

# BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU  
630 SOUTH BERETANIA STREET  
HONOLULU, HI 96843  
www.boardofwatersupply.com



December 14, 2022

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

And

Dr. Elizabeth A. Char, MD  
Director  
State of Hawaii  
Department of Health  
P. O. Box 3378  
Honolulu, Hawaii 96801-3378

Dear Regional Administrator Guzman and Dr. Char:

**Subject:** United States Environmental Protection Agency (EPA) and Hawaii Department of Health (DOH) letter to the United States Navy (Navy) dated November 2, 2022 Regarding Per- and Polyfluoroalkyl substances (PFAS)

Your December 8, 2022 reply to our November 30 and December 5, 2022 letters regarding the aqueous film forming foam (AFFF) spill at the Red Hill fuel facility included the subject letter that states the Navy detected PFAS in water samples collected from Red Hill Shaft on December 20 and 27, 2021. The results showed 2.76 ppt (parts per trillion) and 3.49 ppt of PFOA (perfluorooctanoic acid) and 6.72 ppt and 4.35 ppt of PFOS (Perfluorooctanesulfonic acid) respectively. Your letter to the Navy states the levels exceed EPA's interim health advisory levels but are below DOH EALs (environmental action limits). The letter also states samples collected by DOH on the same days (December 20 and 27, 2021) did not detect PFAS. We have the following questions and ask for your response to each.

1. Did EPA and DOH direct the Navy to collect additional samples to recheck the difference between the samples collected by DOH and the Navy's results? If not why?
2. If additional samples were collected what did those results show? Please provide us a copy of the laboratory report.
3. Hawaii Revised Statutes (HRS) §340E-24 states the public shall be notified of any previously undetected contaminant in ground water. Did the DOH and Navy notify the public of the findings? If so, please send us a copy of the news release. If not, why? If public notification by DOH and/or the Navy was not required, please describe the criteria

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that exempted the Navy and DOH from public notification and can those criteria be used by other water systems? If not, why?

4. Why did the regulatory agencies write to the Navy on November 2, 2022 about test results of samples collected almost one year later? Please explain the rationale.
5. The Navy reported the PFAS results to EPA and DOH on March 31, 2022. What written follow up actions did the regulatory agencies send to the Navy after receiving notification on March 31 2022?
6. The BWS asked for PFAS testing in the groundwater in June 2022 but the Navy and regulatory agencies indicated that results showed no detections. The subject letter states otherwise. Please explain.

The BWS is extremely concerned given the persistence of PFAS in the environment, the health effects of PFAS and the risk it poses to the drinking water aquifer. Please send us your responses to our questions by December 26, 2022.

If you have any questions, please contact me at 808-748-5061.

Very truly yours,



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

cc: The Honorable Josh Green  
Governor, State of Hawaii  
Executive Chambers  
State Capitol  
Honolulu, Hawaii 96813

Ms. Kathleen S. Ho  
Deputy Director  
State of Hawaii  
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