



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX – PACIFIC SOUTHWEST REGION
75 Hawthorne Street
San Francisco, CA 94105-3901**

VIA CERTIFIED MAIL
No.
RETURN RECEIPT REQUESTED

Rear Admiral Stephen Barnett
Joint Base Pearl Harbor-Hickam
Commander, U.S. Navy Region Hawaii
850 Ticonderoga St, Suite 110
Pearl Harbor, HI 96860-5101
stephen.d.barnett.mil@us.navy.mil

**Re: Request for Information Pursuant to Section 308 of the Clean Water Act
Docket No. CWA-308-9-23-002**

Dear Rear Admiral Barnett:

The United States Environmental Protection Agency, Region 9 (“EPA”) is requesting the United States Navy, Region Hawai‘i (Navy) to submit information regarding the GAC Water Treatment Facility (Facility) located in Honolulu, Island of Oahu, Hawaii, subject to the National Pollutant Discharge Elimination System Permit, HI21DG544 (“NPDES Permit”), and in addition to the effluent parameters listed in Hawaii Department of Health’s January 27, 2022 Notice of General Permit Coverage (“NGPC”) to the Navy.

This Request for Information encompasses information regarding the operation of the Facility. The request is made pursuant to EPA’s information-gathering authority under Section 308 of the Clean Water Act (“CWA”), 33 U.S.C. § 1318, which authorizes EPA to require persons subject to the CWA to furnish information, conduct monitoring, provide entry to the Administrator or authorized representatives, and make reports as may be necessary to carry out the objectives of the CWA.

EPA requests that the Navy provide the information specified in the attached Request for Information, Attachment 1, **by February 28, 2023** as well as regular monthly monitoring results for the duration of discharge. Please read the instructions and questions in the attachments carefully before preparing your response.

Please send your response by certified mail, return receipt requested, to the following address:

Jamie Marincola
Red Hill Enforcement Coordinator
U.S. Environmental Protection Agency, Region 9
Enforcement Division (ENF 3-2)
75 Hawthorne Street
San Francisco, CA 94105

marincola.jamespaul@epa.gov

and

Joanna Seto, Chief
Environmental Management Division
Hawaii Department of Health
2385 Waimano Home Road
Uluakupu Bldg. 4, Ste. 110
Pearl City, HI 96782-1400
joanna.seto@doh.hawaii.gov

All submittals in response to this letter must be accompanied by the following certification signed by a responsible corporate officer or authorized representative in accordance with 40 C.F.R. § 122.22:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

Please identify any information that you claim is confidential business information. If you make a confidentiality claim, and if EPA determines that the information you designated meets the criteria in 40 C.F.R. Section 2.208, we will disclose the information only to the extent, and by means of the procedures, specified in 40 C.F.R. Part 2, Subpart B. If you do not make a claim of confidentiality, we will assume that you are waiving confidentiality and the information you provide may be made public without further notice. If the Navy determines that information requested is classified in accordance with E.O. No. 13526, EPA will work with the Navy to protect such information. EPA has a “need to know” the information it requests. If you make such a claim, please simultaneously provide a copy of the reports with the claimed CBI or other privileged information redacted.

Compliance with this Request for Information does not relieve the Navy of its obligation to comply with the CWA or other applicable laws and permits.

The Request for Information is not subject to review by the Office of Management and Budget under the Paperwork Reduction Act because it is directed to fewer than ten persons and is therefore not a “collection of information” under 44 U.S.C. § 3502(3). It is also an exempt activity under 44 U.S.C. § 3518(c) and 5 C.F.R. § 1320.4.

Thank you for your cooperation and prompt attention to this letter. If you have any questions regarding this Request for Information, please contact Jamie Marincola of the Enforcement and Compliance Assurance Division at 415-972-3520 or marincola.jamespaul@epa.gov. Please direct any legal questions to Rich Campbell in our Office of Regional Counsel at 415-972-3870 or campbell.rich@epa.gov.

Sincerely,

Amy C. Miller-Bowen, Director
Enforcement and Compliance Assurance Division

cc (via email):

Kathleen Ho, Deputy Director, Hawaii Department of Health
Capt. Gordie Meyer, NAVFAC Hawaii Commanding Officer, U.S. Navy
Karnig Ohannessian, U.S. Navy

Enclosure

ATTACHMENT 1: Request for Information, EPA Docket No. CWA-308-9-23-002

Under the authority of Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a), the United States Environmental Protection Agency, Region 9 (“EPA”) requests the U.S. Navy (“Navy”) to provide to EPA the information described below (“Request for Information”) for its GAC Water Treatment Facility.

