

BOARD OF WATER SUPPLY

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



March 10, 2023

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Ms. Leslie Chau
HIARNG Environmental Office
91-1227 Enterprise Avenue, Building 175
Kapolei, Hawaii 96707

Dear Ms. Chau:

Subject: Response to the Draft Final Site Inspection Report for the Waiawa
Gulch Training Site and Unit Training and Equipment Site

Thank you for meeting with the Honolulu Board of Water Supply (BWS) via a virtual meeting on January 30, 2023. We were also in attendance at your public meeting held at the Army National Guard Training Center at 96-1210 Wainona Street on Friday, February 24, 2023, regarding information surrounding per- and polyfluoroalkyl substances (PFAS)-containing materials and their historical releases, storage, usage, and disposal. We appreciate that you provided us a copy of the DRAFT FINAL Site Inspection Report ("SI") for the Waiawa Gulch Training Site and Unit Training and Equipment Site ("facility") and acknowledge your efforts for an open discussion with the community and other stakeholders.

The BWS is not a regulatory agency; however, we strongly recommend that the SI and any follow-up studies, reports and actions conducted by the HIARNG be in accordance with the requirements of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), and be thorough, timely and responsive to the needs of the impacted community.

The BWS is a stakeholder within the community, and we hope that the HIARNG respects and responds positively when addressing the concerns of the community, even going further than what CERCLA requires. In addition to the concerns expressed by the community at the February 24 public meeting, the BWS also recommends:

- That the HIARNG plans include investigations, and any necessary remedial actions, on the impact that PFAS have had on down-gradient food crops including lo'i (taro farms).
- That the HIARNG plans include investigations, and any necessary remedial actions, into possible PFAS contamination into the basal aquifer.

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- That the HIARNG investigate the use of other laboratory services that can provide PFAS testing results in a quicker turnaround time that more accurately reflect the urgency of the situation than the current 12-14 weeks that the HIARNG currently states is the norm.
- That all parties that are at risk from PFAS from the facility are duly notified and the issue is remedied quickly to reduce and minimize the risk of adverse effects.
- That the HIARNG consult with the Navy regarding possible impacts to their nearby Waiawa Shaft pumping facility.

The BWS is open to furthering the discussion in having the HIARNG or their CERCLA partners sample pertinent BWS wells for PFAS.

If you have any questions, please contact Marc Chun of the Water Resources Division at (808) 748-5906 or mchun@hbws.org.

Very truly yours,



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

lau

cc: Kathleen Ho, Department of Health