

May 12, 2019

The Honorable Paul Tonko
Chairman, Subcommittee of Environment and Climate Change
2369 Rayburn HOB
Washington, DC 20515

The Honorable John Shimkus
Ranking Member, Subcommittee of Environment and Climate Change
2217 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Tonko, Ranking Member Shimkus, and Honorable Committee Members,

As the Director of the Informed-Public Project (IPP) in Okinawa, Japan, which has been working on issues of environmental contamination related to the U.S. military bases in Okinawa, I write to inform you of the alarming situation regarding PFAS contamination in Okinawa, and I respectfully request immediate and proper action be taken to address this problem.

PFAS Contamination in Okinawa

Comprised of only 0.6% of Japan's total land area, Okinawa struggles with 70% of all US military bases in Japan concentrated on its small islands. US bases occupy 15% of the entire area of Okinawa's main island. This disproportionate concentration of US bases and their close proximity to local communities continue to adversely affect the people in various ways. The issue of PFAS contamination is one of the most serious and urgent matters that call for the full attention of the US Government.

In Okinawa, PFOS/PFOA have been detected around two major U.S. bases, Kadena Air Base (KAB) and Marine Corps Air Station Futenma (MCAS Futenma). According to the results of survey conducted by Okinawa Prefecture, it is highly likely that the both of these US bases have caused PFAS contamination. A local expert's analysis of the survey data has also indicated that PFAS contamination should have occurred within the bases and PFOS/PFOA then would have seeped into water sources outside the bases.

A series of investigations by Jon Mitchell (correspondent reporter for The Okinawa Times) using FOIA has discovered that KAB had conducted on-site surveys on PFOS contamination in 2014, 2016 and 2017 (at 2 "hold ponds" and 16 "foam holding

tanks”). It has also shown that the US Military had conducted surveys at MCAS Futenma in 2016 and that PFOS (27,000 ng/L) and PFOA (1,800 ng/L) were detected from samples of wastewater from a fire pit training site on the base.

All available survey data and analysis point to KAB and MCAS Futenma as the most likely sources of PFAS contamination in Okinawa.

Our Concern: PFOS/PFOA Affecting Sources of Drinking Water and Seeping into Agricultural Fields

We are very concerned that PFOS/PFOA have been detected in some sources of drinking water around KAB. For example, according to a recent report released published by the Okinawa Prefectural Enterprise Bureau (OPEB), the agency in charge of safeguarding drinking water, PFOS/PFOA (1,124 ng/L) were detected in the Dakujyaku river in March 2019. (See this site <http://www.eb.pref.okinawa.jp/opeb/309/619>). In response, OPEB has installed a carbon filtration system at the Chatan Water Treatment Plant as an effort to remove PFOS/PFOA from water coming from the sources around KAB. While continuing with its efforts to monitor water safety, the OPEB has seen costs near 1.5 million USD. Given the fact that effective measures to mitigate the problem had not been taken, OPEB must continually replace its filters while all the costs have to be shouldered by the local people, not by the US military or the Japanese government. Despite OPEB’s efforts, however, the issue of PFAS contamination at the water sources around KAB remains unresolved.

According to data gathered in a subsequent survey conducted by Okinawa Prefecture around KAB in 2019, high concentrations of PFOS/PFOA were detected also from the natural springs and groundwater. From Yara Ubuga, natural spring in Kadena Town, 2,100 ng/L (PFOS/PFOA) , was detected, which is the highest number of PFOS/PFOA since Okinawa Prefecture began survey off the bases. As in previous studies, the results also indicate it is highly likely that KAB caused the PFAS contamination.

It should be noted that the Chatan Water Treatment Plant provides drinking water via surrounding municipalities for US military bases: Camp Foster, Camp Smedley D. Butler, MCAS Futenma, Camp Kinser, Kadena Air Base, Camp Shields, Camp Lester, and Army POL Depos. In order to protect US citizens at risk of PFAS exposure and contamination, the Department of Defense should assume its responsibility for the PFAS issues in Okinawa. In light of the issue of PFAS contamination becoming public, KAB officials released a statement to its community on January 27, 2016 that downplayed the seriousness of the issue to public health. (See this site: <https://www.kadena.af.mil/portals/40/documents/AFD-160124-001.pdf>).

