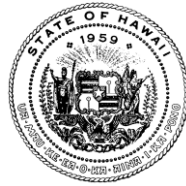


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GOVERNOR OF HAWAII  
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In reply, please refer to:  
File:  
**232834 JO**

March 19, 2026

Ms. Jocelyn Tamashiro  
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Environmental Restoration Division, Department of the Navy  
Naval Facilities Engineering Command, Hawaii  
400 Marshall Road, Building X-11  
Pearl Harbor, Hawaii 96860  
**Transmitted via e-mail to:** *jocelyn.tamashiro.civ@us.navy.mil*

**Facility/Site:** Red Hill Bulk Fuel Storage Facility (iHEER Site 3365)

**Subject:** HDOH Comments on *Revised Draft Remedial Investigation Work Plan, Per- and Polyfluoroalkyl Substances Release, Red Hill Bulk Fuel Storage Facility*; Dated February 2026

Dear Ms. Tamashiro:

The Hawaii Department of Health (HDOH) Hazard Evaluation and Emergency Response (HEER) Office has reviewed the Revised Draft Remedial Investigation Work Plan (RI WP) and has the following comments pertaining to the investigation of Area B. Additional comments on the remainder of RI WP are forthcoming.

1. Please conduct multi-incremental sampling (MIS) for soil sampling in accordance with the HDOH Technical Guidance Manual (TGM). HDOH does not consider discrete soil sampling adequate for final decision-making purposes but considers use of discrete samples sufficient for determination of contaminant presence/absence. For example, if concentrations of chemicals of potential concern (COPCs) were detected in discrete samples, even if below the Environmental Action Levels (EALs), then additional sampling to adequately characterize the nature and extent utilizing MIS must be conducted. This should include the collection of triplicate soil samples to test for accuracy, reliability, and reproducibility of the results and calculation of the relative standard deviation.
2. In addition to analysis via U.S. Environmental Protection Agency (EPA) Method 1633, HDOH highly recommends that soil and groundwater samples are processed for Total Oxidizable Precursors (TOPs) and analyzed for Total Organic Fluorine (TOF) to calculate a cumulative Hazard Index for PFAS and determine the Total

Ms. Jocelyn Tamashiro  
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PFAS Risk per HDOH HEER Office's updated *Interim Soil and Water Environmental Action Levels (EALs) for Perfluoroalkyl and Polyfluoroalkyl Substances (PFASs)* (<https://health.hawaii.gov/heer/files/2025/04/Hawaii-PFAS-Guidance-April-2024-Rev-022125.pdf>). Furthermore, please require that the laboratory take an MIS subsample size of 10 grams for soil analysis. Revise all areas of the RI WP that discuss laboratory analysis of soil and groundwater samples to include TOPs and TOF analysis in addition to EPA Method 1633, and a laboratory subsample size of 10 grams.

Should you have any questions, please contact Jennah Oshiro at (808) 586-4249 or via email at [jennah.oshiro@doh.hawaii.gov](mailto:jennah.oshiro@doh.hawaii.gov).

Sincerely,



Gracelda Simmons  
Environmental Management Program Manager  
Site Discovery, Assessment, and Remediation  
Hazard Evaluation and Emergency Response Office  
Hawaii Department of Health

Cc: Captain Gregory deWindt, NCTF-RH (via email at [gregory.p.dewindt.mil@us.navy.mil](mailto:gregory.p.dewindt.mil@us.navy.mil))  
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