



**DEPARTMENT OF THE NAVY**  
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**ACO Monthly Status Report (February 1, 2025 – February 28, 2025)**

**Section 2.6(a): List and provide the status of all deliverables required by the 2023 Consent Order and this SOW.**

- Section 2.5 - Sampling and Analysis Plan: All the Navy's current sampling efforts are completed under previously approved sampling and analysis plans.
- Section 2.6 - Progress reports: This document is the monthly progress report for February 2025.
- Section 3.2.2 – Results of soil vapor monitoring: Sampling continues to be collected weekly and uploaded into EDMS, which regulators can access.
- Section 5.1 – On June 28, 2024, Navy submitted Tank Closure Plan Supplement 3: Site Assessment and Release Response Actions and posted a redacted version of the Site Assessment Work Plan to the Navy's ACO webpage on July 18, 2024.
- Section 5.2.1 – Interim Phase 1 Closure Report(s): Submit within 30 days after one or more of the 20 USTs, pipelines, or surge tanks have achieved Phase 1 Closure. Based on the Integrated Master Schedule (IMS), the Navy projects April 2025 for the first (2) Interim Phase 1 Closure Reports to be submitted.
- Section 5.2.4 – Final Phase 1 Closure Report: Submit within 180 days of Final Phase 1 Closure Inspection. Based on the IMS, the Navy projects December 2028 for the Final Facility Closure Inspection and the Final Phase 1 Closure Report, due no later than June 2029.
- Section 5.3 – Phase 2 Closure Report: Submit within 180 days of completion of Phase 2 Closure. Phase 2 Closure requires conducting a site assessment and any necessary release response for the soil, groundwater, and soil vapor that may have been contaminated. Based on the IMS, the Final Site Assessment Report is scheduled to be completed by December 2026. If concurrence is received by December 2026, the Phase 2 Closure Report will be due by June 2027.
- Section 6.1.1 – Source Water Protection Plan (SWPP) Phase I (Red Hill Shaft): The initial draft SWPP Phase I was sent to EPA and DOH on June 15, 2023, by JTF-RH. The Navy received comments on the SWPP from EPA on July 18, 2023, and responded to those comments on July 31, 2023.
- Section 6.1.2.3 - Source Water Protection Plan Phase II – Submit Phase II SWPP to EPA for approval: To comply with 6.1.2.1, a scoping meeting between EPA, DOH, and Navy took place on June 28, 2023. The Navy shared a summary of the project scope for the ongoing Wellhead Protection Plan (WHPP) project and agreed to share the WHPP Work Plan with EPA and DOH. The Navy shared the Work Plan on September 1, 2023, ahead of an anticipated review meeting with EPA and DOH. A review meeting on the WHPP Work Plan was held on November 21, 2023, where EPA provided comments informally. Note that the WHPP is being developed to meet the intent of the Source Water Protection Plan Phase II requirement. A list of resources used to update the inventory of potential contamination activities was submitted to EPA and DOH on December 22, 2023. Navy received EPA's letter dated March 1, 2024, and is working to modify the WHPP project scope and execute a new contract to address implementation. A draft scope for the Implementation Plan and scope comparison table was provided to EPA on March 15, 2024, as a read ahead. A draft of the scope modification to the JBPHH WHPP project was provided to EPA on



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March 28, 2024, as a read ahead. A meeting with EPA was held on April 9, 2024, to discuss the three read a head's. Meeting minutes were shared with EPA on April 16, 2024, for review and concurrence. A revised scope for the WHPP, now named the Source Water Assessment Plan (SWAP), has been shared with the EPA for review and approval. The Navy submitted a revised scope for the Implementation Plan, now named the Source Water Protection Plan (SWPP) and shared it with EPA for review and approval on May 3, 2024. Naming revisions to these documents are per EPA recommendation. Navy received approval on the SWPP scope of work in EPA's letter dated June 5, 2024, and awarded a contract in September 2024. The Navy submitted a Pre-Final Draft of the SWAP in October 2024. Navy presented the SWAP to EPA in a meeting on October 28, 2024. EPA provided comments on December 16, 2024. Navy will provide a response-to-comments, propose to meet with EPA, and incorporate comments into the Final SWAP.

