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DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HAWAII 96801

In reply, please refer to:
HEER OFFICE

96-334-MM

October 4, 1996

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

Dear Ms. Ige:

Subject: Phase II Remedial Investigation Sampling and Analysis Plan (Draft) for Red Hill Oily Waste Disposal Facility Fleet and Industrial Supply Center, Pearl Harbor, Hawaii

The Hawaii Department of Health Hazard Evaluation and Emergency Response Office has reviewed the subject sampling and analysis plan and has the following comments.

1. In addressing the chromium contamination in the soil at the AST, underground piping and oily waste delivery system and unauthorized disposal area (sections 2.1.2.5, 2.2.2.5, 2.3.2.5), the plan cites the chromium PRG of 30 mg/kg, which is for chromium VI. It then compares this chromium VI PRG with "total chromium" concentrations found at the sites and concludes that the PRG was exceeded. The plan then states that although the chromium concentrations exceeded the PRG, they were below the background levels for chromium which was 435 mg/kg. This background level of 435 mg/kg was from one soil sample (S14) which was 61 feet below ground surface and much higher than the highest chromium concentrations found at the three sites (183, 226, 232 mg/kg). Table 3.3-4, Potential Chemical-Specific ARAR and TBC Criteria for Soil, shows the EPA Region IX PRG for chromium (total) at 210 and 450 mg/kg for residential and industrial. This evaluation of the chromium contamination found at the sites has some problems which need to addressed.

2. In Section 4, Field Investigation and Analysis Program Criteria, the plan calls for the use of SW 846 Method 4030, Soil Screening for Petroleum Hydrocarbons by Immunoassay. What brand of immunoassay kit will be used for this soil screening? What will be the screening or detection level set up for the immunoassay kit for this petroleum soil screening? These items need to be addressed in the SAP. Also the plan calls for confirmation analysis of Method 4030 for TFH by the CDOHS Modified EPA Method 8015. Since Method 4030 does not distinguish

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between different hydrocarbon fractions and Method 8015 does, this would create a problem in confirming the petroleum concentration in the diesel range for the petroleum contaminated soil.

3. Section 4.4.2.2, Monitoring Well Installation, states that two wells will be installed downgradient of the stilling basin area and the third will be installed upgradient with Figure 4.4-1 showing the location of the upgradient and two downgradient wells. With no basal groundwater gradient data available for this site, what reasons or how was it determined as to where the two downgradient wells would be located? Please explain.

Should you have any questions, please contact me at 586-4698.

Sincerely,

Michael K. Miyasaka

Michael K. Miyasaka
Remedial Project Manager
Hazard Evaluation and Emergency Response Office

c: Lewis Mitani EPA Region IX

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