We are also gravely concerned that PFOS/PFOA have been detected in natural springs around MCAS Futenma where local community members have long used water from the springs, not as drinking water but for growing agricultural products and tending to domestic gardens. According to the report by the Environmental Preservation Division at the Department of Environmental Affairs of the Okinawa Prefectural Government, the department in charge of safeguarding water sources other than those for drinking water, PFOS/PFOA (2,000 ng/L) were detected in the Chunnagaa spring in the summer of 2018. (See this site https://www.pref.okinawa.jp/site/kankyo/hozen/mizu_tsuchi/water/documents/jfy2018s_report.pdf). Chunnagaa is not only a pristine natural spring, but also a cultural and historical site, which is designated as a National Important Cultural Property by the Japanese Government. Water from this spring, which is largely used for domestic gardening, poses a danger to the health and safety of people in local communities. While the Department of Environmental Affairs conducts surveys twice a year (summer and winter), the issue of PFAS contamination at MCAS Futenma remains unresolved.

Our Concern: US Military Evading Its Responsibility

Despite the available data, analysis, and evidence that points to the US bases as source of PFAS contamination, the US military has no actions to remedy this problem. Instead, in our view, the military has evaded its responsibility.

Between 2016 and 2018, the Okinawa Prefectural Enterprise Bureau convened four meetings with KAB and the Okinawa Defense Bureau (Japanese Government) with the aim of discussing issues of PFOS/PFOA related to KAB. During the meetings, however, KAB did not mention its on-site surveys in 2014, 2016 and 2017 (at 2 “hold ponds” and 16 “foam holding tanks”) and their concerning results. In fact, at no point did the US Military inform the Prefectural Government or the people of Okinawa that the military had even conducted on-site surveys regarding PFAS contamination.

In 2016, the US Military, furthermore, declined the request of Okinawa Prefectural Government (Department of Environmental Affairs) for a meeting to discuss the issues of PFAS contamination related to MCAS Futenma. IPP’s investigation reveals that the Marine Corps Installations Pacific have no interest in dealing with this issue: “Since PFOS is not a regulated substance in the US and Japan, therefore there is no point in responding to additional questions or holding a meeting for which there are no established standards nor regulations.” The US Military’s response is both outrageous and highly irresponsible. The reply, in fact, is contrary to DOD’s formal recognition in 2009 that PFOS/PFOA are “Emerging Contaminants.”

Moreover, the US Military has rejected the requests by the Government of Japan and Okinawa Prefectural Government to conduct surveys regarding PFOS/PFOA on the bases. The Department of Defense's report *Addressing Perfluorooctane Sulfonate (PFOS) and Perfluorooctanoic Acid (PFOA)*, which was issued in March 2018 as an official response to the House Report 115-200, did not even include these test results from KAB and MCAS Futenma although it addressed test results from other US bases overseas.

Our struggle and Obstacles

The US Military has not been forthcoming with information on PFOS/PFOA on KAB and MCAS Futenma. It has not allowed the Okinawa Prefectural Government or the Japanese Government to carry out surveys on the bases. As a result, no comprehensive studies and no sufficient clean-up efforts of PFAS contamination have been carried out in Okinawa. No effective measure has been set up or implemented to safeguard the future of Okinawa and its residents. All the while, members of the communities, including members of US bases on Okinawa, are constantly exposed to the danger of PFAS.

IPP and residents of Okinawa have been struggling to change this situation. We have spent immeasurable time and energy attempting to address the issue of PFAS contamination and protect the environment and ourselves. Thus far, we have made little progress. The US military remains indifferent to our concerns. That the US and Japanese Governments conveniently interpret and implement the Status Forces Agreement (SOFA) between them has been and remains a major obstacle in our struggle.

We are also concerned that the February 2019 (delayed) action of the US Environmental Protection Agency (EPA) addressing PFAS contamination is insufficient. As most states within the United States find direction in the EPA's Health Advisories, the Okinawa Prefectural Government has also used EPA guidance and standards to evaluate the safety and quality of local water contaminated by PFOS/PFOA. We believe that more stringent safety standards and measures must be adopted.

Our Requests

It is imperative that proper action be taken in Okinawa and Japan and in the US. I thus wrote a letter of request to the Okinawa Prefectural Government, requesting them review their policies on the issues of PFAS contamination. I am now turning to the Environment and Climate Change Subcommittee and respectfully request the Subcommittee as follows:

- 1) Discuss and critically review the issue of PFAS contamination on the US military's bases overseas and affected local communities around the bases;
- 2) Hold the U.S. Military accountable for the issue of PFAS contamination in Okinawa by requiring the US Military to be more transparent with information and by collaborating with the Okinawa Prefectural Government to conduct surveys on the bases;
- 3) Recognize that US citizens are included in the affected communities contaminated by US Bases in Okinawa to protect Americans at risk of PFAS contamination and exposure;
- 4) Recognize that the SOFA violates the environment and human rights of the people of Okinawa.
- 5) Include issues of overseas bases in the legislation to address PFAS contamination issues.

Thank you for your time and attention to the issue of PFAS contamination in Okinawa.

Respectfully submitted,

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