

This document includes;

- **Written Testimony related to the Navy Closure Plan comments received from DOH and EPA**
- **My thoughts regarding portions of the FTAC that I transcribed**
- **Testimony from several online and present individuals at the FTAC**

RESPONSES FROM NAVY TO DOH AND EPA REGARDING CLOSURE AND SUPPLEMENT 1

- 1. Navy Response to DOH Comments of 15 March 2023 Tank Closure Plan**
- 2. Response to EPA Comments of 7 April 2023 on the Closure Plan, Analysis of Alternatives, and Supplement 1.**

This only contains my points of interest in either of the two documents regarding closure.

The recommendation from the Navy to remove all 3 pipelines was first offered in Supplement 2 but has a small reference here also in the comment by the DOH by which the Navy then agrees as early as 15 March 2023.

Of note: Between the requests from the DOH and EPA and the responses to both, the Navy changed course and proposed removing the 3 pipelines.

1. Navy Response to DOH Comments of 15 March 2023 Tank Closure Plan

As stated by the Navy Response to DOH: “Most importantly, the Navy did not consider cost as a factor in selecting the preferred alternative of Closure in Place. Instead, Closure in Place was chosen because it provides the safest approach for site workers, the quickest schedule, and the least impact on the environment and local community, while having no significant constraints on engineering feasibility and allowing the potential for beneficial non-fuel reuse of the tanks.

Specific Comments

DOH: Page 5, 2. Evaluation of Alternatives:

This section states “[a]ll four closure alternatives will render the tanks incapable of being used for fuel storage and will effectively eliminate any future possibility of the tanks containing fuel.”

NAVY: (Change of course):

Supplement 2 describes the Navy plan to remove the 3 large fuel pipelines under Alternatives 1 and 2, thereby rendering the tanks incapable of being used again for fuel storage.

My Thoughts: The DOH and Navy have been meeting regularly. Now the proposal to remove the 3 pipelines is suggested, while the DOH and EPA really wasted a lot of time providing their responses to Supplement 1. Usually, a new supplement is an update on the first one, this is a complete change, **causing more delays to closure.**

This type of response is reflected throughout this document.

DOH: Page 7, 3. Closure Alternatives, item 1: This item states the U.S. Department of the Navy (Navy) must determine if any significant restrictions will remain after defueling. When will this determination be made? How will it affect the Tank Closure Plan's discussion of ***potentially opening the Facility to the public, for example, as a museum, or a different beneficial reuse?***

Navy: After closure is complete, many of the current access restrictions (which are in place to protect fuel resources) will no longer apply. At that point, restrictions **would remain to protect the Red Hill well**, and any new access restrictions would depend on the selected non-fuel reuse.

DOH Page 8, 3. Closure Alternatives, item 4: How will piping with asbestos insulation or piping supports with lead-based paint be closed in place? This is not described in the Tank Closure Plan or Red Hill Tank Closure Plan Analysis of Alternatives & Concept Design to Close in Place. However, from the cost estimates, it appears the Navy intends to demolish these portions of piping. Please confirm. How will the pipes be cleaned and verified as clean? **Unless recommends all fuel pipelines located in the lower access tunnel and harbor access tunnel be removed.**

NAVY: The Navy concurs with the recommendation, and Supplement 2 describes the Navy plan to remove the fuel pipelines from the lower access tunnel and harbor access tunnel. The details of pipeline removal, including potential lead-based paint and asbestos insulation, will be described in the contractor work plan and Environmental Protection Plan, which will be provided to DOH and EPA for review and comment prior to beginning the work. The Navy expects the piping supports will be left in place, and the paint will be maintained by re-painting and sealing in accordance with EPA regulations for lead paint management. Because pipelines must be designed for their intended purpose, the

Navy does not expect the existing fuel pipelines to be adequate for any beneficial non-fuel reuse. Instead, new pipelines would need to be installed if required by the selected reuse option.