- Section 6.2 – Complete Tank Inspection and Cleaning: The National Pollutant Discharge Elimination System (NPDES) permit has been approved, allowing the Navy to proceed with the draining and cleaning of the Camp Smith Tanks (S325, S326, and S327). As a result of unforeseen delays, the Navy submitted an extension request to EPA for the cleaning, inspecting, and sampling of the Camp Smith tanks on December 21, 2023. Tank S-2 is scheduled to be demolished and reconstructed. Tank S-1 work cannot proceed until Tank S-2 is back in service. An extension request to the EPA for the inspection and cleaning of Red Hill Tanks (685 and 316) was submitted on December 21, 2023, because these tanks need to be in service during destructive defueling to provide fire protection. On January 24, 2024, EPA provided approvals for the extension requests of both Camp Smith and Red Hill tanks to May 13, 2024, and September 1, 2025, respectively. Camp Smith Tank S325 was cleaned and inspected with tank disinfection occurring from February 2, 2024, to February 5, 2024. Camp Smith Tank S325 tank was filled on February 7, 2024, by the contractor who at the time was not aware of deficiencies that would prevent the tank from being put back into service. The Navy obtained the draft tank inspection report on February 20, 2024, and was informed that the recommendation from the tank inspection subcontractor was to not put the tank back in service until specific repairs were completed. The Navy has decided to replace the existing S325 tank with a new tank. Efforts are underway to get a project inducted and executed. An estimated timeline for the replacement and cleaning/inspection of the remaining tank(s) and additional extension request was submitted for the Camp Smith tanks on May 6, 2024, and approved by EPA on June 5, 2024, for extension deadline of May 1, 2030. Navy is working internally to determine a path forward for the cleaning and inspection of the Red Hill Tanks.

- Section 6.2 – Cross Connection Control Survey: The Cross Connection Control Survey and Remedial Action Report were submitted on July 3, 2023, and redacted documents were submitted on August 2, 2023.

- Section 6.2 – Closed Inactive Underwater Distribution Lines – Notice of Status of Intent to repair, replace or abandon the Broken Line: Notice of status of intent to repair was submitted on July 3, 2023. Navy received EPA's closeout letter for this deliverable on October 16, 2023.



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- Section 6.3.1 – Sampling of Finished Water Tanks: The Navy’s Drinking Water LTM contract is under review to add in sampling efforts following the 2023 Red Hill ACO Appendix B, as required under this section. The start of this effort is dependent upon the completion of tank inspections and cleaning. A Request for Clarification on sampling requirements for reconstructed tanks was submitted to EPA on July 19, 2024. The EPA provided a response to the Navy on July 22, 2024, confirming that AWWA standards can be followed for tank sampling in place on the ACO Appendix B sampling requirements for newly constructed tanks.
- Section 6.4 – Access to Analytical Results: This information is provided in 2.6(f) of this report. The sample results are posted in the EDMS website for regulators to review and all results are posted on the Safe Waters website monthly. [JBPHH Drinking Water System \(jbphh-safewaters.org\)](http://jbphh-safewaters.org)
- Section 6.5.1.2 – Operations and Maintenance – Submission of Operator SOPs: To comply with 6.5.1.1, a scoping meeting took place on June 28, 2023. The Navy has developed a tracker for all Appendix C requirements, including Operator SOPs, which was shared with EPA for review and commenting on September 1, 2023. The Navy submitted an updated SOP tracker to EPA on December 6, 2023. Early engagement meetings with EPA to ensure successful completion of operator SOPs, recurring monthly meetings were scheduled until May 27, 2024, the due date of this deliverable. During the February 12, 2024, monthly meeting, Navy shared a working draft response with EPA. On March 11, 2024, Navy met with EPA, received questions for clarifications, and submitted responses to those questions on March 14, 2024. Navy received EPA’s written comments on the submitted SOPs on March 22, 2024, and is working on contracting efforts to bring on an Architect-Engineer (AE) to improve existing SOPs and develop remaining SOPs needed to fully comply with the Appendix C requirements. A monthly meeting was held on April 8, 2024, where it was decided future meetings would be postponed until a Navy AE is brought onboard. An extension request was submitted on May 16, 2024 to request new deliverable due date of March 13, 2026. The extension request was approved by EPA on June 5, 2024. The contract was awarded on August 29, 2024. The AE is proceeding with the work; the Navy intends to propose another meeting upon completion of the draft SOP submittal.
- Section 6.5.2 Operations and Maintenance – Asset Management Program: The Asset Management Program was submitted on October 2, 2023. Redacted documents were submitted on November 1, 2023. The Navy received EPA’s request for supplemental information on January 9, 2024, and provided a response by the requested date of March 8, 2024. An addendum to the Asset Management program was submitted to EPA on March 8, 2024. Redacted documents were submitted on March 19, 2024.
- Section 6.5.2 – Operations and Maintenance – Asset Management Program Review Meeting: This meeting was due December 1, 2023 (60 days after submittal of Asset Management Program submitted on October 2, 2023). The Navy met with EPA on November 29, 2023. The EPA provided informal comments on the Asset Management Program submitted on October 2, 2023, to the Navy to guide the meeting discussion topics. At the December 1, 2023, biweekly ACO sync, EPA confirmed that they will be submitting their comments in a formal letter. The Navy



