operations. Additional information was provided in an email response to EPA comments on June 26, 2024. NCTF-RH has described a process for safely removing and disposing sludge from tank bottoms in a manner protective of public health and the environment. In addition to the information provided in the CONOP, EPA has received the following supporting material regarding sludge removal:

1. Clean Fuel Storage Tanks for Closure – Work Plan, Waste Management Plan, and Environmental Protection Plan w/ Spill Response Plan (Revised December 15, 2023)
2. Response to EPA 20 November 2023 Letter Enclosure Comments on the Work Plan, Environmental Protection Plan with Spill Response and Waste Management Plan Regarding Fuel Storage Tank Cleaning for Closure (December 15, 2023)
3. Reply to EPA and DOH Tank Cleaning Conditional Approvals Requests for Information (February 7, 2024)
4. Response to EPA Comments on Conditional Approval of Tank Cleaning Work Plan (April 26, 2024)

EPA has reviewed the documents and grants NCTF-RH approval to begin removing sludge from Tank 8 provided the following conditions are met:

1. NCTF-RH shall provide EPA the waste characterization analyses upon receipt. Laboratory testing results shall include TPH-diesel, TCLP RCRA metals, VOC, PAHs, and flash point as indicated in Section 4 of the Tank Cleaning Waste Management Plan.
2. A waste manifest and certificate of disposal from a permitted hazardous waste facility shall be provided to EPA to verify proper disposal of the sludge. The certificate shall include the name and location of the disposal facility, date received, quantity of waste, and method of disposal.
3. EPA shall be notified when spill containment for sludge removal has been staged and when the satellite waste accumulation area has been established. EPA shall be provided the opportunity to inspect these containment measures prior to the start of sludge removal work.
4. NCTF-RH shall provide an estimate of the volume of sludge removed from the tank in a weekly situation report (SITREP). The SITREP shall summarize the volume of waste removed, the work completed that week, activities anticipated for the following week, and any spills or other issues to note.
5. This approval is for the removal of sludge only. NCTF-RH shall not begin tank cleaning (i.e. pressure washing of tank interior as described in Section 4.2 of the Tank Cleaning Work Plan) at this time. EPA shall be notified in writing prior to the start of sludge removal from Tank 7.
6. 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.
7. EPA shall be granted access to the RHBFSF during Tank 8 sludge removal unless prohibited by health and safety concerns.
8. 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/

Jamie Marincola

2023 Red Hill Consent Order Coordinator

Enforcement and Compliance Assurance Division

cc: RDML Marc Williams, 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]
Mr. Joshua Stout, Navy Closure Task Force – Red Hill [email only]
Ms. Kathleen Ho, Hawaii Department of Health [email only]

Ms. Kelly Ann Lee, Hawaii Department of Health [email only]