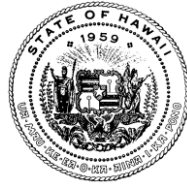


JOSH GREEN, M.D.
GOVERNOR OF HAWAII
KE KIA'ĀINA O KA MOKU'ĀINA 'O HAWAII



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In reply, please refer to:

May 9, 2024

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

Dear Rear Admiral Barnett:

SUBJECT: DOH Comments on Revised Tank Cleaning Verification Plan

The Hawai'i Department of Health received the Navy Closure Task Force – Red Hill's (NCTF-RH's) *Updated Tank Cleaning Verification Plan*, dated April 12, 2024. We understand the NCTF-RH is currently revising this plan based on discussions with the Regulatory Agencies from March 2024 to present. We are providing the enclosed preliminary comments to be incorporated into the forthcoming revision. We will provide a separate response after reviewing the revised plan.

Should you have any questions regarding this letter or its enclosure, 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

Enclosure

cc w/enclosure via email only:

Ash Nieman, U.S. Environmental Protection Agency
Jamie Marincola, U.S. Environmental Protection Agency
RDML Marc Williams, NCTF-RH
Sherri Eng, NCTF-RH
Joshua Stout, NCTF-RH

Enclosure
DOH Comments on Revised Tank Cleaning Verification Plan, dated April 12, 2024
May 9, 2024 Letter to Rear Admiral Stephen Barnett
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General Comments

1. The *Revised Tank Cleaning Verification Plan*, dated April 12, 2024, only discusses verification methods for the tank walls. Explain the verification method(s) for other difficult-to-clean areas, such as the standpipe interiors, welds, catwalks, and center towers.
2. Sections 2.1.2 and 2.1.3 mention that quality control (QC), quality assurance (QA), and quality validation (QV) will observe the water break test. However, the later sections, including Section 2.3: Process Overview, do not explain how this will happen. For example, will all three parties be in the basket observing the water break test together?
3. We are aware that the Navy Closure Task Force – Red Hill (NCTF-RH) is revising the *Revised Tank Cleaning Verification Plan* based on discussions with the regulators from March 2024 to present. Our understanding is that the forthcoming version will propose a National Association of Corrosion Engineers (NACE)-certified white rag test instead of the wipe test described in the April 2024 submission. Therefore, we will not comment on the wipe test method component of the *Revised Tank Cleaning Verification Plan*.

Specific Comments

4. **Page 1, Section 1, item 3:** Lists “American Petroleum Institute Publication (API) 1604 ‘Removal and Disposal of Used Underground Petroleum Storage Tanks’” as one of the cleaning standards. Which publication does this refer to? The recent API 1604 publication, dated February 2021, is titled “Closure of Underground Petroleum Storage Tanks.” What is the name of the publication being used for API 2015?
5. **Page 2, Section 2.1.1:** Is the gas free inspection a onetime occurrence per tank? Or will the tanks be inspected and monitored throughout cleaning?
6. **Page 4, Section 2.1.2.1:** States “[w]ritten records detail each inspection’s date, exact location within the tank....” How will exact locations be written in the reports?
7. **Page 4, Section 2.1.2.3:** States “[o]nce the tank cleaning is complete and the interior is dry, the NCTF-RH QA team conducts a thorough inspection to verify the absence of any product or sludge.” Explain in detail how this “thorough inspection” will occur and how it will be documented.
8. **Page 4, Section 2.1.2.4:** States the “QV process confirms that the cleaning contractor’s methods have been thorough and up to the prescribed standards.” How will the cleaning contractor (QC) and QA know if they have met QV’s prescribed standards?
9. **Page 4, Section 2.1.3:** Will the water break test follow the [American Society for Testing and Materials] ASTM-F22 Handbook? Does the water break test work on vertical surfaces?

Enclosure

DOH Comments on Revised Tank Cleaning Verification Plan, dated April 12, 2024

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10. **Page 4, Section 2.1.3.1:** How will the number of “various locations” be determined? What percentage of the tank walls will the water beading test be performed on? How will “various locations” be documented?
11. **Page 4, Section 2.1.3.2:** We recommend adding video documentation, especially for the water break test. Photos alone do not seem sufficient to review the water break test for those who do not observe it directly from the basket. However, photos may be sufficient to record sludge removal.
12. **Page 9, Section 2.3, Figure 1:** The figure indicates the Hawai'i Department of Health (DOH) and U.S. Environmental Protection Agency (EPA) are involved in “Evaluate Baseline Data to Inform Degree of Cleaning Required.” What are the DOH's and EPA's proposed roles in this step? Also, see comment 13.b below regarding tailoring the degree of cleaning based on baseline results.
13. **Page 10, Section 2.3:**
 - a. **Step 1:** Step 1's description and Section 2.1.1 Gas Free Tank Inspection and Certification state this step will be completed by an industrial hygienist or marine chemist. However, Figure 1 seems to indicate QC and QA will also be involved. What are QC's and QA's roles in the step?
 - b. **Step 2:** States the baseline test “aids in tailoring the subsequent cleaning efforts.” Explain what efforts will be “tailored.” The NCTF-RH's *Project Work Plan, Clean Red Hill Tanks [Joint Base Pearl Harbor-Hickam] JBPHH, Hawaii*, dated December 2023, describes one method for cleaning “all internal structures.” Per the DOH's January 18, 2024 conditional approval of the plan, the DOH must be “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.”
14. **Page 12, Section 3, Tier 4:**
 - a. States “DOH and EPA inspections represent the ultimate validation of the cleaning process, ensuring that all standards are met...” The DOH does not have jurisdiction or expertise in “all standards” mentioned in this plan, for example, worker safety standards. Therefore, the DOH is not responsible for ensuring that all standards are met.
 - b. When will the regulators be able to review the QV reports? The NCTF-RH's February 7, 2024 response to the DOH's tank cleaning conditional approval suggests that the regulators should perform tank inspections without reviewing QV documentation beforehand because the QV reports will take at least 30 days to prepare. Is this still the case? The DOH will not concur that tanks are clean without reviewing the QV reports.