NCTF-RH'S RESPONSE TO DOH COMMENTS ON MAY 17, 2024 TANK CLEANING VERIFICATION PLAN

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.

    NCTF-RH Response: *Acknowledged; once NCTF-RH contracts a certified inspector, it will submit an addendum detailing the certified inspector's proposed QV process and credentials.*

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.

    NCTF-RH Response: *Acknowledged.*

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?

    NCTF-RH Response: The current APTIM contract only covers the 14 tanks that were defueled by JTF Red Hill in their cleaning contract. Tanks 13, 14, 17 and 18 recently underwent Clean Inspect and Repair but were not returned to fuel service. Tanks 1 and

19 have not had fuel in decades. NCTF-RH will provide a separate plan for addressing those tanks guided by the results of the June tank gauging event.

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.

   NCTF-RH Response: *Acknowledged; NCTF-RH will revise the plan to reflect the maximum 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?

   NCTF-RH Response: *NAVFAC QA will be on site regularly and will be out on the basket with the contractor QC to spot check the 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.

   NCTF-RH Response: *Acknowledged; NCTF-RH will add these additional items to the QV report. However, NCTF-RH can only provide the amount of simple green solution and total volume of water used but will not be able to accurately break out how much water was used for cleaning and rinsing because there is anticipated to be multiple cleaning operations going on at the same time, and only one flow meter measuring water usage.*

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?

   NCTF-RH Response: The inspection frequency will vary based on the rate of production but should not be more than three times per week. QV inspections will capture sections washed in previous shifts, not the current shift. The vertical surfaces are expected to be dry from gravity and forced ventilation. The process will be adjusted based on conditions experienced in the field.

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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.

   NCTF-RH Response: *NCTF-RH has updated the plan and removed the incorrect statement. See Enclosure 2, Revised Tank Cleaning Verification Plan, dated June 13, 2024.*

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?

   NCTF-RH Response: *The Contractor will have their own tracking system for demarking sections in the tank that have been cleaned and transcribed to the shell rollout figure. QV rub sample locations will be marked on the shell with crayon and then transcribed to the location on the shell rollout figure.*

10. The figure provided for review in the QV reports must be large and high-quality enough to make the text legible.

    NCTF-RH Response: *Acknowledged; NCTF-RH will ensure the text is legible in all figures included in the QV reports.*

11. The document should include a scale and orientation (e.g., where is the left edge of the drawing in the tank).

    NCTF-RH Response: *Acknowledged; NCTF-RH will include a scale and orientation in the document.*

Enclosure (4): Tank Cleaning Quality Validation Plan Addendum

1. **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.

   NCTF-RH Response: *The third party contractor will AMPP-certified; Contractor QC will be limited to visual inspection.*

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2. **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

NCTF-RH Response: *Acknowledged; NCTF-RH will update the QV Report to reflect the list on page 12 in the plan.*

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