NCTF-RH Responses to EPA and DOH Comments on Revised Tank Cleaning Verification Plan Dated 12 April 2024

EPA Comments

Section 1

1. ***"The NCTF-RH intends to comply with the following prescribed cleaning standards when cleaning the tanks…" – In the event that conflicting guidance exists between standards, how will Navy determine which standard should be applied? For example, NFPA 326A and API 2015 are duplicative and may contain differing guidance.***

NCTF – RH Response - The Tank Cleaning Verification Plan Revised May 13, 2024, lists the priority for applying standards. This information can be found in Section 1.

"NCTF-RH intends to comply with the following prescribed cleaning standards when cleaning the tanks:

1. Society for Protective Coatings (SSPC): Surface Preparation Standard No. 1 – Solvent Cleaning
2. American Petroleum Institute Publication 2015 "Requirements for Safe Entry and Cleaning of Petroleum Storage Tanks"
3. American Petroleum Institute Publication (API) 1604 "Closure of Underground Petroleum Storage Tanks"
4. United Facilities Guide Specifications (UFGS) 33 0150.55 "Cleaning of Petroleum Storage Tanks"
5. National Fire Protection Association (NFPA) 326, "Standard for the Safeguarding of Tanks and Containers for Entry, Cleaning, or Repair"
6.

In the event that there are conflicts between the standards, NCTF-RH intends to comply with the standards in the order shown above."

2. ***"It should be noted: there are no criterion listed in any of the aforementioned regulations (API 2015, UFGS 33.0150.55, API 1604) regarding level of cleanliness. NCTF-RH assumes both EPA and DOH agree with this definition based on past discussions and correspondence." – Although API standards do not define a level of cleanliness, the Association for Materials Protection and Performance (AMPP), formerly the National Association of Corrosion Engineers (NACE) and Society for Protective Coatings (SSPC), have developed the Surface***

Preparation Standard No. 1 (SP-1) for solvent cleaning of tanks. As an alkaline aqueous solution, Simple Green meets the SP-1 definition of a solvent cleaner. The SP-1 outlines acceptable verification methods to be used following a solvent cleaning to ensure the surface is "free of visible oil, grease, dust, drawing and cutting compounds, and other visible soluble contaminants".

NCTF – RH Response - NCTF-RH has revised the Tank Cleaning Verification Plan dated May 13, 2024, to reflect the definition found in SP-1 (Section1. Paragraph 2-3).

"As suggested by the EPA and DOH in their letters to NCTF-RH dated May 8, 2024, and May 9, 2024, NCTF-RH is proposing to adopt the definition of clean from the Society for Protective Coatings (SSPC) Surface Preparation Standard No. 1 – Solvent Cleaning (SP-1).

It should be noted this definition is aligned with the definition previously adopted from API 2015 which was "the removal of all products, vapor, sludge, and residue from a tank, and washing, rinsing, and drying a tank so that no product or residue remains on any tank surfaces (shell, bottom, piping, appurtenances)." However, NCTF-RH is proposing to use the definition found in SP-1 to be consistent with the use of the rest of SP-1."

3. ***Paragraph 3 describes the verification methods that will "support closure-in-place of RHBFSF's 20 underground fuel storage tanks and 4 surge tanks" – The Tank Cleaning Work Plan also includes the cleaning of the Main Sump and Sump 7. Please confirm that these sumps will also be subject to the agreed upon tank cleaning verification methods.***

NCTF – RH Response - The Tank Cleaning Verification Plan Revised May 13, 2024, now includes the Main Sump and Sump 7 (Section 1, Paragraph 4). A" third-party quality verification (QV) inspector with industry-recognized certification from the Association for Materials Protection and Performance (AMPP), formerly the National Association of Corrosion Engineers (NACE), will conduct the wipe test (hereinafter referred to as the "cloth rub test") described in paragraph 6.1.1 of SP-1 to further demonstrate sufficient cleanliness of tank interior surfaces, protection of the aquifer, and support closure-in-place of Red Hill Bulk Fuel Storage Facility's (RHBFSF) 14 underground fuel storage tanks (Tank Nos. 2 through 12, 15, 16 and 20), 4 surge tanks and the main sump and Zone 7 sump."

<u>Section 2.1.1</u>

4. ***Gas Free Tank Inspection and Certification – As EPA has previously commented, the monitoring of gases prior to entry, while fundamental to worker safety, does not validate tank cleanliness. If Navy intends to use this as qualitative method to evaluate the removal of noxious vapors, monitoring should also occur following tank cleaning and discontinuation of***

ventilation.

