

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: Conditional Approval to Begin Pipe Cutting

Dear Rear Admiral Ortiz,

This letter is to inform you that the Environmental Protection Agency, Region 9 (EPA) conditionally approves Navy Closure Task Force – Red Hill (NCTF-RH) to begin cutting the Red Hill fuel product pipeline as described in the Pipe Cutting and Removal Concept of Operation (CONOP).

The revised CONOP, provided on December 3, 2025, describes the method in which NCTF-RH will cut and remove approximately 52,900 feet of pipe from the harbor tunnel and 8,000 feet of piping laterals and common line from the tank gallery. The CONOP, however, does not describe the final disposition of the pipeline and therefore could not be approved by EPA without additional recycling details.

As clarified in EPA's March 3, 2026, letter, information was needed to demonstrate the material is being appropriately managed under the 40 CFR § 261.6(a)(3)(ii) recycling exemption. Navy responded to EPA's request on March 26, 2026, with draft documentation supporting the legitimate recycling of the fuel product pipeline.

Documentation provided to EPA includes:

1. Identification of the metal processing facility and steel recycling facility, and enforcement and compliance summary reports for each.
2. Written confirmation from the metal processing facility that the facility manager has received the waste characterization reports for the pipe; is aware the pipe coating exceeds the Toxicity Characteristic Leaching Procedure (TCLP) regulatory threshold for lead; is permitted to accept the waste in accordance with state regulations; and will document

incoming and outgoing weight tickets to verify all material is being sent to the steel mill for recycling

3. Documentation of recycling legitimacy, which addresses the four requirements described in 40 CFR § 260.43(a) and (b).
4. Transportation plan describing the step-by-step movement of the pipe material from Red Hill to its ultimate recycling location.

EPA understands NCTF-RH is in the process of finalizing a Pipeline Recycling Plan, which will include the aforementioned documentation, and intends to formally submit the plan to EPA. In order to expedite the safe and environmentally protective closure of the Red Hill Bulk Fuel Storage Facility, EPA approves NCTF-RH to begin cutting the pipe provided the following conditions are met:

1. Pipe material shall not leave the Adit 2 load-out area until EPA receives and approves the finalized Pipeline Recycling Plan.
2. EPA shall be kept informed of any changes made to the Pipe Cutting and Removal CONOP and/or Pipeline Recycling Plan. EPA must approve any proposed change that affects the form, fit, or function of the activity and/or facility. This includes, but is not limited to, any changes in the processing or recycling locations.
3. NCTF-RH shall provide bills of lading for the pipe material at the request of EPA. EPA may require bills of lading to be included in Interim Closure Reports and/or the Final Closure Report.
4. EPA approval is limited to the operations described in the Pipe Cutting and Removal CONOP provided to EPA on December 3, 2025; email response to requests for information on December 3 and 9, 2025; and draft recycling documents provided March 26, 2026.
5. NCTF-RH shall continue to keep a record of the estimated volume of fuel removed during pipeline removal operations. Estimated volumes shall be reported to EPA in a weekly situation report (SITREP).
6. EPA shall be granted access to the Red Hill facility during pipeline removal work unless prohibited by health and safety concerns.
7. 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,

/s/

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

cc: RADM Brad Collins, Navy Closure Task Force – Red Hill [email only]
 CAPT Gregory deWindt, Navy Closure Task Force – Red Hill [email only]
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