



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
**75 Hawthorne Street**  
**San Francisco, CA 94105-3901**

June 15, 2022

Rear Admiral Timothy J. Kott  
Joint Base Pearl Harbor Hickam  
Commander, Navy Region Hawaii  
850 Ticonderoga St, Ste. 110  
Pearl Harbor, HI 96860-5101  
[timothy.j.kott@navy.mil](mailto:timothy.j.kott@navy.mil)

Re: Request for SPCC and FRP coverage for the piping system between the Red Hill Bulk Fuel Storage Facility and the Pump-House at Joint Base Pearl Harbor-Hickam

Dear Rear Admiral Kott:

U.S. EPA Region 9 (“EPA”) conducted a joint Resource Conservation and Recovery Act (“RCRA”) underground storage tank (RCRA Subtitle I; 40 C.F.R. Parts 280 and 281) and Spill Prevention, Control, and Countermeasure (“SPCC”) and Facility Response Plan (“FRP”) (Clean Water Act Section 311; 40 C.F.R. Part 112) inspection the week of February 28, 2022, at the Joint Base Pearl Harbor-Hickam (“JBPHH”). As a result of that inspection and associated document review, EPA determined that the Department of Navy (“DON”) does not have SPCC or FRP coverage for the piping system between the Red Hill Bulk Fuel Storage Facility and the Pump-House at JBPHH as required. Therefore, the Navy will need to create new SPCC and FRP plans for this area or expand the existing SPCC and FRP plans at JBPHH to include the pipeline between the Red Hill Bulk Fuel Storage Facility and the Pump-House.

The establishment and implementation of these plans in advance of the commencement of defueling operations will be critical to ensure any potential spills are fully contained and that DON has protocols in place to respond to an incident if one were to occur. In order for EPA to have sufficient time to review the updated planning documents and DON to have sufficient time to incorporate comments and implement the plans, EPA requests that DON submit new or revised SPCC and FRP plans to EPA to cover the piping system between the Red Hill Bulk Fuel Storage Facility and the Pump House no later than August 8, 2022.

If you have any questions, please have your program staff contact Pete Reich of my staff at (415) 972-3052 or [reich.peter@epa.gov](mailto:reich.peter@epa.gov). If you have any questions regarding the FRP process, please have your program staff contact Ben Castellana at (562) 305-0694 or [castellana.ben@epa.gov](mailto:castellana.ben@epa.gov). For any legal questions, please have your counsel contact Dustin Minor in our Office of Regional

Counsel at (415) 972-3888 or at [minor.dustin@epa.gov](mailto:minor.dustin@epa.gov). Your cooperation in this matter is appreciated.

Sincerely,

AMY MILLER-BOWEN

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MILLER-BOWEN  
Date: 2022.06.15 16:13:55  
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Amy C. Miller-Bowen, Director  
Enforcement and Compliance Assurance Division

cc: Karnig Ohannessian, U.S. Navy  
Kathleen Ho, Deputy Director, Hawai'i Department of Health