



REGION 9

SAN FRANCISCO, CA 94105

February 6, 2024

VIA ELECTRONIC MAIL ONLY

Vice Admiral John F. Wade
Commander
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Subject: Fuel Samples from Aqueous Film-Forming Foam Retention Line

Dear Vice Admiral Wade and Rear Admiral Barnett:

This letter provides clarification about a request that the U.S Environmental Protection Agency (EPA) made during the Senior Executive Meeting on Friday, February 2. On Wednesday, January 31, the EPA's Red Hill environmental team learned there is still some fuel remaining in the Red Hill aqueous film-forming foam (AFFF) retention line. The fuel in this AFFF retention line is very likely representative of the November 2021 release, and we believe it is important to fully characterize.

The Navy plans to begin cleaning the AFFF retention line later this week. We request that the Navy collect aliquots of the fuel prior to cleaning the line, and have a lab hold the aliquots for future analyses. The aliquots could later be used to evaluate risk from potentially unknown components of the release, including petroleum-related constituents, fuel additives, cleaning products, per- and polyfluoroalkyl substances (PFAS), and/or other unidentified chemicals.

We understand that approximately 300 gallons of fuel remain in the AFFF line, spread across several different segments. Aliquots should be collected directly from each segment of the pipeline prior to pigging and placed into four containers:

- One HDPE bottle,

- One Amber glass jar with Teflon liners,
- Two VOA vials

The Navy should not use buffers or preservatives in the jars, but immediately place the aliquots into a cooler with ice, chill them to 4 degrees Celsius, and send them to a laboratory. The goal is to best preserve the contents in the state they were in when they were collected from the source. The recommended sample bottles and collection methods should be sufficient to allow for a variety of analytical methods and to prevent cross contamination.

To prevent false positive PFAS results, the Navy should also follow strict PFAS sampling protocols when collecting the fuel samples, including Items 2 through 4 in *EPA Pacific Southwest (Region 9) Per- and Polyfluoroalkyl Substances (PFAS) Tribal Drinking Water Sampling Project Directions for PFAS Sample Collection* (<https://www.epa.gov/system/files/documents/2022-06/r9-tribal-drinking-water-sampling-project-directions-for-pfas-sample-collection.pdf>).

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 Lynn Brockway, Physical Scientist, at Brockway.Lynn@epa.gov or (808) 539-0541.

Sincerely,

/s/

Claire Trombadore, Director
Land, Chemicals, and Redevelopment Division

cc by email only:

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