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received EPA's comments in a formal letter on January 9, 2024. Per EPA's comments, an Addendum to the Asset Management Program was submitted on March 8, 2024. A meeting was held on May 9, 2024, for EPA to discuss their comments on the addendum. A follow-up meeting was held on June 17, 2024, to demonstrate Navy's failure scenario for asset management in Maximo. EPA provided formal written comments in a letter on July 25, 2024. The Navy submitted a response to comments on September 30, 2024, to meet deadline specified in EPA's letter. EPA provided a letter of satisfaction on November 15, 2024.

- Section 6.5.3 – Operations and Maintenance – Hydraulic Model Submission and Demonstration: Hydraulic model report submitted on July 3, 2023. Navy requested an extension for the model demonstration for August 18, 2023. EPA provided an approval of the extension request on June 30, 2023. Scope clarification and expectations meeting between Navy, EPA, and DOH was held on August 4, 2023. The hydraulic model demonstration took place on August 17, 2023. Navy received EPA's approval of the JBPHH Hydraulic Model and Report on December 11, 2023.
- Section 6.5.4 – Operations and Maintenance – Submission of Unidirectional Flushing Plan: Due 180 days after EPA's approval of Hydraulic Model (TBD). The start of this effort is contingent to EPA's approval of the hydraulic model deliverables in Section 6.5.3. During the September 22, 2023, biweekly ACO sync, the Navy notified EPA and DOH of plans to contract this effort and request for an extension. EPA provided an approval of the JBPHH Hydraulic Model and Report on December 11, 2023, prompting the due date to June 8, 2024. The Navy submitted an extension request on February 15, 2024, requesting an extended due date to January 20, 2025. The Navy is currently working on the Request for Proposal and scope of work for the AE Contract. The Navy met with EPA to define scope on April 10, 2024. Meeting minutes for this discussion was submitted to EPA for review and approval on April 21, 2024. An example UDF Plan for a different Navy Water System that was developed without a hydraulic model was submitted to EPA on April 21, 2024, for their review and to aid in EPA's decision on how the hydraulic model will be used toward building resiliency for the JBPHH Water System, if not for the development in the UDF Plan. Navy met with EPA on April 30, 2024, to discuss scope of UDF Plan and way forward. Navy awarded a contract for an Architect-Engineer (AE) to develop the UDF Plan and Maintenance Flushing Program on August 29, 2024. In October 2024, the Navy sought clarification if the UDF should follow the areas established in the December 2021 Drinking Water Distribution System Recovery Plan, as specified in the ACO, or if it should follow the areas of the Public Water System (PWS) ID 360. EPA responded via email on October 18, 2024, that the Navy's proposal to design the UDF for the areas of PWS ID 360 is reasonable and acceptable. Navy submitted an extension request to December 15, 2025, in a letter dated January 13, 2025, explaining the reason for the extension request is due to performing more extensive field work prior to finalizing the UDF Plan. EPA responded in a letter on January 22, 2025. A partial extension to July 31, 2025, was granted. The letter explained that further extension requests will only be made if a meeting is held with EPA and DOH by February 21, 2025, and if the Navy verifies and validates valves and hydrants and informally submits a draft UDF Plan by July 31, 2025. The Navy satisfied this condition by meeting with EPA on February 21,





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2025. The Navy gave an update explaining that the contractor has verified and validated the valves and hydrants, the Navy is anticipating sending the draft UDF Plan in March 2025, and is open to a meeting to discuss the plan.

