



## 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](mailto:marc.f.williams.mil@us.navy.mil)

Re: Conditional Approval of Principal Physical Modifications Memorandum

Dear Rear Admiral Williams,

On December 16, 2024, Navy Closure Task Force – Red Hill (NCTF-RH) provided the United States Environmental Protection Agency, Region 9 (EPA) a Principal Physical Modifications memorandum related to Phase 1 Closure of the Red Hill Bulk Fuel Storage Facility (RHBFSF). The memorandum describes the proposed method in which tank components will be decommissioned and/or removed from the facility. EPA provided comments on the memorandum in a January 10, 2025, letter, and NCTF-RH responded on January 31, 2025.

EPA has reviewed NCTF-RH's response and approves the Principal Physical Modifications memorandum provided the following conditions are met:

1. EPA approval is limited to the modifications described in the memorandum and NCTF-RH's January 31, 2025, response. EPA understands that Supplement 4 of the Closure Plan is forthcoming and will contain additional information related to facility closure. The final agreed upon facility closure design plan may require additional modifications be made to the bulk fuel storage tanks. Approval of the Principal Physical Modifications memorandum is not meant to be understood as concurrence with the final disposition of the tanks.
2. NCTF-RH shall develop a concept of operations (CONOP) for any pigging, flushing, and draining operations necessary to ensure that components left in place are free of any residual fuel products. CONOPs should include details on how NCTF-RH will verify that all fuel has been removed. 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.

3. It is EPA's expectation that all FOR line drains will be cut flush with the tank bottom. Given the size of the tank, the estimated 8-inch height of the modified steam casing lines would result in the accumulation of thousands of gallons of liquid and would not allow for free draining into the FOR system. EPA concurs with NCTF-RH's plan to field verify the heights of FOR line drains and develop CONOPs when modifications are required. A request for deviation to the Principal Physical Modifications memorandum shall be provided to EPA in the event it is not feasible to make the FOR line drain flush with the tank bottom. The request shall include justification for the deviation and provide an alternative method to prevent the accumulation of liquid.
4. EPA concurs with NCTF-RH's plan to monitor the tanks' interior temperature and humidity. EPA's approval of the final ventilation configuration is predicated on these data. EPA looks forward to reviewing the monitoring plan and collected atmospheric data.
5. NCTF-RH has indicated that a spreadsheet detailing the expected modifications will be developed for each tank. EPA requests that this spreadsheet be shared with regulators once the tank has been entered and an initial evaluation has been made. Additionally, EPA shall be notified when any deviation or unanticipated modifications are made to the spreadsheet.
6. EPA shall be kept informed of any changes made to the Principal Physical Modifications memorandum. 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 decommissioning 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](mailto:suesse.andrew@epa.gov)).

Sincerely,

**JAMES  
MARINCOLA**

Digitally signed by JAMES  
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Date: 2025.02.25 12:02:02  
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Jamie Marincola  
2023 Red Hill Consent Order Coordinator  
Enforcement and Compliance Assurance Division

cc: RADM Stephen Barnett, Navy Closure Task Force – Red Hill [email only]  
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