



REGION 9

SAN FRANCISCO, CA 94105

March 6, 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

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 is following up on our letter of February 2, 2024, which requested that the Navy meet with EPA on amending the 2023 Consent Order to incorporate a new drinking water monitoring plan to replace the existing Drinking Water Long-Term Monitoring Plan (LTM Plan) that expires at or around the end of this month. EPA understands the Navy has agreed to voluntarily extend the LTM Plan requirements into a new extended drinking water monitoring plan (EDW Plan). EPA appreciates this decision, however, to avoid any confusion or misunderstanding, EPA writes to reiterate its expectation that the new EDW Plan, like the existing LTM Plan, be incorporated by reference into and made a part of the existing 2023 Consent Order and be enforceable as such.

EPA also requests that the new EDW Plan include a revised complaint investigation procedure that incorporates the concept of a new "Water Quality Action Team" that the Navy discussed with EPA's technical team last week. In addition, for consistency, the Navy should ensure that the new EDW Plan specifically incorporates the current LTM Plan requirement pertaining to tank cleaning that is referenced in Section 6.2 of the 2023 AOC's Scope of Work, which the Navy is completing under an EPA-approved extended timeline.

EPA requests that the Navy provide a framework for the new EDW Plan to EPA by March 15, 2024 to give EPA adequate time to review, provide any comments, and approve the final EDW Plan prior to expiration of the current LTM Plan on or around April 1, 2024.

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

Sincerely,

/s/ March 6, 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