UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

3 April 1996

Ms. Darlene Ige
Department of the Navy
Pacific Division
Naval Facilities Engineering Command
(Makalapa, HI)
Pearl Harbor, Hawaii 96860-7300

Re: Draft Final Phase I Remedial Investigation, Red Hill Oily Waste Disposal Facility, Fleet & Industrial Supply Center, Pearl Harbor, Hawaii

Dear Darlene:

The U.S. Environmental Protection Agency (EPA) has received the Draft Final Phase I Remedial Investigation, Red Hill Oily Waste Disposal Facility (OWDF), Fleet & Industrial Supply Center, Pearl Harbor, Hawaii, dated January 1996. We have reviewed the above document and your responses to our 22 November 1995. Your responses to our 22 November review comments addressed most of our concerns, except on one comment, EPA's general comment on Section 7.0 (Human Health Preliminary Risk Assessment) which was not fully addressed.

We have concerns regarding the approach used in the Preliminary Risk Evaluation (PRE). The approach was difficult to follow. The site specific health-based levels (HBLs) that were calculated and used in place of the Region IX Preliminary Remediation Goals (PRGs) remain suspect, it is still unclear whether a 1E-06 target cancer risk level was used to calculate the HBLs. In addition, questionable rationale was used for dismissing a number of chemicals of potential concern (COPCs) (e.g., insignificant concentrations below the 1E-04 risk trigger level, typical Navy installation contaminants, and infrequent detection). Consequently, the results of the PRE are not convincing and some doubt remains as to whether or not further action may be warranted. In any event, there is still a question as to whether there are areas at the Red Hill OWDF, where chemical concentrations are at levels that would require further investigation; and any further investigation has been dismissed in some of the exposure areas of concern (EAOCs) as unnecessary because of the results of the PRE.

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EPA and the Hawaii Department of Health have been using the Region IX PRGs for screening risk at Superfund sites, as well as DOD in the Risk Assessment Primer. We recommend the Navy use the latest PRG Table to carry out the PRE at Red Hill OWDF. In a telephone conversation between Wesley Ching of your staff and Xuan-Mai Tran of EPA on 29 March 1996, EPA understands that Phase II RI will be performed at the Red Hill OWDF by another contractor. We expect the Navy to address EPA's concerns either prior to or as part of the Phase II work. The Navy should be aware that Phase II work may have to include an expanded COPCs to address the issue as well as re-examine areas dismissed based on the HBLs.

If you have any questions, please contact me at (415) 744-2412 or Xuan-Mai Tran at (415) 744-2386.

Sincerely,

Lewis Mitani
Remedial Project Manager

cc: Mike Miyasaka, DOH
Donald Gruber, URS

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