



REGION 9

SAN FRANCISCO, CA 94105

July 31, 2026

VIA ELECTRONIC MAIL ONLY

Jocelyn Tamashiro
Environmental Restoration Manager
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400 Marshall Road, Building X-11
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Subject: U.S. Environmental Protection Agency Approval of the *Draft Final Remedial Investigation Work Plan Per- and Polyfluoroalkyl Substances, Red Hill Bulk Fuel Storage Facility, Joint Base Pearl Harbor-Hickam, Hawaii*, July 2026

Dear Ms. Tamashiro:

Thank you for submitting the *Draft Final Remedial Investigation Work Plan Per- and Polyfluoroalkyl Substances, Red Hill Bulk Fuel Storage Facility, Joint Base Pearl Harbor-Hickam, Hawaii*. The Per- and Polyfluoroalkyl Substances (PFAS) Remedial Investigation (RI) provides the foundation for understanding the nature and extent of PFAS and comingled petroleum hydrocarbons in soil and groundwater at the Red Hill facility. The findings from this remedial investigation will inform subsequent project phases. EPA appreciates the Navy's efforts to accelerate the schedule and remains committed to working together on the site cleanup process.

EPA approves the Navy's Draft Final PFAS RI, with the following conditions. Please provide written acceptance of these conditional comments.

Conditional Comments:

1. Page 135 (PDF page 141), Worksheet #17: We appreciate the effort to develop a comprehensive sampling methodology by collecting and analyzing composite samples. As discussed during a July 22, 2026, meeting, Navy will initially sample soils as proposed; however, in consultation with EPA, procedures will need to be continuously evaluated and modified to ensure representative samples are collected and that they meet project objectives.

Additionally, please incorporate the following:

- a. Please target fine grained sediments for analysis and demonstrate the efficacy of the proposed sieve size. The highest PFAS concentrations will accumulate in fine-grained, organic-rich soils where the chemicals bond tightly to the soil matrix and resist migration. The proposed ¼ inch sieve may introduce an overly coarse sediment fraction to the sample, biasing results low.
 - b. Please evaluate the feasibility of sending all or a subset of the collected soil to the laboratory for compositing to eliminate risk of PFAS adhering to sampling equipment and to reduce the risk of cross-contamination from field gear.
2. Please inform EPA of any significant impacts to the schedule or potential impacts to sampling locations. In the final report, adequately document areas of cut and fill and recent soil disturbance to ensure the appropriate depth intervals have been sampled and the site is properly characterized. The report should include figures identifying excavation locations, depths (with elevations), dates, and the thickness and final elevation of filled areas.

Additional General Comments:

1. Please schedule a meeting with EPA to discuss the PFAS groundwater monitoring program, including installation of pressure transducers in perched aquifer wells.
2. To minimize disruptions to the construction schedule for the Red Hill Shaft water treatment plant, EPA encourages Navy to work expeditiously to develop project screening levels (PSLs) so that any potential removal and/or remedial actions can be scoped and scaled as needed. Please schedule a meeting with EPA to discuss the approach to developing PSLs for the leaching-to-groundwater pathway.
3. Please ensure the conceptual site model and final report incorporate all EPA comments received to date.

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

Sincerely,

/s/

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

/s/

John Chesnutt
Manager, Superfund Pacific Islands Section
U.S. Environmental Protection Agency, Region 9

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