



REGION 9

SAN FRANCISCO, CA 94105

VIA ELECTRONIC MAIL – READ RECEIPT REQUESTED

Rear Admiral Lester Ortiz
Deputy Commander
Navy Closure Task Force – Red Hill
850 Ticonderoga Street, Suite 110
Joint Base Pearl Harbor-Hickam, Hawaii 96860-5101
lester.ortiz.mil@us.navy.mil

Re: EPA Approval of the Analytical Wipe Sampling Methodology

Dear Rear Admiral Ortiz,

On May 8, 2026, the United States Environmental Protection Agency, Region 9 (EPA) received the final *Analytical Wipe Sampling Methodology Addendum, May 2026* from Navy Closure Task Force – Red Hill (NCTF-RH). EPA has reviewed the documents and is providing approval to begin sampling the tank residue in accordance with the agreed upon plan.

The *Analytical Wipe Sampling Methodology* was developed at the request of the EPA and Hawai'i Department of Health (DOH) in response to data presented in the Tank 7 and 8 Quality Validation (QV) Reports provided on March 26, 2025. Per the QV reports, the third-party inspector, certified by the Association for Materials Protection and Performance (AMPP), found that cleaning of Tanks 7 and 8 satisfied industry standards (Surface Protection Standard No. 1 (SP-1) from the Society for Protective Coatings), and no visible signs of oil contamination were present.

While the AMPP inspector certified the tanks had been cleaned to SP-1 standards, cloth rub samples collected from the tank interiors exhibited a dark staining on nearly all the cloths collected. In order to better understand the composition of the cloth rub residue and demonstrate that any material remaining inside the tanks does not pose a significant environmental threat, EPA requested an analysis of the residue in a joint letter with DOH (dated March 17, 2025) and reaffirmed in a June 25, 2025 EPA letter.

The *Analytical Wipe Sampling Methodology* describes a two-tier process in which one tank from each of the three fuel types (F-24, JP-5, and F-76) will be sampled, and the residue analyzed for

key analytes detailed in Table 2 of Enclosure 1. In Tier One, the analytical results will be evaluated using a NCTF-RH developed model (pending EPA concurrence) and compared to Environmental Action Levels (EALs) (or Regional Screening Levels where no EALs exist). Should any analyte exceed the EAL, a Tier Two evaluation will consist of a risk analysis and proposed mitigation measures to be included in the Interim Phase 1 Closure Report.

NCTF-RH's proposed *Analytical Wipe Sampling Methodology* provides a process in which the observed residue will be evaluated for risk and ensures the Red Hill bulk fuel storage tanks are being closed in a manner protective of human health and the environment.

EPA approves the *Analytical Wipe Sampling Methodology* with the following clarifications:

1. The final version of the model used in Tier One Evaluation must be provided to EPA for concurrence. Likewise, the Tier Two Evaluation and proposed mitigation measures will require EPA approval as part of the Interim Phase 1 Closure Reports.
2. EPA's approval of the Tank Cleaning QV reports will acknowledge that the tank has been cleaned to the standards agreed to by NCTF-RH and EPA in the *Tank Cleaning Verification Plan* (October 2024) and in accordance with the cleaning requirements under the 2023 Administrative Consent Order.
3. It is EPA's understanding that future QV reports may combine tank cleaning and infrastructure decommissioning into one report. If reports are combined, EPA's approval following Tier One Evaluation will be limited to tank cleaning work only. EPA reserves the right to partially disapprove a QV report should deficiencies related to infrastructure decommissioning be identified.
4. At the time of this letter, Supplement 4 of the Closure Plan has not yet been approved. EPA and NCTF-RH continue to discuss closure requirements related to the risk evaluation of tank coating and assessment of legacy trapped fuel. This work is understood to be part of permanent closure in place, though potential mitigation measures may include removal of fuel products or other waste material from the tank interior.
5. Tanks with booms installed will be given preference when selecting a tank for sampling. However, should EPA determine that such tanks do not contain sufficient residue, NCTF-RH may be required to re-enter a tank that had its booms removed.

EPA looks forward to being onsite to oversee the sampling event and conduct an Underground Storage Tank inspection of Tank 2 to verify cleaning and closure conditions are being met. Should you have any questions regarding this letter or seek clarification, please contact Drew Suesse (808-539-0545, suesse.andrew@epa.gov).

Sincerely,

/s/

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

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