NCTF – RH Response - The Tank Cleaning Verification Plan dated May 13, 2024, has been revised to reflect submitting the Gas Free Tank Inspection and Certification as evidence of safety compliance and not evidence that the tank has met a cleanliness standard. Section 3.2.1 Gas Free Tank Inspection and Certification indicates that once the tank has been certified as gas free, the contactor will be required to recertify gas free conditions daily, prior to entry.

Section 2.1.1.2

5. ***"This certification affirms that… noxious fumes such as benzene, hydrogen sulfide, carbon monoxide, and other hydrocarbons are within permissible exposure" – It is unclear from this section what other hydrocarbons will be monitored. Please provide a table detailing what will be monitored and what exposure limits will be used***.

NCTF – RH Response - The Tank Cleaning Verification Plan dated May 13, 2024, Section 3.2.1.2 Certification Process has been revised to include a table of gases that will be monitored. The table is labeled as Table 1 on page 6 gives gases and OSHA acceptable exposure limitations, though it should be noted that the contractor may adhere to more strict standards when conducting daily gas free certification.

Section 2.1.2.4

6. ***As discussed at the March 20, 2024, Tank Cleaning Validation Forum and in subsequent meetings, EPA requests that an AAMP/NACE certified inspector be incorporated into the quality validation process. A NACE inspector lends validity to the QV process in their ability to certify the tanks have been cleaned in accordance with AAMP standards. A detailed description of the NACE inspector's role in the QV process should be provided in an updated Tank Verification Plan. This should include, but is not limited to, the AAMP criteria which will serve as the basis of evaluation, the NACE inspector's selected method of verification, detailed testing protocol, and method of documentation.***

NCTF – RH Response - In the Tank Cleaning Verification Plan dated May 13, 2024, Section 7, has been revised to include a description and summary table that identifies the inspector's role, the AAMP certification criteria, the NACE inspector's methods of verification including both visual and the cloth rub test, including their respective testing protocols found in SP-1 and the means of documenting test results. It is labeled as Table 3 on page 12.

7. ***"The independent third-party quality validation (QV) contractor will perform an independent review of the cleaning process. This includes examining plate layout diagrams that record the date each section was cleaned, rinsed, and visually inspected by QC and QA personnel." – This section does not mention the QV contractor's role in the visual inspections;***

only that they will be reviewing plate layout diagrams based on Navy's QA inspections. Please clarify that the third-party QV contractor will also be performing an independent visual inspection of the tanks.

NCTF – RH Response - The third-party QV contractor will be performing independent visual inspections and cloth rub tests. Section 4: Process Overview, Step 4 Quality Validation, Paragraph 3 provides this clarification and outlines the way in which this process will take place and be documented. It states, "Photographs and cloth rub tests will be collected by the third-party certified inspector to clearly demonstrate the tanks are within the required standard of cleanliness, or to inform whether additional cleaning is needed."

Section 2.1.3

8. ***While a water break test is listed as an acceptable method of cleaning verification according to the SP-1 standard, it is EPA's preference that a "cloth rub" test be implemented instead. EPA has concerns regarding the reproducibility of a water break test, and without a pilot test, it is uncertain how factors such as surface slope, surface condition, and the presence (or lack of) coating may impact the outcome of the test. Additionally, EPA foresees challenges in the photo documentation of a water break test. A photo may not accurately capture the extent to which water beads on a surface, and visual confirmation is limited to whomever is in the basket conducting the test. The cloth rub method, however, provides evidence that can be observed first-hand by all involved parties. An added benefit of the cloth rub is that it can be applied to welds, tank appurtenances, and other difficult to reach areas that are more likely to be contaminated with fuel.***

NCTF – RH Response - The Tank Cleaning Verification Plan dated May 13, 2024, Section 3.1.2 has been revised to replace the water break test with the cloth rub test. NCTF-RH proposes the use of the cloth rub test described in paragraph 6.1.1 of the SP-1 Standard.

9. ***For any qualitative verification method selected, Navy must demonstrate that the inspector conducting the test is qualified to do so. Visual tests inherently contain an element of subjectivity, which should be mitigated to the greatest extent possible by requiring the test be conducted by someone with who has experience performing and evaluating test results. A NACE certified inspector would be appropriately trained to interpret cloth rub results. Once identified, please provide the relevant certification of the tank cleaning inspector(s).***

NCTF – RH Response - NCTF-RH will include the qualifications of CIP Level 2 and CIP Level 3 inspectors once those individuals have been identified by name.

