Tank Cleaning Conditional Approval from the Regulators

Conditions and Responses from both EPA and DOH:

EPA Condition (Received on 18 January 2024) with Responses (8 RFIs):

1. Disposal locations for sludge and oily rinsate

The Waste Management Plan identifies an on-island location for sludge disposal if the material is confirmed to be non-hazardous. Based on conversations with the Navy, EPA understands that this facility is no longer being considered for sludge disposal. All sludge and sediment removed from the tank will be handled and disposed of as if it were hazardous waste, regardless of whether laboratory testing deems the material to be hazardous. Please confirm, either in response to this letter or revision to the Waste Management Plan, how and where Navy intends to dispose of sludge.

Similarly, it is unclear where oily wash water will be treated and discharged. The Work Plan states that the contractor "will collect the rinsate and dispose of it off-site [in accordance with] all Federal, State, and Local regulations" (page 20). Please specify how the wash water with be treated and disposed and what documentation will be provided to EPA to ensure that the treatment and discharge of oily rinsate meets all disposal regulations.

Response: APTIM's revised Waste Management Plan identifies the proposed disposal facilities for oily sludge as:

Clean Harbors Grassy Mountain LLC
Grantsville, UT 84029
or
Chemical Waste Management of the NW
17629 Cedar Springs Lane
Arlington, OR 97812

Both are permitted HW disposal facilities. Note: The generator of the waste can influence the selection of the ultimate disposal facility and will be informed of the disposition through the returned manifest/shipping papers. But ultimately the Navy can only require that the material be disposed of at a permitted HW disposal facility.

APTIM's revised Waste Management Plan identifies the proposed disposal facilities for oily water as:

Pacific Commercial Services LLC
91-254 Olai St (office)
Kapolei, HI 96707

APTIM's revised Waste Management Plan identifies the proposed disposal facilities for residual fuel as:

Pacific Commercial Services LLC
91-254 Olai St (office)
Kapolei, HI 96707
or
Clean Harbors Grassy Mountain LLC
Grantsville, UT 84029

2. FOR pipeline leak detection testing and monitoring
As described in the Tank Cleaning Work Plan, Navy intends to use the Fuel Oil Recovery (FOR) pipeline to convey rinsate from fuel storage tanks to Tank 311 prior to disposal. A Concept of Operation was provided to EPA on January 4, 2024, with the leak detection test occurring on January 9, 2024. EPA has been made aware that preliminary results indicate the FOR line has passed the leak detection test, and a detailed QV report is to follow. Please provide the full QV report for regulatory review once received. Additionally, EPA supports Navy's plans to have rovers visually monitor the FOR line on a daily basis to ensure no leaks occur during the tank cleaning procedure.

Response: JTF-RH Repair Director provided initial Red Hill FOR pipeline test results to DOH and EPA via email on January 18, 2024. See QV INC-025R2.

3. Standpipe and nozzle cleaning
Further information is needed regarding how the section of underground piping between the standpipe and nozzle that sits below the tank will be cleaned. Per the December 15 response, Navy proposes "ventilation as part of the method to be used to clean this segment of pipeline since it will remain in place and is too small to allow safe access for a human being to clean the inside of the pipe". What other method, in addition to ventilation will be used to clean this pipe segment? Also, as this section will remain in place, please confirm that a forthcoming Closure Plan Supplement will describe how Navy intends to close this piece of equipment.

Response: NCTF-RH is proposing to use forced air ventilation to ensure there is no residual fuel remaining inside the nozzle and standpipe that could be discharged to the environment. NCTF-RH is proposing to dry the inside of the standpipe and nozzle and then seal each end with a bolted blind flange.

4. Rinsate Accounting In order to ensure all rinsate is completely captured and not released to the subsurface, Navy will maintain a daily account of the volume of water used for tank cleaning and compare that with the increase in Tank S311 level. A weekly summary of this information should be provided to EPA. It is understood that minor discrepancies between the volume of water used and the increase in Tank S311 level will exist due to sump pump operations. However, if the Page **3** of **4** data provided suggest that rinsate is not accounted for in the tanks, FOR pipeline, main sump, or Tank S311, Navy shall conduct an assessment identifying the location of the unaccounted rinsate. If EPA is unsatisfied with the accounting, EPA may require

a pause in tank cleaning operations until Navy is able to verify there are no leaks in the operation.

