

#### ACO Monthly Status Report (September 1, 2025 – November 30, 2025)

This report combines progress updates for September, October, and November 2025 due to the government shutdown and subsequent mandatory NCTF-RH personnel furlough. To address the lapse in monthly submissions, a Furlough Extension Request was submitted to EPA on November 19, 2025, and approved by EPA on November 21, 2025.

The table below provides information to fulfill the 2023 ACO requirements of the following sections: Section 2.6(a): List and provide the status of all deliverables required by the 2023 Consent Order and this SOW. 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 2.6(c): Describe all work planned for the next two (2) months. 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.

Legend-

· ·	Completed
	On Schedule
	At Risk of Delay
	Delayed

Submittal / Deliverable	Status	Activity
Section 2.5 - Sampling and Analysis Plan		Actions Taken during Prior Month(s)- All the Navy's current sampling efforts are completed under previously approved sampling and analysis plans.  Work Planned (Next 2 Months)- Nothing significant to report.  Problems or Delays- Nothing significant to report.
Section 2.6 - Progress reports		Actions Taken during Prior Month(s) - This document is the monthly progress report for September, October, and November 2025.  Work Planned (Next 2 Months)-



	The Navy will continue to submit monthly progress reports as scheduled.  Problems or Delays- Nothing significant to report.
Section 5.2.1 – Interim Phase 1 Closure Report(s)	Actions Taken during Prior Month(s) - Received comments from DOH on November 3, 2025 and EPA on November 4, 2025. On November 22, 2025, the Navy received comments on the Analytical Wipe Sampling Methodology letter sent to Regulatory Agencies on September 30, 2025. As a next step in achieving consensus on the tank cleaning verification requirements, an in-person Additional Analyte Working Group meeting was held on December 3, 2025 with participants from Navy, DOH and EPA.  Work Planned (Next 2 Months) Finalize analytical wipe sampling methodology for tank cleaning verification Execute remaining physical closure modifications per Tank Closure Plan Supplement 4 - Begin drafting report for Tanks 7 & 8  Problems or Delays Revisions to residue characterization methodology could impact timeline and requirements for tank cleaning verification and closure schedule Final tank Cleaning QV / Closure QV reports will include all physical closure modifications to tank which are dependent upon pending contract modifications for completion.
Section 5.2.4 – Final Phase 1 Closure Report (To be submitted within 180 days of Final Phase 1 Closure Inspection)	Actions Taken during Prior Month(s) - Not applicable. Based on the current Integrated Master Schedule, the Navy projects December 2028 for the Final Facility Closure Inspection and



	the Final Phase 1 Closure Report, due no later than June 2029.
	Work Planned (Next 2 Months)- Not applicable
	Problems or Delays- Revisions to tank cleaning verification requirements could impact timeline to close tanks.
Section 5.3 – Phase 2 Closure Report	Actions Taken during Prior Month(s) - 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. Site Assessment Field Investigation sampling work commenced July 2025 and is ongoing.  Work Planned (Next 2 Months)- Site Assessment Field Investigation work will continue over next several months; report is scheduled to be completed in 2026.  Problems or Delays- Nothing significant to report.
Section 6.1.1 – Source Water Protection Plan (SWPP) Phase I (Red Hill Shaft)	Remarks- Navy sent EPA initial draft of SWPP Phase 1 on June 15, 2023. Navy received comments on July 18, 2023, and responded to comments on July 31, 2023.
Section 6.1.2.3 - Source Water Protection Plan Phase II	Actions Taken during Prior Month(s) - Navy began routing the Source Water Assessment Plan (SWAP) for submittal to EPA. The Navy received the draft SWPP in September and is currently reviewing it.
	Work Planned (Next 2 Months)-The draft SWAP and SWPP will remain under internal review.