10. ***Any qualitative method must also include a detailed testing protocol. The information provided for the water break test lacks the level of detail necessary to determine if it will be sufficient in evaluating tank cleanliness. If a cloth rub test is implemented (as recommended by EPA), that method should include the number of samples to be taken, the location and***

rationale of where sampling will occur (i.e., not only the barrel of the tank, but also tank seams, standpipes/nozzles, and other tank appurtenances), the surface area to be tested, materials required, and how results will be interpreted. Criteria for a "passing" sample should be clearly defined so that a consensus between all involved parties can be reached.

NCTF – RH Response - The number and location of cloth rub test samples will be determined by the NACE CIP Level 2 and 3 inspectors. The Tank Cleaning Verification Plan dated May 13, 2024, has been revised. This information is listed as Table 2 in Section 6: Sample Size. As a guideline, NCTF-RH will rely on the QV inspectors to complete cloth rub tests in the more difficult areas to confirm the tank is clean. However, NCTF-RH will provide more detail on the number and locations of cloth rub test samples once the QV inspectors have been incorporated.

11. ***It is not clear from this section when the third-party independent contractor will be performing the qualitative verification method. Likewise, the figure in Section 2.3 does not mention a qualitative verification method performed by the QV contractor. Please clarify at which point in the tank cleaning verification process this will occur.***

NCTF – RH Response - The Tank Cleaning Verification Plan dated May 13, 2024, Section 7: Summary, Table 3, portrays QV inspections occurring three times per week. This will be an ongoing process to confirm the tank is clean throughout the cleaning process.

Section 2.2

12. ***It is EPA's understanding that the TPH wipe test will not be included in the revised Tank Verification Plan. EPA concurs with the decision to remove this method from the plan, as it has not been field-tested and questions remain regarding its applicability to all fuel product types remaining at RHBFSF based on research data previously shared with EPA. The comments provided below for Sections 2.2.2 – 2.2.4 outline in further detail EPA's concerns with the TPH wipe test.***

NCTF – RH Response - The Tank Cleaning Verification Plan dated May 13, 2024, has been revised to replace the water break test with the cloth rub test.

Section 2.2.2

13. ***"This conversion assumes complete diffusion of TPH-DRO from the interior tank surfaces in contact with water. This highly conservative approach will ensure the utmost protection of the environment and public health." – While this assumption may provide a conservative estimate for the TPH concentration diffused into water, it only considers one scenario and does not accurately assess the risk that residual fuel inside the tank may pose.***

NCTF – RH Response - The Tank Cleaning Verification Plan dated May 13, 2024, has been

revised to replace the TPH-DRO wipe test with the cloth rub test. This comment is no longer applicable. This revision can be found in Section 1.1: Historical Evolution of the Tank Cleaning Verification Plan.

14. ***"Although DOH EALs are a cumulative total of TPH… the majority of residual fuel (>95%) is composed of TPH-D which is the leading risk driver for closure" – Please clarify whether the Navy assumes that other contaminants, with different physical and chemical properties, are assumed to be gone when TPH-D results are negative.***

NCTF – RH Response - The Tank Cleaning Verification Plan dated May 13, 2024, has been revised to replace the TPH-DRO wipe test with the cloth rub test. This comment is no longer applicable. This revision can be found in Section 1.1: Historical Evolution of the Tank Cleaning Verification Plan.

15. ***"Estimate Volume of Water: …" The approach assumes only standing water comes in contact with TPH on the walls of the tank. However, another plausible scenario is that condensate forms on the tank walls and migrates to tank bottom under gravity. This would result in much less dilution and a corresponding higher concentration of TPH in the water.***

NCTF – RH Response - The Tank Cleaning Verification Plan dated May 13, 2024, has been revised to replace the TPH-DRO wipe test with the cloth rub test. This comment is no longer applicable. This revision can be found in Section 1.1: Historical Evolution of the Tank Cleaning Verification Plan.

Section 2.2.3

16. ***As touched on in the document, the appropriate number of samples for decision making is dependent on the heterogeneity of the medium, data variability and distribution (e.g. normal, logarithmic), and the desired level of statistical confidence. These factors should be evaluated to determine the appropriate number of samples to collect.***

NCTF – RH Response - The number and location of cloth rub test samples will be determined by the NACE CIP Level 2 and 3 inspectors. The Tank Cleaning Verification Plan dated May 13, 2024, has been revised to include some recommended percentages of the general locations of cloth rub tests (Section 6: Sample Size, Table 2). As a guideline, NCTF-RH will rely on the QV inspectors to complete cloth rub tests in the more difficult areas to confirm the tank is clean. By concentrating the majority of cloth rub tests in these areas, the third-party certified inspectors ensure that the data is collected from the most severe areas of the tank, thereby adopting a conservative stance in the verification process. However, NCTF-RH will provide more detail on the number and locations of cloth rub test samples once the QV inspectors have been incorporated into the team.