Response: NCTF-RH acknowledges EPA concerns about accounting for all wash water being utilized to clean the tank interiors. NCTF-RH requests more detailed guidance on what will be defined as a "minor discrepancy." The most reasonable means of monitoring water use is to compare the volume of water used from the storage tank to the increase in level in Tank S311. This could be accomplished on a daily basis provided both EPA and DOH acknowledge the limitations on comparing the differences between the rising level in Tank S311 and the drop in the operational storage tank. However, this means of measurement has limited accuracy. There are several challenges when attempting to reconcile the volume of wash water used and the volume of wash water collected.

(1) Water being discharged from the GAC is not metered so the volume of water entering the tanker truck will be an estimated volume;
(2) Water discharged from the storage tank and being utilized by the pressure washer is not metered;
(3) The sump pump will cycle and there will always be some fluid remaining in the sump pump discharge between the main sump pump and Tank S311; and
(4) Some evaporation and back spray on clothes and equipment will have some effect on the total wash water collected.

Given these limitations, it is paramount that NCTF-RH have clear direction from EPA and DOH about what level of discrepancy will trigger the need for additional investigation.

5. Submittal of weekly situation reports
A weekly situation report (SITREP) should be provided to regulators and include a summary of the work completed, work anticipated for the following week, quantities of waste removed from site, volume of rinsate discharged to Tank S311, and any issues or spills to note. Weekly SITREPs should not be used as a substitution for continued cooperation and communication between EPA and NCTF-RH. Any spill event or change to the Work Plans will require immediate notification of EPA.

Response: NCTF-RH agrees to provide a weekly SITREP and will notify both EPA and DOH in the event of a spill or changes to Work Plans.

6. Changes or additions to the existing plans
Changes to the Tank Cleaning Work Plan, Waste Management Plan, or Environmental Protection Plan will require additional approval from EPA prior to commencing work affected by the change in concept.

Response: NCTF-RH agrees to provide updates to plans to both DOH and EPA.

7. Additional plans will be required for pipeline removal and ancillary equipment
Methods of cleaning and handling of waste shall only apply to the facilities described in the Project Summary of the Tank Cleaning Work Plan. Equipment and facilities outside of the 14

bulk fuel storage tanks, four surge tanks, and two sumps will require the submission of additional plans. EPA anticipates additional submittals related to the removal of pipelines and ancillary equipment.

Response: NCTF-RH agrees to provide additional plans to both EPA and DOH as necessary.

8. EPA site access

EPA shall be granted access to any location at RHBFSF involved in tank cleaning unless health and safety concerns necessitate a restriction to access.

Response: NCTF-RH will continue to provide access to both DOH and EPA. Depending on the location visited, training and personal protective equipment may be required prior to accessing specific locations such as inside tanks and/or suspended scaffolding.

DOH Conditions (Received on 18 Jan 2024) with Reponses (11 Comments / 29 RFIs):

1. Cleaning occurs according to the *Tank Cleaning Plan*. For purposes of this conditional approval, the *Tank Cleaning Plan* refers to Attachments 2A, 2B, 4, 5, and 6; and the cleaning schedule submitted on December 13, 2023. Where these documents conflict, Attachments 2A, 2B, and the cleaning schedule apply. Per the *Tank Cleaning Plan*, cleaning will include "all internal structures," including the tank walls, standpipes, and other infrastructure and equipment currently in the tanks. We are awaiting the NCTF-RH's proposal, for our review and approval, of what infrastructure will remain in place (with justification) or be removed (with associated waste management process).

Response: NCTF-RH will provide a brief in February during the weekly technical working group meeting on the detailed facility closure plan that will include the disposition of interior tank components. This brief will also be submitted separately via written correspondence.

