



REGION 9

SAN FRANCISCO, CA 94105

September 26, 2025

VIA ELECTRONIC MAIL

Rear Admiral Brad Collins
Commander
Navy Closure Task Force – Red Hill
850 Ticonderoga St, Suite 110
Joint Base Pearl Harbor - Hickam, Hawaii 96860-5101

Subject: September 2025 Spill Incidents Obligations under 2023 Administrative Order on Consent

Dear Rear Admiral Collins:

The Environmental Protection Agency Region 9's (EPA) 2023 Administrative Consent Order (ACO) with the Navy and Defense Logistics Agency (DLA) to oversee the defueling and closure of the Red Hill Bulk Fuel Storage Facility (Red Hill) and upgrades to the Joint Base Pearl Harbor-Hickam (JBPHH) Drinking Water System was put in place to protect the public from any future incidents at Red Hill and JBPHH facilities.

EPA values our partnership and emphasis on communication with Navy throughout the duration of defueling, closure, and implementation of all requirements under the ACO. This communication has been critical in allowing regulatory agencies to swiftly respond, investigate, and adapt our approach in addressing environmental challenges that arise during this unprecedented operation.

EPA has recently become aware of several recent incidents at the Facility which have the potential to impact the environment or human health:

- On August 20, 2025, a release of polychlorinated biphenyls (PCBs) contaminated dust with a concentration of 64.3 mg/kg occurred during electrical upgrade work in the Red Hill Pump Room. The incident was reported to EPA in writing on September 15, 2025. EPA considers the PCB-contaminated dust to be a PCB remediation waste under the PCB regulations.
- On September 13, 2025, Red Hill Finished Water Tank 685 was nearly completely drained due to a pipe failure, releasing approximately 200,000 gallons of potable water in the vicinity of historical releases. EPA was notified of the incident on September 16, 2025.

- On September 18, 2025, the Navy observed an overflow from the main sump releasing two gallons of a water petroleum mixture into the sump's containment. This incident was reported to EPA on September 19, 2025.

As you are aware, Section 8(c) of the ACO states:

In the event that during the performance of this 2023 Consent Order, Navy and/or DLA encounters any condition or situation at the Facility or at the JBPHH System, such as a spill or release from the Facility, that constitutes an emergency or may present an immediate threat to human health or the environment, Navy and/or DLA shall immediately take all appropriate actions to prevent and/or minimize such emergency or threat, and shall immediately notify EPA's Project Coordinator (or, if unavailable, the EPA Regional Duty Officer at (800) 300-2193). Navy and/or DLA shall also notify all appropriate state, federal and local agencies, potentially affected persons and officials in accordance with applicable regulations. In addition to the regulatory notification requirements, Navy and/or DLA shall post any notification of an emergency or immediate threat to human health or the environment under this paragraph on Navy's and DLA's website within twenty-four (24) hours of Navy's or DLA's encountering such a situation.

EPA's expectation is prompt notification on any spill or release at the facility that has the potential to present an immediate threat. In addition, Navy provides regulators with a weekly situational report. The PCB and sump overflow incidents were not included in the weekly reporting to EPA.

EPA's interest in the incidents extend beyond notification. The incidents have raised concerns related to the presence of PCBs at the facility and impacts from the tank release on water quality in Red Hill Shaft and the drinking water system. Given the age of the Facility, EPA also is concerned that there may be additional sources of PCBs at the Facility, such as equipment manufactured before 1980 and PCB bulk products containing PCBs at or above 50 mg/kg.

The Navy's obligations at Red Hill under the Toxics Substances Control Act's ("TSCA") implementing PCB regulations at 40 CFR Part 761. Those regulations include, among other requirements, (1) characterization, cleanup, and disposal of PCB remediation waste (40 CFR 761.61), (2) prohibitions and authorizations for use of PCBs (40 CFR 761.20 and 40 CFR 761.30), (3) decontamination of PCB-impacted materials (40 CFR 761.79), and (4) disposal of PCB bulk product waste (40 CFR 761.62). The PCB regulations include three cleanup options for PCB remediation waste. Two of those options require notification to EPA and submission of cleanup plans for approval. The third option is fully self-implementing and requires that a post-cleanup notification be submitted to EPA. Please coordinate proposed investigation and cleanup of PCBs directly with EPA's RCRA Hazardous Waste Program Office. Additional follow-up is forthcoming. Please note that EPA is the sole governmental agency responsible for administering the TSCA PCB regulations. EPA has not delegated its authority to regulate PCBs to state or local agencies.

For the unanticipated release of approximately 200,000 gallons of water from Tank 685, potential concerns include:

- Assessment of impacts to the drinking water system from the sudden loss of water in the tank such as an associated lapse in pressure within the system.

- Notification to residents served by Tank 685 in case service is impacted.
- Impacts from the discharge and flushing of that volume of water into adjacent soils, including possible mobilization of contaminants to groundwater or any discharges to jurisdictional surface waters.

We appreciate your attention to these specific concerns and need for enhanced and swift communication with regulators as similar incidents arise.

Sincerely,

/s/

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

cc: Karnig Ohannessian, Office of the Secretary of the Navy
RDML Marc Williams, NCTF-RH
Joshua Stout, NCTF-RH
Kathleen Ho, Hawai'i Department of Health
Kelly Ann Lee, HDOH