My thoughts: Since the DOH response was provided to the Navy on 15 March 2023, this now becomes the NEW closure plan. More answers will be provided or written in the contractor's statement of work. I believe it should be sooner.

DOH: Page 8, 3. Closure Alternatives, item 5: The Facility may be opened to the public in the future, depending on the proposed beneficial reuse. This should be considered when determining the “level of repair” needed to provide safe access. Due to the historical significance of the site, after closure would the Facility be **transferred to another Federal Agency, such as, the National Park Services?**

Navy: Decisions regarding further actions to support reuse will be made outside of the closure process once such future use(s) have been determined. The potential transfer of the facility to another federal agency would be resolved during the process of developing any non-fuel reuse. **At present, the Navy does not anticipate transferring the Red Hill Bulk Fuel Storage Facility to another federal agency.**

My thoughts: The public has the same question. If the reuse portends use and access to the public, the state gains NO REVENUE from entry fees! Neither do the DOH or EPA as this seems to be leading towards.

Additional Navy responses to DOH questions follow and focus on the re-use possibility.

[**DOH:** It is difficult to determine true cost without knowing what the reuse is, as there may also be an **economic benefit from the reuse.**]

Navy: The Navy will further evaluate the removal of specific metal components when the beneficial non-fuel reuse is selected.

Specific maintenance requirements may also depend on the beneficial non-fuel reuse, so the Navy will submit a plan for monitoring and maintenance of the tanks in a future supplement.

As additional information on the non-fuel reuse becomes available, the Navy will update the closure design and the post-closure monitoring and maintenance program.

Future supplement(s) will provide further information necessary to support the closure in place alternative. The uncertainty exists at present and will remain until the non-fuel reuse option is selected.

2. Response to EPA Comments of 7 April 2023 on the Closure Plan, Analysis of Alternatives, and Supplement 1.

EPA: Navy states that, “[a]ll four closure alternatives will render the tanks incapable of being used for fuel storage and will effectively eliminate any future possibility of the tanks containing fuel.” EPA disagrees with this statement.

NAVY: Supplement 2 to the Tank Closure Plan provides additional information on how the Navy will render the tanks incapable of being used for fuel storage. The three fuel pipelines will be removed between the tanks and the underground pumphouse, effectively eliminating any future possibility of the facility being used to store fuel.

EPA: The report does not evaluate the cost of maintaining the structural integrity of the tanks over the long term. Will this cost be estimated by Navy, and will this review be impacted by tank reuse/closure choice?

NAVY: Most importantly, the Navy did not consider cost as a factor in selecting the preferred alternative of Closure in Place. Instead, Closure in Place was chosen because it provides the safest approach for site workers, the quickest schedule, and the least impact on the environment and local community, while having no significant constraints on engineering feasibility and allowing the potential for beneficial non-fuel reuse of the tanks.

EPA: How will the piping be managed for different closure options? How will it be cleaned and verified clean? Does Navy expect to find lead-based piping and/or appurtenances that need special handling?

NAVY: Piping and appurtenances that are left in place will be maintained by re-painting and sealing in accordance with EPA regulations for lead paint

management. **No regulated friable asbestos containing material (ACM) has been identified at Red Hill; however, the Navy has identified non-friable ACM in gaskets associated with the pipe flanges.** The contractor's methods and means for ACM management will be included in the Environmental Protection Plan that will be approved by the Navy and submitted to EPA and DOH for review and comment.

EPA: The statement, “[p]otential beneficial reuse must be viable assuming the **DOD will continue to own the property**” is unclear. Please provide clarification to the term, “viable,” in this sentence.

Navy: The statement means that **the beneficial reuse must work under the condition that DOD still owns the property. In other words, if a potential reuse depends on property transfer to a new owner, then it would not be a viable reuse.**

EPA: Please provide clarification to the statement, “[p]otential beneficial reuse must be considered viable based on the current DON proposal for tank and pipeline closure...”. Is it correct that reuse cannot involve the removal/destruction of any tanks or pipelines, and that the surge tanks must be filled with inert material?

