

Requested Information

1. Describe the November 29, 2022 and September 29, 2020 releases of AFFF and all other known PFAS releases, such as AFFF fire suppression system or any other sources at the Red Hill Bulk Fuel Storage Facility, including the estimated release quantities and the circumstances that led to each release. Provide a narrative response for each release, any videos of the releases, and maps and/or schematics that delineate the contaminated areas. Please describe any releases of AFFF discharged to sewer lines or storm drains. Provide any associated PFAS monitoring data that occurred around the time of the releases.

Navy Response: The Navy has provided a weekly Situation Report (SITREP) to the Hawai'i Department of Health (DOH) that documents the response actions taken in response to the spill on 29 November 2022 release. The most recent version (SITREP #6) is provided as Question 1 Enclosure 1, which is classified as Controlled Unclassified Information (CUI) and is not publicly releasable.

In response to a DOH letter dated 16 December 2022, the Navy provided detailed information on the 29 September 2020 incident that occurred at Adit 1/Underground Pump House. The Navy's response and associated attachments are provided as Question 1 Enclosure 2 (five products).

Question 1 Enclosure 3 provides a summary of the past AFFF releases that occurred at Red Hill Bulk Fuel Storage Facility.

There have been no known releases of AFFF discharged to sewer lines or storm drains for the following known releases at Red Hill:

- 29 November 2022
- 29 September 2020
- 7 December 2019

For the 29 November 2022 release, AFFF concentrate did enter the concrete storm V-ditch and flowed to within feet of a storm drain drop inlet. In an abundance of caution, the Navy immediately removed the V-ditch and sealed the drop inlet and associated storm drain at the inlet and outlet. For the V-ditch, soil was removed below the ditch to ensure any AFFF concentrate that may have penetrated the concrete was removed. The Navy subsequently developed a Work Plan to scope, remove and replace the storm drain. The Work Plan was approved by DOH and executed in December 2022. Confirmation PFAS samples were collected from the soil beneath the V-ditch and storm drain. The sample results are available in the Electronic Data Management System (EDMS).

2. Identify water utility infrastructure in the immediate vicinity of the contaminated areas for each release, including drinking water supply, wastewater, or storm sewer piping or conveyances. Provide a map indicating the location of such infrastructure in relation to the releases.

Navy Response: Question 2 Enclosures 1, 2, and 3 are the requested maps supporting the summary of releases provided in Question 1 Enclosure 3 which are classified as Controlled Unclassified Information (CUI) and are not publicly releasable.

3. Provide complete output data from the Navy's Supervisory Control and Data Acquisition ("SCADA") system for the AFFF fire suppression lines at Red Hill Bulk Fuel Storage Facility from November 28, 2022 to December 1, 2022. Provide the SCADA code key that defines SCADA shorthand text included in the output data.

Navy Response: Joint Task Force Red Hill attorneys sent Fire Alarm Control Panel data to EPA attorneys in mid-Feb. This was shared only with EPA since it is still close hold with restrictions associated with the investigation still pending release.

6. Describe the Navy's efforts to remediate the November 29, 2022 release of AFFF and all other known PFAS releases. Explain how recovered AFFF or other PFAS media were stored, treated and/or disposed of. Provide photographic evidence of remediation actions.

Navy Response: The Navy has provided a weekly Situation Report (SITREP) to DOH that documents the response actions taken in response to the spill on 29 November 2022 release. The most recent version (SITREP #6) is provided as Question 1 Enclosure 1. The Navy has also provided a Waste Management Plan to DOH for approval. The Draft Waste Management Plan is provided as Question 6 Enclosure 1.

A complete photographic log of the emergency response/remediation for the 29 November 2022 AFFF releases is provided as Question 6 Enclosure 2 which is CUI and not releasable to the public.

7. Describe or provide the Navy's plan for addressing detections of PFAS in the sole source drinking water aquifer including the Navy's protocol for receiving and reviewing monitoring data results and criteria for making determinations of actions the Navy will take in response to PFAS detections.

Navy Response: The Navy follows the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process and its long-standing EPA regulations for all chemicals in our cleanup program, including PFAS. We use the CERCLA process to investigate potential releases from Navy activities, prioritize responses, and determine the appropriate cleanup actions based on risk to human health and the environment.

The Navy tailors the actual sequence, timing, and scope of cleanup actions to site-specific conditions. Additionally, the Department prioritizes resources and addresses sites where risk to human health is the highest. As the Navy moves through the CERCLA process, it

works in collaboration with regulatory agencies, communities, and other stakeholders to ensure open and transparent information sharing.

Specific to RHBFSF, the Navy has conducted a response to the November 2022 AFFF spill and any long-term effects from this spill will be included in the ongoing CERCLA PFAS investigation and subject to an enforceable interagency cleanup agreement with DOH and EPA. The Navy is sampling for PFAS weekly at ten groundwater well locations, including the inactive Red Hill Shaft drinking water well, under a DOH-approved Sampling and Analysis Plan. All PFAS sampling results are publicly available online at www.jbphh-safewaters.org. Under the approved PFAS Sampling and Analysis Plan, groundwater data is screened against residential scenario EPA regional screening levels (RSLs) based on a hazard quotient (HQ) of 0.1 consistent with DoD-wide requirements. RSLs for PFOS, PFOA, PFBS, PFHxS, PFNA, and HFPO-DA based on an HQ of 0.1 are presented in the November 2022 RSL Table (USEPA, 2022). Data will also be screened against HEER Office TGM Section 4.2.7 (HDOH 2021), interim soil and water environmental action levels (EALs) for PFAS. PFAS sampling under this process began in December 2022, and all these groundwater results have been below the USEPA RSLs and DOH EALs. This groundwater data will be incorporated into the ongoing PFAS investigation under CERCLA. It is important to note that a PFAS detection in the drinking water aquifer does not mean that cleanup action is required or that the PFAS originated from RHBFSF or Navy activities. The Navy remains committed to fulfilling our cleanup responsibilities under CERCLA, and clearly communicating and engaging with our regulatory partners and communities.

In addition to the ongoing Navy CERCLA PFAS investigation (that includes RHBFSF), the Navy has been sampling for PFAS in its drinking water systems since 2020 under DoD-wide requirements. Also, the Navy will conduct required PFAS sampling for drinking water under EPA's Unregulated Contaminant Monitoring Rule Round #5 (UCMR 5).

