



UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
REGION IX
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STATE OF HAWAII
DEPARTMENT OF HEALTH
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April 12, 2024

Rear Admiral Stephen Barnett
Commander, Navy Region Hawai'i
850 Ticonderoga St., Ste. 110
Joint Base Pearl Harbor Hickam, HI 96860-5101
(Sent via Electronic Mail)

Subject: Conditional Approval of the *Site Characterization Plan Addendum – Collection, Holding, and Transfer Tank Overflow Site Characterization*, dated March 2024

Dear Rear Admiral Barnett:

Thank you for submitting the *Site Characterization Plan Addendum – Collection, Holding, and Transfer (CHT) Tank Overflow Site Characterization (Work Plan)*, dated March 2024. The U.S. Environmental Protection Agency's (EPA's) 2023 Consent Order requires the U.S. Department of the Navy (Navy) and U.S. Defense Logistics Agency to address the investigation and remediation of all past releases at the Red Hill Bulk Fuel Storage Facility (Facility). Similarly, the Hawai'i Department of Health's (DOH's) 2022 Emergency Order requires the Navy to "continue to characterize the release(s) and develop strategies for remediation of impacted groundwater in accordance with 11-280.1, HAR [Hawai'i Administrative Rules]."

The DOH and EPA, collectively the Regulatory Agencies (RAs), have reviewed the Work Plan and associated responses to regulator comments. Most of our comments have either been adequately addressed or acknowledged. In accordance with Paragraph 7b of EPA's 2023 Consent Order and DOH's 2022 Emergency Order, we conditionally approve the Work Plan under the following conditions:

1. **Cleaning products** – The RAs appreciate that the Navy acknowledged the potential for bathroom cleaners to be in the materials released from the CHT tank. Ensure the analyte list for each media is comprehensive enough to detect residual chemicals from these

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cleaners, or any cleaners historically used during the life cycle of the Facility, if those chemicals may have been released from the CHT tank.

2. **Per- and polyfluoroalkyl substances (PFAS)** – The RAs agree that CHT work can begin while upper management discuss PFAS. While discussions are underway, collect and have the Navy lab hold extra media from each matrix. Collect and hold sufficient aliquot volume for future PFAS analysis via EPA Method 1633.

If you have any questions regarding this letter, please contact Matthew Cohen, EPA Red Hill Project Coordinator, at Cohen.Matthew@epa.gov or (415) 972-3691; or Kelly Ann Lee, DOH Red Hill Project Coordinator, at KellyAnn.Lee@doh.hawaii.gov or (808) 586-4226.

Sincerely,


Digitally signed by Cohen,
Matthew
Date: 2024.04.12 11:16:34
-07'00'

Matthew Cohen PG
Red Hill Project Coordinator
U.S. Environmental Protection Agency, Region 9

Kelly Ann Lee
Red Hill Project Coordinator
State of Hawai'i, Department of Health

cc by email only:

RDML Marc Williams, Deputy Commander, Navy Closure Task Force – Red Hill
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