NAVY: The details of tank and pipeline closure are being discussed at ongoing technical meetings among DOH, EPA, and Navy. Some of the details may change, but the expectation is that the large USTs will be closed in place and the surge tanks will be filled with inert material. The potential reuse must be viable in the sense that it must work with the conditions that exist following closure activities. For example, if the reuse depends on using the surge tanks, then it would not be viable if the tanks are already filled.

EPA: In response 1(f), it states that “Navy will consider benefits of the [tank reuse] options in terms of their...social...aspects.” Please describe how the Navy will weigh **social benefits** in this context.

NAVY: The Navy has contracted with a federally funded research and development center (FFRDC) as required by the FY23 NDAA to complete detailed evaluations, including cost-benefit and engineering feasibility, of potential beneficial non-fuel reuse concepts for the Red Hill Bulk Fuel Storage Facility.

Specifically, the NDAA requires the cost-benefit analysis to cover each of the following for each such alternative use:

- i. The design and construction costs.
- ii. Life-cycle costs, including the operation and maintenance costs of operating the facility, such as annual operating costs, predicted maintenance costs, and any disposal costs at the end of the useful life of the facility.
- iii. Any potential military benefits.
- iv. Any potential benefits for the local economy, including any potential **employment opportunities for members of the community**.
- v. A determination of environmental impact analysis requirements.
- vi. The effects of the use on future mitigation efforts.
- vii. Any additional factors determined to be relevant by the federally funded research and development center in consultation with the Secretary.

Under items (iv), (v) and (vii), the Navy will coordinate with the FFRDC to ensure that the analysis will look at positive effects on society as a whole (e.g. proposed reuse will not add risk to the environment or human health and **may provide jobs to the people of Hawai'i**).

EPA: In response 1(g), Navy states, “[w]hile consideration of non-fuel reuse is dependent on the permanent tank closure method selected, it is a separate process from underground storage tank (UST) closure.” Please clarify this response. Is Navy suggesting that reuse is outside the scope of UST closure requirements? Regulatory closure involves permanent tank closure, site assessment, and necessary remediation.

NAVY: The Navy agrees that regulatory closure under the HAR 382G involves permanent tank closure, site assessment and necessary remediation, but the HAR 382G **does not address reuse (absolutely true)**. While reuse can only occur if the tanks are properly closed in place, **the Navy believes that reuse is outside the scope of UST closure requirements, and we are not aware of other closed USTs**

that have been reused for non-fuel purposes. Beneficial non-fuel reuse will almost certainly require analysis under the National Environmental Policy Act, and the EPA and the public will have opportunities to provide input.

MY CLOSURE SUPPLEMENT 2 CONCERNS

Introduction

The SECDEF established that the Joint Task Force-Red Hill (JTF-RH) would lead and execute all defueling activities, after which the Department of the Navy (DON) **[Navy Region Hawaii (NRH)-RADM Barnett]** would commence with the closure of the facility.

1.1 Department of the Navy Tank Closure Plan History

With the submission of the third-party analysis, the DON (NRH) 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.

On February 28, 2023, the DON submitted Tank Closure Plan Supplement 1, which provided additional detail on tank and pipeline cleaning, detailed procedures for waste management, a process for updating the Facility Response Plan, an update on planning for beneficial non-fuel reuse, an updated Critical Path Method (CPM) schedule, and responses to DOH comments on the **initial Tank Closure Plan**.

