



REGION 9

SAN FRANCISCO, CA 94105

July 8, 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 6.5.5.2 Development of Maintenance Flushing Program

Dear Rear Admiral Marc Williams:

The Environmental Protection Agency, Region 9 (EPA) has reviewed your June 26, 2025 proposal to modify the Development of Maintenance Flushing Program (MFP), required under Statement of Work (SOW) Section 6.5.5.2 of the 2023 Administrative Consent Order (ACO).

EPA agrees with the Navy's modification proposal, as long as the Navy incorporates an ongoing review process to evaluate and amend high priority areas and flushing frequencies based on new field data or repeated complaints. The addition of this language to require a review process in the MFP ensures a consistent validation or modification of flushing areas and flushing frequencies based on newly gathered information.

EPA's amendment to the proposed modification language is underlined below. EPA requests the Navy's response to the suggested changes by July 14, 2025:

"Within two-hundred-and-seventy (270) days after EPA's approval of the Hydraulic Model, Navy shall submit to EPA for approval a Maintenance Flushing Program, designed to improve water quality served to customers. The Maintenance Flushing Program shall be developed in accordance with American Water Works Association ("AWWA") Standard G200-21 Distribution Systems Operation and Management, subsection 4.1.8 System Flushing, effective November 1, 2021. The Maintenance Flushing Program shall be conducted annually. UDF shall be incorporated wherever possible, particularly, among other circumstances, where the Hydraulic Model required under 6.5.3 indicates it is necessary. All areas of low chlorine residual, dead-ends and blow-off locations, shall be flushed at least annually, with the possible need for more frequent flushing based on the reoccurrence of the following: air and sediment in the lines; issues with maintaining free chlorine residual; and issues (customer complaints) with taste,

odor or color. Key problem areas and flushing frequencies for all system areas will be periodically reviewed and amended based on new field data or repeated complaints. In addition, the entire distribution system will be flushed every five years (approximately 1/5 annually) using the UDF plan. Records of all Maintenance Flushing Program flushing events shall include the following: date, time, locations, persons responsible, duration of flushing, notations of any taste, odor, color or other unexpected conditions, chlorine residual before and after flushing, and the amount of water used for flushing. Additionally, public notification shall be made to advise the consumers when and where maintenance flushing, fire flow testing, or emergency flushing is taking place.”

If the Navy concurs with the modification proposal, it will be effective on July 15, 2025.

Should you have any questions, please contact Claire Ong at 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)