- Section 6.5.5.1 – Operations and Maintenance – Interim Flushing: A Summary of the interim flushing activities for the JBPHH water system was submitted on July 3, 2023.
- Section 6.5.5.2 – Operations and Maintenance – Submission of Maintenance Flushing Program: Due 270 days after EPA approval of Hydraulic Model (TBD). The start of this effort is contingent to EPA’s approval of the hydraulic model deliverables in Section 6.5.3. During the September 22, 2023, biweekly ACO sync, the Navy notified EPA and DOH of plans to contract this effort and request for an extension. EPA provided an approval of the JBPHH Hydraulic Model and Report on December 11, 2023, prompting the due date to September 6, 2024. The Navy submitted an extension request on February 15, 2024, requesting an extended due date to April 20, 2025. Meetings with the EPA to define scope was held on April 16, 2024, and April 30, 2024. Navy awarded a contract for an Architect-Engineer (AE) to develop the UDF Plan and Maintenance Flushing Program on August 29, 2024. The AE has conducted field work and staff interviews and is working on the draft submittal.
- Section 6.5.5.3 – Operations and Implement Maintenance Flushing Program Plan: Due 30 days after the submittal of the Maintenance Flushing Program (TBD). The start of this effort is contingent to EPA’s approval of Section 6.5.5.2.
- Section 6.5.6.1 – Operations and Maintenance – Update Valve Inventory: The valve inventory update was submitted on October 2, 2023. Redacted documents were submitted on November 1, 2023.
- Section 6.5.6.2.1 – Operations and Maintenance – Valve Exercising Program (VEP) Submission was due on January 30, 2024 (120 days after updating Valve Inventory submitted on October 2, 2023). The Navy is in the process of developing a draft program. In consideration of EPA’s feedback on the Asset Management Program, the Navy is planning to make substantial revisions to the draft Valve Exercising Program. The Navy submitted an extension request for an additional 45 days (March 15, 2024) to incorporate EPA recommendations and received EPA’s approval on January 22, 2024. The Navy submitted a working draft of the VEP submittal to EPA on February 15, 2024, and a meeting to discuss comments was held on February 27, 2024. The Navy submitted a second extension request on March 8, 2024, requesting new due date of July 15, 2024, to address EPA written comments, and received an approval letter on April 3, 2024. EPA written comments on the working draft VEP was received by the Navy on March 22, 2024. Navy provided an updated draft to EPA on April 9, 2024, and response to comments on April 14, 2024. A meeting with EPA to discuss the updated draft and response to comments was held on April 15, 2024. Navy provided additional pending responses on May 3, 2024. Navy received EPA’s written comments on the updated Read Ahead on June 12, 2024. Navy revised the VEP and submitted another Read Ahead and Response to Comments on June 24, 2024. A meeting was held on June 25, 2024, to discuss EPA’s comments and the revised VEP. EPA provided additional comments on the VEP. Navy submitted an extension request on July 8, 2024. On July 17, 2024, EPA granted a conditional extension for requested date of December 15, 2024. Navy met with EPA on August 7,



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2024, to discuss the potential of modifying the ACO in support of aligning valve exercising frequency to industry standards. A meeting was held on October 4, 2024, to discuss more details, followed by additional discussion in the October 18, 2024, biweekly meeting. The Navy sent a letter to EPA on December 8, 2024, requesting an extension to June 15, 2025. EPA provided a partial extension in a letter dated December 15, 2024, provided that the Navy submit proposed modification per ACO Section 8(a), and incorporation of interim milestones. The Navy sent a draft of the proposed modification wording to EPA in an email on December 20, 2024, and intends to meet with EPA in early January 2025. A meeting with EPA was held on February 21, 2025, to discuss path forward on modification language. Navy presented proposed categories for valves to not be exercised along with an estimated numerical breakdown. Navy will send revised proposed modification wording to EPA.

