



## REGION 9

SAN FRANCISCO, CA 94105

March 21, 2025

Rear Admiral Marc Williams  
Navy Closure Task Force - Red Hill  
850 Ticonderoga Street, Suite 110  
Joint Base Pearl Harbor-Hickam, Hawai'i 96860  
(Sent via Electronic Mail)

Subject: U.S. Environmental Protection Agency Review of *Draft Independent Data Collection in Support of Site Assessment Pilot Study, Red Hill Bulk Fuel Storage Facility, Joint Base Pearl Harbor Hickam, Hawaii, dated January 2025*

Dear Rear Admiral Williams:

Thank you for submitting the *Draft Independent Data Collection in Support of Site Assessment Pilot Study, Red Hill Bulk Fuel Storage Facility, Joint Base Pearl Harbor Hickam, Hawaii, January 2025*. The report describes the results of a multiple line of evidence (MLE) approach to measure for "the presence of a release where contamination is most likely to be present at an underground storage tank (UST) site." The independent data collection effort (IDCE) demonstrated that the proposed MLE approach with a focus on passive soil vapor samples successfully detected petroleum impacts and is likely to meet most of the site assessment objectives.

U.S. Environmental Protection Agency (EPA) requests that by **May 1, 2025**, the Navy submit a revised Site Assessment Work Plan to implement full scale MLE site assessment. In addition to the previously submitted comments and lessons learned during the IDCE, please incorporate the following comments:

1. The IDCE did not demonstrate an ability to detect older, less volatile releases. In tunnel segments where the passive soil vapor samplers do not detect a release, plan to supplement the assessment by employing carbon trap samplers (or other regulatory agency approved technology), as well as collecting a greater density of biogenic gas, soil, and grab groundwater samples (if groundwater is present).
2. As the site assessment proceeds, please plan to work with the regulatory agencies (RAs) to demonstrate the ability of the MLE approach (or a modification of it) to detect weathered contamination and releases of less volatile fuels. While we hope Navy can detect releases of weathered or less volatile fuels by isolating the carbon traps from the tunnel air, more data are necessary to demonstrate the efficacy of this approach.

3. Please provide monthly progress reports with preliminary unvalidated data. The progress reports will allow the RAs to monitor the progress, evaluate the ability to detect the older less volatile releases, and adjust the site assessment approach as needed to ensure the best outcome. At a minimum, the progress reports should include:
  1. Heat maps
  2. Detailed results following completion of each "segment or area;"
  3. Characterize differential pressures in each segment of the tunnel to determine the direction of airflow across the tunnel floor and to properly interpret the soil gas data.
  4. Identify drains and other tunnel features that historically may have provided a pathway for fuel releases to enter the environment.
  5. Identify deviations from the Site Assessment Work Plan.

If you have any questions regarding this letter, please contact me at russi.tonya@epa.gov or (415) 972-3706.

Sincerely,

/s/

Tonya Russi  
Red Hill Project Coordinator  
U.S. Environmental Protection Agency, Region 9

cc: CDR Benjamin Dunn, NCTF-RH  
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