



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

September 16, 2024

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: RESPONSE TO EPA PRIORITY COMMENTS REGARDING DRAFT
REMEDIAL INVESTIGATION WORK PLAN PER- AND POLYFLUORALKYL
SUBSTANCES RELEASE, RED HILL BULK FUEL STORAGE FACILITY, JOINT
BASE PEARL HARBOR-HICKMAN, OAHU HI, PEARL HARBOR HI FISC SITE 30,
JUNE 2024**

Dear Ms. Tamashiro:

The U.S. Environmental Protection Agency (EPA) received the subject response to priority comments Friday September 6, 2024. The priority comments were identified in our August 7, 2024, letter and considered by EPA to be the most immediate with respect to new monitoring well construction and quarterly sampling. Follow up scoping sessions including EPA, Navy, and Hawaii Department of Health personnel were held August 14th and 27th, 2024. The initial scope of Remedial Investigation field work, including monitoring well locations and sampling frequency, was determined during the August 27th meeting.

Based on the responses to priority comments and agreement reached during the August 27th meeting, EPA concurs that monitoring well construction and sampling should begin. However, full work plan approval is contingent on resolution of all comments in the August 7, 2024, letter.

Although EPA agrees groundwater sampling can begin, some of the Navy's responses were incomplete. Please also note that EPA's acceptance of the data will require the Navy to provide the following additional information:

- Laboratory Standard Operating Procedures or portions that discuss:
 - Sample dilution procedures,
 - Protocols for handling high turbidity samples,
 - Technical definitions of “limit of quantitation”, “limit of detection”, and “detection limit”.
- An operations and maintenance plan for the wells or a summary of how the condition of each monitoring well will be documented in the field.
- A description of how duplicate precision will be used to evaluate the impact of uncertainty on decisions for the RI Report.
- Detailed protocols for collecting field blanks, equipment blanks, and rinsate blanks.

Additionally, expectations set forth in the scoping meeting are not fully captured by the response to General Priority Comment 1:

- Please ensure that the preliminary groundwater sampling events include all wells depicted in the updated Figure 1a that was provided with the RTCs, and update the document text globally to include all wells. The revised draft text for Section 14.7.3 is missing many of the agreed-upon wells, including RHMW wells 01R, 02, 03, 04, 05, 06, 07, 08, 17D, 18, 20, and 21; RHP wells 04a-c, 05, and 08b.
- After a year of quarterly sampling, the data will be evaluated to determine future sampling locations and frequency.
- To evaluate risk, PFAS results will be evaluated comprehensively along with co-occurring contaminants, not as individual, maximum concentrations of PFAS at each well.

If you have any questions regarding this letter, please feel free to call me at (415) 972-3149 or contact me by email at lichens.christopher@epa.gov.

Sincerely,

Chris Lichens
 Remedial Project Manager
 Superfund and Emergency Management Division
 Federal Facilities and Site Cleanup Branch
 US EPA, Region IX

cc: Allison Hutto, Hawaii Department of Health