- Section 6.5.6.2.2 – Operations and Maintenance – Valve Replacement: Valves categorized as, “in need of replacement,” and identified during the Valve Exercise Program under Section 6.5.6.2.1 will be repaired/replaced NLT 60 days after identification for replacement. As stated in the ACO, additional time to replace certain valves may be necessary upon agreement between Navy and EPA.
- Section 6.5.7 – Operations and Maintenance – Cross Connection Control Program (CCC-BFP): The CCC-BFP Program was originally due on October 31, 2023 (120 days from CCC Survey submitted on July 3, 2023); however, in support of the Navy incorporating feedback from EPA’s comments on the CCC-BFP Survey, EPA approved an extension and the Navy submitted the CCC-BFP Program on January 12, 2024. Section 6.5.7 also requires the Navy to commence implementation of the CCC-BFP Program 30 days after the CCC-BFP Program submittal. The Navy submitted an extension request for the commencement of implementation requirement to the EPA on February 5, 2024, and received an approval on February 9, 2024, for a new due date of April 30, 2024. In the bi-weekly ACO Sync call on the February 23, 2024, EPA instructed Navy to submit a finalized POAM and establish routine progress reporting through both written monthly progress reports and quarterly meetings. Received EPA comments on NAVFACHIINST from EPA on March 29, 2024, for Navy review and comment responses which may impact some of the POAM line items. The POAM for implementation was submitted on April 30, 2024. Navy is currently working on contracting efforts to bring on an AE to develop the CCC-BFP Program. The contract was awarded on September 5, 2024. A meeting was held on November 22, 2024, with EPA, DOH, and the Navy and its AE to discuss the contract and EPA’s previously submitted comments. A draft of the meeting minutes was distributed on November 29, 2024, and finalized on December 27, 2024.
- Section 6.5.8 – Operations and Maintenance – Capital Improvement Plan Submittal of Capital Improvement Plan: The Capital Improvement Plan and Project List was submitted on October 2, 2023. The plan included a list of specific projects that have been or will be submitted (upcoming program year 2027) for MILCON or other centralized funding. Redacted documents were submitted on November 1, 2023.
- Section 6.5.8 – Operations and Maintenance – Capital Improvement Plan Submittal of List of Specific Projects: Due 30 days after submittal of Capital



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Improvement Plan. The List of Specific Projects was submitted on October 2, 2023, as part of the Capital Improvement Plan required in Section 6.5.8.

- Section 6.5.9 – Operations and Maintenance – Chemical Use, Storage, and Handling: Documentation of chemicals used in the water treatment process for JBPHH water system was submitted on July 3, 2023. A follow-up meeting between Navy and EPA was held on August 3, 2023. Navy submitted follow-up information in response to EPA’s requests on September 18, 2023. Navy received EPA’s closeout letter for this deliverable on October 16, 2023.
- Section 6.6 - Submission of Certified Public Notice: Certified public notice submitted on June 12, 2023. On the July 14, 2023, biweekly ACO sync between the Navy, EPA, and DOH, the EPA requested that Navy submit a copy of the individual notice to residents as a supporting document for this deliverable. The Navy submitted the supporting document on August 23, 2023. Navy received EPA’s closeout letter for this deliverable on October 16, 2023.
- Section 6.7.1 – Designation of Operator – All System operators: Listing of System Operators and certifications submitted on June 12, 2023. On July 14, 2023, the EPA requested that Navy follow-up with DOH regarding a potential typo in the original submittal. Navy investigated, followed up with DOH, and resubmitted a corrected list of system operators and certifications on July 17, 2023. Navy received EPA’s closeout letter for this deliverable on October 16, 2023.
- Section 6.7.2 - Operator Logs/Schedules: During the June 2024 EPA drinking water inspection, EPA requested the operator schedule. A copy of the revised operator schedule was provided to EPA in a letter dated December 6, 2024.
- Section 6.8 – Revise Previously Submitted Risk and Resilience Assessment (RRA) and certify to EPA: The RRA was updated, and a copy of the certification sent to [awiaservicedesk@epa.gov](mailto:awiaservicedesk@epa.gov), and submitted to EPA on July 17, 2023, with a tracker providing a cross-reference for each edit requested in the National Enforcement Investigations Center (NEIC) inspection and 2023 ACO. The RRA will be available for review upon request at JBPHH. EPA reviewed the document during their inspection on June 7, 2024.
- Section 6.9 - Revise Previously Submitted Emergency Response Plan and Certify to EPA: The ERP was updated, a copy of the certification sent to [awiaservicedesk@epa.gov](mailto:awiaservicedesk@epa.gov), and submitted to the EPA on August 1, 2023, with a tracker providing a cross-reference for each edit requested in the NEIC inspection and 2023 ACO. The ERP will be available for review upon request at JBPHH. EPA reviewed the document during their inspection on June 7, 2024.
- Section 6.10 - Records: During the June 2024 EPA drinking water inspection, EPA requested documents pertaining to the aforementioned ACO section. Examples of Supervisory Control and Data Acquisition SCADA Operator Logs, Rover Monthly Preventative Maintenance Work Orders, Handwritten Operator SCADA Logs were provided to EPA in a letter dated December 6, 2024. The letter also explained that location keywords are used to determine which records are applicable to PWS No. 360. EPA responded in a letter dated December 15, 2024, requesting revision and resubmission of the Rover Monthly Preventative Maintenance Work Order, and submission of the Roving Operator Daily Log. The letter stated the documents are



