



# SIERRA CLUB OF HAWAII

To: Secretary of Defense Lloyd J. Austin III  
1000 Defense Pentagon  
Washington, D.C. 20301-1000

Secretary of the Navy Carlos Del Toro  
1000 Navy Pentagon, Room 4D652  
Washington, D.C. 20350.

Date: July 28, 2023

Re: Red Hill Bulk Fuel Storage Facility and Water Testing Needs for the Island of O‘ahu

Dear Secretary of Defense Austin and Secretary of the Navy Del Toro,

As a preliminary matter, I would like to express my appreciation of your acknowledgement of the inherent, unnecessary, and unjustifiable danger that the U.S. Navy’s Red Hill Bulk Fuel Storage Facility (Red Hill Facility) poses to the people and environment of O‘ahu – as well as to the United States’ national security interests in the Indo-Pacific Region. I am also appreciative of the Department of Defense’s (DoD’s) investment in the Joint Task Force – Red Hill, to expediently and safely defuel the Red Hill Facility.

Unfortunately, the DoD’s acknowledgement of our years’-long concerns came too late to prevent the contamination of the Navy’s water system, the poisoning of hundreds if not thousands of military and civilian families, and the release of 5,000 gallons of jet fuel into our once-pure sole source aquifer. The inherent dangers of the Red Hill Facility, along with alarming levels of years-long negligence and complete failures of leadership documented by the Navy and Environmental Protection Agency, have now left our island in a water crisis that may take years if not decades to resolve.

**While much remains to be done, an immediate and indefinite need to mitigate the impacts of this crisis is the creation of an on-island, EPA-certified water testing laboratory that can deliver test results to island and regional consumers in a timely manner.**

Currently, analyses of monitoring well, sentinel well, and drinking source samples require transshipment of potentially volatile contaminants across thousands of miles to backlogged laboratories on the U.S. continent. As a result, water quality results have taken and continue to take months to be returned. This leaves us at unacceptable risk from further and potentially catastrophic harm due to the DoD’s legacy of contamination both at Red Hill and in other areas across the islands. **If we are not given sufficient and timely data to prevent DoD-sourced contamination plumes from entering our municipal drinking water system, the public health, socioeconomic, and environmental justice impacts will be devastating and potentially irreparable.**

For example, the November 2022 spill of aqueous fire-fighting foam (AFFF) concentrate, along with at least two prior, unreported releases of AFFF from the Red Hill facility, will require ongoing and

continual testing of existing and future monitoring wells, to anticipate the movement of PFAS and preexisting petroleum hydrocarbon contamination including contamination that may be mobilized by PFAS. The lack of timely test results and the extreme uncertainty regarding contaminant transport (the groundwater contaminant fate and transport model promised by the U.S. Navy in 2015 is still non-existent) in our aquifer means that we may not be able to prevent nearby municipal drinking water wells – and our municipal drinking water system – from being contaminated should recent or historic plumes migrate toward them. This threat will also persist for decades (for petroleum hydrocarbons) or centuries (for PFAS), meaning timely testing capacity will be needed indefinitely.

A water testing facility will also be required for circumstances beyond Red Hill. For example, citizens of Waiawa have had to wait for months simply to know if their drinking water sources were contaminated by PFAS due to AFFF training at the Waiawa Army National Guard Armory. Given the extent of past training exercises and the persistence of PFAS “forever chemicals” in the environment, ongoing and timely testing will also be required to ensure that these citizens are not exposed to these contaminants in the future, as the AFFF percolates and migrates in soil, streams, and groundwater for the decades and centuries to come.

Notably, such a lab would also assist in the analysis of water samples throughout the Pacific region, including in areas with known PFAS contamination such as Guåhan, Okinawa, the Philippines, and elsewhere.

Our islands’ isolation and lack of alternative water sources, along with new revelations about both recent and historical releases of contaminants above our groundwater supply demand dedicated local testing capacity that can deliver timely results. Not having such capacity is placing us at risk of the catastrophic contamination of our drinking water systems and needless additional injury to our people, communities, economy, and ways of life. **A small fraction of a percent of the DoD’s budget – commensurate with a rounding error – could be sufficient to begin the process of training local technicians and procuring equipment for a local testing facility that could save hundreds of thousands of lives and prevent irreparable harm to over a million citizens that call these islands home.**

We respectfully but strongly urge you to consider making this critical investment to prevent the people of these islands from any further harm due to the actions and inactions of the United States military. I look forward to receiving your response.

Sincerely,



Wayne Chung Tanaka, Director  
Sierra Club of Hawai‘i

Cc:

Michael S. Regan, Administrator, Environmental Protection Agency  
Ben Jealous, Executive Director, Sierra Club