

**BOARD OF WATER SUPPLY
KA 'OIHANA WAI
CITY AND COUNTY OF HONOLULU**

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August 21, 2024

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Rear Admiral Stephen Barnett
Commander
Navy Region Hawai'i
850 Ticonderoga Street, Suite 110
Joint Base Pearl Harbor-Hickam, Hawai'i 96860

and

Martha Guzman
Regional Administrator
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, California 94105

and

Kenneth S. Fink, MD, MGA, MPH
Director of Health
Hawai'i State Department of Health
1250 Punchbowl Street
Honolulu, Hawai'i 96813

Dear Rear Admiral Barnett, Ms. Guzman, and Dr. Fink:

Subject: Honolulu Board of Water Supply (BWS) Request – Weekly Sampling and Analysis of Navy Monitoring Wells (Red Hill Bulk Fuel Storage Facility Monitoring Well Network) and Navy Production Wells, Honolulu, Hawai'i

BWS recently detected polycyclic aromatic hydrocarbons (PAHs) at BWS' inactive 'Aiea Wells (Lau, 2004a). BWS was forced to stop pumping 'Aiea Wells on December 8, 2021, as a result of the Navy's fuel release crisis and Red Hill Shaft contamination incident on November 20, 2021. Additionally, BWS recently commented on the Navy's draft Per- and Polyfluoroalkyl Substances (PFAS) Release Remediation Investigation Work Plan, which was developed for the Red Hill Bulk Fuel Storage Facility (RHBFSF) in response to the 2022 releases of aqueous film-forming foam (AFFF) at the RHBFSF (Lau, 2024b). The recent PAH detections at 'Aiea Wells, coupled with the considerable uncertainties regarding the extent of PFAS contamination emanating from the RHBFSF,

only serves to underscore the critical need to understand the full extent of the impacts of past fuel and AFFF releases at the RHBFSF to the underlying regional groundwater aquifer.

Although a significant number of onsite monitoring wells have been installed recently at the RHBFSF, the off-site monitoring well network is regrettably limited and must be enhanced in order to better understand the regional risk to our nearby drinking water production wells. Assessing this risk requires, among other things, a significant, well-coordinated, and robust sampling effort of the potential sampling locations immediately available. Accordingly, BWS requests the Navy immediately undertake the following activities:

1. Groundwater sampling and analysis of all RHBFSF monitoring wells, both on and off-site (see attached Navy well listing).
2. Groundwater sampling and analysis of all Navy production wells in Honolulu, HI (Navy 'Aiea Hālawā Shaft, Red Hill Shaft, and Waiawa Shaft).
3. All groundwater samples, from both the Navy monitoring wells and the Navy production wells, should be collected on a weekly basis.
4. All groundwater samples should be analyzed for the presence of PAHs using EPA Methods 525.2 and 625. The lowest possible minimum reporting limits (MRLs) should be used.
5. All groundwater samples should be analyzed for the presence of PFAS using EPA Methods 533 and 537.1 to the lowest possible MRLs.
6. All groundwater samples should be analyzed for the presence of total petroleum hydrocarbons (TPH), diesel range organics (DRO), gasoline range organics (GRO), and motor oil range organics (MRO) using EPA Method 8015 to the lowest possible MRLs.
7. All analytical data from this weekly sampling effort should be sent to BWS directly upon receipt and completely unredacted.
8. BWS would like to concurrently collect water samples during the weekly Navy sampling at all monitoring wells and production wells.

BWS strongly urges the Regulatory Agencies to require the Navy to move expeditiously to fulfill the requests outlined above. If you have any questions, please contact Erwin Kawata, Deputy Manager, at (808) 748-5066.

Very truly yours,



Ernest Y.W. Lau, P.E.
Manager and Chief Engineer

Rear Admiral Stephen Barnett, Ms. Martha Guzman, & Dr. Kenneth Fink
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Attachment

References

Lau, Ernest Y.W. 2024a. Polynuclear Aromatic Hydrocarbons (PAHs) Detected at Board of Water Supply Aiea Wells. Letter from Ernest Y.W. Lau, BWS Manager and Chief Engineer to Ms. Martha Guzman, United States Environmental Protection Agency Region IX Administrator, and Dr. Kenneth S. Fink, Director, State of Hawaii Department of Health. July 8.

