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DIRECTOR OF HEALTH

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DEPARTMENT OF HEALTH
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HONOLULU, HAWAII 96801

In reply, please refer to:
HEER OFFICE

May 5, 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: Draft Final Report Phase II Remedial Investigation (RI) for the 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 RI report and has the following comments.

1. The Navy's response to the DOH comment No.8 on Section 6.4.3, Unauthorized Discharge Area, stated that the text was revised to reflect the comment. The text in this draft final report has not been revised.

2. The Navy's response to DOH comment No. 1 has not fully addressed our concern. It is evident that there has been a release of fuel oil at the AST Area with the discovery of TPH contamination in surface soil. The phase II RI sampling investigation also showed that the TPH contamination had migrated down into the subsurface with TPH contamination levels above the DOH Tier 1 TPH soil action level found in the subsurface soil at 5, 10 and 15 feet below ground surface. The phase II RI sampling investigation did not determine the full extent of TPH contamination in the subsurface soil as the soil samples with the high levels of TPH were collected at depths where the sampling probe met refusal. Phase II ground water analysis from MW03 showed TPH contamination in the perched ground water. This TPH contamination in the perched ground water at MW03 is a new development as the ground water analysis for the former MW03 monitoring well did not detect any TPH contamination. These phase II RI sampling results seem to indicate that the TPH contamination in the AST Area has possibly migrated down to the ground water. With this in mind, the Navy should continue monitoring the perched and basal ground water and further investigate the AST Area to fully

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characterize the extent of the TPH contamination, especially in the vertical plane.

3. The Navy's response to DOH comment No. 2 has not addressed our concern. Three (August 10, 1998, September 3, 1998, July 31, 1998) of the four ground water flow directions shown in Figure 3-7, Estimated Direction of Basal Ground Water Flow, Red Hill Oily Waste Disposal Facility, would generally prevent monitoring well MW08 from acting as a down gradient monitoring well and monitoring the contaminate transport from the facility. Without knowing the ground water flow direction at the times that the two rounds of basal ground water samples were collected, you would not be able to confirm that MW08 was properly serving as a down gradient well. Were ground water flow directions determined when basal ground water samples were collected for the two rounds of sampling?

Should you have any questions, please contact me directly 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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