



REGION 9

SAN FRANCISCO, CA 94105

August 26, 2025

VIA ELECTRONIC MAIL ONLY

Ms. Jocelyn Tamashiro, L.G.
Environmental Restoration Manager
NAVFAC Hawaii, EV3
400 Marshall Road, Building X-11
Joint Base Pearl Harbor-Hickam, HI 96860

Subject: U.S. Environmental Protection Agency Request for Expedited Investigation of PFAS Sources at Red Hill Bulk Fuel Storage Facility

Dear Ms. Tamashiro:

The United States Environmental Protection Agency (EPA) appreciates the Navy's continued commitment to address per-and polyfluoroalkyl substances (PFAS) contamination at the Red Hill Bulk Fuel Storage Facility (Red Hill). We reviewed the quarterly groundwater PFAS analytical results, and we request the Navy expedite the investigation of PFAS contamination at the Oily Waste Disposal Facility (OWDF) and beneath Adit 3. The Navy's intent to reactivate Red Hill Shaft (RHS) as a public water supply and the ongoing construction of a water treatment facility on a portion of the OWDF elevate the priority of investigating and addressing PFAS contamination in these areas. EPA, with the support of the Hawaii Department of Health, is raising these concerns to ensure that construction of the treatment facility remains on schedule and PFAS contamination in the proposed construction area subsurface is addressed as soon as possible.

Protection of Water Resources

Given the Navy's plan to reactivate RHS as a drinking water supply and its proximity to Adit 3, PFAS contamination at the OWDF and Adit 3 should be thoroughly investigated and evaluated as quickly as possible. As summarized in Attachment 1 of this letter, PFAS contamination has been detected in perched water beneath the OWDF and Adit 3 above the source water for RHS. The Navy model indicates the perched water beneath Adit 3 discharges to the underlying basal aquifer, posing a threat to the basal aquifer with the potential to degrade water quality in RHS. Furthermore, the discharge of cooling water from the RHS production pump into the perched aquifer could further exacerbate contaminant migration to the basal aquifer.

Access for Investigation and Remediation

The Navy's reactivation of RHS will include construction of a permanent water treatment facility. The proposed location of the treatment facility will occupy the OWDF where the highest levels of PFAS were detected. The construction of the treatment plant may limit Navy access to investigate and remove PFAS contamination. Therefore, EPA requests that the Navy expedite the PFAS investigation and, if needed, remediation at the OWDF and Adit 3 prior to constructing the treatment facility. Further, the vertical and lateral extent of PFAS contamination should be delineated in advance of the treatment plant construction to ensure any PFAS contaminated soil is managed and disposed of appropriately.

Path Forward

EPA requests that at the next PFAS Remedial Investigation (RI) scoping meeting in September 2025, the Navy be prepared to present a draft plan and schedule for performing the PFAS investigations on the OWDF and at Adit 3 prior to completion of the treatment plant construction. The Plan should include:

- A construction schedule that outlines all phases of RHS water treatment facility construction, including clearing and grading of the property.
- A figure identifying well locations, current features on the OWDF, PFAS analytical results, historical activities, AFFF infrastructure on the OWDF and adjacent properties, and the footprint of the proposed RHS water treatment facility.
- Updated cross-sections and plan-view figures of the OWDF with emphasis on vertical and lateral extent of perched aquifer.
- The proposed actions to identify source(s) and characterize the spatial distribution of PFAS contamination in perched water beneath the OWDF and Adit 3, such that any necessary action to control the migration of contaminants can be taken as soon as possible and prior to completion of construction of the treatment facility.

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

Sincerely,

/s/

John Chesnutt
Manager, Superfund Pacific Islands Section

/s/

Tonya Russi
Red Hill Project Coordinator

Attachment 1

cc:

CAPT Kevin McCormick, NCTF-RH
CAPT James Sullivan, NAVFAC
CDR Benjamin Dunn, NCTF-RH
Joshua Stout, NCTF-RH
Gracelda Simmons, Hawai'i Department of Health
Kelly Ann Lee, Hawai'i Department of Health

Attachment 1: Review of quarterly groundwater PFAS analytical results at the Oily Waste Disposal Facility (OWDF) and beneath Adit 3.

Evidence of a PFAS source on or near the OWDF

1. PFAS groundwater sampling from wells on and offsite of the Red Hill facility indicate the highest PFAS concentrations detected to date have been at OWDF-03B and -05B, near the southwest boundary of the OWDF. PFOS and PFOA were detected at OWDF-03B at concentrations exceeding their MCL and RSLs.
2. Wells OWDF-03B and -05B are screened at approximately 35 feet (ft) below ground surface, which is more than 65 ft above the regional basal aquifer. Detections in perched water indicates a local source of PFAS.
3. The spatial distribution of PFAS impacts across the OWDF, and specifically the higher levels observed at OWDF-03B and -05B relative to other wells, indicates these two wells are near a source of PFAS contamination.
4. A historical aqueous film forming foam (AFFF) storage tank is located near OWDF-05B, where the highest levels of PFAS in perched water have been observed. Although Navy indicates the tank was never used, the co-location of the shallow PFAS impacts and the former AFFF tank warrants follow-up investigation.

Evidence of a separate PFAS source near Adit 3

1. PFAS compounds were detected in perched water in wells OWDF-03B, -05B, and -08B. The perched water elevation near Adit 3 (OWDF-08B) is approximately 20 ft higher in elevation than perched groundwater observed on the west side of the OWDF (OWDF-03B and -05B). The change in elevation likely represents a separate perched zone or a hydraulic gradient sloping away from Adit 3. Therefore, impacts observed in OWDF-08B represent a separate source of PFAS contamination from that found at the OWDF. During the 3rd quarter sampling event, PFOS and PFOA were detected in the perched water beneath Adit 3 (OWDF-08B) at concentrations exceeding MCL and RSLs.