2. DOH is notified of any changes or omissions to the *Tank Cleaning Plan* in writing as soon as practicable. Significant changes or omissions must be submitted to the DOH for review and approval before execution.

Response: NCTF-RH agrees to notify both DOH and EPA if there are omissions or revisions to the tank cleaning plan.

3. The NCTF-RH addresses all enclosed comments within 30 days of receipt of this letter, including updating the IMS and *Project Work Plan, Clean Red Hill Tanks JBPHH, Hawaii*, and making copies available to the public.

Response: NCTF-RH agrees to update the Project Work Plan within thirty calendar days of receiving this letter - February 16, 2024. NCTF-RH provided EPA and DOH an updated detailed IMS on January 31, 2024 and will continue to provide an updated detailed IMS monthly. An executive-level IMS is being developed and will be used during public engagements.

4. The DOH approves or conditionally approves a NCTF-RH plan to verify the tanks, sumps, and other infrastructure remaining in the tanks are sufficiently cleaned.

Response: NCTF-RH interprets this statement that the tank cleaning verification plan dated January 10, 2024 is conditionally approved.

5. The DOH approves or conditionally approves a NCTF-RH spill exercise plan for tank cleaning and is permitted to observe the exercise. If the DOH is not satisfied with the exercise, additional exercise(s) shall be conducted before cleaning, as necessary, to address the DOH's concerns.

Response: NCTF-RH understands and concurs with this term for conditional approval.

6. The NCTF-RH submits concept of operations (CONOPs) with spill mitigation measures for the DOH's review and approval for activities that may result in releases for which a detailed spill mitigation plan has not been provided. For example, sump cleaning and removal of floatable fuel and sludge from the tanks.

Response: The NCTF concurs with the conditional approval. Individual detailed spill mitigation plans are currently being developed for each evolution involving risk to the environment and public health and will be submitted to the DOH for review and approval prior to executing said evolutions.

7. Before waste removal begins (e.g., sludge, rinsate) from each main fuel tank, surge tank, and sump, the NCTF-RH hosts a site visit for the DOH to view spill containment measures. The DOH's comments from site visits must be satisfactorily addressed.

Response: NCTF-RH agrees to host a site visit for DOH to review the spill mitigation measures prior to executing said evolution.

8. The DOH receives unredacted and redacted copies of the final report confirming the fuel oil reclamation (FOR) line to be used for cleaning passed the pressure testing in January 2024.

Response: JTF-RH provided information indicating the FOR pipeline passed the testing in January to DOH and EPA on January 18, 2024. Please see information submitted under QV INC-025R2.

9. As stated in the Joint Task Force – Red Hill's December 20, 2023 responses to our *Defueling Plan Supplement 3* comments, rovers will be utilized during cleaning to ensure there are no leaks in the FOR line and to initiate a release response, if necessary.

Response: NCTF-RH acknowledges rovers will be used to visually inspect the FOR pipeline to confirm there are no leaks during FOR main sump pump operations.

10. The NCTF-RH provides weekly updates during cleaning, including a summary of completed work; volumes of sludge, fuel, and rinsate collected and from where; any accidental releases; and any changes to the cleaning schedule.

Response: NCTF-RH agrees to provide weekly SITREP updates to DOH and EPA.

11. The DOH must be permitted to observe cleaning and our staff must be accommodated.

Response: NCTF-RH agrees to allow both DOH and EPA personnel access to observe cleaning. Depending on the location visited, prior training might be required along with protective equipment.

Attachment 1: ***Navy Closure Task Force – Red Hill [NCTF-RH] Integrated Master Schedule*** **(IMS), dated December 15, 2023**

General Comments

1. Please submit, and make publicly available, an updated IMS that addresses the specific comments below.

Response: A detailed IMS will be provided to the regulators monthly, along with an IMS Change Management Log supporting any updates. An Executive IMS will be created and presented during public engagements.

2. We understand the IMS is a living document and may change as new information becomes available. The DOH may also request schedule changes based on new information.

