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

STATE OF HAWAII
DEPARTMENT OF HEALTH
KA ʻOIHANA OLAKINO
P. O. BOX 3378
HONOLULU, HI 96801-3378

July 28, 2026

Mr. Ernest Y.W. Lau, P.E.
Manager and Chief Engineer
Board of Water Supply - City and County of Honolulu
630 South Beretania St
Honolulu, Hawaiʻi 96843

Subject: U.S. Environmental Protection Agency and Hawaiʻi Department of Health Response to Board of Water Supply Request to Modify Red Hill Groundwater Sampling Frequency and Constituents, dated June 16, 2026

Dear Mr. Lau:

Thank you for your June 16, 2026 letter to the U.S. Environmental Protection Agency (EPA) and Hawaiʻi Department of Health (HDOH) requesting the agencies require the Navy to expand its Red Hill Facility groundwater monitoring program, especially as it relates to polyfluoroalkyl substances (PFAS). We appreciate the detailed data, maps, and observations you have provided, as well as the Board of Water Supply's (BWS) ongoing commitment to protecting Oahu's sole-source aquifer.

We share your concern about the presence of PFAS in the environment and the importance of thoroughly understanding its sources and potential impacts on public drinking water supplies. With respect to our oversight of the Navy's investigation of PFAS releases at the Red Hill Facility, as you know, the Navy is actively engaged in a Remedial Investigation (RI) under CERCLA (the "Superfund law"). The CERCLA framework outlines a stepwise, systematic approach to a RI: identifying and characterizing specific source areas, release mechanisms, and contaminant fate and transport (current phase). For a site with a hydrogeological setting as complex as Red Hill, this is typically an iterative process involving several phases of

investigation. Initial data from this investigation has already informed the need for additional investigation of soil and groundwater and refinement of the site groundwater monitoring well network.

At the same time, we continue to evaluate other available data, such as that provided by BWS. The data tables included in your letter appear to contain selected results from BWS wells that do not appear to be publicly available on the BWS website. To fully assess the information you presented, EPA would need the complete data set and associated data validation information for the samples referenced in your letter. We would appreciate receiving a complete data set including the laboratory reports associated with the BWS drinking water and groundwater monitoring wells.

We understand from the observations noted in your letter that BWS is concerned that PFAS from the Red Hill Facility could be affecting receptor wells to the northwest of the facility. While we appreciate your assessment and will review any additional information you provide, the PFAS RI is in its early stages and there has not been a sufficient amount of data collected to evaluate a linkage between the PFAS contamination at Red Hill and PFAS impacts identified in your letter. While Red Hill remains a potential source for PFAS in the Aiea area, for example, we anticipate data from further RI work will help determine whether to require the Navy expand its sampling to this area.

Your letter also stated that the regulatory agencies have reached a conclusion regarding the Halawa Industrial Park area being a source of PFAS contamination at Red Hill. That is not the case, and thus far, no source of PFAS has been identified in this area. Additional data are needed to determine whether past or present operations on the Halawa Industrial Park contributed to PFAS impacts near Red Hill. Sampling is included in the next phase of work.

Lastly, your letter requests increasing groundwater sampling frequency to weekly. We do not believe that weekly testing, including for petroleum chemicals, is currently warranted. As discussed above, ongoing results from the PFAS RI will inform the PFAS investigation approach, including frequency of sampling. Following the November 2021 fuel release, more frequent sampling was required to closely monitor changing groundwater conditions. Now, the tanks have been defueled and there is no ongoing fuel release, the monitoring data show that groundwater conditions and the known contamination plume remain relatively stable. HDOH and EPA continue to review new data as it comes in and if there are any signs that the contaminated groundwater is moving or new contamination is found, the regulatory agencies will require more frequent sampling, as appropriate.

We remain committed to transparent oversight and will provide updates as the site RI progresses. We appreciate your time in corresponding with EPA and HDOH. If you have any additional questions, please reach out to Weila Li at weila.li@doh.hawaii.gov or John Chesnutt at chesnutt.john@epa.gov.

Sincerely,

Signature: Gracelda Simmons

Email: gracelda.simmons@doh.hawaii.gov

Gracelda M. Simmons
Environmental Management Program Manager
Hawai'i State Department of Health

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Sharon Lin
Assistant Director
EPA Region 9 Superfund & Emergency Management Division

cc by email only:

Jocelyn Tamashiro, NAVFAC
CDR Dunn, NCTF-RH
Steven Chow, NCTF-RH
Joshua Stout, NCTF-RH
Alison Fong, EPA Region 9 Land, Chemicals, and Redevelopment Division