



REGION 9

SAN FRANCISCO, CA 94105

February 19, 2025

VIA ELECTRONIC MAIL ONLY

Jocelyn Tamashiro
Environmental Restoration Manager
NAVFAC Hawaii, EV3
400 Marshall Road, Building X-11
Joint Base Pearl Harbor-Hickam, Hawai'i 96860

Subject: Request to Collect Per- and Polyfluoroalkyl Substances Groundwater Samples

Dear Ms. Tamashiro:

Thank you for meeting with the Hawai'i Department of Health (DOH) and United States Environmental Protection Agency (EPA) on 22 January 2025 to discuss the first quarter per- polyfluoroalkyl substances (PFAS) groundwater sampling results and proposed path forward. On 31 January 2025, EPA received the U.S. Department of Navy's (Navy) memo in response to a request to collect additional PFAS groundwater samples.

EPA appreciates that Navy plans to add the groundwater wells listed below to the routine sampling program:

- OWDF02B (when sufficient water is available)
- OWDF04B (when sufficient water is available)
- OWDF05B
- OWDF06A
- OWDF06B
- OWDF07A
- OWDF07B
- OWDF07C
- Cluster wells near building 313 (when complete)

During the meeting, EPA also requested that the temporary wells in Adit 3 be added as part of the second quarter PFAS sampling event. Consensus was not reached in the meeting, and we agreed to provide our rationale in writing. We request that the temporary wells in Adit 3 be sampled in the upcoming quarter 2 event because:

- It is very important to identify and address sources of PFAS that are in the immediate vicinity of the Red Hill Shaft (RHS) drinking source. EPA notes that aqueous film forming foam (AFFF) systems at Red Hill date back to at least 1962 and information regarding AFFF system components, testing, and use are not available. Furthermore, the distribution of contaminants in groundwater around RHS and north and south of the water development tunnel as detected in the RHP series wells, suggest releases from or near Adit 3 are potential sources of PFAS contamination in groundwater. The proximity of the Adit 3 to RHS and the Navy proposal to reactivate RHS as a drinking water source makes this a high priority area for investigation.
- At this phase of the remedial investigation, groundwater, and specifically perched water, is an effective medium to sample for identifying sources. It represents water derived locally from the vadose zone and provides a composite sample of an area unlike a discrete soil sample. This sampling assesses perched water contamination, and thus contributes to the objective of determining nature and extent of PFAS contamination in Area B.
- The perched zone has been impacted by previous releases of fuel in Adit 3; the PFAS data would complete the characterization of water quality in the perched water.
- Navy notes the wells were installed for the investigation of fuel releases, not PFAS releases covered under non-Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). However, EPA is unaware of reasons why this distinction would compromise the quality and representativeness of perched groundwater samples. If the concern pertains to potential PFAS content of the materials used to construct the temporary wells, the specific materials should be identified and investigated.
- Navy expressed concern that the data quality would not be suitable for risk assessment purposes. EPA notes that the data for the Adit 3 wells is being collected for screening purposes and data collection for risk assessment can be a separate effort.
- If significant levels of PFAS are detected in the perched wells, then a more robust investigation of potential PFAS sources, including sorbent pads sources of the contamination, would be warranted. Regardless of the original source, significant levels of PFAS in the perched water could have adverse impacts on the basal aquifer and contribute to contamination in the RHS, therefore it should be investigated.

If you have any questions regarding this letter, please contact me at russi.tonya@epa.gov or (415) 972-3706.

Sincerely,

/s/

Tonya Russi
Red Hill Project Coordinator
U.S. Environmental Protection Agency, Region 9

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