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

22 November 1995

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

Dear Darlene:

Enclosed are the comments of the U.S. Environmental Protection Agency (EPA) to the Phase I Remedial Investigation Report (draft) for the Red Hill Oily Waste Disposal Facility, Pearl Harbor Fleet and Industrial Supply Center, Oahu, Hawaii.

The Preliminary Risk Evaluation should focus on using the detected concentration in each area and compare the values to the PRG's. Both industrial and residential land use scenarios should be used for comparison purposes. The use of a residential scenario is not binding on the Navy but used to establish the incremental differences for analysis of risk and cleanup decisions. The Preliminary Risk Evaluation, Ecological, alludes to the Pearl Harbor Sediment Study to address the surface pathway. The Pearl Harbor Sediment Study as currently configured, will not address the surface pathway. A more comprehensive effort is needed to fully evaluate ecological risk. There also needs to be close coordination between these two studies.

If you have any questions please contact me at (415) 744-2412.

Sincerely,

Lewis Mitani
Remedial Project Manager

cc: Mike Miyasaka, DOH
Donald Gruber, URS

carrollcox.com

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