

JBPWH PWS-360 Risk and Resilience Assessment Updates to Address EPA 2023 Red Hill ACO

Comment/Recommendation Source	Recommendation Description	Page Addressed in ERP/RRA	Notes
EPA NEIC Civil Investigation Report dated APR 2022 - ERP (Observation 10)	NEIC inspectors observed the JBPWH PWS ERP was missing the following:		
	Discussion of the strategies and resources to improve the resilience of the system, including the physical security and cybersecurity of the system.	ERP Section 2.11	NAVFAC HI completed EPA's Cybersecurity Assessment tool in June 2023 and through this process identified some areas to improve. The items, with the exception of the Incident Response Plan (IRP), were corrected and incorporated into operations and practices. The IRP is forthcoming.
	Discussion of the strategies that can be used to aid in the detection of malevolent acts or natural hazards that threaten the security or resilience of the system.	ERP Section 2.14-2.15	
	Discussion that the Navy will coordinate to the extent possible with local emergency planning committees established under the Emergency Planning and Community Right-To-Know Act (EPCRA) of 1986 when preparing or revising an assessment or emergency response plan under the AWIA.	ERP Section 1.8	
	Statement that the Navy will maintain a copy of the assessment and emergency response plan for 5 years after certifying the plan to the EPA.	ERP Section 1.8	Statement added to section 1.8
	NEIC inspectors observed the following inconsistencies in the ERP's purpose or when to use the plan:		
	JBPWH PWS staff stated they were not aware of their responsibilities described in the ERP. JBPWH PWS staff stated the ERP applied to natural disasters or malicious acts, not to contaminants within the system.	ERP Pg. 55-56, Pg. 65	PWS staff need to read and understand their responsibilities within the ERP, 2.21 Training Staff should be trained on their ERP responsibilities.
	In some places, the ERP includes discussions that natural disasters and emergency events may cause damage to potable water through hurricanes, earthquakes, threats, or introduction of contaminants into the water system; in other areas, the ERP only refers to natural disasters and malicious acts.		There are definitions, and then how to prepare and respond. Terminology may vary in report; however, ERP will still be appropriately followed.
	The ERP lacks a description of the response steps necessary for addressing an uncontrolled release of the Red Hill bulk fuel storage facility, a unique threat that can impact the JBPWH PWS.	ERP Pg. 55-56	2.20. Emergency Response Plans, section 2.20.1 (starting on pg. 55 through Monitoring on pg. 56)
	The ERP states that training will be conducted on the "contingency plans within the ERP" and that "staff should be trained on their ERP responsibilities." JBPWH PWS staff stated they had not received training on the plans in the ERP. Additionally, the ERP states that training should be provided annually and should include testing of the response procedures outlined in the ERP. In several locations, the ERP states the plan should be tested regularly using a simulated disruption; this is also reiterated in the executive summary in an all caps "NOTE."	N/A	Navy will ensure that training is conducted in accordance with the ERP.
The ERP Appendix D checklist does not adequately detail the steps water operators should take, or guidance required, for inspecting system assets. For example, when the operator smelled fuel on November 20, 2021, the water operator did not inspect the Red Hill shaft and did not have training on how to use the checklist in the ERP.	ERP Pg. 55-56	Appendix D acts as a site assessment report as part of 2.15.2. Report is filled out by team members familiar with the water system. Referencing back and following the body of the ERP should result in the source being resolved. Navy will ensure that training is conducted in accordance with the ERP.	
Inspectors observed inconsistencies between a table that identifies the booster pumps within the system but does not include the Camp Smith booster pumps that are depicted on the map in the ERP.	RRA Pg. 18, ERP 21	2.6.1.5 of the RRA describes how the Camp Smith Booster Pumps operate. Further information is listed on pages 20 and 21 of the ERP. Note that the Halawa booster pumps, which pump to Camp Smith, are near the Halawa Shaft.	
EPA 2023 Red Hill Administrative Consent Order (SOW Item 6.9)	Within sixty (60) days after the Effective Date, Navy shall submit a certification to EPA that Navy has revised the previously certified Emergency Response Plan to include all required elements in 42 U.S.C. § 300i-2(b)		
(1) Strategies and resources to improve the resilience of the system, including the physical security and cybersecurity of the system;	ERP Section 2.11	NAVFAC HI completed EPA's Cybersecurity Assessment tool in June 2023 and through this process identified some areas to improve. The items, with the exception of the Incident Response Plan (IRP), were corrected and incorporated into operations and practices. The IRP is forthcoming.	
(2) Plans and procedures that can be implemented, and identification of equipment that can be utilized, in the event of a malevolent act or natural hazard that threatens the ability of the community water system to deliver safe drinking water;	ERP Section 2.20		
(3) Actions, procedures, and equipment which can obviate or significantly lessen the impact of a malevolent act or natural hazard on the public health and the safety and supply of drinking water provided to communities and individuals, including the development of alternative source water options, relocation of water intakes, and construction of flood protection barriers;	ERP Section 2.15, Appendix F.		
(4) Strategies that can be used to aid in the detection of malevolent acts or natural hazards that threaten the security or resilience of the system.	ERP Section 2.15		