JOSH GREEN, M.D. GOVERNOR OF HAWAI'I KE KIA'ĀINA O KA MOKU'ĀINA 'O HAWAI'I



KENNETH S. FINK, MD, MGA, MPH DIRECTOR OF HEALTH KA LUNA HO'OKELE

> In reply, please refer to: File:

STATE OF HAWAI'I DEPARTMENT OF HEALTH KA 'OIHANA OLAKINO

P. O. BOX 3378 HONOLULU, HI 96801-3378

January 27, 2023

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]

Dear Rear Admiral Wade:

SUBJECT: DOH Response to "Joint Task Force – Red Hill Response to Department of

Health Requests for Information Regarding Red Hill Bulk Fuel Storage Facility

Independent Third-Party Quality Validation Plan"

On December 13, 2022, the Hawai'i Department of Health (DOH) received from the Joint Task Force – Red Hill (JTF-RH) responses to the DOH's November 10, 2022 comments on the JTF-RH's Independent Third-Party Quality Validation Plan, dated November 1, 2022. The JTF-RH's response included:

- Cover letter, dated December 12, 2022, titled "Joint Task Force Red Hill Response to Department of Health Requests for Information Regarding Red Hill Bulk Fuel Storage Facility Independent Third-Party Quality Validation Plan;" and
- Enclosure titled "Red Hill Bulk Fuel Storage Facility, Oahu, Hawaii Independent Third-Party Quality Validation Plan Department of Defense, November 1, 2022."

As discussed in meetings with the DOH, U.S. Environmental Protection Agency, and JTF-RH on December 21, 2022, and January 5, 2023, and based on the JTF-RH's responses to our comments, the DOH supports the JTF-RH's decision to hire an independent third-party to implement a quality validation program for completed, on-going, and future repairs for the Red Hill Bulk Fuel Storage Facility made before defueling.

Based on the responses received, the DOH conditionally approves the Independent Third-Party Quality Validation Plan, with the following conditions:

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- 1. Within two (2) weeks of awarding the third-party quality validation contract, the JTF-RH provides the contractor's name and name(s) of the third-party quality validation team and their credentials.
- 2. Within six (6) weeks of awarding the third-party quality validation contract, the JTF-RH provides an updated Third-Party Quality Validation Plan or addendum detailing testing requirements that will follow repairs, in order to ensure that all necessary repairs meet the design and operation criteria.
- 3. To facilitate regulator oversight, the JTF-RH provides:
 - a. Monthly inspection updates, including any available pipeline integrity validation test results, photographs taken upon completing sections of repairs, and a running checklist detailing which repairs have been completed, validated, and delayed (provide reason).
 - b. A bi-weekly updated schedule of testing and inspection dates, so that the DOH may observe testing and inspections of repairs with the third-party quality validation team.
- 4. The JTF-RH provides a final Third-Party Quality Validation Report with inspection and verification for regulatory agency concurrence on identified repairs. The Report shall include, but not be limited to, identified deficiencies, locations of deficiencies, descriptions of each repair, before and after repair photos, repair/integrity testing results (as appropriate), and explanations of how each repair was determined adequate.

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

Sincerely,

Kathleen Ho

KATHLEEN S. HO Deputy Director for Environmental Health

c: Ms. Gabriela Carvalho, EPA [via email only]