1.2 Contents of Tank Closure Plan Supplement 2

This Supplement 2 builds upon the previous November 1, 2022, December 22, 2022, and February 28, 2023 submissions. Supplement 2 provides the following:

- **A plan for removal of the three fuel pipelines (1st time Public heard about this!!!)**
- A third party assessment of the long term structural integrity of the tanks (Enclosure 1)
- Additional procedures for addressing the surge tanks
- Responses to DOH comments on the third party analysis of alternatives for tank closure (Enclosure 2)
- Responses to EPA comments on 1) the initial Tank Closure Plan, 2) the third party analysis of alternatives for tank closure, and 3) Supplement 1 (Enclosure 3)

2. Removal of the Fuel Pipelines

The original Tank Closure Plan (submitted November 1, 2022) and Supplement 1 (submitted February 28, 2023) describe the DON's plan to clean the pipelines associated with the 20 large fuel storage tanks at the RHBFSF. **Based on further analysis since that time, the DON has decided to remove and properly dispose of the three large fuel pipelines, rather than clean them in place as described previously.**

With the pipelines removed, the tanks cannot be refilled with fuel. Thus, pipeline removal is a clear and tangible demonstration of the DON's commitment to the public, regulatory agencies, and other stakeholders that the Red Hill facility will never be used again for storage of fuel or hazardous chemicals.

Additional benefits of pipeline removal include the following:

- Ensures the complete removal of any residual fuel that may be associated with the pipelines.
- Creates additional space within the tunnels, thereby providing the most flexibility for beneficial non-fuel reuse of the tanks and tunnels.
- Eliminates long term maintenance of pipelines that no longer have an operational use.

In general, pipelines must be designed for their intended purpose, so the Navy does not expect the existing fuel pipelines to be adequate for any beneficial non-fuel reuse. Instead, new pipelines would need to be designed and installed if required to support the selected reuse option.

My Thoughts: Then why didn't you just propose that in the initial plan and supplement 1?

2.1 Pipeline Configuration

A 3.2 mile tunnel system runs under non-Navy property and connects the 20 large fuel storage tanks of the RHBFSF to the Underground Pump House located on Pearl Harbor. The tunnels contain three common fill/issue fuel pipelines. The pipelines carry fuel as it is pumped uphill to the tanks from the Underground

Pump House or flows downhill to Pearl Harbor by gravity.

The tunnel system includes the Upper Access Tunnel, Lower Access Tunnel, Tank Gallery, Makalapa Adit tunnel, and Harbor Tunnel. All tunnels are accessed by openings or access doors into the tunnels called “adits”.

The Tank Gallery provides access to the tank valves, sample stations, drain lines, electric room, and Gauger Station. The Tank Gallery is the widest tunnel at 20-24 feet in width, and the other tunnels are approximately 12 feet wide. The Upper Access Tunnel provides access to the tank manways and gauging platforms, but there are no fuel pipes installed in the Upper Access Tunnel. All tunnels have electrical infrastructure (lights and power) and ventilation.

2.2 General Considerations

Adit 3 currently contains a large diameter water line coming from the Harbor Tunnel and other equipment that restrict its use for equipment and material access. As a result, it is expected that pipe removal will be performed at Adit 2 or another adit selected by the contractor. ***The contractor will be required to determine the means and methods for removing the disassembled pipelines.***

My Thoughts: What contractor? Oppose Kinetix!!

The capacity of the existing ventilation system may limit certain types of activities within the tunnel areas. For example, **only minimal hot work** (e.g., burning or arc-gouging of piping) can be performed. The contractor will develop health and safety plans for Navy review and approval. Prior to pipeline removal activities, the piping will be drained and ventilated.

The Red Hill facility has limited parking, laydown, and storage areas; therefore, the contractor will need to take the pipe segments off site for recycling and proper disposal as they are removed.

2.3 Pipeline Removal

Removal efforts will include the three large fuel pipelines and associated valves, steel frame supports, and other appurtenances. The removal activities will occur from the lower tank gallery to the first flange at the underground pump house. Flanges at the outlet of the tanks will remain in place and sealed with a blind flange.

Due to access limitations at Adit 3, the piping and other materials will be removed through Adit 2 or one of the other adits. **The contractor will be responsible for developing the method for removing and properly disposing of the disassembled pipeline.**

The area outside of Adit 2 is limited, but there is sufficient space to bring in containers for material removal. The existing overhead crane hoist system at Adit 2 may be used to assist with removal of the disassembled pipeline. **Throughout the removal process, the water line from the Harbor Tunnel will be protected.**

My Thoughts: How will the water line be protected?

