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DIRECTOR OF HEALTH

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In reply, please refer to:
HEER OFFICE

April 9, 1999

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

Dear Ms. Ige:

Subject: Draft Phase II Remedial Investigation Report for the Red Hill Oily Waste Disposal Facility

The Hawaii Department of Health Hazard Evaluation and Emergency Response Office has reviewed the subject RI report and has the following comments.

1. The Phase II remedial investigation identified some moderate levels of petroleum soil contamination in the Aboveground Storage Tanks Area with TPH levels at 6800, 7620 and 11300 mg/kg and in the Unauthorized Discharge Area at 8300 mg/kg. In this investigation, the Department of Health (DOH) Risk Based Corrective Action (RBCA) and Decision Making Tier 1 Guidelines were identified as a To Be Considered (TBC) item. The DOH RBCA policy has an action level for petroleum (TPH) contamination at 5000 mg/kg. With several areas at the site having TPH contamination levels exceeding the 5000 mg/kg action level, the Navy needs to take action to address this contamination issue.

2. With the continuos operation of the PWC water pumping station, the ground water beneath the Oily Waste Disposal Facility flows to the northeast direction as indicated in Figure 3-7. As a result, the locations of the monitoring wells are not adequate for evaluating and monitoring the contaminate transport from the facility.

3. The use of a CD ROM to present information in this report proved to be cumbersome, time consuming and restrictive to review. Having to view the analytical data and figures in sections because it was not readable in the full page view made it difficult to get a perspective of the contamination situation.

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Also, printing a page off the CD ROM was extremely slow. With these problems, we don't support the use of the CD ROM for this type of information

4. Section 2.9, Basal Aquifer Water Level Monitoring, states the water level measurement data are discussed in Section 3.7. There is no Section 3.7.

5. Figure 4-4, Elevated Confirmation Detections of TPH in AST Subsurface Soil Samples, 4.5 to 8.0 feet, shows the TPH contamination level at 7400 mg/kg at sampling point AB189. Laboratory analytical result shows TPH level at 7620mg/kg.

6. Figure 4-5, Elevated Confirmation Detections of TPH in AST Subsurface Soil Samples, > 8.0 feet, shows TPH contamination level at 11000 mg/kg at sampling point AB216. Laboratory analytical result shows TPH level at 11300 mg/kg.

7. It would be more effective to show all the TPH and PAH detections in Figures 4-1 thru 4-5 for the soil samples, instead of just the ones above action levels.

8. Section 6.4.3, Unauthorized Discharge Area, states that the concentrations of TPH were detected in the 36 surface and subsurface soil samples analyzed during the Phase II RI, but none exceeded the DOH recommended soil action levels. This statement is in error as sample AB102 had a TPH residual fuels concentration of 8300 mg/kg.

9. Section 9.3, Human Health PRE, states that elevated TPH concentrations occur sporadically, that analyses of immediately adjoining samples typically demonstrate very low detected concentrations and that collective data indicates the elevated TPH concentrations are anomalous spot concentrations and the evidence suggests that TPH impact at the EAOCs is not widespread or significant. The soil sampling data in the AST area does not support these conclusions. Surface soil samples AB113, AB193 and AB198 have total TPH levels of 7600, 9100 and 5046 mg/kg. The samples are adjacent to each other and encompass an area of about 300 square feet. Subsurface soil samples AB189, AB211, AB185 and AB216 which are adjacent to each other have total TPH levels of 8420, 5440, 3950 and 12,700 mg/kg. Samples are at depths of 5 to 15 feet below ground surface and encompass an area of about 250 square feet.

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

Sincerely,

Michael K. Miyasaka

MICHAEL K. MIYASAKA
Remedial Project Manager

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