



REGION 9

SAN FRANCISCO, CA 94105

July 15, 2024

Karnig Ohannessian
Deputy Assistant Secretary (Environmental and Mission Readiness)
Department of the Navy
1000 Navy Pentagon
Washington, DC 203520
(Sent via Electronic Mail)

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

Dear Deputy Assistant Secretary Ohannessian:

Thank you for your June 20, 2024 letter stating your intent to submit an additional work proposal pursuant to paragraph 8(b) of the 2023 Administrative Consent Order (ACO) for the Red Hill Bulk Fuel Storage Facility Defueling, Closure and Joint Base Pearl Harbor-Hickam Drinking Water System.

EPA acknowledges and appreciates the Navy's partnership and good faith discussions with EPA and the Hawaii Department of Health ("HDOH") in developing an Extended Drinking Water Monitoring ("EDWM") plan. We received the latest iteration of the EDWM plan via email from Commander Ben Dunn on July 3, 2024.

While the Navy prepares their additional work proposal, EPA would like to reiterate its position that all the proposed elements of the EDWM be proposed as additional work under the ACO. In addition, we have the following concerns which we would like addressed in the final EDWM:

- The EDWM Course of Action (COA) 3, for detections of total petroleum hydrocarbons (TPH) via Method 8015/8260 and/or JP-5/petroleum indicator compounds via Methods 524.2/525.2 as presented in Table 2-2, is to evaluate primary and duplicate results above the laboratory's minimum detection limit (MLD) in the Initial Assessment Decision Rule for proceeding to the next steps in the tier assessment.
- Written information on the reactivation plans, including any additional proposed drinking water monitoring, for the Navy's Aiea-Halawa and Red Hill shafts is to be included in the final EDWM or submitted to EPA outside of the EDWM as a separate letter no later than August 30, 2024.
- Substantial technical comments on the Risk Evaluation Protocol (EDWM Appendix B) will be

provided to Navy technical staff during a meeting scheduled for July 16, 2024 (1015–1145 HST). Additional comments on the Risk Evaluation Protocol will be provided to EPA from the Agency for Toxic Substances and Disease Registry (ATSDR) by Friday July 19, 2024 and communicated, as appropriate, to the Navy. EPA expects technical comments from our staff and agency partners to be addressed prior to approval.

- Additional miscellaneous comments on the July 3, 2024 version of the EDWM will be provided to Commander Ben Dunn from our technical team.

We look forward to reviewing your proposal and appreciate Navy’s collaboration on this phase of drinking water monitoring.

Sincerely,

/s/

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

cc: RADM Steven Barnett, NCTF-RH
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