INSTRUCTIONS

1. Separate Response for Separate Question. Provide a separate narrative answer to, and segregate responsive documents by each question or its subpart. Precede each answer with the number of the corresponding question or its subpart.
2. Best Information Available. Respond to the best of your ability, even if documents are not available. Explain any qualified response. If you do not have the responsive information but know the person from whom the information may be obtained, identify the person.
3. Document Submission. Whenever requested to provide documents, provide copies of all responsive documents in your possession, custody or control. If a responsive document was, but no longer is, in your possession, custody or control, explain what was done with it. If another person has possession, custody or control of the document, identify the person. If the document was disposed of, explain when and why it was disposed of and who disposed of it.
4. Use of Document in Place of Answer. If a document provides the complete answer to a question, you may use it in place of a written answer by supplying the document and appropriately identifying the applicable portion of the document as answering a specific numbered question.
5. Document Alteration or Deletion. Explain the reason and identify the person responsible for any deleted, altered or redacted portion of a submitted document.
6. Obligation to Correct. If you later discover that any submitted information is incorrect, submit a corrected response as soon as possible.
7. No Effect on Other Legal Obligations. This information request in no way alters or relieves you of other legal responsibilities or restrictions.

DEFINITIONS

The following terms shall have the following definitions for this Request for Information:

1. “Document” means all written, recorded, computer generated, or visually or aurally reproduced materials of any kind in any medium in your possession, custody or control or known by you to exist, including all originals, drafts and non-identical copies. The term includes, without limitation, all reports, studies, surveys, plans, transcripts, permits, licenses, deeds, maps, drawings, schematics, specifications, instructions, calculations, monitoring data, rental records, contracts, agreements, bid documents, purchase orders, work orders, invoices, manifests, payment records, spreadsheets, communication records, correspondence, notes, memoranda, photographs, and videos.

2. “Facility” means the GAC Water Treatment Facility located in Honolulu, Island of Oahu, Hawaii.
3. “Operation” means any activities related to water treatment at the Facility.
4. “Effluent” means industrial wastewater and storm water discharged from the Facility to the Halawa Stream receiving waterbody as identified in the Notice of Intent (NOI) e-Permitting Submission: HPD-W343-RERE8 (submitted online on December 14, 2021);
5. “NGPC” shall mean Hawaii Department of Health’s January 27, 2022 Notice of General Permit Coverage to the Navy.
6. “Permit” means the Hawaii Administrative Rules (HAR) Chapter 11-54; HAR Chapter 11-55; HAR Chapter 11-55, Appendix A; HAR Chapter 11-55, Appendix D, available on the HDOH, Clean Water Branch website at: <https://health.hawaii.gov/cwb/>.
7. “PFAS” shall mean per- and polyfluoroalkyl substance(s) listed in Attachment 2 of this information request where perfluorinated substances are defined as man-made chemicals of which all of the carbon atoms are fully fluorinated, and where polyfluoroalkyl substances are defined as man-made chemicals containing a mix of fully fluorinated carbon atoms, partially fluorinated carbon atoms, and nonfluorinated carbon atoms.
8. “You” means the Navy, its employees, and its contractors and consultants.

REQUESTS FOR INFORMATION

1. Please provide the following documents, information, and communications by **February 28, 2023**. If no such document, information, and/or communication exist, then so state explicitly.
 - a. Provide a process flow diagram of the Facility, including the location of point source discharge, and influent (e.g., possible sampling ports prior to entry of water to GAC tanks) and effluent sampling locations.
 - b. Provide the date when the Navy commenced discharges from the Facility to Halawa Stream.
 - c. Provide how frequently the Navy monitors raw water influent to the Facility for the parameters listed in the NGPC, including any monitoring for PFAS.
 - d. Provide how frequently the Navy monitors effluent discharged to Halawa Stream for PFAS, and if no effluent monitoring for PFAS has occurred to date please so indicate.
 - e. Provide the analytical results of any PFAS monitoring conducted by the Navy to date of the effluent discharged to Halawa Stream from the Facility.
2. PFAS Monitoring Results.

- a. Within forty-five (45) days of the date of this information request, provide the analytical results of the first monthly influent and effluent monitoring for each of the forty (40) PFAS parameters listed in Attachment 2.
- b. Navy shall continue to provide the analytical results of monthly PFAS monitoring through the NGPC's current expiration date of July 12, 2023 subject to HDOH's extension of the NGPC's expiration date. Should HDOH extend the NGPC's expiration date, the Navy shall continue to provide the results of PFAS monitoring to EPA.
- c. Navy shall monitor using CWA wastewater draft analytical method 1633 (*see* 40 C.F.R. § 122.21(e)(3)(ii) and 40 C.F.R. § 122.44(i)(1)(iv)(B)) or equivalent method DOD QSM version 5.1 or higher. In lieu of using method 1633, the Navy may use the draft CWA wastewater method 1621 for Adsorbable Organic Fluorine to determine whether PFAS is present. If present, the Navy must use method 1633, or its DOD equivalent.
- d. Monthly PFAS influent/effluent monitoring reports shall be provided by email to:

Pete Reich
U.S. EPA Region 9 Oil Program
Reich.peter@epa.gov

3. In addition to providing the monthly monitoring reports pursuant to paragraph 2 above, report all PFAS monitoring data to the Hawaii Department of Health through the Discharge Monitoring Reports (DMRs) required by the Permit.
4. For each of the above requests, if the records are unavailable or do not exist, affirmatively state that no records exist.