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expected to be submitted by January 31, 2025. The Navy provided a response on January 31, 2025.

- Section 6.11 – Complaint Investigation Procedures: The complaint call log was updated on the Safe Waters Website on February 5, 2025. The complaint flow chart for both TPH and Non-TPH related calls was submitted and posted on the Safewaters website. Navy submitted latest flowcharts on August 15, 2024.
- Section 6.12 – Surveillance and Response System - Submit Plan: The Navy is working on a pilot study using purchased in-line analyzer units that will be installed at the Red Hill Shaft. These units will be compared to existing units in that location to calibrate a baseline and appropriate response levels for utilization in the distribution system. Information from this study will inform the final Surveillance and Response System Plan that will be submitted to the regulators for review. The Navy provided the draft report to EPA for review and had a call to discuss comments on August 10, 2023. These comments were incorporated in the working draft submitted on August 31, 2023. EPA comments were received on November 14, 2023. Navy Comments were sent out in May 2024. The Red Hill Pilot Study, currently in progress, will help inform and finalize the response procedures used in the Final SRS plan.

**Section 2.6(b): Describe the actions (including plans for contractor procurement) taken to comply with the 2023 Consent Order and this SOW, including any significant deviations from approved plans.**

- Section 2 – Project Coordination:
  - Coordination with HI Department of Health (DOH)
    - Discussed approaches to tank closure and schedules during biweekly Technical Closure Working Group meeting.
    - Established a biweekly tank closure working group to discuss facility closure elements.
    - Monthly Senior Executive Service (SES) meetings between Navy, DLA, EPA, and DOH were held on February 7 and 21, 2025.
  - 2025 Community Engagement Plan and Actions
    - 10 FEB: NCTF-RH hosted Uncle Kalani Whitford, retired federal firefighter, to observe a Concept of Operations (CONOP) brief
    - 11 FEB: NCTF-RH attended Aiea Neighborhood Board
    - 13 FEB: NCTF-RH attended Ewa Neighborhood Board
    - 13 FEB: NCTF-RH attended Aliamanu/Salt Lake Neighborhood Board
    - 24 FEB: NCTF-RH hosted a webinar on tank cleaning
    - 25 FEB: NCTF-RH attended Pearl City Neighborhood Board
    - Summaries of previous CRI meetings and the Navy's responses to CRI member questions can be found on the Navy Region Hawaii 2023 ACO CRI website: [Community Representation Initiative \(navy.mil\)](https://www.navy.mil/CommunityRepresentationInitiative)
  - Navy 2023 Consent Order Website
    - Biweekly updates continue to be published, which include 2023 Consent Order deliverables, redacted documents, and public





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engagement actions (please refer to Section 2.6e of this report for detailed website posting information).

