



**UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**



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

May 18, 2023

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: Red Hill Shaft Flow Optimization Study

Dear Rear Admiral Barnett:

On March 30, 2023, the Hawai'i Department of Health (DOH) and U.S. Environmental Protection Agency (EPA), "Regulatory Agencies" (RAs), provided conditional approval for the U.S. Department of the Navy (Navy) to begin its Red Hill Shaft Flow Optimization Study (Study) to evaluate the effects of decreased pumping from Red Hill Shaft (RHS) into Halawa Stream.

We received the Navy's letter, dated April 3, 2023, providing the step-down schedule for the ongoing Study and responses to comments 2 and 3 in our joint letter, dated March 30, 2023. We appreciate the Navy's preliminary responses but have concerns regarding two specific responses quoted below. In addition, we request a response to our unaddressed comment 4.

Navy's response to RAs' March 30, 2023 letter, comment 2:

"Specific to this work plan, the Navy acknowledges the comment for the incident-specific EAL [environmental action level] for TPH document, Recommended Risk-Based Drinking Water Action Levels for Total Petroleum Hydrocarbons (TPH) Associated with Releases of JP-5 Jet Fuel (April 20th, 2022). Currently, the Red Hill Shaft is not connected to the drinking water system, and has not been utilized as a drinking water source since November 2021. The Navy will continue

to utilize the incident-specific EAL for drinking water action levels at water sources that provide drinking water.”

The aquifer underlying the Red Hill Bulk Fuel Storage Facility (RHBFSF) is a sole source aquifer utilized for drinking water. Therefore, the use of the incident-specific EALs for drinking water is appropriate for the groundwater at this site. The RAs will continue to require the use of incident-specific, risk-based screening levels as we review RHBFSF data and evaluate the protectiveness of the Navy’s response actions.

Navy’s response to RAs’ March 30, 2023 letter, comment 3:

“Specific to this work plan, the Navy acknowledges the comment regarding the use of pre-chlorination points. As part of the revision in January 2023 to the Regulatory Agencies’ comments of December 15th, 2022, the work plan has been revised in Section 4.7 to perform influent sampling into the granular activated carbon system upon reactivation of the system after each scheduled outage. The sampling will be analyzed utilizing the Notice of Interest’s list of analytes that are in effect at the time of the sample’s collection.”

The RAs will pursue this issue further via the comprehensive monitoring plan, as discussed in the April 11, 2023 meeting. Specifically:

- The influent granular activated carbon (GAC) sampling point appears to be located at a different depth and position than the pre-chlorination point where samples were previously drawn. Continuous data records are important to our analyses, so it is crucial to know whether the two sampling points are co-located. Please describe the depth and location of the GAC influent sampling point and provide a diagram showing its location in relation to the pre-chlorination influent sampling points within RHS.
- To promote consistency and repeatability of sampling and monitoring data, the RAs request the Navy include the pre-chlorination point under the comprehensive monitoring program. The influent GAC point shall remain compliant with methods and procedures to fulfill anticipated National Pollutant Discharge Elimination System (NPDES) sampling requirements for the Red Hill Shaft Recovery and Monitoring Plan (RHSRMP) (DON 2021).
- It is unclear whether the Navy will assess data pertaining to the RHS pre-chlorination point in historic and current assessments, especially when creating the spatial-temporal plume maps. Groundwater data analyses performed by the Navy that omit existing data from the pre-chlorination point must be updated to include those results.

RAs’ March 30, 2023 letter, comment 4:

The Navy did not address comment 4. The letter expressed the RAs’ interest in beneficial water reuse and requested the CAPE Environmental Management Inc. report evaluating beneficial

Rear Admiral Stephen Barnett

May 18, 2023

Page 3 of 3

water reuse courses of action (COAs) for RHS. Comment 4 also asked the Navy to “[p]rovide the basis for the design of the permanent drinking water treatment facility and the list of all contaminants which are being considered for treatment (e.g., JP-5, historically released fuels, weathered fuels, PFAS, fuel additives, etc.)” These items do not affect the schedule of the Study, but the Navy should acknowledge the comment and provide separate document(s) to address these outstanding issues.

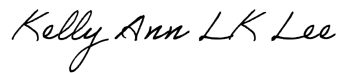
If you have any questions regarding this letter, please contact Grant Scavello, EPA Red Hill Project Coordinator, at Scavello.Grant@epa.gov or (415) 972-3556; or Kelly Ann Lee, DOH Red Hill Project Coordinator, at KellyAnn.Lee@doh.hawaii.gov or (808) 586-4226.

Sincerely,

**GRANT
SCAVELLO**

Grant Scavello
Red Hill Project Coordinator
U.S. Environmental Protection Agency, Region 9

Digitally signed by GRANT
SCAVELLO
Date: 2023.05.18 13:56:10
-07'00'



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

cc: VADM John Wade, Commander, Joint Task Force – Red Hill [via email only]
Donald Panthen, Red Hill PMO Director, Navy Region Hawai‘i [via email only]
Sherri Eng, Environmental Director, Navy Region Hawai‘i [via email only]
RDML Jeffrey Kilian, Commander NAVFAC Hawai‘i [via email only]
LCDR Travis Myers, Aquifer Recovery Team Lead, NAVFAC Hawai‘i [via email only]
Dr. Donald Thomas, Director, Center for the Study of Active Volcanos, UH-Hilo
[via email only]