



**UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
REGION IX**
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**STATE OF HAWAII
DEPARTMENT OF HEALTH
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June 10, 2024

Karnig Ohannessian
Deputy Assistant Secretary (Environmental and Mission Readiness)
Department of the Navy
1000 Navy Pentagon
Washington, DC 203520
(Sent via Electronic Mail)

Subject: Requested Monitoring to Evaluate Presence of PFAS in Oahu Groundwater and Drinking Water

Dear Deputy Assistant Secretary Ohannessian:

During our meeting with you on May 16, 2024, U.S. Environmental Protection Agency (EPA) and Hawai'i Department of Health (DOH) requested that the Navy increase their sampling of per- and polyfluoroalkyl substances (PFAS) at and around the Red Hill Bulk Fuel Storage Facility. Specifically, EPA requested sampling of groundwater, source water, and the November 2021 release fluids. The DOH requested sampling of the source water. In response, the U.S. Department of the Navy (Navy) offered to conduct quarterly sampling for PFAS at the Waiawa Shaft, currently the sole water source for the Joint Base Pearl Harbor-Hickam (JBPHH) drinking water system, in an email sent to EPA and DOH on May 20, 2024.

While this would satisfy federal requirements under the new [PFAS drinking water regulation](#) that all drinking water systems supplied by a groundwater source and serving greater than 10,000 persons, conduct one-time quarterly sampling as part of initial monitoring beginning in 2024, EPA and DOH would like to further reiterate our request for comprehensive sampling to investigate the presence of PFAS in the groundwater. EPA and DOH request sampling and testing the following for PFAS:

- **Groundwater:** A routine groundwater sampling regimen consistent with the goals set forth in EPA and DOH's joint letter sent to Navy Region Hawaii on March 1, 2024 (enclosed). In its April 11, 2024 response to EPA's letter and subsequent meetings, the

Navy agreed to expedite the Red Hill PFAS remedial investigation and to conduct interim sampling of monitoring wells for PFAS. EPA and DOH would like to work with the Navy to implement this interim PFAS sampling effort as soon as possible.

- **Existing and Potential Future Water Source Water:** Bi-monthly (every two months) sampling at Waiawa, Aiea-Halawa, and Red Hill Shafts.

EPA requests sampling and testing the following for PFAS:

- **2021 Release Fluids:** Fluids preserved from the polyvinyl chloride aqueous film-forming foam (AFFF) retention line that may be representative of the November 2021 release and fluids stored in the FRAC tanks near the collection, holding, and transfer (CHT) tank outside of Adit 3, consistent with our February 6 and April 12, 2024 letters (enclosed) and subsequent meetings. We recognize that fluids were collected from the pipeline 2.5 years after the November 2021 event and may be affected by piping degradation from fuel constituents; and the samples collected from the FRAC tanks may include runoff from the ground within Adit 3, as well as contents from the sanitary sewer sump, and may have picked up PFAS from sources other than the release fluids.

EPA and DOH believe it is critical for the Navy to collect data to characterize the presence of PFAS in the groundwater, source water, and November 2021 release. EPA and DOH request a response by the Navy no later than June 21, 2024, on their commitment to conduct monitoring to characterize the presence of PFAS in these three areas.

If you have any questions regarding this letter, please contact Matthew Cohen, EPA Red Hill Project Coordinator, at Cohen.Matthew@epa.gov or (415) 972-3691; or Joanna L. Seto, P.E., DOH Environmental Management Division Administrator, at joanna.seto@doh.hawaii.gov or (808) 586-4305.

Sincerely,

/s/

Martha Guzman
Regional Administrator
U.S. Environmental Protection Agency, Region 9

/s/

Kenneth S. Fink, MD, MGA, MPH
Director
State of Hawai'i, Department of Health

Enclosures:

- February 6, 2024 EPA Letter to Joint Task Force and Navy Region Hawaii re: Fuel Samples from AFFF Retention Line
- March 1, 2024 EPA/DOH Letter to Navy Region Hawaii re: Request for Additional PFAS Sampling

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- April 12, 2024 EPA/DOH Letter to Navy Region Hawaii re: Conditional Approval of Site Characterization Plan Addendum – CHT Tank Overflow Site Characterization

cc: RADM Stephen Barnett, Commander, Navy Closure Task Force- Red Hill