



## REGION 9

SAN FRANCISCO, CA 94105

June 05, 2025

### **VIA ELECTRONIC MAIL ONLY**

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

Subject: U.S. Environmental Protection Final Comments on *Tank Closure Plan, Supplement 3: Phase 1 Closure Site Assessment Work Plan, Red Hill Bulk Fuel Storage Facility, Joint Base Pearl Harbor Hickam, Hawaii, April 2025*

Dear Rear Admiral Williams:

Thank you for submitting the *Tank Closure Plan, Supplement 3: Phase 1 Closure Site Assessment Work Plan, Joint Base Pearl Harbor Hickam, Hawaii, April 2025*. The report describes the proposed sampling and analysis program for phase 1 closure site assessment. The objective of the phase 1 closure site assessment is to measure for "the presence of a release where contamination is most likely to be present at an underground storage tank (UST) site."

If the results of the phase 1 closure site assessment indicate that additional site characterization and or remediation are required, a separate work plan will be submitted for release response action.

U.S. Environmental Protection Agency (EPA) has completed a review of the Draft Phase 1 Closure Site Assessment Work Plan and requests that by **June 26, 2025**, the Navy submit a Final Phase 1 Closure Site Assessment Work Plan. EPA generally concurs with the proposed approach. However, the final work plan should incorporate responses to the following comments:

#### Specific Comments:

1. Section 10.4.3, Exposure Pathways, pg. 63. The work plan indicates that the current exposure pathway for drinking water from Red Hill Shaft (RHS) is incomplete. However, Navy has submitted plans to reactivate RHS, thus drinking water from RHS is a complete pathway. In the final work plan please indicate that drinking water is a potentially complete pathway.
2. In addition to the evaluation summarized in the Executive Summary, the Site Assessment report should include:

- a) Figures showing all areas of concern that the Navy has identified as having known or suspected releases.
  - b) Discussion of potential source areas that exist outside of the current assessed area(s).
3. Section 17.1, Independent Data Collection in Support of Pilot Study, pg. 119. EPA believes that pressure differentials between ambient tunnel air and air beneath the tunnel floor could adversely affect the quality of soil vapor samples. No action requested; EPA appreciates that differential pressure readings will be logged at 1-minute intervals. EPA believes that characterizing pressure differentials within sampled tunnel segments is critical to data interpretation.

General Comments:

1. Navy's proposed plan includes high density sampling along pipelines in the lower access tunnel and at the base of each tank. The proposed sample locations should be adequate for identifying releases from the pipelines or bottoms of the tanks but may not identify releases from the tank sidewalls above the lower access tunnel, especially those that have migrated laterally away from the tank. This remains a data gap in the site assessment and will need to be addressed in future phases of work. Please evaluate methods to assess potential releases from tank sidewalls. Additionally, please update the final work plan and identify this data gap.
2. The Navy will notify the regulatory agencies (RAs) if changes in scope occur that may impact data quality, or the ability to meet data quality objects. Modifications to the scope must be agreed upon in writing by EPA and the Navy.
3. EPA requests that Navy schedule a meeting with RAs prior to submittal of the Site Assessment Report to discuss potential data gaps and recommendations for further action.

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

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