17. ***The plan assumes residual TPH concentrations will be higher near the tank bottoms based on period of submersion and presence of sludge. However, this does not consider the cleaning process and whether it was performed uniformly throughout the tank. This assumption should be validated before spatially biasing the sampling. Additional, biased samples should also be considered where there are crevices or seams, and where the design of an appurtenance makes it more difficult to clean.***

NCTF – RH Response - The Tank Cleaning Verification Plan dated May 13, 2024, has been revised to replace the TPH-DRO wipe test with the cloth rub test. Additionally, the Tank Cleaning Verification Plan dated May 13, 2024, Section 6: Sample Size, has been revised to include some recommended percentages of the general locations of cloth rub tests. This information is displayed in table 2. As a guideline, NCTF-RH will rely on the QV inspectors to complete cloth rub tests in the more difficult areas to confirm the tank is clean. However, NCTF-RH will provide more detail on the number and locations of cloth rub test samples once the QV inspectors have been incorporated into the team. Biased samples will be incorporated to consider areas where there are crevices or seams, and where the design of an appurtenance makes it more difficult to clean.

Section 2.2.4

18. ***It is unclear how 10 samples were determined to be sufficient for establishing baseline concentrations for each tank. Prior to collecting the baseline samples, Navy would need to specify targeted locations for each baseline sample and provide a rationale for why each location was selected.***

NCTF – RH Response - The Tank Cleaning Verification Plan dated May 13, 2024, has been revised to replace the TPH-DRO wipe test with the cloth rub test. This comment is no longer applicable. This revision can be found in Section 1.1: Historical Evolution of the Tank Cleaning Verification Plan.

Section 2.3

19. ***Figure 1 omits key elements of the verification process. QV is not identified as having a role in the visual confirmation of fuel residue removal. Additionally, there is no mention of the qualitative test as described in Section 2.1.3. A revision to the figure should also include the role of a NACE certified inspector.***

NCTF – RH Response - Table 3 in Section 7: Summary of the Revised Tank Cleaning Verification Plan now shows the role of QV for both independent visual inspections and the cloth rub tests. The revised figure includes the role of NACE certified inspector.

20. ***Step 1 – The goal of the post-cleaning gas analysis is unclear. Is this intended as a safety precaution or as a method to verify tank cleanliness (as is suggested by its inclusion in this***

section)? Does Navy anticipate the pre- and post-cleaning gas free certification to change if the tank is continuously ventilated? As mentioned in comment #4, a post ventilation gas analysis should be performed if the purpose is to demonstrate hazardous vapors have been removed during cleaning.

NCTF – RH Response - A marine chemist/industrial hygienist will determine the hazards for entering a tank and a confined space entry permit will be issued before personnel are allowed to enter each tank.

Section 3

21. ***Tier 4 – All documentation including QV reports, NACE inspection findings, cloth rub results, and photos shall be provided to EPA prior to the inspection to facilitate the Regulators' independent analyses.***

NCTF – RH Response - The Tank Cleaning Verification Plan dated May 13, 2024, has been revised to reflect ongoing collection of QV report data throughout the cleaning process (Section 7: Summary, Table 3). NCTF-RH estimates this report will be available within two weeks of completing tank cleaning. The inspection by the regulatory agencies can be completed after the report has been submitted.

DOH Comments

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.***

NCTF – RH Response – The center tower, catwalks and structural members will be visually inspected, with focused cloth rub tests in areas suspected of residual oil. Additionally, the inspector may use a black light as a screening tool to focus inspections. Standpipe interiors will be visually inspected to the extent possible. Small diameter piping will be water-jetted to flush residuals. The contractor will monitor the atmosphere within the small diameter piping to confirm there is no residual fuel after flushing is complete.

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?***

NCTF – RH Response – The proposed Revised Tank Cleaning Validation Plan eliminates the requirement for a water break test to be used as a means for accepting tank cleanliness and the

need for all three parties to be in the basket together. However, the water break test will still be used informally during QC for the operator to verify cleanliness. Operators will use this technique to assist them in confirming no further pressure washing is required.

