Joint Task Force – Red Hill

Red Hill Bulk Fuel Storage Facility, Oahu, Hawaii

Independent Third-Party Quality Validation Plan

November 1, 2022

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Background

Joint Task Force - Red Hill (JTF-RH) was officially established on September 30, 2022 to represent the Department of Defense (DOD) as the lead organization to defuel the Red Hill Bulk Fuel Storage Facility (RHBFSF). As part of the commitment from DoD found in Section IV of Defuel Plan Supplement 1.B., JTF-RH is submitting this independent third-party quality validation plan to the State of Hawaii Department of Health (DOH) for concurrence.

For the purposes of this document, the following definitions apply:

1. Quality control: an aggregate of activities (such as design analysis and inspection for defects) designed to ensure adequate quality. Contract documents place the responsibility for quality control on the contractor (or person completing repairs or enhancements).

2. Quality assurance: a program for systemic monitoring and evaluation of the various aspects of a project, service, or facility to ensure the standards of quality are being met. Contract documents place the responsibility for quality assurance on the US government (i.e. JTF-RH)

3. Quality validation: an independent means of confirming JTF-RH has properly completed quality assurance.

Purpose

The purpose of the independent third-party quality validation plan is to provide stakeholders (i.e. DOH, political leaders at the local, city, state and federal level, public citizens, etc.) with reassurance that JTF-RH is properly implementing all repairs, enhancements, and mitigation measures required to safely defuel the RHBFSF. The independent third-party quality validation plan will provide an enhanced level of protection for the residents of Hawaii and the environment.

The independent third-party quality validation plan is a two-fold process to:

1. Provide DOH with supporting documentation confirming all recommended repairs and enhancements have been properly assessed and completed.

2. Receive 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:

    a. Assessment of Red Hill Underground Fuel Storage Facility dated April 29, 2022 completed by Simpson Gumpertz & Heger Inc (SGH).

    b. Fuel Transfer System Inspection Report dated August 30, 2022 as required by Section 318 FY22 National Defense Authorization Act (NDAA).

    c. Hotel Pier to Underground Pump House (UGPH) Fuel Transfer Infrastructure Assessment Report summary of repairs dated October 3, 2022.

Part I: Repair/Enhancement Validation Process

As stated in Defuel Plan Supplement 1.B., JTF-RH has identified eight steps in the Phase 3 repair or enhancement lifecycle (derived from the initial recommendation to DOH) to gain concurrence that each repair or enhancement addresses the relevant underlying condition and supports safe defueling. The eight steps are as follows:

Step 1: Each repair or enhancement recommendation originates from either a third-party assessment or is identified by DOD.

Step 2: JTF-RH reviews and validates that each repair or enhancement recommendation is required for defueling, with concurrence from DOH.

Step 3: JTF-RH personnel either complete the work, if it is minor and within their capability, or contracts for the work to be performed by civilian contractors.

Step 4: For contracted work, the contractor is required to perform quality control (QC) to ensure that construction and repairs meet the standards and guidelines set by DOD. DOD outlines QC requirements in each contract and performs quality assurance (QA) to ensure that the contractor is performing the work, and that the contractor's quality control program is effective. For work that DOD performs in-house, DOD technical experts conduct QC on the completed work.

Step 5: JTF-RH construction management personnel (managers and engineering technicians) conduct QA to ensure contractor QC is properly performed and the work meets DOD requirements and standards. Assigned JTF-RH construction management personnel complete QA for each repair recommendation. The JTF-RH construction management personnel regularly observe the work and all critical construction activities or testing procedures.

Step 6: JTF-RH contracts an independent third-party firm to perform quality validation (QV) of QA. The QV is an objective verification of results to certify work is appropriately completed and addresses the original repair or enhancement recommendation.

Step 7: JTF-RH submits the independent third-party QV report to DOH for concurrence.

Step 8: DOH concurs via letter that the work performed addresses the repair or enhancement recommendation or the underlying condition that drove the recommendation.

The following **Figure 1** shows the Repair/Enhancement Validation Process.