The most time-consuming activity will be moving the pipe through the tunnels for off-site transportation and disposal. The existing rail system does not go to all locations and is currently not inspected or rated. **The contractor will determine the means and methods for pipe removal.**

My thoughts: If the contractor is making the decision on the means and methods for pipe removal then why do we have the next two paragraphs?

1. One possible approach is to use custom electric industrial tuggers and carts to haul pipe and material to Adit 2. An electric industrial tugger is a utility vehicle designed to stack and store heavy materials such as pipe. Tuggers are commercially available, with standard off the shelf units having 5000 pounds of towing capacity. **The contractor can select the tugger for maximum efficiency based on specific needs at the site.** For example, a custom bi-directional tugger could be fabricated and purchased to reduce the need to turn around in the tunnels.
2. Otherwise, the electric carts can be turned around in only a few locations within the tunnels, including the Adit 2 junction with the Harbor Tunnel, the Adit 3 junction, and the Tank Gallery. The contractor will protect fiberglass grates and cover the existing rail in areas where it would inhibit electric tugger and cart operation.

The contractor will determine the means and methods for cutting pipe within the limited work area. Since the existing pipe is coated in lead paint, a strip of coating will be removed at each location where the pipes will be cut. The contractor will be required to remove lead based paint in accordance with

federal, state and local regulations. The removed material will be sampled to determine the disposal method in accordance with applicable environmental laws and regulations. Piping and appurtenances that are left in place will be maintained by re-painting and sealing in accordance with EPA regulations for lead paint management. If painted pipe is removed, the scrap metal processor receiving the pipe will be notified that the paint may contain lead.

Due to the potential presence of residual fuel in low points and behind valves, the contractor will be responsible for primary and secondary containment, as well as proper removal and disposal of any residual fuel, in accordance with applicable environmental laws and regulations.

My Thoughts: Wouldn't this be part of RH-JTF Defueling Operations?

The pipe will be cut into sections and removed from the facility. The contractor will determine the length of each section for optimal removal efficiency. At each location, the pipe will be transported out of the facility for proper recycling and disposal. The contractor will determine the pipe cutting method and will either use cold cutting methods or obtain the necessary hot work permits.

Space limitations will hinder all removal activities, especially in the Harbor Tunnel where the large water line must remain in place and metal ribs provide structural support for the tunnel. In addition, a cable tray runs the entire length of the Lower Access and Harbor Tunnels.

My Thoughts: There must be a clearly defined plan on how the large water line and metal ribs will be protected. There must be a safety plan if either of those are compromised.

The contractor will be responsible for safely cutting the pipe into sections and removing the pipe from the facility. **Multiple solutions may be required**, one for the Harbor and Lower Access Tunnels and one for the Tank Gallery.

My Thought: Multiple solutions must be delineated and the chosen method accurately defined.

My thoughts: Asbestos is a health hazard. Employees must have proper PPE before removal. Suggest an OSHA Official be involved in the proper PPE. As far as the estimate of 5% of piping containing asbestos is concerned, an estimate is

NOT acceptable. Unidentified friable asbestos is another safety concern. If during removal will the workers be able to identify friable asbestos?

The Navy estimates approximately 5% of the piping between Pearl Harbor (Adit 1) and the Red Hill tank farm may contain asbestos. Prior to cutting and removal of pipe, the contractor will remove and dispose of asbestos wraps in accordance with applicable laws and regulations. No regulated friable asbestos containing material (ACM) has been identified at Red Hill; however, the Navy has identified non-friable ACM in gaskets associated with the pipe flanges. Therefore, if a pipe flange must be disturbed or removed, the work will be conducted in accordance with the NESHAP 40 CFR Part 61, subpart M Standard for Demolition and Renovation, which includes notification 10 days prior to commencing work.

When conducting demolition activities on asbestos-containing pipe flange gaskets, the contractor will establish and maintain worker protections as required by 29 CFR 1926.1101.

