

**Congress of the United States**  
**Washington, DC 20510**

December 19, 2022

The Honorable Gene Dodaro  
Comptroller General of the United States  
Government Accountability Office  
441 G St., NW  
Washington, DC 20548

Comptroller General Dodaro,

We write urging an immediate investigation into the procedures and practices utilized by the Department of Defense and the Department of Navy to protect human health and the environment from per- and polyfluoroalkyl substances (PFAS) at the Red Hill Bulk Fuel Storage Facility complex (Red Hill). Both Departments use compounds containing PFAS, such as aqueous film forming foam (AFFF), at Red Hill, and the recent events in Hawai‘i demonstrate the need for a thorough audit to ensure that Hawai‘i’s people, land, water, and ocean are all protected.

The November 29<sup>th</sup> leak of a fire suppression system at the Red Hill complex that spilled over 1100 gallons of AFFF into the environment, as well as other previous PFAS contamination events affecting Red Hill and Joint Base Pearl Harbor-Hickam (JBPHH), have potentially exposed the community surrounding the Red Hill complex to enduring threats to their health. This community and the people of Hawai‘i deserve answers regarding how the Navy undertook efforts to address these incidents and complete the clean-up and remediation of impacted sites.

The dangers associated with “forever chemicals,” such as PFAS, are significant to the health of people exposed to them and to the environment. Moreover, because these chemicals degrade extremely slowly, they can build up in the environment and in animals and plants that ingest or are otherwise exposed to them. Consistent exposure to highly concentrated amounts of these chemicals can cause a range of adverse health effects including severe diseases, like cancer. This persistent threat underscores the necessity for adequate oversight and due diligence for the methods employed to handle the containment of such chemicals, safe storage, and eventual remediation of impacted sites. Without proper care, the legacy of damage of these spills will impact the health and well-being of people for generations and exact a devastating toll on the ecosystem and environment.

In June 2022, the EPA revised its health advisories for two specific PFAS chemicals: perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS):

PFAS	Prior HA	New HA	Increase
PFOA	70 parts per billion (ppb)	.02 parts per trillion (ppt)	3500x
PFOS	70 ppb	.004 ppt	17,500x

Further, both PFOA and PFOS have been detected in water quality reports for JBPHH released by the Department of the Navy in 2021 and 2022:

PFAS	2021 Detection Level	2022 Detection Level
PFOA	3.2 ppb	3.6 ppb
PFOS	5.5 ppb	5.6 ppb

While the Department of Defense and the Department of Navy should continue to conduct their own reviews on their responses to ongoing and previous PFAS/PFOA and AFFF exposure events, a GAO investigation will provide a necessary third-party assessment of their practices. We urge you to use the resources and tools available to you to conduct a rigorous and data-driven investigation to provide transparency on these response efforts and provide recommendations on required improvements that will protect impacted communities.

Given the ongoing operation to complete defueling at Red Hill, contamination from the current and prior discharges of PFAS-based firefighting foam raise significant questions for the people of Hawai‘i for their health and safety. Accordingly, we request the GAO to conduct an investigation to answer the following questions:

- Were the methods employed by the Navy to clean up and remediate sites exposed to PFAS adequate to the standards of state and federal regulators in Hawai‘i?
- Did the Navy inappropriately withhold any pertinent information from appropriate state and federal regulators during the course of any PFAS exposure investigations? If so how did this impact their investigation and remediation of sites?
- How should the Navy use the updated EPA health advisories for PFOS and PFOA to ensure the safety of drinking water at JBPHH, remediate the environment, and prevent further discharges of these and other PFAS at JBPHH and Red Hill?
- Did the Navy effectively include Hawai‘i state regulators and relevant state agencies in previous AFFF exposure incident investigations at the Red Hill Complex?
- Based on GAO analysis of the Navy’s PFAS-related procedures and practices for exposed sites in Hawai‘i, what deficiencies exist that the Navy should alter?
- Of the Hawai‘i sites with previously documented exposures of PFAS-based substances and that were cleaned and remediated by the Navy, which require further clean up, remediation, and testing?
- As the Department of Defense continues to consider PFAS-free alternatives for firefighting systems, what alternatives are best suited for installations in Hawai‘i to adopt? How best can the Department of Defense position its Hawai‘i based operations to quickly and safely adopt these alternatives?

We expect this GAO investigation will not interfere with the defueling timeline of Red Hill and further underscore that GAO conducts their investigation so there is no delay to defueling efforts.

We look forward to the results of your investigation and any recommendations you determine are in the best interests of impacted communities.

Sincerely,



Brian Schatz  
United States Senator



Mazie K. Hirono  
United States Senator



Ed Case  
Member of Congress



Kaihō'i Kahele  
Member of Congress