Response: The Navy agrees, and the detailed IMS will be updated monthly and submitted to both EPA and DOH along with the IMS Change Management Log. An Executive IMS will be created and presented during public engagements.

Specific Comments

3. Tank Cleaning

a. At the NCTF-RH's request, the DOH is providing conditional approval for cleaning nearly three weeks ahead of schedule. How does this expedited review benefit the overall closure timeline? Update the IMS accordingly.

Response: NCTF-RH greatly appreciates DOH's conditional approval ahead of the schedule supporting the tank cleaning work plan. An updated IMS was provided to DOH on January 26, 2024 that identified the update to start cleaning Tanks 7 and 8 on 4/2. Due to DOH's expedited review of this cleaning plan, NCTF-RH has been able to move forward its planning and execution of the spill exercise. However, in the interest of a smooth transition of command and control of the Red Hill facility, it is NCTF-RH's desire to wait to begin tank cleaning until after the official transition of authority from JTF-RH to NCTF-RH on March 28, 2024. During the execution of the tank cleaning plan, if there are opportunities to accelerate any aspect, these will be identified on the IMS along with notification to both EPA and DOH.

b. Add the expected date for tank entry. Currently, there appears to be a one-month pause between the "Spill Exercise" on February 23, 2024, and the start of tank cleaning on March 27, 2024. We understand based on meetings with the NCTF-RH that this time will actually be used to prepare the tanks for cleaning, which could start earlier than March 27, 2024, if preparations do not take the full month.

Response: On the IMS delivered to DOH on January 26, 2024, the spill exercise was updated to February 22, 2024. Though there is a lag between the spill exercise and the start of tank cleaning on April 2, 2024, there are other efforts during that time to support the transition from the JTF-RH to NCTF-RH. In the interest of a smooth transition of command and control of

the Red Hill facility, it is NCTF-RH's desire to wait to begin tank cleaning until after the official transition of authority from JTF-RH to NCTF-RH on March 28, 2024 As the NCTF-RH executes the tank cleaning plan, all opportunities to safely expedite the overall plan will be considered and communicated to both EPA and DOH, along with the IMS being updated once approved.

c. Are the quality validation (QV) reports for tank cleanliness described in the *Tank Cleaning Verification Plan* submitted on January 11, 2024, the same as the "Tanks Cleaning Report[s]" listed in the IMS? The QV reports must be submitted before the inspections with enough time for regulatory review. Please include dates for when we can expect these reports.

Response: Yes, the QV reports in the *Tanks Cleaning Verification* Plan is the same as the "Tanks Cleaning Report[s]" listed in the IMS. NCTF-RH will provide these reports as soon as they are available, which we anticipate will be thirty calendar days following completion of cleaning and quality assurance. While NCTF-RH will provide these reports to EPA and DOH as completed, if DOH and EPA wait to inspect the tanks until after receipt and review of the reports, this process will add 30+ days to the cleaning process for each tank. Accordingly, NCTF-RH would propose that regulator inspections of the tanks occur while awaiting delivery of the QV reports.

d. What will the reports for Tanks 1, 13, 14, 17, 18, and 19 include? Based on the IMS, we understand these tanks will not be cleaned further, unless they do not pass verification.

Response: The reports content will include the auditor information, validation and certification sections, and references, as required.

e. We understand the NCTF-RH is planning to inspect the tanks that have undergone clean, inspect, repair (CIR) for condensation to help determine whether the vent lines should be kept open after cleaning and to possibly test condensate to further assess the cleaning process. Is this what the "Condensation Inspection" on March 1, 2027, refers to? If so, 2027 seems late. Another condensation inspection for the CIR tanks can and should be scheduled in the near future.

Response: NCTF-RH is agreeable to an earlier condensation inspection of the six previously cleaned tanks prior to March 1, 2027. NCTF-RH will prepare a CONOP to inspect the six tanks (1, 13, 14, 17, 18, 19) for condensation, to take place prior to entering each tank for the required cleaning validation. If there is a recommended near-future date(s), please provide date(s).

