



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

Re: Conditional Approval of Pipeline Removal Plans

Dear Rear Admiral Williams,

On October 24, 2024, Navy Closure Task Force – Red Hill (NCTF-RH) provided the United States Environmental Protection Agency, Region 9 (EPA) a Pipeline Removal Work Plan, Environmental Protection Plan, and Demolition Work Plan. Additional information was provided by NCTF-RH in response to EPA comments on December 13, 2024, and February 26, 2025. These plans and responses describe NCTF-RH's intentions to remove an estimated 4,000 gallons of residual fuel through pigging operations, then deconstruct and remove over 56,800 linear feet of fuel product pipelines from the Red Hill Bulk Fuel Storage Facility (RHBFSF).

EPA has reviewed NCTF-RH's response and approves the Pipeline Removal Plans provided the following conditions are met:

1. EPA approval is limited to the operations described in the Pipeline Removal Work Plan, Environmental Protection Plan, Demolition Work Plan dated October 24, 2024, in addition to the responses provided by NCTF-RH on December 13, 2024, and February 26, 2025.
2. EPA shall be kept informed of any changes made to the Pipeline Removal Plans. EPA must approve any proposed change that affects the form, fit, or function of the activity and/or facility,
3. NCTF-RH shall develop a concept of operations (CONOP) for any pigging, draining, pipeline cutting, or any other operations that may result in fuel being released from the system. EPA shall be provided the CONOP a minimum of one week prior to the planned start of work, and work shall not commence until EPA has approved the CONOP.

4. NCTF-RH shall keep a record of the estimated volume of fuel removed during pigging operations. Estimated volumes shall be reported to EPA in a weekly situation report (SITREP).
5. EPA understands that the 32" pipeline between pipe support (PS) 103 to PS-203 is being evaluated as a fire water collection point. Once a determination has been made if the 32" line is necessary for the fire suppression system, an updated plan shall be provided. This plan shall include details on how NCTF-RH will clean and verify this section is free of residual fuel (if used for fire suppression) or how NCTF-RH will remove this section of pipe.
6. As agreed to by NCTF-RH in their February 26, 2025 response, pipe coatings shall be analyzed for PCBs as part of the waste characterization prior to disposal of pipes. EPA shall be provided the results from the analyses.
7. EPA shall be granted access to the RHBFSF during pipeline removal work 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,

Jamie Marincola
2023 Red Hill Consent Order Coordinator
Enforcement and Compliance Assurance Division

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