

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

630 SOUTH BERETANIA STREET • HONOLULU, HAWAII 96843  
Phone: (808) 748-5000 • [www.boardofwatersupply.com](http://www.boardofwatersupply.com)

RICK BLANGIARDI  
MAYOR  
*MEIA*

ERNEST Y. W. LAU, P.E.  
MANAGER AND CHIEF ENGINEER  
*MANAKIA A ME KAHU WILIKI*

ERWIN KAWATA  
DEPUTY MANAGER  
*HOPE MANAKIA*



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

October 28, 2024

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

and

Mr. Kenneth S. Fink, MD, MGA, MPH  
Director of Health  
Hawai'i State Department of Health  
1250 Punchbowl Street  
Honolulu, Hawai'i 96801-3378

Dear Ms. Guzman and Dr. Fink:

Subject: Renewed Request for Unredacted Information Related to Environmental Conditions in the Vicinity of the Red Hill Bulk Fuel Storage Facility (RHBFSF)

The Honolulu Board of Water Supply (BWS) is in receipt of the joint letter dated October 17, 2024 from the U.S. EPA and the Hawai'i Department of Health (DOH) (collectively, the "Regulatory Agencies") responding to seven letters previously sent by the BWS addressing a number of topics related to the U.S. Department of the Navy's (Navy's) operations at the RHBFSF and the contamination of the Navy's drinking water distribution system. The Regulatory Agencies' letter raises many significant issues to which the BWS will respond in detail under separate cover. There is one issue that was raised in the October 17 letter, the open and transparent sharing of Navy data, which is so critical to the BWS that we felt compelled to address separately.

The BWS agrees with the Regulatory Agencies that the sharing of all available data, including by the Navy, would provide the most complete information for understanding the condition of our irreplaceable groundwater aquifer, its flow, and the extent of the contamination caused by releases from the RHBFSF. As you know, for far too long the

Ms. Guzman and Dr. Fink  
October 28, 2024  
Page 2

Navy has withheld and continues to withhold information critical to determining the ultimate fate and transport of pollutants from the RHBFSF and evaluating the extent of the resulting groundwater contamination. As the agency charged with managing O'ahu'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 the BWS and public in real time without further delay.

The BWS has also been steadfast in its belief that a nondisclosure agreement, which the Navy claims is somehow necessary to share this environmental data and analyses, is unnecessary, inappropriate, and contrary to the BWS' commitment to public transparency. It now seems apparent that the Regulatory Agencies concur:

*As a matter of policy, EPA does not believe a non-disclosure agreement (NDA) is necessary for this information and is now questioning whether an NDA should be required by the Navy.*

Given this agreement and the fact that the Navy has no legitimate basis for denying access to and redacting the contents of reports on the RHBFSF or the environmental conditions nearby, the BWS again asks for the active support of the Regulatory Agencies in compelling the Navy to provide us with all RHBFSF environmental data, information, and analyses in unredacted form.

The BWS appreciates our longstanding, collaborative relationship with the Regulatory Agencies to safeguard O'ahu's drinking water resources. If you have any questions concerning this request, please contact Mr. Erwin Kawata, Deputy Manager at (808) 748-5066.

Very truly yours,



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

cc: Mr. Nā'ālehu Anthony, BWS Board Chair

### References

Response to Letters to US Environmental Protection Agency (EPA), Region 9 and Hawai'i Department of Health (DOH), dated October 17, 2024