REGION 9
SAN FRANCISCO, CA 94105

June 30, 2025

SENT VIA ELECTRONIC MAIL

Rear Admiral Marc Williams
Red Hill Project Management Office
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Subject: Proposed Modification to the 2023 Administrative Consent Order
Section 6.5.4 Unidirectional Flushing Plan

Dear Rear Admiral Marc Williams:

The Environmental Protection Agency, Region 9 (EPA) has reviewed your June 26, 2025 proposal to modify the Unidirectional Flushing Plan (UFP), required under Statement of Work (SOW) Section 6.5.4 of the 2023 Administrative Consent Order (ACO).

EPA approves the proposal to modify the language of Section 6.5.4. The proposed language substitutes the requirement of a contaminant slug study with simulations using a hydraulic model and historical data that would provide more robust and additional information, in comparison to a traditional slug study, to better prepare for and respond to a potential contamination event. The proposed language fulfills the intent of the original Section 6.5.4 language with a focus on the usage of the approve Hydraulic Model to provide the required information, as compared to utilization of a UDF Computer Model Study, and adds a requirement to identify areas in the distribution system that may need additional flushing.

Pursuant to ACO paragraph 8(a), the following approved modified wording will be incorporated into the 2023 ACO by reference:

"Navy shall submit, for EPA approval, a Unidirectional Flushing ("UDF") Plan. The UDF Plan shall include:

• Incorporation of a velocity adequate to remove sediments and solids from the line, per AWWA M68 standards, for lines 12-inches in diameter and smaller;

• Simulations with the existing hydraulic model for combinations of the three water sources based on historical SCADA data and up to four (4) contamination scenarios. Based on the modeling results, identify locations of valves that would isolate areas served by the three sources from one another;

• Employment of the existing hydraulic model for UDF development. Review previously developed fire-flow simulation results for the areas that might experience low pressure during flushing. Those areas will receive particular attention during UDF planning and execution to ensure that the pressure will not drop below 20 psi. Additionally, use the existing hydraulic model to identify areas with potentially stagnant water, which may require more frequent flushing.

Any updates, additions or changes to the JBPHH System will be evaluated, and if revisions are needed, should be reflected in appropriate modifications to the flushing plan and/or hydraulic model for each area (zone) contingent to any construction."

Should you have any questions, please contact Claire Ong at ong.claire@epa.gov.

Sincerely,

JAMES MARINCOLA

Digitally signed by JAMES MARINCOLA
Date: 2025.07.01 06:44:15 -07'00'

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)