ATTACHMENT 2
PFAS PARAMETERS

Excerpted from 3rd Draft Method 1633, Analysis of Per- and Polyfluoroalkyl Substances (PFAS) in Aqueous, Solid, Biosolids, and Tissue Samples by LC-MS/MS

Available at: https://www.epa.gov/system/files/documents/2022-12/3rd%20Draft%20Method%201633%20December%202022%2012-20-22_508.pdf

Table 1. Names, Abbreviations, and CAS Registry Numbers for Target PFAS, Extracted Internal Standards and Non-extracted Internal Standards¹

Target Analyte Name	Abbreviation	CAS Number
Perfluoroalkyl carboxylic acids		
Perfluorobutanoic acid	PFBA	375-22-4
Perfluoropentanoic acid	PFPeA	2706-90-3
Perfluorohexanoic acid	PFHxA	307-24-4
Perfluoroheptanoic acid	PFHpA	375-85-9
Perfluorooctanoic acid	PFOA	335-67-1
Perfluorononanoic acid	PFNA	375-95-1
Perfluorodecanoic acid	PFDA	335-76-2
Perfluoroundecanoic acid	PFUnA	2058-94-8
Perfluorododecanoic acid	PFDoA	307-55-1
Perfluorotridecanoic acid	PFTTrDA	72629-94-8
Perfluorotetradecanoic acid	PFTeDA	376-06-7
Perfluoroalkyl sulfonic acids		
Acid Form		
Perfluorobutanesulfonic acid	PFBS	375-73-5
Perfluoropentanesulfonic acid	PFPeS	2706-91-4
Perfluorohexanesulfonic acid	PFHxS	355-46-4
Perfluoroheptanesulfonic acid	PFHpS	375-92-8
Perfluorooctanesulfonic acid	PFOS	1763-23-1
Perfluoronanesulfonic acid	PFNS	68259-12-1
Perfluorodecanesulfonic acid	PFDS	335-77-3
Perfluorododecanesulfonic acid	PFDoS	79780-39-5
Fluorotelomer sulfonic acids		
1H,1H, 2H, 2H-Perfluorohexane sulfonic acid	4:2FTS	757124-72-4
1H,1H, 2H, 2H-Perfluorooctane sulfonic acid	6:2FTS	27619-97-2
1H,1H, 2H, 2H-Perfluorodecane sulfonic acid	8:2FTS	39108-34-4
Perfluorooctane sulfonamides *		
Perfluorooctanesulfonamide	PFOSA	754-91-6
N-methyl perfluorooctanesulfonamide	NMeFOSA	31506-32-8
N-ethyl perfluorooctanesulfonamide	NEtFOSA	4151-50-2
Perfluorooctane sulfonamidoacetic acids *		
N-methyl perfluorooctanesulfonamidoacetic acid	NMeFOSAA	2355-31-9
N-ethyl perfluorooctanesulfonamidoacetic acid	NEtFOSAA	2991-50-6
Perfluorooctane sulfonamide ethanols *		
N-methyl perfluorooctanesulfonamidoethanol	NMeFOSE	24448-09-7
N-ethyl perfluorooctanesulfonamidoethanol	NEtFOSE	1691-99-2
Per- and Polyfluoroether carboxylic acids		
Hexafluoropropylene oxide dimer acid	HFPO-DA	13252-13-6
4,8-Dioxa-3H-perfluorononanoic acid	ADONA	919005-14-4
Perfluoro-3-methoxypropanoic acid	PFMPA	377-73-1
Perfluoro-4-methoxybutanoic acid	PFMBA	863090-89-5
Nonafluoro-3,6-dioxaheptanoic acid	NFDHA	151772-58-6

Table 1. Names, Abbreviations, and CAS Registry Numbers for Target PFAS, Extracted Internal Standards and Non-extracted Internal Standards¹

Target Analyte Name	Abbreviation	CAS Number
Ether sulfonic acids		
9-Chlorohexadecafluoro-3-oxanonane-1-sulfonic acid	9Cl-PF3ONS	756426-58-1
11-Chloroeicosafluoro-3-oxaundecane-1-sulfonic acid	11Cl-PF3OUdS	763051-92-9
Perfluoro(2-ethoxyethane)sulfonic acid	PFEESA	113507-82-7
Fluorotelomer carboxylic acids		
3-Perfluoropropyl propanoic acid	3:3FTCA	356-02-5
2 <i>H</i> ,2 <i>H</i> ,3 <i>H</i> ,3 <i>H</i> -Perfluorooctanoic acid	5:3FTCA	914637-49-3
3-Perfluoroheptyl propanoic acid	7:3FTCA	812-70-4