

BOARD OF WATER SUPPLY

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CITY AND COUNTY OF HONOLULU

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ERWIN KAWATA
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September 24, 2024

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

And

Rear Admiral Stephen Barnett
Commander
Navy Region Hawai'i
850 Ticonderoga Street, Suite 110
JBPHH, Hawai'i 96860-5101

Dear Secretary Austin and Rear Admiral Barnett:

Subject: Past Requests for Information Related to the Red Hill Bulk Fuel Storage Facility (RHBFSF)

The Honolulu Board of Water Supply (BWS) writes again to the United States Department of Defense (DoD) and Department of the Navy (Navy) to follow up on its past requests for unredacted information related to the defueling and closure of the RHBFSF, the Joint Base Pearl Harbor Hickam (JBPHH) water system, as well as environmental data associated with the investigation and remediation of O'ahu's sole-source groundwater aquifer (e.g., Lau, 2024a; 2024b; 2024c; and 2024d) that remain unfilled. As you know, the importance of military transparency and the timely provision of this information is critical to ensure that O'ahu's drinking water supply will be secured and that safe, dependable, and affordable drinking water will remain available to the people of Hawai'i. Accordingly, the BWS continues to insist that the Navy's data and information be provided without further delay so that we can fulfill our public trust responsibility to protect and preserve the rights of present and future generations in the waters of the State.

Secretary Austin and Rear Admiral Barnett
September 24, 2024
Page 2

For reference, our most recent information requests are attached to this letter. To date, we have not received the requested information. We look forward to receiving your information and data. 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

Attachments 1 - 4

cc: Martha Guzman
Regional Administrator
United States Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, CA 94105

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

Kathleen Ho
Deputy Director
Environmental Health Administration
State of Hawai'i, Department of Health
1250 Punchbowl Street
Honolulu, Hawai'i 96813

References

- Lau, Ernest Y.W. (Lau). 2024a. Subject-Request for Information Related to the Red Hill Bulk Fuel Storage Facility (RHBFSF). Letter to Sec. Austin, February 12, 2024.
- Lau, Ernest Y.W. (Lau). 2024b. Subject-Renewed Request for Information Related to the Red Hill Bulk Fuel Storage Facility (RHBFSF). Letter to Sec. Austin, March 5, 2024.

Secretary Austin and Rear Admiral Barnett
September 24, 2024
Page 3

Lau, Ernest Y.W. (Lau). 2024c. Subject-Request for Information Related to April 24, 2024 Technical Memorandum Addressing JBPHH Water Distribution System: Lines of Evidence Regarding TPH Detections during Long-Term Monitoring. Letter to Sec. Austin, April 26, 2024.

Lau, Ernest Y.W. (Lau). 2024d. 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. Letter to Navy Rear Admiral Barnett, Marth Guzman (EPA) and Kenneth S. Fink (DOH), August 21, 2024.

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February 12, 2024

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

Dear Secretary Austin:

Subject: Request for Information Related to the Red Hill Bulk Fuel Storage Facility

On December 15, 2023, the Navy completed work to defuel the Red Hill Bulk Fuel Storage Facility (RHBFSF) of 104.6 million gallons of fuel. Over the next three to four years, the Navy will be working to remove 64,000 gallons of residual fuel, 28,000 gallons of sludge, and over three miles of pipeline from the facility. Now that the fuel has largely been removed from RHBFSF and the facility is being decommissioned, there is no longer any basis to cite defense-sensitive critical infrastructure as the reason to deny access and redact the contents of reports on RHBFSF. As the agency charged with managing Oahu's municipal water resources and providing residents with safe and dependable water service, it is paramount that full and complete information from the Red Hill investigations is provided to Board of Water Supply (BWS) and the public in real time without further delay. Accordingly, BWS (again) asks that the Navy provides us with the following information in unredacted form:

1. A complete, unredacted copy of the Navy Red Hill Closure Plan Supplement 3
 - Our understanding from the Fuel Tank Advisory Committee (FTAC) meeting on November 15, 2023, is that Closure Plan Supplement 3 has been provided to the U.S. Environmental Protection Agency (EPA) and Hawai'i Department of Health (DOH).
2. A complete, unredacted copy of the Naval Facilities Engineering Systems Command (NAVFAC) September 19, 2023, Final Report of Findings, Red Hill Shaft Optimization Study Report
3. All DOH and/or EPA responses to the NAVFAC Red Hill Shaft Optimization Study Report issued by the Navy on September 19, 2023.

