

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

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April 24, 2024

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

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

Dear Dr. Fink and Ms Guzman:

Subject: Navy 'Aiea-Hālawa Shaft

The Board of Water Supply (BWS) strongly urges the U.S. Environmental Protection Agency (EPA) and Hawaii Department of Health (DOH) (collectively referred to as the regulatory agencies) to defer granting the Navy approval to resume pumping of the Navy 'Aiea-Hālawa Shaft until the nature and extent of Red Hill fuel releases in the groundwater aquifer have been determined, the Groundwater Flow Model Report and Contaminant Fate and Transport Model Report have been completed and approved by the regulatory agencies and stakeholders, and the groundwater transport model has been successfully applied to simulate the observed contamination in the Red Hill monitoring wells following the 2021 fuel releases at Red Hill.

Releases from Red Hill forced BWS to shut down pumping at several potable water wells located in the vicinity of the Navy 'Aiea-Hālawa Shaft (BWS 'Aiea Wells, BWS Hālawa Wells). Pumping the Navy 'Aiea-Hālawa Shaft would facilitate the migration of fuel contamination in the sole-source groundwater aquifer away from Red Hill toward the Navy 'Aiea-Hālawa Shaft and BWS drinking water wells. Until the Navy has answered our questions regarding the volume of the Red Hill fuel releases and the extent of migration of the released fuel through the saturated and unsaturated zones in the subsurface, the Navy 'Aiea-Hālawa Shaft should not be operated. We therefore ask

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that the regulatory agencies not approve the Navy's request to resume pumping the Navy 'Aiea-Hālawā Shaft.

Thank you for your consideration of this matter. 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

cc: The Honorable Carlos Del Toro
Secretary of the Navy
Office of the Secretary of the Navy
1000 Navy Pentagon, Room 4D652
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