



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: EPA Response to Navy Closure Task Force – Red Hill Tank Residue Sampling Letter

Dear Rear Admiral Williams,

On March 17, 2025, the United States Environmental Protection Agency, Region 9 (EPA) and the Hawai'i Department of Health (DOH) sent a joint letter to Navy Closure Task Force – Red Hill (NCTF-RH) requesting the sampling of a residue observed on the tank shell following tank cleaning.

As per Section 3.1.1 of the Revised Tank Cleaning Verification Plan (Verification Plan) (October 4, 2024), NCTF-RH agreed to clean the tanks so that the “surface shall be free of visible oil, grease, dust, dirt, drawing, and cutting compounds and other visible soluble contaminants”. Additionally, Section 3.1.2 of the Verification Plan describes NCTF-RH’s plan to use a cloth rub test to examine for visible residue.

Photos presented in the Quality Validation Reports for Tanks 7 & 8 (QV reports), and corroborated by EPA and DOH field staff, reveal a visible residue remaining inside the tanks. EPA understands that a third-party inspector does not believe the residue is fuel, but a lack of quantitative analysis and unknown composition of the material prevents NCTF-RH from demonstrating that the current disposition of the tanks is protective of groundwater resources. EPA therefore maintains that additional data is necessary to evaluate the potential risk and vulnerabilities of pollutants remaining in the tank post-closure.

NCTF-RH responded to the EPA and DOH joint letter on May 29, 2025, declining to sample the residue as requested. The letter highlights two reasons why NCTF-RH believes analyzing the residue is unnecessary: (1) Navy has historical generator knowledge of the fuel products, and the

sludge and washwater have not been classified as a RCRA hazardous waste; and (2) the tanks are self-contained and there is no pathway to the environment from the interior of the tanks.

The information provided in the letter does not sufficiently address the concerns of the remaining tank residue for the following reason:

1. The scope of analysis for Toxicity Characteristic Leaching Procedure (TCLP) is limited and is primarily used to determine waste disposal requirements. TCLP parameters are not typically used for assessing risk. Likewise, waste characterization of sludge and washwater only assess what has been removed from the tank, not what remains. NCTF-RH has posited that the residue is an accumulation of dirt, dust, or rust, but have not provided substantive data to support this claim.
2. The Fuel Oil Recovery (FOR) line represents a potential pathway for contaminants to be released to the environment. NCTF-RH has proposed using the FOR line as a long-term method for draining accumulated water. The FOR line has the potential to degrade and leak over time.

The Red Hill bulk fuel storage tanks present a unique challenge in their massive scale and the infeasibility of closure by removal or fill. The 2023 Administrative Consent Order requires that tanks closed-in-place need to be done so in a manner approved by EPA. At this time, EPA has not been provided sufficient data to concur that the tanks no longer pose a risk to human health and the environment, and therefore EPA is unable to approve the Tank 7 and 8 QV reports.

EPA looks forward to receiving additional quantitative data to better assess the risk of the residue. NCTF-RH has already indicated that TCLP results from the interior coating of Tanks 3 and 4 would be provided to the regulators. While TCLP does not fully evaluate the risk to groundwater nor characterize the residue, these coating results will help regulators better understand the material that may remain in the tank post-closure. EPA is willing to meet with NCTF-RH and DOH and discuss additional quantitative analyses that are agreeable to all parties. Potential options may include analysis of the residue from the cloth rub rags, an expanded analysis of the tank coating to include contaminants of concern beyond TCLP, or a revised methodology to the previously proposed hexane wipe sample.

If you seek any 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 Stephen Barnett, Navy Closure Task Force – Red Hill [email only]
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