

**Enclosure (2) - Navy's Response to EPA Comments on 2023 Administrative Consent Order Statement of Work Section 6.5.6.2.1 Valve Exercising Program**

- 1. Section, Organizational Structure & Key Personnel, Page 7 - Which positions are staffed by certified distribution operators?***

**Navy Response** - Utilities Supervisor, Supervisor Pipefitter, Backflow Installation Mechanic, Industrial Equipment Mechanic, Pipefitter Work Leader, Pipefitter Helper, Backflow Work Leader, Industrial Equipment Mechanic Work Leader. Total of 19 personnel with Distribution System Operators (DSOs).

- 2. Section, Evaluation and Course of Action, Table 9, Page 29 - For non-critical, inoperable valves, is the intention that a schedule will be developed within 60 days instead of replacing within 60 days? ACO requires valve replacement within 60 days of identification, and scheduling for replacement within 60 days is not a substitute.***

**Navy Response** – The ACO states that valves identified for replacement shall be replaced within a reasonable amount of time, but no later than 60 days unless EPA and Navy agree an additional amount of time is necessary. UM has spare valves available. If a spare valve is available and if replacement is practical, the Navy will aim to replace the valve within 60 days.

As discussed in previous meetings with EPA regarding the non-critical 40 yr old valves, the Navy explained that all 1,500 valves are not able to be replaced within 60 days. We discussed that the annual progress report will report replacements each year with schedule for replacements for the following Fiscal Year.

The modification to the ACO language was also done to include short-term exemptions to valve exercising. It should be noted that these inoperable valves are stuck in the position it needs to be (valves that need to be opened are opened) and are not affecting the water system flow. The most efficient way the utility goes about with replacement is to do entire line replacements which will include replacement of the valves on the line. It would not be efficient use of funds or labor to spot replace each valve (work would often involve repaving, dewatering, trench support installation, traffic control, etc.). The line will eventually be replaced and the valves will be replaced when the line is replaced. The Navy intends to provide a Recapitalization Plan by February 2026.

- 3. Section, Evaluation and Course of Action, Table 9, Page 29 - For not-exercised valves where PM is deferred until system resilience improves, it should be clearly identified what conditions need to be met so that PM can be completed.***

**Navy Response** – Wording added to table 9 to clarify the PM will be deferred until system resilience improves (S1 and S2 tanks online, and Red Hill shaft online).

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4. *Section, Evaluation and Course of Action, Table 9, Page 30 - Consider continuing the routine schedule until the project execution date. Projects frequently experience delays.*

**Navy Response** – Depending on the circumstances, the Navy will continue the routine schedule. It's intended to exercise the maximum number of valves as possible.

5. *Section, Valve Repair and Replacement, Table 10, Page 31 - Still not clear whether non-critical valve will be replaced in 60 days, or much longer. The table seems to imply non-critical valve may be purchased and then wouldn't be replaced for at least 9 months due to valve lead time?*

**Navy Response** - Wording revised. See response to comment 2.

6. *Section, Sample Maximo Valve Report, Page 36 - Is there a comments section with more details about why a valve can't be exercised? Is the Target Finish date for Not-Exercised valves left blank or are target dates still listed?*

**Navy Response** - The reasons for non-exercising will be entered into the notes field in Maximo.

The "Target Finish" dates in Figure 12b are dates in which the work order should be completed/closed. Although, completion/closing of a work order does not necessarily mean the valve was exercised. That detail would be included in the aforementioned notes field.

7. *Section, Problem Areas & Limitations, Page 37 - With 29% aging and due for replacement, is the intent to place a very large valve order(s) due to the long lead time and begin replacements? Are all 40+ year old valves unilaterally considered inoperable, or can pipefitters make determinations onsite on whether it is operable?*

**Navy Response** – All 40+ year old valves are not unilaterally considered inoperable. Pipefitters can make the determinations onsite. Also, see response to comment 2.

8. *Section, Problem Areas & Limitations, System Disruption, Breakage Concerns, Page 37 - Standard industry practice for critical valves is to conduct valve exercising with full crew, equipment, and supplies onsite and ready for valve replacement, so if a critical valve breaks during exercising, it may be immediately replaced to minimize service disruption.*

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**Navy Response** - The crew size will be enough to exercise, isolate and operate nearby shutoff valves. In the event of a failure, nearby shutoff valves will be operated to isolate the break while a full response team, equipment, and supplies are dispatched to the site. There will be a contingency plan in place.

- 9. Section, Appendix C.1, C.2, Page 50, 58 - There should be a section where it clearly notes why the critical valve cannot be exercised and what actions need to be taken to allow for exercising again.**

**Navy Response** – Reasons for the valves being considered critical were added to Appendix C. Essentially, the valves are either on a main source line to an area, a transmission main, or supplies water to a critical building. A secondary line or secondary water source is needed before exercising the valves. It should be noted that these valves may not end up being exercised due to its potential to affect critical Navy operations.

Actions were added to Appendix C.2.

- 10. Section, Appendix C.3, Page 60 - If a valve no longer meets the conditions within AWWA for partial cycling, then it should be moved into the pool for routine full exercising.**

**Navy Response** – The Navy will reevaluate the valves as the system improves.

- 11. Section, Appendix C.4, Page 65 - Proposed replacement dates for each of the valves should be submitted for approval since it is already known all these valves require replacement.**

**Navy Response** – The Navy intends to submit a Recapitalization Plan in February 2026.