- Section 3 – Facility Maintenance and Release Detection: Soil Vapor Monitoring sampling frequency remains at once per week and all results are uploaded into EDMS for regulator review.
- Section 5 - Facility Closure: Navy continues to hold technical working group meetings with both DOH and EPA on a weekly basis. Tank cleaning and pipeline demolition remain on schedule.
  - Tanks 7 and 8: Completed pressure washing; third-party tank cleanliness validation.
  - Tanks 5 and 6: Continued with structural repairs and modifications.
  - Tanks 3 and 4: Preparations for degassing.
  - Pipeline Removal: Crane modifications completed.
- Section 6 – Drinking Water Protection: The Navy is continuing with contracted efforts for 6.1.2.2 and 6.1.2.3 SWPP, 6.5.4 UDF Plan, 6.5.5.2 Maintenance Flushing Program, 6.5.1.2 Operator SOP, and 6.5.7 Cross-Connection Control Program deliverables

**Section 2.6(c): Describe all work planned for the next two (2) months.**

- Section 2 – Project Coordination: The Navy will continue to meet with EPA and DOH on a regular basis. Project Coordinators for the ACO from the Navy, EPA, and DOH meet biweekly, and SES-level meetings are conducted biweekly.
  - 11 MAR: Aiea Neighborhood Board operational brief
  - 12 MAR: NCTF-RH quarterly open house
  - 13 MAR: Aliamanu-Salt Lake-Foster Village-Airport Neighborhood Board operational brief
  - 13 MAR: Ewa Neighborhood Board operational brief
  - 09 APR: Fuel Tank Advisory Committee (FTAC)
  - 10 APR: Red Hill Remediation Roundtable
- Section 3 – Facility Maintenance and Release Detection: Soil Vapor Monitoring sampling frequency remains once a week and all results are uploaded into EDMS for regulators to access.
- Section 5 – Facility Closure: The Navy will continue meeting weekly with EPA and DOH in support of discussions on tank cleaning, pipeline removal and closure design contract developments. Biweekly working group meetings specifically for tank closure discussions will continue.
  - Tanks 7 and 8: Compiling tank cleaning QV reports for Regulatory Agency review and approval.
  - Tanks 5 and 6: Continuing center tower and catwalk repairs and modifications; Removal of spiral staircase plan being developed.
  - Tanks 3 and 4: Preparing for degassing to start on 12 March.



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- Pipeline Removal: Load testing completed on modified crane. Asbestos abatement will commence mid-March.
- Section 6 – Drinking Water Protection:
  - 6.5.4. - Continue contract with AE for the Unidirectional Flushing Plan. Anticipating the draft submittal being available for EPA review in March 2025.
  - 6.5.5.2 - Continue contract with AE for the Maintenance Flushing Program.
  - 6.1.2.2 - EPA approved of scope. Contract work with AE will continue. Navy presented the SWAP to EPA in a meeting on October 28, 2024. Navy is addressing EPA comments and will propose a meeting to discuss responses.
  - 6.5.1.2 - Contract work with AE will continue.
  - 6.5.7 - Contract work with AE will continue. Anticipating the draft submittal being available for EPA review in early 2025.
  - 6.5.6.2.1 - Developing interim goals to reach 100% valve exercising. Schedule meetings to discuss current requirements and potential changes with EPA. Navy will send proposed modification language to EPA.

**Section 2.6(d): Describe all problems encountered and any anticipated problems, any actual or anticipated delays, and solutions developed and implemented to address any actual or anticipated problems or delays.**

