



REGION 9

SAN FRANCISCO, CA 94105

November 14, 2025

VIA ELECTRONIC MAIL ONLY

Rear Admiral Marc Williams
Navy Closure Task Force - Red Hill
850 Ticonderoga Street, Suite 110
Joint Base Pearl Harbor-Hickam, Hawai'i 96860

Subject: U.S. Environmental Protection Agency Final Comments on *Draft Final Site Characterization Work Plan, Holding Tank-Leach Tank, Red Hill Bulk Fuel Storage Facility, Joint Base Pearl Harbor-Hickam, Hawaii*, May 2025

Dear Rear Admiral Williams:

Thank you for submitting the *Draft Final Site Characterization Work Plan, Holding Tank-Leach Tank, Red Hill Bulk Fuel Storage Facility, Joint Base Pearl Harbor-Hickam Oahu HI* dated May 2025 (Draft Final Work Plan). The report describes the proposed scope of work to further investigate the nature and extent of petroleum contamination impacting the subsurface near a former buried concrete holding tank and leach tank. The proposed work is intended to fill data gaps identified during previous phases of the Holding Tank-Leach Tank area investigation, including delineation of chemicals of potential concern (COPCs) in subsurface soil and groundwater, evaluation of impacts to South Halawa Stream, and identification of other subsurface petroleum infrastructure at the Site.

U.S. Environmental Protection Agency (EPA) has completed a review of the Draft Final Work Plan and generally agrees with the proposed approach with the following comments:

1. Please include dissolved lead in the analyte list for groundwater samples and total lead in the analyte list for soil samples. Should lead be detected in groundwater and/or soil, please include dissolved lead in the analyte list for surface water.
2. Please expand the area of investigation to include soil at 5-12 feet below ground surface that exceeded direct exposure criteria for TPH-g and TPH-o, as identified in Enclosure 2 of EPA's letter dated October 29, 2024.
3. Please ensure the problem statement in Section 4.1 considers "petroleum" and "petroleum contamination or degradation" rather than just "JP-5 contamination or degradation". Historic releases may have impacted this area directly or been mobilized to impact this area during the 2021 releases.

Additionally, please consider the following:

1. Appendix B: Please update the “TBD” designations with actual parameters as they become available. For example, Laboratory-Specific Limits in Table B-2 should be documented before beginning work.
2. Appendix C: Many of the well installation procedures seem to be copied from an earlier version of the Red Hill Monitoring Well Installation Work Plan. Instead, please reference the January 2025 MWIWP.
3. Appendix D (pages 408-410): Navy proposes to utilize the tiered forensic analysis to screen low level detections of total petroleum hydrocarbons. The work plan indicates that the analysis will be used to identify sources of petroleum hydrocarbon detections. If these evaluations will be used to rule out detections for further evaluation or corrective action, additional lines of evidence will be needed. Prior to making decisions based on these evaluations, please schedule a special purpose meeting to discuss the findings and recommendations.

Please correct the following editorial errors:

1. Table 5-1, second row: Please correct the Well ID in the last sentence of the Sampling Rationale column. It currently states “HTLTMW02B”, but should be “HTLTMW02A”.

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

cc: (email only)
CDR Benjamin Dunn, NCTF-RH
Joshua Stout, NCTF-RH
Lyndsay Kelsey, NCTF-RH
Kelly Ann Lee, Hawaii Department of Health
Claire Trombadore, EPA