Lau, Ernest Y.W. 2024b. Honolulu Board of Water Supply (BWS) Comments on the U.S. Department of the Navy's (Navy) Draft Remedial Investigation Work Plan Per- and Polyfluoroalkyl Substances (PFAS) Release, Red Hill Bulk Fuel Storage Facility date June 2024 (redacted version). Letter from Ernest Y.W. Lau, BWS Manager and Chief Engineer to Ms. Martha Guzman, United States Environmental Protection Agency Region IX Administrator, and Dr. Kenneth S. Fink, Director, State of Hawaii Department of Health. August 7.

cc:

The Honorable Lloyd J. Austin III
Secretary of Defense
U.S. Department of Defense
1000 Defense Pentagon
Washington, DC 20301-1000

The Honorable Brian Schatz
United States Senate
Prince Kuhio Federal Building
300 Ala Moana Boulevard, Room 7-212
Honolulu, Hawai'i 96850

The Honorable Carlos Del Toro
Secretary of the Navy
Office of the Secretary of the Navy
1000 Navy Pentagon, Room 4D652
Washington, DC 20350

The Honorable Mazie Hirono
United States Senate
Prince Kuhio Federal Building
300 Ala Moana Boulevard, Room 3-106
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Michael S. Regan
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U.S. Environmental Protection Agency
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Mail Code 1101A

The Honorable Ed Case
U.S. House of Representatives
1003 Bishop Street, Suite 1110
Honolulu, Hawai'i 96813

The Honorable Josh Green, M.D.
Governor of Hawai'i
Executive Chambers, State Capitol
415 South Beretania Street
Honolulu, Hawai'i 96813

The Honorable Jill Tokuda
U.S. House of Representatives
700 Bishop Street, Suite 1902
Honolulu, Hawai'i 96813

Nā'ālehu Anthony
BWS Board Chair

Navy drinking water source and monitoring well testing

Sample type	Sample Location	EPA Test Method				EPA 8015
		EPA 525.2	EPA 625	EPA 533	EPA 537.1	
		SOC/PAH	SOC/PAH	PFAS	PFAS	TPH
DW supply well	Red Hill Shaft	Weekly	Weekly	Weekly	Weekly	Weekly
	Waiawa Shaft	Weekly	Weekly	Weekly	Weekly	Weekly
	Aiea Hatawa Shaft	Weekly	Weekly	Weekly	Weekly	Weekly
On Red Hill property	OWDFMW01	Weekly	Weekly	Weekly	Weekly	Weekly
	OWDFMW4A	Weekly	Weekly	Weekly	Weekly	Weekly
	OWDFMW5A	Weekly	Weekly	Weekly	Weekly	Weekly
	OWDFMW7A	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW01	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW01R	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW02	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW03	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW04	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW05	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW06	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW06	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW07	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW08	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW09	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW10	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW11 (01 - 07)	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW12	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW12A	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW13 (01-05)	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW14 (01-07)	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW15 (01-05)	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW16	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW16A	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW17	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW18	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW19	Weekly	Weekly	Weekly	Weekly	Weekly
	RHMW20	Weekly	Weekly	Weekly	Weekly	Weekly
	RHP01	Weekly	Weekly	Weekly	Weekly	Weekly
	RHP02	Weekly	Weekly	Weekly	Weekly	Weekly
RHP03	Weekly	Weekly	Weekly	Weekly	Weekly	
RHP04A	Weekly	Weekly	Weekly	Weekly	Weekly	
RHP04B	Weekly	Weekly	Weekly	Weekly	Weekly	
RHP04C	Weekly	Weekly	Weekly	Weekly	Weekly	
RHP05	Weekly	Weekly	Weekly	Weekly	Weekly	
RHP06	Weekly	Weekly	Weekly	Weekly	Weekly	
RHP07	Weekly	Weekly	Weekly	Weekly	Weekly	
RHP08	Weekly	Weekly	Weekly	Weekly	Weekly	
Outside RH property	NMW24	Weekly	Weekly	Weekly	Weekly	Weekly
	NMW25	Weekly	Weekly	Weekly	Weekly	Weekly
	NMW26	Weekly	Weekly	Weekly	Weekly	Weekly
	NMW30	Weekly	Weekly	Weekly	Weekly	Weekly
	NMW32	Weekly	Weekly	Weekly	Weekly	Weekly
	NMW33	Weekly	Weekly	Weekly	Weekly	Weekly
	NMW34	Weekly	Weekly	Weekly	Weekly	Weekly

Key:

SOC/PAH = Synthetic organic chemicals/ polycyclic aromatic hydrocarbons

PFAS = Per- and polyfluoroalkyl substances

TPH = Total petroleum hydrocarbons