SAFETY INPUT: *Non-friable asbestos is a type of asbestos that is not easily crumbled or reduced to dust. It is often found in vinyl floor tiles, roofing products, and adhesives. Non-friable asbestos may become friable if it is damaged, thrown, dropped, or subjected to power tools. Non-friable asbestos removal requires notification, wet methods, careful handling, and disposal by a certified professional. [Non-friable asbestos removal is subject to the same requirements as friable asbestos removal if the material becomes friable during the process](#)¹².*

Asbestos-containing materials are either friable or non-friable. Friable asbestos is high risk. Friable asbestos can be crumbled, pulverised or reduced to a powder by hand pressure. Non-friable asbestos is lower risk. It is mixed with cement or other hard bonding materials. [Non-friable asbestos can become friable if damaged or old](#)².

You can't tell if a material contains asbestos just by looking at it.

[Identifying asbestos requires testing by a licensed asbestos lab](#)³. [If you think you may have asbestos in your home or on your work site, use our Asbestos Checker](#)³. [You can't confirm asbestos by sight or smell](#)³. [Use a licensed asbestos assessor who will test the sample to confirm asbestos](#)³.

The contractor will remove the steel pipe supports from the Harbor Tunnel, the Lower Access Tunnel, and the side tunnels that extend to the tanks. As needed to allow for pipe removal, the contractor will cut the large frame supports into smaller sections. These sections can then be transported down the tunnel to the desired adit.

The contractor will sever the wall, ceiling, and floor connections as needed. Baseplates, anchors, and a maximum of 6-inches of connecting steel will be abandoned in place. Steel mainline supports (supports directly underneath the pipelines that run the length of the tunnel) in the Tank Gallery will remain as they support electrical, water, and other utilities that must stay in place. Thrust blocks and concrete supports for the largest pipeline will remain.

2.4 Engineering Feasibility

If the contractor uses Adit 2 for pipeline removal, there will be minimal impacts to the surrounding community; however, the occupants of buildings close to Adit 2 will experience **construction noise, dust, and heavy volumes of construction traffic. (for 3+ years; see “Schedule”)** The contractor will apply mitigation measures to reduce these impacts.

My Thoughts: These mitigation methods must be clear and agreed upon.

2.5 Schedule

As a rough order of magnitude (ROM) estimate, the duration of pipeline removal activities will be **approximately three years. The three-year estimate does not include preliminary processes such as project planning, programming of funds, design, and contractor procurement.**

BUT MOST IMPORTANT FOR THE PUBLIC IS THIS TIMELINE!!

JUL 2023	NAVFAC EXWC	Contract Award – Tank Cleaning
NOV 2023	CNRH	Public Stakeholder Engagement – FTAC, Public Outreach Results
NOV 2023	NAVFAC Hawaii	Draft Sampling and Analysis Plan
DEC 2023	CNRH	Press Release
FEB 2024	SECNAV	Beneficial Non-fuel Reuse Report submitted to Congress and report available to public
JUN 2024	CNRH	Press Release (Semi-annually as needed during closure)
NLT JUL 2024	NAVFAC Hawaii	Tank cleaning begins
NLT AUG 2027	NAVFAC Hawaii	Tank cleaning ends
NLT AUG 2027	CNRH	Press Release
NLT SEP 2027	CNRH	UST Closure Assessment Report (within 30 days after UST permanently closed)

FTAC EXCERPTS

RADM Barnett:

The closure plan has 4 options for closure. First, option is closure to close in place.

The second option is closed, in place for potential beneficial, not fuel reuse. **This was requested that we look at this by a DOH during a 14 July last year, on a meeting that we had with senior Navy leaders, also with DOH.**

My Thoughts: Was the public invited, informed or asked for input?

The third option is close and fill, and the fourth option is close, and remove the steel liner and fill.

The Navy has formally requested DOH approval and option one which is to close in place and executing this plan will take roughly 3 years. Why? Well, this is the most limited impact to the environment. It's most limited impact to the surrounding community.