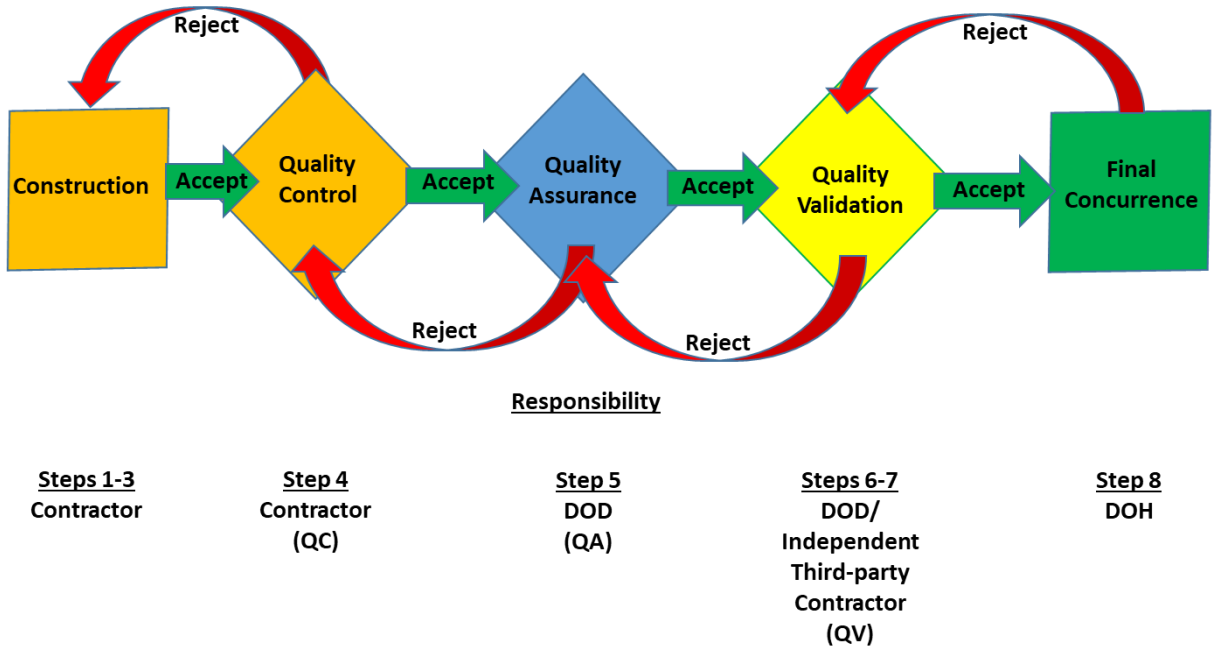

Figure 1: Repair/Enhancement Validation Process

Steps 1 and 2 are complete and a consolidated list of repairs and enhancements was submitted to DOH on October 24, 2022.

JTF-RH is finalizing contracting efforts to confirm the repairs or enhancements shown on the consolidated list are being addressed. JTF-RH will complete Step 3 prior to beginning work as shown on Figure 1.

The contractor is required to complete quality control to confirm repairs or enhancements are completed in accordance with the contract documents. Step 4 will be completed under quality control as shown on Figure 1.

JTF-RH is responsible for completing quality assurance to confirm the contractor has completed work in accordance with the contract documents. JTF-RH will follow established and proven quality assurance processes which are described below:

1. Contactors are required to submit copies of their quality control organization chart to JTF-RH prior to beginning work.

2. JTF-RH construction management personnel will review and approve required submittals to accept materials and/or procedures prior to beginning work.

3. JTF-RH will attend periodic quality control meetings with contractors throughout the duration of the work.
4. JTF-RH will review quality control reports to ensure the level of quality control is appropriate for the intended construction.

5. JTF-RH construction management personnel will witness key testing on critical components necessary to support defueling.

These processes will be used to complete quality assurance (Step 5) as shown in **Figure 1**.

The level of QA and QC will be commensurate with the degree of complexity of the repair, enhancement, or alternative mitigation. For example, structural repairs to pipeline supports will typically be evaluated by a visual inspection of welds whereas pipeline repairs will be evaluated using hydrostatic testing, leak testing, or other forms of non-destructive evaluation.

Steps 6 and 7 will be completed by an independent third-party quality validation contractor under quality validation as shown under Figure 1.

Step 8 will provide DOH with an opportunity to concur or request additional information to confirm all repairs, enhancements, or alternative mitigation measures have been completed in a manner sufficiently protective of the residents of Hawaii and the environment. Steps 4 through 8 will be accomplished by providing the following audit trail:

- Contractor submits written correspondence providing evidence of quality control to JTF-RH.

- JTF-RH inspects the written correspondence provided by the contractor as evidence of quality assurance. The contractor will then submit concurrence documents to independent third-party quality validation contractor.

- Independent third-party quality validation contractor submits written correspondence providing evidence of quality validation to DOH.

- DOH responds to independent third-party quality validation contractor indicating repairs, enhancements or alternative mitigation measures are acceptable or requests additional information prior to confirmation.