4. Pipeline Deconstruction and Defueling

a. The IMS states the NCTF-RH will submit "draft requirements" to the regulatory agencies in January 2024. We may provide comments on this portion of the schedule when we receive the "draft requirements."

Response: The IMS was updated on January 26, 2024 to reflect presenting the proposed detailed facility closure plan no later than February 15, 2024. This brief will include plans for removing the pipelines between Red Hill and the underground pump house. A formal copy of the brief will be submitted to both EPA and DOH immediately following the technical working group. NCTF-RH will await EPA and DOH comments once the brief has been formally submitted.

5. Facility Closure Design and Execution

a. We understand that a meeting will be scheduled around January 29, 2024, for the NCTF-RH to brief the DOH on the proposed facility closure design. We may have additional comments on this portion of the schedule after the brief.

Response: NCTF-RH will provide this brief to EPA and DOH during a regularly scheduled technical working group meeting on or about February 15, 2024. NCTF-RH would ask for a slight modification to the schedule in order to allow for adequate time for Navy leadership to review and comment on the proposed approach. This slight delay should not impact the overall schedule to close the RHBFSF.

6. Site Assessment

a. In a meeting with the NCTF-RH and U.S. Environmental Protection Agency (EPA) on December 8, 2023, we were told the NCTF-RH would submit a technical memo on historical data in a couple of weeks to discuss with the DOH and EPA during scoping meetings. We have not received this technical memo, and it is not on the IMS. When will we receive it?

Response: The technical memo regarding historical data will be provided to the Regulatory Agencies no later than February 8, 2024 as a read-ahead document of the first site assessment scoping session scheduled for February 15, 2024.

b. We understand that a scoping meeting will be scheduled around January 29, 2024, as a follow-on to our first scoping meeting in May 2023. We may provide comments on this portion schedule after the second scoping meeting.

Response: NCTF acknowledges that additional comments may be expected due to the iterative nature of the scoping sessions and site assessment work plan development.

Attachment 2A: ***Responses to DOH Concerns Regarding Red Hill Closure***

7. **Page 1, paragraph 5:** States, "[i]n the absence of state and federal regulatory drivers, the NCTF-RH is willing to take an additional step to verify the tanks as clean. The NCTF-RH proposes rinsate sampling and comparison to the environmental action levels (EALs) for DOH and EPA consideration." The *Tank Cleaning Verification Plan*, received on January 11, 2024, no longer proposes to test rinsate. In addition, the current validation proposal does not provide sufficient detail to understand the basis for decision-making on whether the tanks are clean.

Further discussion on verification will be provided under a separate cover in response to the NCTF-RH's January 11, 2024 submission.

Response: The cleaning verification process is iterative between NCTF-RH, EPA, and DOH, especially due to the absence of state or federal regulatory drivers establishing a validation method or standard. NCTF-RH understands your comment and is committed to working with both EPA and DOH to find a suitable and practical solution to confirming the tanks are clean.

8. **Page 4, paragraph 2:** States "APTIM will use the FOR system only if the FOR system inspections and tests indicate that the rinsate will be contained completely to reduce the risk of a release from the FOR system into the environment." Currently, it is the DOH's understanding that only the FOR line in the tank gallery will be used. If the underground pump house FOR lines will be used, the NCTF-RH shall submit repair and testing methods, associated quality validation reports, and spill mitigation and operational plans for the DOH's review and approval prior to use.

Response: NCTF-RH only intends to utilize the FOR system at Red Hill and is not considering using the FOR system in the underground pump house. NCTF-RH will notify both EPA and DOH if there is a reason for a change to this decision.

9. **Page 4, paragraph 4:** Based on the IMS, there is a 1.5-year gap between the briefing to regulators on the final disposition of ancillary systems around January 29, 2024, and the actual proposal submission on May 30, 2025. We assume this timeline will be explained during the January 29, 2024 brief. In the meantime, we have the following concerns:

a. This paragraphs states: "In parallel, NCTF plans to submit a basis of design report (BODR) to propose the final disposition of ancillary systems in the Red Hill facility." Please clarify what is being done "in parallel." Based on meetings with the NCTF-RH, we understand the BODR will be submitted with or around Supplement 4 in May 2025. It seems excessive to allot ~1.5 years to prepare a BODR. This should be expedited.

