REGION 9
SAN FRANCISCO, CA 94105

March 18, 2026

VIA ELECTRONIC MAIL ONLY

Jocelyn Tamashiro
Environmental Restoration Manager
NAVFAC Hawaii, EV3
400 Marshall Road, Building X-11
Joint Base Pearl Harbor-Hickam, Hawai'i 96860

Subject: U.S. Environmental Protection Agency Conditional Approval of the *Revised Daft Remedial Investigation Work Plan Per- and Polyfluoroalkyl Substances, Red Hill Bulk Fuel Storage Facility, Joint Base Pearl Harbor-Hickam, Hawaii*, February 2026

Dear Ms. Tamashiro:

Thank you for submitting the *Revised Daft Remedial Investigation Work Plan Per- and Polyfluoroalkyl Substances, Red Hill Bulk Fuel Storage Facility, Joint Base Pearl Harbor-Hickam, Hawaii.* We appreciate the accelerated timeline of the investigation of polyfluoroalkyl substances (PFAS) contamination at the Oily Waste Disposal Facility (OWDF) and beneath Adit 3. The PFAS Remedial Investigation (RI) is essential to developing a comprehensive understanding of the nature and extent of PFAS and comingled petroleum hydrocarbons in soil and groundwater at the Red Hill facility. Our comments on the work plan are provided below. In an effort to expedite the investigation in the vicinity of the proposed Red Hill Shaft (RHS) water treatment plant, we are granting conditional approval of several aspects of the Area B investigation. Final approval of the comprehensive RI work plan, including Area B, and the proposed groundwater monitoring program requires further discussion.

Comments

1. EPA approves the number, depths and locations of soil borings and temporary wells proposed for the OWDF and Adit 3 portion of Area B as shown in Figures 39, 40 and 41.

2. To support PFAS delineation at Area B, EPA recommends conducting Total Oxidizable Precursor (TOP) assays and Total Organic Fluorine (TOF) analyses on groundwater samples. These lines of evidence will be interpreted qualitatively to characterize potential source(s), relative strength, extent, and the presence of precursor compounds. TOP results can also help differentiate and apportion contributions from multiple PFAS sources within a commingled plume. We also

recommend applying these methods to perched-water samples at the Oily Waste Disposal Facility to evaluate whether shallow contamination is connected to the basal aquifer.

3. **Section 14.5.2 Scenario 2: No Petroleum Impacts Observed, PID Reading Between 10 ppmv and 50 ppmv.** The highest levels of both PFAS and total petroleum hydrocarbon (TPH) detected in groundwater at the OWDF were detected at OWDF-03B and OWDF-05B, where a maximum PID reading of 9.8 parts per million by volume (ppmv) was recorded during drilling. This indicates a potential correlation and co-occurrence of TPH and PFAS. EPA recommends targeting collection of soil samples at depth intervals with PID reading from 10-50 ppmv for PFAS analysis.

4. **14.7.1 Surface Soil and Subsurface Soil Sampling -** Sample depths discussed in paragraph 1 should be relative to the bottom elevations of backfilled excavations (i.e. samples should not be collected from recently placed fill).

EPA requests that Navy notify regulatory agencies if changes in scope occur that may impact data quality, or the ability to meet the data quality objectives. Modifications to the scope must be agreed upon in writing by EPA and the Navy.

If Navy disagrees with EPA comments, please schedule a meeting to ensure the investigation schedule remains on track. If you have any questions regarding this letter, please contact Tonya Russi at russi.tonya@epa.gov or (415) 972-3706.

Sincerely,

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

JOHN CHESNUTT
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John Chesnutt
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