- Our understanding from the FTAC meeting on November 15, 2023, is that DOH (and possible EPA) provided a comment letter or other response to the Navy on or about November 15, 2023, that provides regulatory comments on the recent Red Hill Shaft Optimization Study.
4. A complete, unredacted copy of the May 6, 2021, RHBFSF fuel release document titled "Root Cause of the JP-5 Pipeline Damage, Assess Tank 20 Piping for Return to Service at the Red Hill Bulk Fuel Storage Facility" dated September 7, 2021.
 - This root cause document was issued by Austin Brockenbrough & Associates, LLC of Richmond, Virginia and submitted to Navy Facilities Engineering Command (NAVFAC).
 5. A complete, unredacted copy of the June 13, 2022, document Final Endorsement on RDML Christopher J. Cavanaugh, USN Itr 5830 of 14 Jan 22, Subject – Command Investigation into the 6 May 2021 and 20 November 2021 Incidents at Red Hill Bulk Fuel Storage Facility (aka "Cavanaugh Report"). Please include complete copies of all documents listed as Enclosures in Appendix A of the Cavanaugh Report.
 6. All laboratory reports of all water data sampling provided in electronic data deliverable (EDD) format.
 - This request is inclusive of all laboratory results of groundwater monitoring wells, Red Hill Shaft, Navy Waiawa Shaft, Navy Aiea-Halawa Shaft, and samples obtained under the Red Hill Recovery and Monitoring Plan Appendix E, the Long-Term Monitoring Plan of the Navy Drinking Water System, and in response to the November 29, 2022, aqueous film forming foam (AFFF) spill near Adit 6 at RHBFSF.
 7. Disclosure of all past AFFF uses and their PFAS compounds from the time the AFFF fire suppression systems were installed at RHBFSF and JBPHH.
 8. Records of all AFFF releases for all Navy facilities on Oahu to date, including the date of the incident, volume, type, release location, and remediation actions that resulted.
 9. Most recent monitoring well installation work plan.
 - Our understanding from the Red Hill Monitoring Well "Mini" meetings held on November 1 and 29, 2023, is that the Navy was to submit an updated monitoring well installation work plan to the EPA and DOH in December 2023.
 10. All groundwater modeling and geologic modeling files for RHBFSF and the subsurface in the vicinity of Red Hill.
 - Please provide groundwater model files in USG and GW Vista format.
 - Please provide geologic model files in EVS and/or GIS format.

As we have made clear in prior correspondence, the information requested consists primarily of environmental data, not critical infrastructure or defense-sensitive information. BWS respectfully asks that the Navy provide the requested information in

The Honorable Lloyd Austin III
February 6, 2024
Page 3

unredacted form as soon as possible. Only then can we effectively assess the magnitude and ultimate fate of the releases originated from the Navy's RHBFSF and the potential past and future impacts of this contamination to our irreplaceable sole-source groundwater aquifer.

Thank you for your prompt attention to this matter. If you have any questions. Please feel free to contact me at (808) 748-5061.

Very truly yours,



ERNEST Y.W. LAU, P.E.
Manager and Chief Engineer

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

Kenneth S. Fink, MD, MGA, MPH
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March 5, 2024

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

Dear Secretary Austin,

Subject: Renewed Request for Information Related to the Red Hill Bulk Fuel Storage Facility (RHBFSF)

The Honolulu Board of Water Supply (BWS) writes to follow up on its request to the Department of Defense (DoD) dated February 12, 2024, for certain unredacted information related to the defueling and closure of the RHBFSF as well as environmental data associated with the investigation and remediation of Oahu's sole-source groundwater aquifer. Despite the critical importance of this information to the BWS, its ratepayers, and the public, to date we have not received a response from DoD or the Navy to our initial information request. The importance of timely receipt of this information cannot be overstated, it may well determine whether Oahu's drinking water supply water will be secured or whether the people of Hawaii's access to safe, dependable, and affordable drinking water will continue to be jeopardized. The BWS must insist that this data and information be provided in a timely manner so that we can fulfill our public trust responsibility to protect and preserve the rights of present and future generations in the waters of the State.

The BWS requests a timely update from the DoD or the Navy as to the status of providing the requested data and information. For ease of reference, our initial information request is reattached to this letter. If you have any questions, please feel free to contact me at (808) 748-5061.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Ernest Y.W. Lau', is written over a faint circular watermark or background.

ERNEST Y.W. LAU, P.E.
Manager and Chief Engineer

The Honorable Lloyd J. Austin III
March 5, 2024
Page 2

cc: Ms. Martha Guzman
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United States Environmental Protection Agency
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San Francisco, CA 94105

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References

Lau, Ernest Y.W. (Lau). 2024. Subject – Request for Information Related to the Red Hill Bulk Fuel Storage Facility (RHBFSF). Letter to Sec. Austin, February 12, 2024.

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April 26, 2024

NĀ ĀLEHU ANTHONY, Chair
KAPUA SPROAT, Vice Chair
BRYAN P. ANDAYA
JONATHAN KANESHIRO
EDWIN H. SNIFFEN, Ex-Officio
GENE C. ALBANO, P.E., Ex-Officio

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

Dear Secretary Austin:

Subject: Request for Information Related to April 24, 2024 Technical Memorandum
Addressing JBPHH Water Distribution System: Lines of Evidence
Regarding TPH Detections during Long-Term Monitoring

The Board of Water Supply (BWS) is in receipt of the above referenced technical memorandum (Memo) prepared by the Navy, seeking to evaluate the Total Petroleum Hydrocarbon (TPH) detections observed in the Navy's water distribution system during long-term monitoring (LTM) and their association with fuel releases from the Red Hill Bulk Fuel Storage Facility (RHBFSF). At the outset, as the agency charged with managing O'ahu's municipal water resources and providing nearly one million residents with safe and dependable water service, BWS has a compelling and unique interest in the data and analyses presented in the Memo, as well as the validity of the conclusions presented therein.

