

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

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September 23, 2024

Rear Admiral M.F. Williams  
Deputy Commander  
Navy Closure Task Force – Red Hill  
850 Ticonderoga Street, Suite 110  
JBPHH, Hawai'i 96860-5101

Dear Rear Admiral Williams:

**Subject: Honolulu Board of Water Supply (BWS) Response to Navy letter dated August 21, 2024 (received September 16, 2024) Discussing a Comprehensive Groundwater Flow Model (GWFM) related to the Red Hill Bulk Fuel Storage Facility (RHBFSF) Contamination Crisis**

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The BWS has reviewed the Navy's letter dated August 21, 2024, in which the Navy's letter discusses a comprehensive GWFM developed by the Navy, the Defense Logistics Agency (DLA), the Hawai'i Department of Health (DOH), the Environmental Protection Agency (EPA) and the University of Hawai'i (UH) in accordance with the 2015 RHBFSF Administrative Order on Consent (AOC). The responsibility to develop a groundwater flow model, and a subsequent fate and transport model is a clear Navy requirement as outlined in the 2015 AOC Statement of Work. It is not the responsibility of the BWS to develop a groundwater flow model; the Navy is required to develop these models in response to the historic documented and undocumented releases at the RHBFSF and in order to ultimately address aquifer contamination. The latest draft of the GWFM report was submitted to the EPA and DOH on July 22, 2024. To date, the BWS has not been provided a copy of this report to review, despite repeated requests to the Navy and the EPA and DOH that an unredacted copy be provided. The 2015 AOC clearly identifies the BWS as a subject matter expert (SME) and in conjunction with our involvement attending meetings and reviewing 2015 AOC reports and work plans, have provided over 150 comment letters to the regulatory agencies. In lieu of being able to review this revised 2024 draft GWFM report, the BWS relies on the 2020 Navy GWFM Report.

While this report was ultimately disapproved by EPA and DOH, and the BWS agreed with many of the reasons the GWFM Report was rejected, the 2020 Report included Navy particle tracking results documenting groundwater particle paths that show groundwater flow from Red Hill toward BWS pumping wells to the northwest, including the BWS Hālawā Shaft, Aiea Wells, and Hālawā Wells. This supports our decision shut down these pumping sources following the Navy's RHBFSF fuel release in 2021.

The Navy letter also requested BWS input on their Red Hill monitoring well network, saying that they have requested BWS input since an October 4, 2022 Navy letter where the Navy noted that it is "open to shifting some of the Navy's planned drilling locations to sites that could be more beneficial to both" the Navy and BWS. The BWS did respond to the Navy's October 4, 2022 letter on November 23, 2022 (Lau, 2022a). In this letter, the BWS requested additional information pertaining to the light non-aqueous phase liquid (LNAPL) encountered during the drilling of RHMW17 and also a copy of the latest Navy geologic and groundwater modeling files for the RHBFSF. The Navy responded on November 29, 2022, by providing a well log for RHMW17, which did not disclose the location of LNAPL encountered at RHMW17. The Navy also included a statement that in order for the BWS to receive geologic and groundwater model files, the BWS would have to sign a non-disclosure agreement (NDA) (Lau, 2022b).

The BWS has provided input by attending many stakeholder meetings and submitting numerous comment letters regarding Red Hill monitoring wells and the Navy RHBFSF environmental investigations in general. Recently, the BWS submitted a monitoring well comment letter pertaining to the Navy's draft monitoring well installation work plan (Lau, 2024a). This comment letter stressed the importance of the Navy installing ground water wells at agreed upon locations to the northwest of Red Hill, and to installed nested wells at each location so shallow and deep aquifer characterization data is collected. The BWS continues its own efforts to install monitoring wells in the regional area and encourages the Navy to install off-site monitoring wells to the northwest of Red Hill as soon as possible. The BWS agrees with the WAI Report, which discusses the need for an additional monitoring wells to the north of the RHBFSF, in addition to what the Navy has proposed, between the RHBFSF and Hālawā Shaft, Hālawā Wells and Aiea Wells, which recommended an additional 122 monitoring wells at 61 locations (WAI, 2023)

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The BWS will be commenting further regarding these Red Hill technical issues. In addition, the BWS strongly urges the Regulatory Agencies to require the Navy to immediately fulfill the BWS request concerning weekly sampling (Lau, 2024b). If you have any questions, please contact Mr. Ernest Y.W. Lau, BWS Manager and Chief Engineer at (808) 748-5061.

Very truly yours,



Mr. Nā'ālehu Anthony  
Chair

cc:

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

## References

Lau, Ernest Y.W. 2022a. Honolulu Board of Water Supply (BWS) Data Request dated September 29, 2022 and Navy Response dated November 7, 2022. Letter from Ernest Y.W. Lau, BWS Manager and Chief Engineer to Rear Admiral J.J. Kilian, P.E., Commander, NAVFAC Pacific. November 23.

Lau, Ernest Y.W. 2022b. BWS Data Request Table Update. November 29.

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Lau, Ernest Y.W. 2024a. Honolulu Board of Water Supply (BWS) Comments – DRAFT Monitoring Well Installation Work Plan, Red Hill Bulk Fuel Storage Facility, Joint Base Pearl Harbor-Hickam, Oahu, Hawai'i, NAVFAC, dated February 22, 2024. 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 Hawai'i Department of Health. May 30.

Lau, Ernest Y.W. 2024b. 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 Hawai'i Department of Health. July 8.

Red Hill Water Alliance Initiative (WAI) Report. 2023. November.