	<b>Problems or Delays-</b> SWAP may require a contract modification to address additional internal comments.
Section 6.2 – Complete Tank Inspection and Cleaning of the Camp Smith finished water tanks S325, S326, and S327 and Red Hill finished water tanks 316 and 685, and Halawa finished water tanks S1 and S2	Actions Taken during Prior Month(s) - The sample results and certification letter for Red Hill Tank 316 were sent to DOH on September 16 and October 3, 2025, respectively. DOH gave the Navy approval to place Tank 316 back into service on November 12, 2025. Navy's contractor has revised the drainage plan for Red Hill Tank 685. Navy's contractor encountered issues when refilling Halawa S2 tank, which was then addressed; refilling has resumed.  Work Planned (Next 2 Months)- Navy is working towards bringing Tank 316 back
	online. Once Tank 316 is online and after the contract modification is completed to account for the change in the drainage plan, work will begin on Tank 685. Work will continue on Halawa S2 tank.
	<b>Problems or Delays-</b> Due to the delays in bringing Tank 316 back online and the change in the drainage plan, the Navy will likely request an extension for the Red Hill tanks; the Navy is currently evaluating the schedule.
Section 6.2 – Cross Connection Control Survey	Remarks- Cross Connection Control Survey was submitted on July 3, 2023.
Section 6.2 – Closed Inactive Underwater Distribution Lines – Notice of Status of Intent to repair, replace or abandon the Broken Line	Remarks- 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.
Section 6.3.1 – Sampling of Finished Water Tanks	Actions Taken during Prior Month(s) - See "Section 6.2 – Complete Tank Inspection and Cleaning"



	Work Planned (Next 2 Months)- See "Section 6.2 – Complete Tank Inspection and Cleaning".  Problems or Delays- See "Section 6.2 – Complete Tank Inspection and Cleaning"
Section 6.4 – Access to Analytical Results	Remarks- Drinking water 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).
Section 6.5.1.2 – Operations and Maintenance – Submission of Operator SOPs	Actions Taken during Prior Month(s) - Navy sent draft Operator SOPs to EPA for review on August 8, 2025. EPA provided comments on four of the SOPs on September 15, 2025 and provided comments on the remainder of the SOPs on October 7, 2025.  Work Planned (Next 2 Months)- Navy is incorporating EPA comments and will look to work comments into the final SOPs submission in March 2026.  Problems or Delays- Nothing significant to report.
Section 6.5.2 – Operations and Maintenance – Asset Management Program	Remarks- The Navy submitted a response to comments on September 30, 2024. EPA provided a letter of satisfaction on November 15, 2024.
Section 6.5.2 – Operations and Maintenance – Asset Management Program Review Meeting	Remarks- Navy met with EPA on November 23, 2023, which was 60 days after the submittal of the Asset Management Program (submitted December 1, 2023).
Section 6.5.3 – Operations and Maintenance – Hydraulic	Remarks-



Model Submission and Demonstration	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 (UDF)	Actions Taken during Prior Month(s) - Navy responded to EPA comments by the requested date of September 26, 2025.  Work Planned (Next 2 Months)- Navy awaiting EPA response.  Problems or Delays- Not Applicable
Section 6.5.5.1 – Operations and Maintenance – Interim Flushing	Remarks- 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	Remarks- Navy received EPA's approval of the Maintenance Flushing Program on August 26, 2025.
Section 6.5.5.3 – Operations and Implement Maintenance Flushing Program Plan	Actions Taken during Prior Month(s) - Navy submitted its implementation letter on September 8, 2025. In a letter dated September 15, 2025, EPA stated the requirements of the section have been fulfilled. Navy began unidirectional flushing of the system on October 6, 2026. A system wide UDF will be completed with 18 months.  Work Planned (Next 2 Months)- See above.  Problems or Delays- Not Applicable
Section 6.5.6.1 – Operations and Maintenance – Update Valve Inventory	Remarks- The valve inventory update was submitted on October 2, 2023.



Section 6.5.6.2.1 – Operations and Maintenance – Valve Exercising Program (VEP)	Actions Taken during Prior Month(s) - Navy received EPA comments on the VEP on August 26, 2025 and is in the process of responding to the comments and revising the VEP.
	Work Planned (Next 2 Months)- Navy will work to provide a response to EPA comments before the agreed upon date of December 5, 2025.
	Problems or Delays- Not Applicable
Section 6.5.6.2.2 – Operations and Maintenance – Valve Replacement	Actions Taken during Prior Month(s) - Not Applicable
	Work Planned (Next 2 Months)- The start of this effort is contingent on EPA's approval of Section 6.5.6.2.1.
	Problems or Delays- Not Applicable
6.5.7 - Cross Connection Control (CCC) Program	Actions Taken during Prior Month(s) - Navy and EPA met on September 9, 2025 to discuss EPA's new comments and current Navy CCC efforts.
	Work Planned (Next 2 Months)- The Navy will finalize the report and submit to EPA by December 31, 2025.
	Problems or Delays- Nothing significant to report.
Section 6.5.8 – Operations and Maintenance – Capital	Remarks- The List of Specific Projects was submitted on
Improvement Plan Submittal of List of Specific Projects	October 2, 2023. Navy received EPA's closeout letter for this deliverable on October 16, 2023.
Section 6.5.9 – Operations	Remarks-
and Maintenance – Chemical	Final correspondence for this item was submitted
Use, Storage, and Handling	on September 1, 2023. Navy received EPA's