As you know, BWS is currently responding to the massive environmental and human health crisis caused by releases of petroleum and other hazardous substances that occurred at Red Hill in November 2021. These releases have forced BWS to take responsive action to prevent contamination from RHBFSF entering the BWS water distribution system, including, among other things, shutting down its own Hālawā Shaft, 'Aiea Well, and Hālawā Well drinking-water wells. Therefore it is paramount that full and complete information provided to the interagency team, including the EPA and Hawai'i State Department of Health (DOH), or relied upon as lines of evidence (LOE) by the Navy and its contractors in preparation of the Memo, is provided to BWS immediately, without further delay.

Accordingly, BWS requests the Navy provide us with the following information in unredacted form:

1. A complete, unredacted copy of the Memo, including all figures, tables, and appendices.
2. A complete, unredacted copy of the AH/BC Navy JV, LLC (2022), Hydraulic Modeling Study for the Joint Base Pearl Harbor-Hickam (JBPHH), Hawai'i. Prepared for the Naval Facilities Engineering Systems Command Pacific, Contract No. N62470-19-D-4001, Task Order No. N6274222F0108, November 2022.
3. All hydraulic modeling files for, prepared in advance of, or in connection with, the Memo or relied upon in the 2022 AH Engineering Consultants modeling study of the JBPHH System, which, according to the Memo, is capable of simulating flows, pressures, and contaminant transport over time, including any subsequent revisions. Please provide hydraulic model files in original EPANET format or exported into EPANET format ([EPANET | US EPA](#)).
4. Supervisory control and data acquisition (SCADA) pumping data at one-minute intervals collected from May 1, 2021 through April 25, 2024 from the following drinking water wells:
 - a. Red Hill Shaft
 - b. 'Aiea-Hālawa Shaft
 - c. Waiawa Shaft
5. A complete data package needs to be provided for all sample results, including primary and validated laboratory reports. For all chromatograms of water samples presented in the Memo, all:
 - a. Laboratory reports
 - b. Chains of custody
 - c. Original raw data used to generate the chromatograms.
 - All chromatograms need to be provided (primary sample, method blanks, dissolved-fraction JP-5, JP-5, etc.) and in the original scale. The .pdf copy of the document "cuts off" a portion of the observed peaks on some of the chromatograms.

The Honorable Lloyd Austin III
April 25, 2024
Page 3

As we have made clear in numerous prior correspondence, the information request consists primarily of environmental data, not critical infrastructure or defense-sensitive information, and BWS respectfully requests the Navy provide the requested information in unredacted form as soon as possible.

Thank you for your prompt attention to our data request. If you have any questions, please contact Erwin Kawata, Deputy Manager, at (808) 748-5066.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Ernest Y.W. Lau". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

ERNEST Y.W. LAU, P.E.
Manager and Chief Engineer

The Honorable Lloyd Austin III

April 25, 2024

Page 4

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

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Director of Health
Hawai'i State Department of Health
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Commander, Navy Region Hawai'i
850 Ticonderoga Street, Suite 110
Joint Base Pearl Harbor-Hickam, Hawai'i 96860

Kathleen Ho
Deputy Director
Environmental Health Administration
Hawai'i State Department of Health
1250 Punchbowl Street
Honolulu, Hawai'i 96813

The Honorable Brendan M. Owens
Assistant Secretary of Defense (Energy, Installations, and Environment)
3400 Defense Pentagon
Washington, DC 20301-3400

The Honorable Paul D. Cramer
Principal Deputy Assistant Secretary of Defense
(Energy, Installations, and Environment)
3400 Defense Pentagon
Washington, DC 20301-3400

Meredith Berger
Assistant Secretary of the Navy (Energy, Installations, and Environment)
Office of the Secretary of the Navy
1000 Navy Pentagon, Room 4D652
Washington, DC 20350

The Honorable Carlos Del Toro
Secretary of the Navy
Office of the Secretary of the Navy
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Washington, DC 20350

The Honorable Lloyd Austin III

April 25, 2024

Page 5

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

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

The Honorable Mazie Hirono
United States Senate
Prince Kuhio Federal Building
300 Ala Moana Boulevard, Room 3-106
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The Honorable Ed Case
U.S. House of Representatives
1003 Bishop Street, Suite 1110
Honolulu, Hawai'i 96813

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

Michael S. Regan
EPA Administrator
U.S. Environmental Protection Agency
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August 21, 2024

NĀ'ĀLEHU ANTHONY, Chair
JONATHAN KANESHIRO, Vice Chair
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EDWIN H. SNIFFEN, Ex-Officio
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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
August 21, 2024
Page 3

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
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The Honorable Carlos Del Toro
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Office of the Secretary of the Navy
1000 Navy Pentagon, Room 4D652
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The Honorable Mazie Hirono
United States Senate
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The Honorable Josh Green, M.D.
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Executive Chambers, State Capitol
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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