

JBPHH 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
DOH SWDB Email dated 29 NOV 2022	Cybersecurity Alert - https://www.cisa.gov/uscert/ncas/alerts/aa22-321a	RRA Pg. 27	CIO & ICS Manager answered "No" on 6 out of the 33 survey questions. Most of these "Nos" are not applicable due to our control system infrastructure. 2 of the questions are addressed in the RRA.
EPA NEIC Civil Investigation Report dated APR 2022 - RRA (Observation 11)	NEIC inspectors reviewed JBPHH PWS's risk and resilience assessment (RRA) and found that it did not adequately address risks to the system:		
	The RRA did not include the Red Hill bulk fuel storage facility as a risk to the JBPHH PWS. The RRA addressed risks from a military attack and did not address a chemical attack or accidental acts that could harm the water system.	Pg. 61 of RRA	
	A table in the RRA listed the Red Hill shaft as no threat of waterborne contamination to the JBPHH PWS.	Pg. 52 of RRA	Red Hill Well Site was evaluated using asset category 0, critical infrastructure & industrial equipment. The asset did not reach the .51 for either asset value or threat likelihood and were not considered for further evaluation using the risk management process in UFC 4-020-01, and should only consider other requirements See Table 4-15. Threat of contamination is addressed on page 62 of RRA.
	The SCADA system was listed as a low risk. Operators do not have individual SCADA log-ins and use a standard administrator log in to access the system.	Pg. 27 of RRA	Operators now have individual log-ins.
	The RRA did not adequately address the resilience of the original cast-iron pipes in the system.	Pg. 25 of RRA	
	The RRA did not adequately address the financial infrastructure of the system and the use, storage, or handling of chemicals.	Pg. 28 of RRA	
	The RRA may include an evaluation of capital and operational needs for risk and resilience management for the system, but it is not required under AWIA. The JBPHH PWS should consider including evaluations of capital and operational needs in the RRA to better position the JBPHH PWS's ability to assess risks to the system.	Pg. 29 of RRA	Financial and O&M are discussed in sections 2.8 and 2.9, respectively.
EPA 2023 Red Hill Administrative Consent Order (SOW Item 6.8)	Within forty-five (45) days after the Effective Date, Navy shall submit a certification to EPA that Navy has revised its previously certified Risk and Resilience Assessment to include all required elements in 42 U.S.C. § 300i-2(a)(1)(A). The Revised Risk and Resilience Assessment shall include the assessment of:		
	(i) risk to the JBPHH System from malevolent acts and natural hazards	Pg. 32 of RRA	
	(ii) resilience of the system, including pipes, water treatment and storage facilities, automated systems, and security,	Pg. 17 of RRA	
	(iii) monitoring practices of the system,	Pg. 26 of RRA	
	(iv) the financial infrastructure of the system,	Pg. 28 of RRA	
	(v) use, storage, or handling of chemicals,	Pg. 21, 22, 23 of RRA	
	(vi) the operations and maintenance of the system.	Pg. 29 of RRA	