



REGION 9

SAN FRANCISCO, CA 94105

April 5, 2024

Sent via electronic mail only

RDML Steve Barnett, USN
Commander,
Navy Region Hawaii and
Navy Closure Task Force – Red Hill
850 Ticonderoga St, Ste 110
JBPHH, HI 96860-5101

Subject: Extended Drinking Water Monitoring Plan
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 Rear Admiral Barnett,

In response to your March 29, 2024 letter, the United States Environmental Protection Agency (EPA) agrees to Navy's request to submit the Extended Drinking Water Monitoring Plan (EDWM Plan) to EPA for review and approval pursuant to Paragraph 8(b) of the 2023 Administrative Order on Consent (Consent Order) on April 12, 2024.

EPA appreciates the Navy's cooperation and willingness to work with EPA and the Hawaii Department of Health (DOH) on the EDWM Plan and the root cause analysis. As noted in EPA's March 6, 2024 letter, the Navy's EDWM Plan submittal shall be submitted pursuant to Paragraph 8(b)'s "Additional Work" provisions and will be incorporated into the Consent Order and enforceable as such. EPA's March 6, 2024 letter also requested that the new EDWM Plan include a revised complaint investigation procedure that incorporates the concept of a new "Water Quality Action Team." EPA would like to clarify EPA's expectations with respect to the Water Quality Action Team pursuant to the Consent Order.

Pursuant to Paragraph 8(b), EPA may determine that Additional Work is necessary to meet the objectives of this 2023 Consent Order as specified in Section 1 (Introduction). Section 1(e) of the Consent Order provides that one of the primary objectives of the 2023 Consent Order is to ensure that the JBPHH System serves safe drinking water during the Facility's Defueling and Closure. Pursuant to Paragraph 8(b), the Navy shall develop a complaint investigation procedure to be implemented by the Water Quality Action Team through newly developed Water Quality Team Standard Operating Procedures (SOPs) and Protocols to investigate and determine the root cause of drinking water complaints. The goal of the Water Quality Action Team SOPs and Protocols is to conduct a root cause analysis and determine if the residents tap water is causing adverse reactions to residents from petroleum or other substances which may be present. The Water Quality Action

Team should look at all potential sources including the premise plumbing to determine if the water is causing adverse effects to residents.

Your March 29, 2024 letter acknowledges that EPA requested the EDWM Plan pursuant to Paragraph 8(b) and requests an extension. We agree to an extension of time until April 12, 2024. We appreciate your action to develop the EDWM Plan and Water Quality Action Team Standard SOPs and Protocols that Navy will submit as a deliverable pursuant to Paragraph 8(b) which will be incorporated by reference and enforceable under the AOC (as was the LTMP under SOW Section 6.2).

Sincerely,

/s/

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

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