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.***

NCTF – RH Response - See attached Revised Tank Cleaning Verification Plan dated May 13, 2024, Section: Cloth Rub Test 3.1.2, Paragraph 2-4, for details regarding the use of a NACE-certified white rag test (hereinafter referred to as the "Cloth Rub Test").

Specific Comments

1. 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?***

NCTF – RH Response - The referenced title has been revised to state *"API Standard 2015: Requirements for Safe Entry and Cleaning of Petroleum Storage Tanks"* in Section 1: Introduction.

2. 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?***

NCTF –RH Response – Prior to any tank entry, the Marine Chemist/Industrial Hygienist issues the Gas-Free Certificate to identify the hazards associated with tank entry. Once the Gas Free Certificate is issued, the contractor is responsible for issuing the confined space entry permit daily before personnel can enter the tank each day.

3. 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?***

NCTF – RH Response - The contractor will track daily progress on a generic shell rollout. The NACE Inspector will inspect segments of the tank as access allows, marking locations on the tank shell and the generic shell rollout of photos, cloth rub tests, and any areas requiring additional cleaning.

4. 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.

NCTF – RH Response - Refer to Quality Validation Plan Addendum in the Revised Tank Cleaning Verification Plan dated May 13, 2024, for details. This addendum goes into detail describing the cleaning standard, evaluation of cleaned surfaces, and the tracking / reporting of this data.

5. <u>Page 4, Section 2.1.2.4:</u> ***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?***

NCTF – RH Response – Per the Tank Cleaning Verification Plan revised on 13 May 2024, Section 7: Summary, QV inspections will occur three times per week. NCTF-RH Quality Assurance team and the tank cleaning contractor will be notified in writing of any areas requiring additional cleaning.

6. <u>Page 4, Section 2.1.3:</u> ***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?***

NCTF – RH Response - The proposed Revised Tank Cleaning Validation Plan eliminates the requirement for a water break test to be used as a means for accepting tank cleanliness. However, the water break test will still be used informally during QC for the operator to verify cleanliness. Operators will use this technique to assist them in confirming no further pressure washing is required.

7. <u>Page 4, Section 2.1.3.1:</u> ***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?***

NCTF – RH Response - Water break tests will not be used as a means for accepting tank cleanliness, but rather as one of the available screening processes for the operator observing their cleaning progress. Operators will be able to observe beading on oily surfaces as part of the cleaning process. The Revised Tank Cleaning Verification Plan provides some recommended percentages for each area of the tank interior that will be inspected using the cloth rub test. Further information will be forthcoming once the QV inspector has been incorporated into the team. Locations of cloth rub testing will be documented using photographs, cloth rub tests and any areas requiring additional cleaning will be documented on the generic shell rollout for each tank. A copy of which can be found in the Revised Tank Cleaning Verification Plan.

8. <u>Page 4, Section 2.1.3.2:</u> ***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.

NCTF – RH Response - Water break tests will not be used as a means for accepting tank cleanliness, but rather as one of the available screening processes for the operator observing their cleaning progress. Operators will be able to observe beading on oily surfaces as part of the cleaning process.

9. <u>Page 9, Section 2.3, Figure 1:</u> ***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.***

NCTF – RH Response - NCTF-RH is requesting that DOH and EPA confirm the tank is clean and does not require any additional cleaning before relocating suspended scaffolding to the next tank.

10. <u>Page 10, Section 2.3:</u>

a. ***<u>Step 1:</u> 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?***

NCTF – RH Response – The Tank Cleaning Verification Plan revised 13 May 2024, Section 7: Summary includes the roles of QC, QA, and QV entities. QA and QC will be responsible for confirming the Gas Free Tank Inspection and Certification is properly completed and the confined space entry permit is issued before personnel are allowed to enter each tank on a daily basis.

b. ***<u>Step 2:</u> 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."***

NCTF –RH Response - The baseline test is no longer being proposed based on the Revised Tank Cleaning Verification Plan dated May 13, 2024. Additional information will be provided once the QV inspector has been incorporated into the team.

11. <u>Page 12, Section 3, Tier 4:</u>

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.

NCTF –RH Response - NCTF-RH is requesting that DOH and EPA confirm the tank is clean and does not require any additional cleaning before relocating suspended scaffolding to the next tank.

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.

NCTF –RH Response - QV reports will be developed as cleaning progresses. Tabulated results, NACE Inspection reports and photographs will be included. After Government acceptance of the subject tank, the QV report will be released for regulator review.