



RED HILL TANK CLOSURE PLAN

Responses to 25 August 2023 EPA Comments on
Closure Supplement 2

September 29, 2023
Department of the Navy

Responses to 25 August 2023 EPA comments on the Red Hill Tank Closure Plan, Supplement 2

1. It is still unclear when Navy will issue a proposed final decision on tank closure method. Enclosure 4 of Supplement 2 of the Closure Plan indicates that, "...further discussion regarding details of the selected closure in place alternative are ongoing, and may require future supplement(s) to provide all necessary information for approval..." Navy also states, in the Supplement 2 report, that, "the DON formally sought DOH approval for ALTERNATIVE 1: Closure in Place as the permanent closure method. The DON selected this alternative because it will allow for potential beneficial non-fuel reuse of the tanks while minimizing impacts to the environment, local community, safety concerns, and closure schedule." EPA cannot approve a proposed closure practice that is undefined. It is understood that additional information is needed for Navy to reach a final proposal for tank reuse and, therefore, closure method. EPA requests that Navy provide a proposed date by which a final proposal will be prepared and submitted to regulatory agencies. Please also include a schedule of key events that will inform this process. This will allow EPA to evaluate Section 5 of the original Closure Plan, and eventually, prepare to evaluate the proposed tank closure method.

Response: In the cover letter to the "Red Hill Tank Closure Plan Analysis of Alternatives & Concept Design to Close In Place," submitted to the Hawaii Department of Health (DOH) on December 22, 2022, the Navy formally requested DOH approval of closure in place as the permanent closure method. We understand that DOH and EPA will not approve this request until the Navy provides additional detail on our specific design for closure in place. The Navy will provide the requested detail to DOH and EPA as part of Supplement 4: Detailed Closure Design, to be submitted at a date to be determined. The Navy continues to gather information to inform a decision on beneficial non-fuel reuse, but we consider this effort to be separate from underground storage tank (UST) closure. While reuse can only occur if the tanks are properly closed in place, the Navy understands reuse to be outside the scope of the UST permanent closure requirements under the Hawaii Administrative Rules (HAR). Therefore, Supplement 4: Detailed Closure Design will not include information on beneficial non-fuel reuse. As requested, the Navy is working to update our schedule of key events, and we will provide this schedule to DOH and EPA as soon as possible.

2. EPA anticipates future submissions from JTF on drainage of fuel from low-points. While it is good to provide containment for pipeline removal processes, EPA's expectation is that all fuel will be removed by JTF as part of defueling.

Response: The process for removing residual fuel from low points and other areas of the pipelines will be fully described in Defueling Supplement 3, with the goal of achieving complete removal of residual fuel. Nevertheless, in order to ensure environmental protectiveness, the Navy will require its pipeline removal contractor to provide containment and be prepared to handle any small amounts of fuel that may remain.

3. Surge Tanks Closure – EPA supports the general method of closure by filling the surge tanks with inert material. EPA will provide specific comments and approval when Navy submits contractor workplans detailing how this work will occur.

Response: The Navy understands and concurs with EPA response.

4. Please confirm that the tank cleaning method proposed by Navy will apply to Surge Tanks and to the Red Hill Tanks.

Response: The cleaning method of the surge tanks will be the same method as the Red Hill Tanks.