Response: The objective of NCTF-RH is to review the proposed approach with DOH and EPA prior to February 15, 2024 to confirm the scope before awarding the contract for the BODR. Once the contract for the BODR is awarded, NCTF-RH will look for opportunities to shorten the duration of the contract for the BODR while seeking a more expeditious method for completing design and execution of the facility closure project. NCTF-RH will seek opportunities to take steps in parallel (such as removing pipelines between the RHBFSF and the underground pump house and sealing nozzles inside the tanks) to close portions of the RHBFSF while developing designs for closing remaining portions of the facility.

b. This paragraph also states: "If DOH and EPA are willing to provide written concurrence to the proposed approach following the brief in January 2024, NCTF will proceed directly to design and forgo development of a formal report." We cannot provide written concurrence on something that has not been submitted. According to the IMS, we will not

receive a submission until ~1.5 years after the brief. Therefore, the NCTF-RH should not expect to receive written concurrence for ~1.5 years, as we wait for the written proposal.

Response: NCTF-RH will submit a formal copy of the brief to DOH and EPA following the presentation in February. NCTF-RH would like to present the opportunity to both DOH and EPA to present this brief instead of a formal report. If this brief can be approved, NCTF-RH would proceed directly with design and forego development of a formal report and this could allow design and execution to proceed earlier and save time on the schedule.

Attachment 2B: ***Response to DOH 15 November 2023 Letter Enclosure Comments on the Project Work Plan, Clean Red Hill Tanks JBPHH, Hawaii (Work Plan), dated September 2023***

General Comments

10. **Repairs:** Thank you for the information regarding repairs. Please submit the designs for any repairs to the remaining system for use that may impact human health and the environment to the DOH for review and approval (e.g., repairs to the FOR line used to transport rinsate during cleaning).

Response: NCTF-RH is committed to submitting designs for any repairs to DOH that may impact human health and the environment.

11. **Redactions:**

a. Why is "APTIM" redacted from some documents? It is clear from the NCTF-RH's comment responses, which are posted on the U.S. Department of the Navy's website, that APTIM is the cleaning contractor.

Response: Redactions of the company name were at the request of APTIM.

b. The NCTF-RH submitted redacted documents to the DOH on December 15, 2023, followed by unredacted copies on December 22, 2023. In the future, submit unredacted documents at the same time or ahead of the redacted versions.

Response: For future submittals, NCTF-RH will submit unredacted documents (with the exceptions of contractor proprietary information) prior to submitting redacted documents.

Specific Comments

12. **Comment 1:** Please confirm which tanks have undergone CIR and will not be cleaned prior to verification. *Supplement 1* stated that only "Tanks F-13, F-14, F-17, and F-18 have been through the Clean, Inspect, Repair (CIR) process[,]" while "Tanks F-1 and F-19 have been empty for many years, but they were not documented as clean under the CIR process." This

statement conflicts with comment 1's response, which refers to "six tanks that have already undergone clean inspect repair[.]" Why is it now six tanks and not four?

Response: - Tanks 13, 14, 17, and 18 have undergone CIR and will be inspected to confirm they meet established cleanliness requirements. Due to the lengthy period of time Tanks 1 and 19have stood empty, there may be minor cleaning required, which will be determined when they are inspected by NCTF-RH and the regulatory agencies. NCTF-RH will confirm all twenty tanks are clean before closing the RHBFSF.

13. **Comment 3.b:** This response and the Joint Task Force Red Hill's (JTF-RH) December 20, 2023 responses to our *Defueling Plan Supplement 3* comments state the NCTF-RH will use a "similar" repair quality validation process to the one established with the JTF-RH. Please elaborate. What will the difference(s) be?

Response: The contents of each quality validation report will include the auditor information, documentation for tank cleanliness validation and certification sections, and references, as required. The quality validation package will be accompanied by a cover letter endorsed by the NCTF-RH leadership.