Phase 2 is the planning for the beneficial reuse and tanks like I mentioned. **This was at the request of DOH to be included as a plan.** During our meeting confer on July the fourteenth of last year.

Nakapuna opened his qualitative survey on 30 March to the public through the end of May, so it just completed. In addition, **they've been conducting key stakeholder interviews during this time as well.**

They will present a **final report in November of this year**, categorizing all the input that was that was received.

My Thoughts: Provide the names of all interviewees. Waiting until November for this report is unacceptable!

NRH has a timeline of February 2024 submission of beneficial non reuse report to SECNAV. There is a large gap between November 2023 and February 2024. There is NO indication of a meeting engaging the public.

RADM Barnett continues:

For the regular tanks we have decided to remove and properly dispose of the 3 large fuel pipeline systems rather than clean them in place, as previously described.

With the pipelines removed, the tanks cannot be refilled. Pipeline removal is a clear and tangible demonstration of our commitment to the public and to the regulatory agencies and other stakeholders that we don't want this facility to be ever used for fuel or hazardous material. Again.

Additionally, benefits of pipeline removal include the following:

- ☐ It ensures the complete removal of any residual fuels that might be associated with the pipeline,
- ☐ It creates additional space within the tunnels, thereby providing the most flexibility or beneficial non-fuel reuse of the tanks and tunnels, if so desired, and
- ☐ It eliminates the long term maintenance of pipelines that no longer have an operational use.

STATING THE OBVIOUS: The Navy has the lease on the land. If there is a plan for non-fuel reuse plan, WHO PAYS FOR IT?

COMMUNITY QUESTIONS TO FTAC

Audience Question: "...My second one is very brief. I was surprised to hear that DOH came up with the idea of the repurposing, that they brought it up. How is the repurposing of the types in any way?

What do they care?

Did somebody suggest that to you and just suggested it? And then just a simple question. Why did you (DOH) bring it up? Of all the agencies who'd be interested in. That's my 2nd question."

DOH Solid Waste Branch Answer:

Joanna Seto:

Thank you for that question. The state solid waste management priorities consider the following hierarchy, source reduction and reuse.

Recycling before and disposal. So based on the state solid waste laws we need to follow those, and being that there is *historical value* of the facility. We believe (WHO?) that it's appropriate to consider possible reuse options prior to disposal.

We need to look at recycling before disposal. So this is primarily from our solid waste management priorities.

I'm going to call up my solid waste branch. Solid waste, supervisor. This is somebody else is coming out to help me answer that question.

Linae Ichinose:

HRS Chapter 342. G. Identifies the State's solid waste hierarchy in which we are required to look at prior to disposal. And so that's a consideration that needs to be done, should be done, but not necessarily have to be done.

I guess it is. It's kind of the reduce, reuse, recycle issue that we want to pursue as far as an environmental protection management strategy.

[*342G-Statute.pdf \(hawaii.gov\)](#)

Kevin: How is the reuse of this facility as it's designed? In other words, you want to reuse a facility. It's only been used for fuel.

How can you guys at DOH reuse it in any way that won't have to do with fuel?

Linae Ichinose:

So we recognize the historical nature of the facility. So you know, one thought could be, and I think Nakapuna mentioned that some of the input that they received from the public was non liquid reuse. So that's a possibility that could occur.

But you know it's a museum of sorts is the one option. So it's a consideration to be made before a decision is rendered.

So we're just asking for that consideration.

HRS Chapter 342. G.

The link is shown above. I thoroughly read that statute and I could not find one iota of what she said.

Also I have read the Solid Waste Branch Resource

[Solid & Hazardous Waste Branch | ISWMP \(hawaii.gov\)](#)

HAWAI'I 2000 PLAN for INTEGRATED SOLID WASTE MANAGEMENT
State of Hawai'i Department of Health Office of Solid Waste Management
July 2000

I cannot find anything that would even relate to reduce, recycle, reuse related to the closure plan.

It does not exist in either.