JOSH GREEN, M.D. GOVERNOR OF HAWAI'I KE KIA'ĂINA O KA MOKU'ĂINA 'O HAWAI'I



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STATE OF HAWAI'I DEPARTMENT OF HEALTH KA 'OIHANA OLAKINO P. O. BOX 3378 HONOLULU, HI 96801-3378

In reply, please refer to: File:

August 9, 2023

Rear Admiral Stephen Barnett Commander, Navy Region Hawai'i 850 Ticonderoga Street, Suite 110 Joint Base Pear Harbor Hickam, Hawai'i 96860 [via email only: <u>stephen.d.barnett.mil@us.navy.mil]</u>

Dear RDML Barnett:

Subject: Request to Immediately Reduce Red Hill Shaft Granular Activated Carbon Pumping Rates

The Hawai'i Department of Health (DOH) is in receipt of the Navy Region Hawai'i's (Navy's) August 1, 2023 request to reduce pumping rates at Red Hill Shaft. However, we understand that a draft report discussing the Red Hill Shaft Flow Optimization Study procedures, data evaluation, and findings, which we anticipate will justify your request, will be provided to the DOH and U.S. Environmental Protection Agency (EPA) on August 17, 2023. Furthermore, as stated in your letter, your staff will discuss this study with our subject matter experts on August 30, 2023, before submitting a final report in mid-September 2023. While we note that previous datasets have not indicated robust capture, we believe it is appropriate for us to review your study report, additional data collected, and the basis of findings that justify your request prior to concurring with your conclusion.

Your letter further states, "[t]he Regulatory Agencies currently have access to all validated Flow Optimization survey data supporting this request." We can only assume this refers to the partial raw dataset, such as transducer data, field measurements, and analytical laboratory data, that may have been uploaded to the Navy's electronic data management system (EDMS). For us to initiate our review prior to receiving the Navy's report, submit the full dataset, including:

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- 1. A list of specific data collected, and information or reports obtained or utilized for this study (e.g., laboratory reports, boring logs) and its location within EDMS or elsewhere. If the data is not available in EDMS and has not otherwise been provided, submit that data or report.
- 2. Dates and times when pumping rates were changed and associated pumping rates.
- 3. The name and geolocational information (northing, easting, and elevation) of each measuring point from which the transducer is referenced or other data is collected.

Lastly, in your response to our December 15, 2022 comments on the Red Hill Shaft Flow Optimization Study Work Plan, you stated "[t]he Navy awarded a contract to CAPE Environmental Management, Inc., in January 2022 to conduct an evaluation of potential water use courses of action (COAs) for effluent from the Red Hill Shaft GAC [granular activated carbon] system." The DOH and EPA requested a copy of this evaluation in letters dated March 30, 2023 and May 18, 2023. Neither request was acknowledged. We again request that you provide a copy of the CAPE evaluation to the DOH and EPA.

We therefore deny the request to immediately reduce Red Hill Shaft GAC pumping rates and will initiate our review of the data once we receive a response to this letter with the requested information. We will also review your draft report when we receive it on August 17, 2023. Should you have any questions regarding this letter, please contact Ms. Kelly Ann Lee, Red Hill Project Coordinator, at (808) 586-4226 or at kellyann.lee@doh.hawaii.gov.

Sincerely,

Kathleen Ho

KATHLEEN S. HO Deputy Director for Environmental Health

Ms. Claire Trombadore, U.S. Environmental Protection Agency [via email only]
Mr. Grant Scavello, U.S. Environmental Protection Agency [via email only]
Mr. Joshua Stout, Navy Region Hawai'i [via email only]