



STATE OF HAWAII
DEPARTMENT OF HEALTH
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In reply, please refer to:
File:

June 6, 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 and Concurrence in Concept with NCTF-RH May 2024
Tank Cleaning Verification Plan**

On January 18, 2024, the Hawaii Department of Health (DOH) conditionally approved the Navy Closure Task Force – Red Hill's (NCTF-RH's) December 15, 2023 tank cleaning submission for the Red Hill Facility, one of the conditions being that the NCTF-RH must receive the DOH's approval for a plan to verify that the tanks, sumps, and other infrastructure remaining in the tanks are sufficiently cleaned. The NCTF-RH submitted its original *Tank Cleaning Verification Plan* on January 12, 2024, which the DOH disapproved on February 8, 2024. We received the NCTF-RH's *Revised Tank Cleaning Verification Plan* on April 15, 2024, and provided comments on May 9, 2024.

The DOH is in receipt of the NCTF-RH's latest May 17, 2024 tank cleaning verification submission, which includes the following enclosures, hereinafter collectively referred to as the *May 2024 Tank Cleaning Verification Plan*:

- Enclosure (1): Navy Closure Task Force – Red Hill, Revised Tank Cleaning Verification Plan, dated May 13, 2024;
- Enclosure (2): NCTF-RH Responses to EPA and DOH Comments on Revised Tank Cleaning Verification Plan, dated 12 April 2024;
- Enclosure (3): Typical Shell Roll Out – Top of Tank; and
- Enclosure (4): Tank Cleaning Quality Validation Plan Addendum.

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Based on our review of the *May 2024 Tank Cleaning Verification Plan*, the DOH concurs in concept with the plan and offers the enclosed comments. We encourage the NCTF-RH to move forward with securing the proposed Association for Materials Protection and Performance-certified inspector, however, more detail on the certified inspector's sampling and evaluation methods (i.e., quality validation) is needed before we can approve the plan. Please respond to the enclosed comments within 21 calendar days of receiving this letter.

Should you have any questions regarding this letter or the enclosed comments, please contact Ms. Kelly Ann Lee, Red Hill Project Coordinator, at (808) 586-4226 or at kellyann.lee@doh.hawaii.gov.

Sincerely,

Kathleen Ho

KATHLEEN S. HO
Deputy Director for Environmental Health

Enclosure

c: w/encl. via email only:
Ash Nieman, EPA
Jamie Marincola, EPA
RDML Marc Williams, NCTF-RH
CAPT Steven Stasick, NCTF-RH
Joshua Stout, NCTF-RH

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Enclosure (1): Navy Closure Task Force – Red Hill, Revised Tank Cleaning Verification Plan, May 13, 2024

General Comments

1. The Hawai'i Department of Health (DOH) supports the involvement of an Association for Materials Protection and Performance-certified inspector in the verification process, however, more information is needed to support an approval. We understand the Navy Closure Task Force – Red Hill (NCTF-RH) will rely on the certified inspector to develop the quality validation (QV) portion of the verification plan. Therefore, once the certified inspector is contracted, provide for the DOH's review and approval an addendum detailing the certified inspector's QV process, including:
 - a. Certified Inspector credentials;
 - b. Cloth rub test method;
 - c. Minimum number of cloth rub tests to be performed per tank and estimated locations or frequencies; and
 - d. Verification and documentation process(es) for difficult to clean and see areas. We understand from Enclosures 1 and 2 that potential options include visual, black light, and atmospheric monitoring. Once the certified inspector is contracted, confirm which methods will be used on which tank components.

Specific Comments

2. **Page 1, Section 1:** The third paragraph states, “[a]s 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).” The DOH did not suggest this in our May 9, 2024 letter, but we have no objections to the NCTF-RH adopting this definition.
3. **Page 2, Section 1:** The April 2024 version of this plan stated it was to “support closure-in-place of Red Hill Bulk Fuel Storage Facility’s (RHBFSF) 20 underground fuel storage tanks and 4 surge tanks.” However, the May 2024 version changed this to “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.” How will the NCTF-RH demonstrate Tanks 1, 13, 14, 17, 18, and 19 are clean for the purpose of closure?

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4. **Page 8, Table 1:** While we defer to the Hawai'i Department of Labor and Industrial Relations, Hawai'i Occupational Safety and Health Division (HIOSH) on issues relating to worker safety, we recommend confirming the listed descriptions for the lower explosive limit (LEL) and hydrogen sulfide, as these numbers appear to be high. We believe for the LEL, the maximum should be described as 10% of the LEL.
5. **Page 11, Section 4, Step 3:** The description states "QA [quality assurance] will be present throughout the cleaning process" to observe and take photos and "will spot check the contractor throughout the process." Does this mean QA will periodically be in the basket during the cleaning process? If not, how will QA observe and spot check quality control's (QC's) work?
6. **Page 12, Section 4, Step 4:** Add the following to the list of QV report contents:
(1) volume of water/simple green solution used, (2) volume of water for clean rinse used, (3) volume of wash water removed from Tank 311 and disposed.
7. **Page 17, Section 7:** According to Table 3, QV inspections will occur three times per week. Does this mean the third-party industry certified inspector will conduct cloth rub tests all three times per week? If so, will the washed surfaces have enough time to dry before the cloth rub tests?

Enclosure (2): NCTF-RH Responses to EPA and DOH Comments on Revised Tank Cleaning Verification Plan Dated 12 April 2024

8. **Page 12, Section 3, Tier 4:** We acknowledge the NCTF-RH's response. However, the incorrect statement is still in the revised plan.

Enclosure (3): Typical Shell Roll Out – Top of Tank

9. Can locations in the field be reproduced from this figure? For example, are the cells based on welds that can be used as landmarks?
10. The figure provided for review in the QV reports must be large and high-quality enough to make the text legible.
11. The document should include a scale and orientation (e.g., where is the left edge of the drawing in the tank).

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Enclosure (4): Tank Cleaning Quality Validation Plan Addendum

12. **Page 2, Tank Cleaning Verification Procedures, Item 2:** The second paragraph states, “[a]s part of the Contractor QC effort, an independent Third-Party Association for Materials Protection and Performance (AMPP) Coating Inspector Program (CIP) Level II Inspector will evaluate and document the tank surface for cleanliness.” However, according to the verification plan, only QV will hold this certification. Please clarify which parties will be AMPP-certified.

13. **Page 4, Quality Validation Report, Item 2:** The list appears to be slightly different than the list on page 12 in the plan. The lists in both documents should be comprehensive.