- Section 2 – Project Coordination: No anticipated project coordination problems or delays with EPA and DOH are anticipated.
- Section 3 - Facility Maintenance and Release Detection: No SVM problems or delays anticipated.
- Section 5 – Facility Closure: Unforeseen spiral staircase in tank 6 must be removed prior to pressure washing that tank. Continuing discussions around way forward on characterization of cloth rub test residue.
- Section 6 – Drinking Water Protection:
  - 6.2 – Camp Smith S325 tank was disinfected and filled in early February but there are tank deficiencies that would prevent the tank from being put back into service. The Navy has decided to replace tank S325 and efforts are underway to induct a project for execution.
  - 6.3.1 - The Navy's contractor had limited availability to dechlorinate the Camp Smith tank water for discharge which delayed the issuance of Navy's NPDES permit. Recently, the valve used to isolate Camp Smith tanks was found to be unable to fully shut. The Navy is working on a solution to resolve the isolation issue and allow the inspection and cleaning to resume. The inspection and cleaning of the Red Hill tanks has been postponed; the Navy is working on a plan to take a tank offline.
  - 6.5.4 - Navy submitted a request to extend the due date for the Unidirectional Flushing Plan in accordance with Section 8 of the ACO. This work has been contracted as the current in-house labor for Utilities projects is at capacity.
  - 6.5.5.2 - Navy submitted a request to extend the due date for the Maintenance Flushing Program in accordance with Section 8 of the ACO. This work has



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been contracted with the ACO Section 6.5.4 Unidirectional Flushing Plan for the same reason.

- 6.5.6.2.1 - Navy submitted an extension request for the Valve Exercising Program. Navy noted that currently, all valves four inches and greater are not able to be exercised annually. The Navy will continue to discuss a path forward with EPA.
- 6.5.7 - The Navy is working on establishing/identifying an Acting CCC-BFP Program Manager and Acting Site Managers (Facility related assets and Utility related assets) until permanent staff is obtained. In addition, support staff to the program (certified inspectors from Facility Sustainment Plumbing or Pipefitting Shop or Utilities Management Water personnel) will need to either be management reassigned or new hires for permanent positions are obtained.
- 6.12 - Navy to submit Revised SRS Plan.

**Section 2.6(e): Describe any public and stakeholder relations activities, including a summary of public inquiries and Navy and DLA responses.**

- Public and Stakeholder Relations Activities:
  - 11 FEB: STAFFDEL Yost (Hirono) Red Hill brief
  - 11 FEB: Aiea Neighborhood Board
  - 13 FEB: Ewa Neighborhood Board
  - 13 FEB: Aliamanu/Salt Lake Neighborhood Board
  - 19 FEB: STAFFDEL Velasquez (For Country Caucus) Red Hill brief
  - 20 FEB: Red Hill Water Alliance Initiative (WAI) meeting
  - 21 FEB: STAFFDEL Nelson (Rep Case) Red Hill on-site engagement
  - 24 FEB: Tank cleaning webinar
  - 25 FEB: Pearl City Neighborhood Board
  - Public Inquiries and Navy/DLA Responses: N/A
  - NCTF-RH Website/APP:
    - 1-28 FEB: Uploaded Air Quality Monitoring (AQM) Data Reports (Monday – Friday ONLY and excluding Federal holidays)
    - 06 FEB: Uploaded Open House and Tank Cleaning webinar graphics to homepage.
    - 07 FEB: “Let’s Talk Red Hill” Episode 14 – Environmental Remediation
    - 07 FEB: Uploaded AQM Monthly Data Report (JAN 2025)
    - 13 FEB: Press Release: Tank Cleaning webinar
    - 13 FEB: “Let’s Talk Red Hill” Episode 15 – Pressure Washing
    - 21 FEB: “Let’s Talk Red Hill” Episode 16 – Tank Cleaning
    - 24 FEB: Posted Tank Cleaning Webinar to Media > Videos section
    - 25 FEB: Posted Tank Cleaning Webinar on homepage > Latest Updates section
    - 25 FEB: Posted the Community Engagement Monthly Report (FEB 2025) to the Community Events page
    - 25 FEB: Created an archive subpage for the 2024 CE/SE monthly reports.



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- 27 FEB: Posted a PRESREL – Public Open House to NCTF-RH website.
- 27 FEB: “Let’s Talk Red Hill” Episode 17 – Upcoming Events
- 2023 ACO Website:
  - 20 FEB: Uploaded JAN 2025 Monthly FAQ Document

**Section 2.6(f): Include a summary of all results of sampling and testing (including field measurements) generated or received by Navy and DLA and indicate where the results of sampling and testing can be found.**

- The sample and testing results are uploaded into EDMS for regulators to review and all results are posted on the Safe Waters website monthly. JBPHH Drinking Water System (jbphh-safewaters.org).