



**STATE OF HAWAII**  
**DEPARTMENT OF HEALTH**  
P.O. BOX 3378  
HONOLULU, HAWAII 96801-3378

In reply, please refer to:

November 10, 2022

Rear Admiral John Wade  
Joint Task Force, Red Hill  
1025 Quincy Avenue, Suite 900  
Joint Base Pearl Harbor Hickam, Hawai'i 96860-5101  
[via email only: [john.f.wade2.mil@us.navy.mil](mailto:john.f.wade2.mil@us.navy.mil)]

Dear RDML Wade:

**SUBJECT:** Independent Third-Party Quality Validation Plan  
Red Hill Bulk Fuel Storage Facility

On November 1, 2022, the Hawai'i Department of Health received from the Joint Task Force – Red Hill (JTF-RH) the Red Hill Bulk Fuel Storage Facility, O'ahu, Hawai'i, Independent Third-Party Quality Validation Plan.

This letter and its enclosure offer our comments on the JTF-RH's proposed Independent Third-Party Quality Validation Plan.

Should you have any questions regarding this letter or the enclosed comments, please contact Ms. Kelly Ann Lee, Red Hill Project Coordinator at (808) 586-4226 or [kellyann.lee@doh.hawaii.gov](mailto:kellyann.lee@doh.hawaii.gov).

Sincerely,

*Kathleen Ho*

KATHLEEN S. HO  
Deputy Director for Environmental Health

Enclosure

c:

[Redacted]

Ms. Gabriela Carvalho, U.S. Environmental Protection Agency (w/encl.) [via email only]

**Enclosure**  
**Hawai'i Department of Health (DOH) Comments on**  
**Independent Third-Party Quality Validation Plan**  
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**Red Hill Bulk Fuel Storage Facility, O'ahu, Hawai'i**  
**Independent Third-Party Quality Validation Plan**  
**Joint Task Force – Red Hill (JTF-RH), November 1, 2022**

1. **Page 2, Purpose, Item 1:** One outcome identified in the plan is “Provid[ing] DOH with supporting documentation confirming all recommended repairs and enhancements have been properly assessed and completed.” Explain the types of documentation that will be included. The documentation shall include, at minimum, before and after photos of each itemized repair that is tied to the Consolidated List of Repairs for Safe Defueling, received in October 2022.
2. **Page 2, Purpose, Item 2:** The other identified outcome is receiving “concurrence from DOH to implement timesaving but equally protective alternative mitigation measures or actions in lieu of recommended actions identified in the following RHBFSF assessments[.]” Explain how this process will work, if Purpose, item 1 is to ensure that the JTF-RH is properly implementing the repairs required, and concurrence on the “alternative mitigation measures” would be required prior to the repairs being implemented (see page 3, Step 6).
3. **Page 3, Part I, Steps 1 and 2:** These steps state, “Each repair or enhancement recommendation originates from either a third-party assessment or is identified by DOD... JTF-RH reviews and validates that each repair or enhancement recommendation is required for defueling...” The DOH notes that there are discrepancies in the basis for repairs in at least two third-party assessments, specifically the Enterprise Engineering, Inc. stress analysis and the Simpson Gumpertz & Heger, Inc. structural surge analysis. How will the JTF-RH resolve these conflicts?
4. **Page 3, Part I, Step 6:** Please confirm that the purpose of this Independent Third-Party Quality Validation Plan is to address Step 6, which is to provide verification and certification that the repair or enhancement was appropriately completed to address the original concern identified by the assessments. Explain JTF-RH’s intention for using an independent third party. Would this contractor be independent from the repair work, or independent from any work associated with the facility? Please identify the contractor performing this work.
5. **Page 4, Part I, Paragraph 1:** The DOH received the Consolidated List of Repairs for Safe Defueling on October 24 and 27, 2022. We are currently reviewing the documents and have not yet provided concurrence, so it is more appropriate to state that we are currently on Step 2 as of November 8, 2022, when the DOH provided our comments on the repair list.
6. **Page 4, Part I, Paragraphs 2 and 3:** For clarification, it appears that construction and quality control (QC) work under Figure 1 are Steps 3 and 4.

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7. **Page 4, Part I, Paragraph 4:** Will the repair and quality assurance (QA) contractors prepare and submit a QA/QC plan (or separate QA and QC plans) to the JTF-RH to show how they intend to comply with the repair specifications or design and testing? Additionally, will the JTF-RH provide the regulatory agencies their QA/QC plan(s) to show how they intend to document that the repair was done in accordance with the design and design criteria?
8. **Page 5, Part I, Bullet 1:** How will the "written correspondence" from the quality validation contractor be documented? Will daily production and quality control reports be included?
9. **Page 5, Part I, Bullet 3:** Will the quality validation contractor be onsite observing 100 percent of the work during Steps 3-5?
10. **Page 6, Part II, Item 3:** How much review time has been allotted for regulatory agency review of the alternative solution?