



## REGION 9

SAN FRANCISCO, CA 94105

May 1, 2025

### **SENT VIA ELECTRONIC MAIL**

Rear Admiral Marc Williams  
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Subject: Proposed Modification to the 2023 Administrative Consent Order  
Section 6.5.6.2.1 Valve Exercising Program

Dear Rear Admiral Marc Williams:

The Environmental Protection Agency, Region 9 (EPA) has reviewed your April 29, 2025 proposal to modify the Valve Exercising Program (VEP), required under Statement of Work Section 6.5.6.2.1 of the 2023 Administrative Consent Order (ACO).

EPA approves the proposal to modify the language of Section 6.5.6.2.1 to specify authorized long-term and short-term exemptions to the Navy's valve exercising and require the submittal of annual metrics and schedule for correction of valves. EPA understands the Navy also plans to provide a recapitalization plan to replace valves over 40 years old and thanks the Navy for being proactive in the replacement of valves and keeping EPA up-to-date on this matter. Pursuant to ACO paragraph 8(a), the following approved modified wording will be incorporated into the 2023 ACO by reference:

*"The Navy will exercise all valves four (4) inches or greater in size in the Hickam System annually, critical valves in the Pearl Harbor System annually, and noncritical valves in the Pearl Harbor System once every two (2) years, in accordance with AWWA Standard G200-21 Distribution Systems Operation and Management, effective November 1, 2021. The determination of critical valves will follow the process described in Section 6.5.2 Asset Management Program. In Summary, the critical assets are determined by evaluating the mission disruption should the assets fail and identifying those assets where failure would impact minimum levels of service for critical operations.*

*The Navy will record each valve exercise and shall include the following: valve size and type, function, manufacturer, type of access, normal position (open or closed), valve opening direction (right or left), a count of the full turns required to isolate the valve, date of installation (if known), and valve maintenance/repair/replacement events.*

*The Navy shall update its valve exercising records on an annual basis and an electronic PDF summary of the record shall be made available for inspection during EPA inspections or sanitary surveys. In addition, the Navy will provide a comprehensive list of all valves. This list will delineate valves to which an exemption applies and the recapitalization plan for each exempted valve.*

*Category 1: The following are authorized long-term exemptions to the Navy's valve exercising requirements due to infrastructure constraints:*

- a. If the Navy determines that exercising the valve may detrimentally affect the system, detrimentally affect the mission, or pose operator safety concerns, the valve will not be exercised. The Navy will identify and mark the valve and note the basis for non-exercise. Once identified that the valve cannot be exercised, the valve will be exempted from being exercised until it can be exercised without detrimental effect to the system, mission, and/or operators. Examples of exemptions include when a valve is on a sole source transmission main, a valve is on a major transmission line, or a valve with risk too great to exercise in the current system configuration.*
- b. Difficult to access valves or circumstances outside of the Navy's control (i.e. road closure denials, denied access to non-Navy property, etc.). These valves may be temporarily exempted until the access issues are resolved. The Navy will identify and mark the valve and note the basis for non-exercise. The Navy will identify if and when the access issues are expected to be resolved. Until the access issue is resolved, the Navy is temporarily exempt from exercising the valve.*
- c. Valves on transmission mains that are associated with the primary source of supply, or the only source of supply in a particular area, will only be cycled partially (in accordance with AWWA M44 Distribution Valves: Selection, Installation, Field Testing, and Maintenance).*

*Category 2: The following are authorized short-term exemptions to the Navy's valve exercising requirements:*

- a. Valves with potential record discrepancies. The Navy will investigate valves with record discrepancies to determine if the valve should be removed from the asset management database. Otherwise, the valve record will be updated, and the valve will be exercised.*
- b. Valves that cannot be operated, such as valves over 40-years old, and which are not included in category 1.*

*Additional exemptions may be added if agreed to by both EPA and Navy.*

*Navy will submit annual metrics to EPA. Metrics will include a summary of valves exercised, not exercised, and partially exercised Valves that are not exercised will be categorized into reasons for not exercising and a schedule of exempted valves to be corrected in the following year will be included Additional annual report details to be later agreed upon between EPA and Navy."*

Should you have any questions, please contact Claire Ong at [ong.claire@epa.gov](mailto:ong.claire@epa.gov).

Sincerely,

Jamie Marincola, Coordinator  
2023 Red Hill Consent Order  
Enforcement and Compliance Assurance Division

cc: Joshua Stout, Navy Region Hawaii  
Captain Jakubowicz, Defense Logistics Agency  
Kelly Ann Lee, Hawaii Department of Health (DOH)