Part II: Alternative Mitigation Process

When JTF-RH proposes to modify the work plan to forego recommended repairs and adopt alternative solutions from the consolidated list of repairs submitted by DoD on October 24, 2022, JTF-RH will utilize the following process:

1. Identify an alternative solution that can provide enhanced resiliency or safely decrease the defueling timeline.
2. Submit the recommendation to DOH by letter for its written concurrence (if applicable, JTF-RH will also seek concurrence from the originator of the recommendation, e.g., SGH).

3. Provide DOH the opportunity to accept or reject the alternative solution in writing and then update the consolidated list of repairs to reflect infrastructure requirements prior to defueling.

The following **Figure 2** shows the Alternative Mitigation Process.

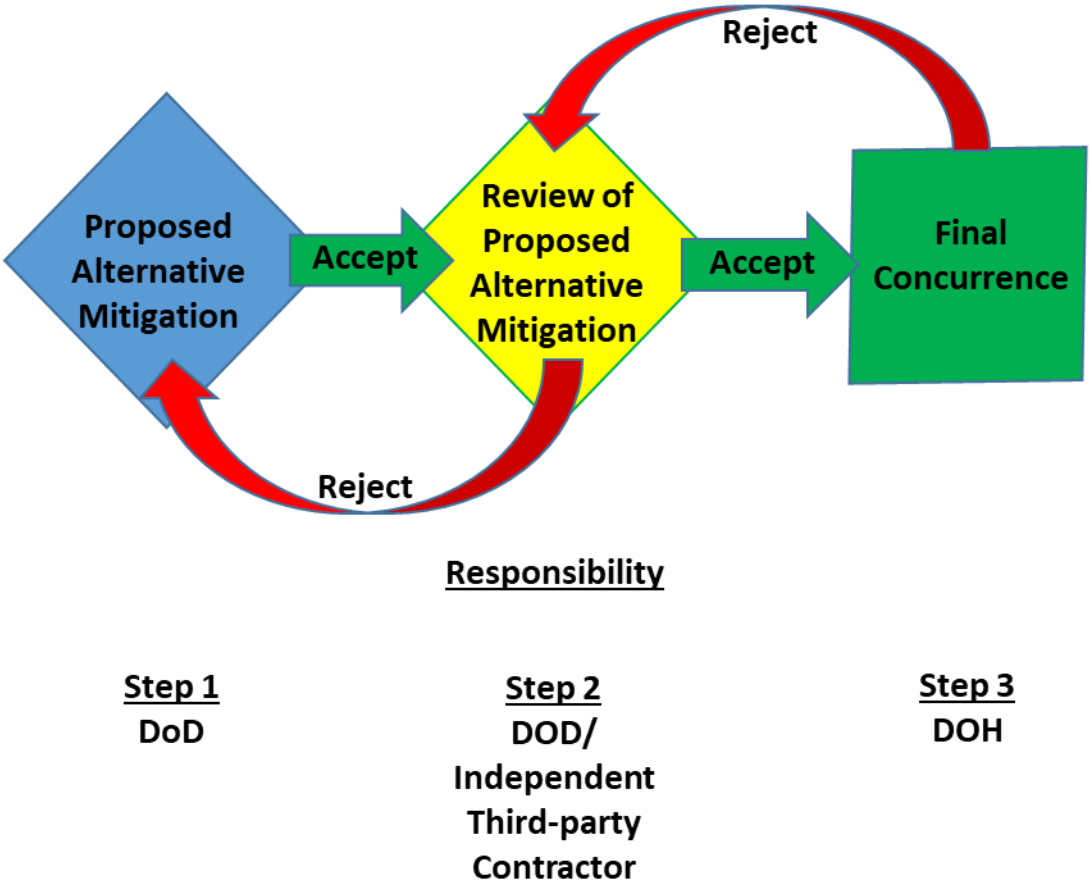

Figure 2: Alternative Mitigation Process

Part III: Independent Third-Party Contractor

The purpose of a third-party contractor is to provide an independent assessment and validation, removed from DoD or repair contractor influence, that confirms recommended repairs, enhancements, or mitigation measures needed for defueling are completed in a manner sufficiently protective of the residents of Hawaii and the environment.

JTF-RH intends to award a contract pending DOH concurrence with this independent third-party quality validation plan. A response is requested by November 21, 2022 to allow DoD to finalize

the contracting process and begin validating completed repairs and repairs in progress. Pursuant to Defuel Plan Supplement 1.A, JTF-RH intends to validate repairs as each repair is completed.

Summary

This independent third-party quality validation program reassures stakeholders that JTF-RH has properly implemented all repairs, enhancements, and mitigation measures or has completed a timesaving but equally protective alternative mitigation measure with concurrence from DOH. The result will be a transparent, auditable process with written documentation to support approval from DOH to safely and expeditiously defuel the RHBFSF.