



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: Response to NCTF Comments on Conditional Approval of Tank Cleaning Work Plan

Dear Rear Admiral Barnett,

On January 18, 2024, the United States Environmental Protection Agency Region 9 (EPA) granted conditional approval of the Tank Cleaning Work Plan, Environmental Protection Plan with Spill Response Plan, and a Waste Management Plan for the Red Hill Bulk Fuel Storage Facility (RHBFSF) provided by United States Navy Region Hawai'i (Navy). Navy responded on February 7, 2024, providing additional information as well as requesting clarification on the conditions of approval.

Enclosure 1 of this letter seeks to clarify the conditions of approval as requested by Navy. It also reiterates questions that were previously raised by EPA, but not fully addressed in Navy's February 7, 2024, letter.

In addition to the comments in Enclosure 1, EPA is including further guidance on Navy's Waste Management Plan. During the Interim Defueling Inspection, EPA witnessed the onsite storage of waste material by contractors at the RHBFSF. These observations have prompted the need for additional clarification on how waste will be managed. Prior to full approval of the work plans, EPA would like to ensure proper handling and disposal of waste during tank cleaning. Specific comments regarding the Waste Management Plan for Tank Cleaning can be found in Enclosure 2.

EPA looks forward to continued coordination with Navy on these critical first steps towards Phase 1 Closure. We ask that you acknowledge these comments and respond by April 23, 2024. If you seek any clarification, please contact Drew Suesse (808-539-0545, suesse.andrew@epa.gov).

Sincerely,

/s/

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

Enclosure 1 – Response to Tank Cleaning Plans Conditional Approval Comments

Enclosure 2 – Waste Management Plan Comments

cc: RADM Marc Williams, Navy Closure Task Force – Red Hill [email only]
 CAPT Darrel Frame, Navy Closure Task Force – Red Hill [email only]
 CAPT Milt Washington, 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]

Disposal locations for sludge and oily rinsate

The following request for information was not provided in Navy's February 7th response: "specify how the wash water will be treated and disposed and what documentation will be provided to EPA to ensure that the treatment and discharge of oily rinsate meets all disposal regulations". This information is needed to ensure that all oily rinsate is handled in accordance with all Federal, State, and Local regulations as stated in the Tank Cleaning Work Plan.

Standpipe and nozzle cleaning

EPA contends that ventilation alone is not a feasible method to remove residual fuel and clean the interior of the standpipe and nozzle. Due to the low vapor pressure of the fuel products stored at RHBFSF and potential for fuel to remain trapped in the line, it is unlikely that air circulation alone will adequately remove residual fuel product. Navy has likewise not provided sufficient evidence to suggest that ventilation will be an effective method to clean this segment of piping.

EPA understands the diameter of the standpipe and nozzle may prevent personnel from safely entering the pipe for cleaning purposes. However, other cleaning methods that do not require entry should be evaluated. This section of piping will remain in place following facility closure and is therefore critical that it be free of all residual fuel.

Rinsate Accounting

Navy identified several perceived challenges in measuring the volume of rinsate used during tank cleaning. EPA recommends the following actions to address these limitations and improve the accuracy of rinsate accounting:

1. Install a meter on the GAC effluent discharge line. It is not clear from Navy's response why the volume of water entering the tanker truck is not metered.
2. Install a meter on the storage tank discharge line. It is not clear from Navy's response why the volume of water being utilized by the pressure washer is not metered.
3. Provide a volumetric measurement of the main sump including the liquid levels that initiate and cease pump cycling.

The implementation of these recommendations will provide a more detailed accounting of rinsate and can be used to identify if a major release of rinsate has occurred.

Section 4 – Waste Characterization

1. “*To ensure proper disposal, all project wastes must be characterized in accordance with 40 Code of Federal Regulations (CFR) Parts 261, 262, and 279...*” – 40 CFR Parts 265 and 268 are also applicable. Please confirm that waste characterization will comply with these regulations in addition to 40 CFR Parts 261, 262, and 279.
2. Hazardous waste record keeping – Pursuant to 40 CFR 262.11, please describe what records will be kept and how those records will be maintained.

Table 3 – Waste Testing Requirements

3. Oily water/tank wash water – Provide an explanation for why total halogen field screening (SW-846 Method 9077) is being used for tank wash water, and how the results from this test will inform subsequent handling and disposal. Why was total halogen screening selected as the waste characterization method instead of TCLP sampling?
4. Oily water/tank wash water – Navy has stated that they do not anticipate the oily wash water will be characterized as a hazardous waste based on previous tank cleanings. Has the wash water previously been analyzed using the same suite of tests required for residual sludge (i.e. TPH, TCLP, RCRA metals, VOC, PAHs, and flash point)? If not, what method was used to establish the oily wash water as a non-hazardous waste?
5. All waste streams – Please provide details on when and where samples will be taken for residual fuel, sludge, and tank wash water (e.g. will samples be taken prior to disposal or when the tank/container is full? Will it be a single grab sample or a composite of several grabs? If sampling from Tank 311, where will the sample be collected?)

Section 5.2 – Waste Labeling and Marking

6. This section identifies the appropriate DOT regulations for hazardous waste marking and labeling. Please also confirm that all 40 CFR 262.32 marking requirements will be met.

Section 7 – Treatment and Disposal

Table 4 – Waste Recycle/Disposal Method, Proposed Facilities, and Proposed Transporters

7. Residual Fuel – It is unclear from the table what disposal method will be used for residual fuel. The total halogen field screening test proposed in Table 3 is not an appropriate analysis if Navy intends to dispose of the fuel (as opposed to recovery and recycle).

A hazardous waste determination will need to be made prior to disposal. The same analyses proposed for sludge would also apply to residual fuel (ie. TPH, TCLP, RCRA metals, VOC, PAHs, and flash point).

Please clarify which transporters and TSDF will be used should the residual fuel be characterized as hazardous waste.

Section 9.1 – Containers and Labeling

8. *“Containers holding waste that is incompatible (flammable, reactive, ect.) with any waste or materials stored nearby in other containers or piles will be separated from the other materials or protected from them by a dike, berm, wall, or other device”* – Please specify which device will be used in this situation. What potential waste or materials are anticipated to be incompatible? For the uncharacterized wastes pending sample results, the generator needs to consider potential compatibility/incompatibility of the wastes when staging the containers.

Section 9.2 – Container Selection, Management, and Secondary Containment

9. Please confirm that the staging of drums in the tank alcoves will conform to the aisle space requirements detailed in 40 CFR Part 262.255. In addition to maintaining unobstructed aisle space for the movement of personnel, fire protection equipment, and spill control equipment, Navy must also maintain access to current and future planned sampling locations. Storage of waste during tank cleaning activities should be coordinated with Remediation and Site Investigation teams to deconflict with any environmental sampling efforts.
10. *“All drums must be placed fully over secondary containment and protected from rain. A covered containment must hold 110 percent of the volume of largest container”* – This plan does not meet the requirements of 40 CFR Part 264.175(b)(3). The secondary containment system must have the capacity to contain at least 10 percent of the volume of the containers or 100 percent of the volume of the largest container, whichever is greater.

Section 9.5 - Procedures for Handling Rejected Load of Hazardous Waste

11. *“In the event a load is returned, APTIM may request to establish a CAA as a temporary holding location. CAA establishment shall follow all applicable regulations and must conform to this Waste Management Plan.”* – Please clarify whether the rejected load would be the only situation where a CAA would be established.

In the event a CAA is requested, EPA shall be notified and a map detailing the location of the proposed CAA shall be provided.