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DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
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HONOLULU, HAWAII 96801

In reply, please refer to:
HEER OFFICE

October 6, 2000

Ms. Darlene Ige
Department of the Navy
Pacific Division
Naval Facilities Engineering Command
258 Makalapa Drive, Suite 100
Pearl Harbor, Hawaii 96860-3134

Dear Ms. Ige:

Subject: Revised Draft Final Phase II Remedial Investigation Report for Red Hill Oily Waste Disposal Facility, Pearl Harbor, Hawaii

The Hawaii Department of Health Hazard Evaluation and Emergency Response Office has reviewed the subject revised RI report and your September 27, 2000 letter response to our comment concerning characterization of petroleum oil contamination in the AST area of the Red Hill Oily Waste Disposal Facility.

The Navy's response to the DOH comment requiring the Navy to further investigate the AST area to fully characterize the extent of TPH oil contamination, especially in the subsurface soil vertical plane, has not addressed our concern. As previously stated in our comment, there has been a release of fuel oil in the AST area which has migrated down through the subsurface soil to at least 15 feet below ground surface. The Navy has no other information that identifies the vertical extent of the TPH oil contamination in the subsurface soil. Without this information, it would not be possible to determine the threat that this TPH contamination has on getting into the perched ground water or even the basal ground water. The TPH contamination newly found in the perched ground water from monitoring well MW03 may indicate that the TPH has already migrated down into the perched aquifer. As has been seen in the old stilling basin, the petroleum oil released did migrate down through the subsurface soil to contaminate the perched ground water aquifer.

Until the issue involving the characterization of the extent of TPH contamination in the subsurface soil in the AST area is resolved, the DOH does not support the recommendations in this RI report of no cleanup for soil at the UDA, UPD and AST areas and that the site monitoring wells be abandoned and sealed.

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Should you have any questions, please contact me at 586-4653.

Sincerely,

Michael K Miyasaka

MICHAEL K. MIYASAKA
Remedial Project Manager
Hazard Evaluation and Emergency Response Office

cc. Mr. Lewis Mitani, EPA Region IX

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