COMPACDIV REVIEW COMMENTS
COMPACDIV 182 (1/94)

	DATE: 18 Dec 95	PAGE 1 OF 1	
PROJECT TITLE: Phase I Remedial Investigation, Red Hill Oily Waste Disposal Facility		Draft/Final PA/SI	Drft/Fnl Risk As
	X	Draft RI/FS	
ACTIVITY: Fleet and Industrial Supply Center, Pearl Harbor			
	REVIEWERS		
LOCATION: Red Hill, Oahu, HI	Install Restr Section	Facility Restr Section	
	Code: 182WC	Code: 1822	

Sec. No./Para No. or Dwg No.	Comnt No.	Comment
General	1	As previously discussed, double side the text of this report to reduce the thickness.

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Response to U.S. Coast Guard Review Comments
Remedial Investigation Report (Draft) Red Hill Oily Waste Disposal Facility

Reviewer: R. M. Diehl

Item No.	Review Comment Reference	Response to Comment
1	Section 8 Page 8-10, 8-16	Paragraph 8.2.11 summarizes the results of chemical tests of soil samples collected from the Coast Guard Parcel. These results indicate that there are contaminants present on the parcel. Paragraph 8.4.11 is a conclusion based on the results of the Preliminary Risk Evaluation (Section 7, PRE), specifically page 7-65, last paragraph and continuing in the first two paragraphs of page 7-70, and the risk estimates calculated in Table 7.1-35. Paragraph 8.4.11 states that "Contamination detected at this EAOC does not represent a significant threat to human health or to the environment." The rationale given on pages 7-65 and 7-70 provide the basis for this statement. Note also that values given in paragraph 8.2.11 are maximum concentrations, as opposed to the reasonable maximum exposure (RME) concentrations used in calculating risk in the PRE.
2	Section 4 Page 4-149 through 4-151.	It is true that the maximum test results given in 4.3.11 are in some cases higher than the regulatory limits. In general, when the maximum detected concentration of a chemical exceeds regulatory levels, that chemical is considered a contaminant of potential concern (COPC) and is evaluated further to assess the risk associated with that chemical. An RME concentration is calculated based on the results of all samples collected at an EAOC in a particular medium of interest. The RME value is greater than the mean value 95 % of the time. See Section 7.1.1.4). The RME value is then used to estimate the risk. The main regulatory levels utilized for metals in soil were taken from the EPA Region IX Preliminary Remediation Goals (PRGs). PRGs are used as first order screening values to identify which chemicals must be evaluated further. Depending on the particulars of each case, the PRG values are often 10 to 100 times more conservative than actual cleanup values (see Section 7.1.4.2). In the case of the Coast Guard Parcel, the main risk driver is estimated to be arsenic, but its appearance is not believed to be related to site activities. It is noted that arsenic is a natural constituent of volcanic soils and is seen at elevated levels in background samples.

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