



## REGION 9

SAN FRANCISCO, CA 94105

February 2, 2024

### **VIA ELECTRONIC MAIL ONLY**

Rear Admiral Stephen Barnett  
Commander  
Navy Region Hawaii  
850 Ticonderoga St. Ste 110  
Joint Base Pearl Harbor Hickam, Hawaii 96860-5101  
[stephen.d.barnett.mil@us.navy.mil](mailto:stephen.d.barnett.mil@us.navy.mil)

Re: Additional Work Pursuant to the 2023 Consent Order (Paragraph 8(b))  
Red Hill Bulk Fuel Storage Facility Defueling, Closure and Joint Base  
Pearl Harbor-Hickam Drinking Water System

Dear RADM Barnett,

The Environmental Protection Agency, Region 9 has determined additional work is necessary to monitor drinking water quality in the Joint Base Pearl Harbor-Hickam Public Water System (JBPHH System) distribution system after the Drinking Water Long-Term Monitoring Plan (DW LTMP)<sup>1</sup> expires at the end of February/beginning of March.

Pursuant to Paragraph 8(b) of the 2023 Consent Order, EPA has determined the Statement of Work (SOW) must be modified to require Navy to conduct continued monitoring of the drinking water system after expiration the DW LTMP. Renewing the DW LTMP is necessary in order to meet the 2023 Consent Order's objective at Section 1(e) of ensuring the JBPHH System serves safe drinking water during the Facility's Defueling and Closure. EPA acknowledges that the total petroleum hydrocarbon (TPH) levels detected pursuant to the LTMP are below the incident specific parameters identified for TPH and that sampling results have been below Safe Drinking Water Act and LTMP levels. However, additional investigation and monitoring is necessary to follow up on complaints raised by JBPHH System users in recent months and ensure that the drinking water is safe.

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<sup>1</sup> Section 6.2 of the SOW incorporates the LTMP into the 2023 Consent Order and requires the Navy to conduct distribution system monitoring for 24 months.

Pursuant to section 8(b) of the 2023 Consent Order, EPA is providing the Navy the opportunity to meet with EPA within twenty-one (21) days<sup>2</sup> after receipt of this letter to discuss the development and implementation of the renewed LTMP, and to agree on a schedule for submitting this new monitoring plan to EPA for consideration and approval. I acknowledge that Navy is already working on a renewed LTMP and meeting with regulators to discuss content which can be incorporated into these discussions when we meet. Under Paragraph 8(b) of the 2023 Consent Order, the renewed LTMP would be incorporated by reference into and made a part of the 2023 Consent Order and be enforceable as such.

If you have any questions, please contact our staff lead on this matter, Corine Li (Li.Corine@epa.gov, (415) 972-3560).

Sincerely,

/s/ February 2, 2024

Amy C. Miller-Bowen, Director  
Enforcement and Compliance Assurance Division

cc: Kathy Ho, HDOH  
Joanna Seto, HDOH  
Dennis Lopez, HDOH  
James Sullivan, Navy Region Hawaii  
Kevin McCormick, Navy Region Hawaii