	closeout letter for this deliverable on October 16, 2023.
Section 6.6 - Submission of Certified Public Notice	Remarks- The final Certified Public Notice was submitted 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	Remarks- The final list of system operators and certifications was submitted July 17, 2023. Navy received EPA's closeout letter for this deliverable on October 16, 2023.
Section 6.7.2 - Operator Logs/Schedules	Remarks- 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	Remarks- The RRA was submitted on July 17, 2023. 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	Remarks- The ERP was submitted on August 1, 2023. 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	Remarks- Navy submitted records in letters dated December 6, 2024 and January 31, 2025.
Section 6.11 – Water Quality Concern and Response Investigation Procedures	Actions Taken during Prior Month(s) - The concern call log was updated on the Safe Waters website on November 6, 2025. The Water Quality Action Team (WQAT) Standard Operating Procedures (SOP) were submitted to EPA on June 9, 2025, and the Navy responded to those comments on July 21, 2025.



	Work Planned (Next 2 Months)- Navy will submit the revised version of the WQAT SOP following the final EPA review of the EDWM report; expected by January 2026.  Problems or Delays- Not Applicable
Section 6.12 – Surveillance and Response System (SRS) - Submit Plan	Actions Taken during Prior Month(s) - The SRS Plan was submitted to EPA on September 1, 2023. The Navy received comments from EPA on April 2, 2024 and July 18, 2025, which will be incorporated into a revised SRS Plan. However, before the SRS Plan can be updated, there are multiple pending Navy efforts that need to be completed beforehand, leading to an ETC of August 2026 for the SRS Plan revision submission.  Work Planned (Next 2 Months)- Nothing significant to report.  Problems or Delays- Not Applicable

#### 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:
  - 09 SEP: OASD EI&E HON Dale Marks Red Hill site visit
  - o 16 SEP: Honolulu Local Emergency Planning Committee (LEPC)
  - o 24 SEP: NCTF-RH Webinar Safety Programs
  - o 26 SEP: University of Hawaii Red Hill Registry Red Hill site visit
  - 30 SEP: Commission on Water Resource Management & Hawaii Dept. Of Land
     & Natural Resources Red Hill site visit
  - o 01 OCT: Fuel Tank Advisory Committee
  - 19 NOV: 01OCT Fuel Tank Advisory Committee part 2
- Public Inquiries and Navy/DLA Responses:
  - Frequently asked questions and Navy/DLA responses can be found at the following website - <a href="https://cnrh.cnic.navy.mil/Operations-and-Management/Red-Hill/2023-Administrative-Consent-Order/Frequently-Asked-Questions/">https://cnrh.cnic.navy.mil/Operations-and-Management/Red-Hill/2023-Administrative-Consent-Order/Frequently-Asked-Questions/</a>.



- NCTF-RH Website, App and YouTube Uploads:
  - o 02 SEP: Red Hill Highlights 24<sup>th</sup> Edition
  - o 09 SEP: Red Hill Highlights 25<sup>th</sup> Edition
  - o 11SEP: Photos NCTF-RH Hosts Hon. Dale Marks at RHBFSF
    - DVIDS
    - NCTF-RH website
  - 15 SEP: Podcast: Let's Talk Red Hill, Episode 36 Webinar and Operations Update
  - 16 SEP: Red Hill Highlights 26<sup>th</sup> Edition
  - o 18 SEP: Photos Honolulu Local Emergency Planning Committee
    - DVIDS
    - NCTF-RH website
  - 25 SEP: Webinar Safety Programs
  - o 30 SEP: Red Hill Highlights 27<sup>th</sup> Edition
  - o 10 NOV: Press Release: Tank 20 Degassing
  - 12 NOV-present: Air Quality Monitoring daily and hourly updates (website and mobile app)
  - o 19 NOV: Red Hill Highlights 28<sup>th</sup> Edition
  - o 20 NOV: Red Hill Highlights Special Edition (Anniversary Edition)

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).