14. **Comment 7.b:** States "[t]he requested information is shown on the IMS dated 15 December 2023. Sump cleaning is scheduled to take place in October and November of 2026." The IMS shows "Sumps Cleaning Start" on April 30, 2026. Please clarify.

Response: The sump cleaning start is the estimated acquisition and preparatory start date prior to the start of the sump cleaning project.

15. **Comment 7.c:** As discussed in meetings with the NCTF-RH and EPA, one day allotted for each tank cleaning inspection should be sufficient, so long as the supporting documents are provided beforehand with enough time for review. At each inspection, the DOH and EPA must be permitted to view the cleaned infrastructure in a method to be determined by the regulators. This may include viewing tank walls from the basket, walking on the tank floor, and/or viewing live video captured by drone.

Response: NCTF-RH understands the request by DOH to provide the supporting documents prior to the final field inspection. However, providing the supporting documents in advance of the final inspection will cause delays in the overall schedule. While NCTF-RH will provide these reports to EPA and DOH as completed, if DOH and EPA wait to inspect the tanks until after receipt and review of the reports, this process will add 30+ days to the cleaning process for each tank. Accordingly, NCTF-RH would propose that regulator inspections of the tanks occur while awaiting delivery of the QV reports.

16. **Comment 10:** The Work Plan still contains Section 4.1.2 describing a pre-construction meeting, which does not apply according to the NCTF-RH's response. Remove it from the Work Plan.

Response: NCTF-RH will coordinate with APTIM to show Section 4.1.2 as deleted.

17. **Comment 17.c:** We understand the FOR line will be left in-place to remove potential condensate from the tanks. How will the FOR line be verified as clean? For example, will the rinsate from the third rinse be tested?

Response: NCTF-RH expects that the volume of rinsate flushing through the FOR pipeline during the tank cleaning process will clean the pipe walls. Fluid contained within the pipeline when condensate is removed from the clean tanks will still be handled and disposed of as if it contained fuel, which would eliminate the requirement to clean and flush the inside of the FOR pipeline. Because NCTF-RH will continue to treat any condensate removed from the tanks as waste, the FOR line will not need to be verified as clean.

18. **Comment 20.a:** What type of coating is inside the tanks? Does the coating contain any contaminants that could be released into the environment later?

Response: Coating types vary from tank to tank based on the last time the coating was applied in each tank as it went through prior CIR projects. To the Navy's knowledge, none of the coatings contain any known contaminants that could be released into the environment. However, NCTF-RH will ensure the contractor takes appropriate precautions (i.e. holding the pressure washer at a distance to prevent delaminating the existing coating) to reduce the risk of stripping the coating from the interior surface of the tanks.

Attachment 4: *Project Work Plan, Clean Red Hill Tanks JBPHH, Hawaii*, (*Tank Cleaning Work Plan*) dated December 2023

19. Will the standpipes and nozzles be cleaned using the same methods described in the Work Plan for "all internal structures"? If not, describe in detail how the standpipes and nozzles will be cleaned. If the cleaning method differs for the standpipes, this change to the conditionally approved submission requires the DOH's approval.

Response: Standpipes and nozzles will have any residual fuel coating the interior surface removed by forced air ventilation.

20. The Work Plan was not updated to reflect the dates in APTIM's cleaning schedule submitted on December 13, 2023. For example, page 4 of the Work Plan still indicates tank cleaning will begin on January 16, 2024. This will confuse stakeholders. Revise all dates in the Work Plan that are no longer accurate and make an updated copy available to the public.

Response: NCTF agrees to coordinate with APTIM to update the work plan and provide that updated Work Plan to the regulators. A redacted version of the updated Work Plan will be made available to the public.

Attachment 7: *Tank One Hydrotest Water Lab Analysis*, dated January 7, 2022

21. We note that this attachment is mislabeled as Attachment 1.1.

Response: Attachment 1.1 refers to an excerpt from a prior report. Due to this, NCTF-RH will not relabel the attachment, however, NCTF will amend the list of attachments to state Attachment 1.1.