AIEA NEIGHBORHOOD BOARD DISTRICT 20

FORMAL TRANSMITTAL LETTER Re: Comments on the Revised Draft PFAS Remedial Investigation Work Plan (February 2026) Date: April 2026

To: Commander, Navy Region Hawaii Environmental Restoration Program Joint Base Pearl Harbor–Hickam, HI

Cc: Hawai‘i Department of Health (DOH) U.S. Environmental Protection Agency (EPA), Region 9 PHHK RAB Co-Chairs

Dear Sir or Madam,

On behalf of the Aiea Neighborhood Board District 20, we respectfully submit the enclosed technical comments and recommendations regarding the Revised Draft Remedial Investigation (RI) Work Plan for PFAS at the Red Hill Bulk Fuel Storage Facility, dated February 2026.

As the community directly adjacent to the Red Hill facility and reliant on the underlying sole-source aquifer, the Aiea Neighborhood Board recognizes the importance of a complete, transparent, and scientifically defensible investigation. The Board appreciates the Navy’s continued coordination with local residents, regulatory agencies, and technical stakeholders. After reviewing the Executive Summary and associated RI elements, the Board offers the following overarching observations:

1. The Work Plan establishes a strong technical foundation, including the use of EPA Method 1633, DoD-accredited laboratories, and a multi-media sampling approach.
2. Several elements require clarification or expansion to ensure full delineation of PFAS impacts and to safeguard the aquifer serving Aiea and surrounding communities.
3. Additional monitoring, clearer decision criteria, and strengthened conceptual site modeling are needed to support defensible conclusions in the final RI.

A detailed Comment Matrix is attached, identifying specific technical issues, bases, and recommended revisions. Key themes include:

- Need for a more robust vertical migration model linking perched and basal groundwater.
- Evaluation of preferential pathways (tunnels, utilities, conduits) that may influence PFAS transport.
- Expanded soil and groundwater sampling in Area B and downgradient locations.
- Clarification of Data Quality Objectives (DQOs), reporting limits, and action triggers.
- Strengthened assessment of off-site migration, including additional perched and basal wells.
- Enhanced risk assessment for sensitive populations and ecological receptors.

The Aiea Neighborhood Board submits these comments in the spirit of constructive collaboration and with the shared goal of protecting public health and Hawai‘i’s drinking water resources. We respectfully request that the Navy, DOH, and EPA review the attached comments and provide written responses in accordance with standard RI/FS comment-response procedures. The Board also requests that the Navy present an updated Work Plan and response-to-comments summary at a future PHHK RAB meeting.

Thank you for your attention to these comments and for your continued engagement with the Aiea community.

Sincerely, Lawrence Higa, Aiea Neighborhood Board District 20

PFAS RI WORK PLAN — RAB COMMENT MATRIX (DRAFT)

Red Hill Bulk Fuel Storage Facility – February 2026 Revised Draft RI Work Plan Prepared for: PHHK Restoration Advisory Board Prepared by: *Lawrence Higa, Aiea Neighborhood Board District 20,* Date: April 2026

COMMENT MATRIX

Section / Page	Comment	Basis / Technical Rationale	Recommended Revision	Priority
Executive Summary	CSM does not fully describe vertical migration from perched to basal groundwater.	PFAS mobility and the presence of perched water above a sole-source aquifer require explicit modeling of vertical pathways.	Add a vertical migration model linking perched and basal groundwater, including hydraulic gradients and potential preferential pathways.	High
Executive Summary	Preferential pathways (tunnels, utilities, conduits) are mentioned but not evaluated.	Subsurface utilities at Red Hill have historically acted as conduits for contaminant migration.	Add mapping and evaluation of utilities, tunnels, and backfilled trenches as potential PFAS transport pathways.	High
Area A Sampling Plan	Soil boring density may be insufficient to capture heterogeneity near the 2022 release.	PFAS distribution in disturbed fill and excavation backfill is highly variable.	Increase boring density or provide justification for spacing; include vadose-zone transport modeling.	Medium
Area A Groundwater	Reliance on legacy wells may not meet PFAS DQOs due to construction materials.	Teflon/Viton components can bias PFAS results; only RHMW15 is being tested.	Evaluate all existing wells for PFAS-compatible construction materials; replace or exclude wells that do not meet DQOs.	High
Area B Sampling Plan	25 + 13 borings may not adequately characterize 37 acres with multiple features.	Large area with complex hydrogeology and multiple potential migration pathways.	Increase boring density near wells exceeding screening levels and near former OWDF and treatment facilities.	Medium
Area B Groundwater	Only one new basal well is proposed in southeast Area B.	PFAS exceedances in multiple basal wells indicate need for more downgradient coverage.	Add at least one additional basal well downgradient of Area A and one along western boundary.	High
Off-Site Assessment	Only two off-site basal wells are proposed; no perched wells.	Perched groundwater is a key transport mechanism; industrial park stormwater systems may act as conduits.	Add perched and basal wells west/northwest of Area B; evaluate stormwater infrastructure in Halawa Industrial Park.	High
DQOs (Worksheets 34–36)	Reporting limits and decision criteria are not explicitly stated.	Decision-making requires clear thresholds relative to EPA MCLs, HALs, and DOH EALs.	Add reporting limits, comparison tables, and explicit triggers for additional delineation or interim actions.	High
Risk Assessment	Sensitive populations and ecological receptors are not fully defined.	PFAS toxicity varies by receptor; infants and pregnant individuals require explicit evaluation.	Expand receptor list; include future land-use scenarios and ecological pathways.	Medium
Stormwater Pathways	Stormwater transport from Area A swales is acknowledged but not quantified.	Stormwater runoff is a known PFAS migration mechanism.	Add stormwater transport modeling or sampling of swale discharge points.	Medium

Section / Page	Comment	Basis / Technical Rationale	Recommended Revision	Priority
Temporary Wells	Up to 15 temporary perched wells proposed, but criteria for converting to permanent wells are unclear.	Long-term monitoring requires clear criteria for permanent well installation.	Define criteria for converting temporary wells to permanent monitoring wells.	Low
Data Interpretation	No explicit plan for evaluating seasonal variability beyond two events.	Hawaii's wet/dry seasons can significantly affect PFAS concentrations.	Add justification for two events or propose contingency for additional sampling if variability is high.	Low