



STATE OF HAWAII
DEPARTMENT OF HEALTH
KA 'OIHANA OLAKINO
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File:

May 14, 2024

Rear Admiral Stephen Barnett
Commander, Navy Closure Task Force – Red Hill
850 Ticonderoga Street, Suite 110
Joint Base Pearl Harbor Hickam, Hawaii'i 96860
[via email only: stephen.d.barnett.mil@us.navy.mil]

Dear Rear Admiral Barnett:

SUBJECT: DOH Conditional Approval of Repair QV Reports for FOR Strainer, Main Containment Sump, Repair No. INC-025, and Tank S311; and Tanks 7 & 8 Filling and Draining CONOP and OPORDs

The Hawaii'i Department of Health (DOH) acknowledges receipt on May 8, 2024 of the Navy Closure Task Force – Red Hill's (NCTF-RH's) repair quality validation (QV) reports for the Fuel Oil Reclamation (FOR) Strainer, Main Containment Sump, Repair No. INC-025, and Tank S311. In addition, the DOH received and reviewed the following supporting documents:

- *API 653 Out-of-Service Tank Inspection, Tank S311 (Facility Number 311), Joint Base Pearl Harbor-Hickam, Oahu, Hawaii, dated March 2024.*
- April 18 and April 22, 2024 NCTF-RH email responses to regulatory comments on the above Tank S311 inspection report.
- Brice Risktec memo relating to "Main Sump to Adit 3, assess areas of surface corrosion/paint loss, provide maintenance coating," dated April 19, 2024.
- May 13, 2024 NCTF-RH email regarding Tank S311 flange check testing and tank gauging calibration.

Based on the information submitted and the Quality Validation Engineer's certification on the completion of these repairs, the DOH approves the QV submission, on the conditions that:

1. Leak-detection testing of the main containment sump and FOR line from the main containment sump to Tank 311 is conducted on an annual basis at a minimum.
2. If the NCTF-RH or DOH identifies a concern(s) over the integrity of the infrastructure used for tank cleaning (e.g., through future testing or assessment performed on the infrastructure), additional assessment or repairs may be required.

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3. The NCTF-RH continues routine inspections of the above ground portions of the FOR line to monitor for leaks and weeps, and submits a copy of monthly contractor inspection reports of Tank S311.

In addition, the DOH received the concept of operation (CONOP) for “Tank 7 & 8 Inject Water to Tank Bottoms & Float Residuals” on April 17, 2024 and the NCTF-RH’s responses to regulatory agency comments on April 27 and May 2, 2024. We also received the latest operation orders (OPORDs) for Tanks 7 and 8 Water Filling and Water Draining on May 13, 2024.

Based on these submissions, the DOH approves the above CONOP and OPORDs, on the conditions that:

1. Adequate spill diversion measures and environmental protection of the nearby groundwater well, soil vapor probes, and other sensitive areas are provided.
2. The NCTF-RH hosts a walkthrough for the DOH to observe spill diversion and control measures before draining. Any comments from the DOH must be addressed before the operation. A walkthrough is currently scheduled for May 14, 2024.
3. Weekly reports of activities conducted are provided to the DOH.

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: Ash Nieman, U.S. Environmental Protection Agency [via email only]
Jamie Marincola, U.S. Environmental Protection Agency [via email only]
Joshua Stout, NCTF-RH [via email only]