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March 8, 2024

Ms. Martha Guzman
Regional Administrator
United States Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, CA 94105

Mr. Kenneth S. Fink, MD, MGA, MPH
Director
State of Hawai'i
Department of Health
1250 Punchbowl Street
Honolulu, Hawai'i 96813

Dear Ms. Guzman and Mr. Fink:

Subject: Request for Additional Testing and Clarification Related to the Investigation of Per- and Polyfluoroalkyl Substances (PFAS) at the Red Hill Bulk Fuel Storage Facility (RHBFSF)

As is documented in the joint U.S. EPA and Hawaii Department of Health (DOH) March 1, 2024, letter to the U.S. Navy requesting additional PFAS testing in the vicinity of the RHBFSF (EPA and DOH, 2024), the Navy has consistently detected PFAS compounds in multiple monitoring wells, some in excess of EPA Regional Screening Levels (RSLs) and proposed Maximum Contaminant Levels (MCLs) in groundwater. Despite the persistent, widespread presence of PFAS compounds in the area, the Navy recently announced that it would discontinue monthly groundwater PFAS sampling conducted in response to the November 2022 aqueous film-forming foam (AFFF) release from Adit 6, that it would not perform interim monitoring at or around locations where PFAS exceedances were identified during the sampling of certain wells in September 2023, and that it would not begin RHBFSF Remedial Investigation until fiscal year 2025. In the March 1st letter, EPA and DOH requested that the Navy continue to monitor groundwater for PFAS every two months until the contaminant plumes are delineated and expedite Red Hill PFAS Remedial Investigation. While the BWS agrees with the

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regulatory agencies that the Navy should continue to investigate the scope of the PFAS contamination originating from the RHBFSF, EPA and DOH's requests do not go nearly far enough. The Navy must be *required* to continue to perform a complete and thorough investigation of the environmental impacts associated with historic and more recent PFAS use and releases from the RHBFSF, by continuing to conduct PFAS sampling at nearby monitoring wells on at least a monthly basis and to expeditiously develop a concrete and workable plan for remediating the impacts of PFAS.

As you know, the release of AFFF into the environment is deeply disturbing since it contains PFAS, a group of synthetic chemicals known as "forever chemicals" due to their persistence in the environment as they do not easily break down. PFAS are highly mobile in water and readily migrate through soil and groundwater often leading to contamination of nearby water sources. These PFAS chemicals have been linked to various adverse health effects in humans and wildlife. The BWS, as the largest municipal drinking water utility in Hawaii, has repeatedly insisted upon more urgent action from the Navy to address PFAS releases from the RHBFSF. We likewise request that the EPA and DOH exercise their regulatory authority to compel the Navy to take appropriate responsive action.

The BWS supports strong regulatory oversight over the Navy as it attempts to address the releases of fuel and other hazardous substances from the RHBFSF. We understand that the Navy intends to respond to PFAS contamination pursuant to the March 1994 Pearl Harbor Naval Complex Federal Facilities Agreement (FFA, 1994). The BWS does not agree with the Navy's preferred approach as it does not ensure sufficient oversight. We recommend that EPA and DOH utilize all available options to hold the Navy accountable for its failure to be a responsible environmental steward. Key among such options is the September 2015 RHBFSF Administrative Order on Consent (AOC, 2015). The 2015 AOC makes clear that "Site" covered by the agreement includes the RHBFSF as well as "any area where petroleum or other substances released from the Facility come to be located" and Section 8(c) expressly empowers the EPA and DOH to determine that certain tasks or activities are necessary in addition to or in lieu of the work originally required under the agreement when such additional performance is necessary for protection of human health and the environment. The BWS respectfully requests that the regulatory agencies exercise their authority under the 2015 AOC to require the Navy to investigate, fully delineate, and remediate any and all PFAS contaminations in a coordinated fashion with the ongoing work associated with fuel releases from the RHBFSF.

Both the EPA and the DOH have a responsibility to protect human health and the environment, including our irreplaceable drinking water resources. It is clear to the BWS that the regulatory agencies share our concerns about the additional threats to Oahu's water resources caused by the PFAS releases from the RHBFSF, as evidenced in your March 1, 2024 letter. Consistent with these obligations and our shared responsibility as environmental stewards, the BWS requests a copy of the Navy's "full results report" that the regulatory agencies received on January 16, 2024. In addition,

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any preliminary assessments, site investigations, and copies of any other related investigations should be shared with BWS. If you have any questions, please feel free to contact me at (808) 748-5061.

Very truly yours,



ERNEST Y.W. LAU, P.E.
Manager and Chief Engineer

cc: The Honorable Lloyd J. Austin III
Secretary of Defense
U.S. Department of Defense
1000 Defense Pentagon
Washington, DC 20301-1000

Ms. Kathleen Ho
Deputy Director
Environmental Health Administration
State of Hawaii, Department of Health
1250 Punchbowl Street
Honolulu, Hawaii 96813

References

FFA, 1994. Peral Harbor Naval Complex Federal Facilities Agreement, Administrative Docket No: 94-05, March 1994.

AOC, 2015. Administrative Order on Consent in the Matter of Red Hill Bulk Fuel Storage Facility, EPA Docket No: RCRA 7003-R9-2015-01 and DOH Docket No: 15-UST-EA-01, September 2015.

U.S. Environmental Protection Agency (EPA) and Hawaii Department of Health (DOH), 2024. Subject – Request for Additional PFAS Sampling. Letter to RADM Barnett, March 1.