

Summary of Substantive Changes to
Comply with EHE Requirements as Specified in DOH-HEER Guidance

Page No.	Section	Change
ES-1	Executive Summary	Added as Paragraph 2: <i>“This interim update fulfills the requirement to review and update the Groundwater Protection Plan every five years. This update also fulfills the DOH request of 12 February 2014 to modify the Groundwater Protection Plan to comply with the requirements of Environmental Hazard Evaluations as specified in the DOH HEER Guidance.”</i>
1-1	1	Added to Paragraph 2: <i>“This update to the plan is intended only to incorporate additional information obtained since completion of the previous plan and to meet current requirements for an environmental hazard evaluation (EHE). This interim update fulfills the requirement to review and update the Groundwater Protection Plan every five years. This update also fulfills the State of Hawaii Department of Health (DOH) request of 12 February 2014 to modify the Groundwater Protection Plan to comply with the requirements of EHEs as specified in the DOH HEER Guidance.”</i>
1-1	1	Added as Paragraph 3: <i>“Preparatory work is currently in progress to update the Numerical Groundwater Model and the Contaminant Transport Analysis that were utilized as the basis for this Groundwater Protection Plan. In addition to the tasks already conducted under the Groundwater Protection Plan, the update effort is anticipated to include construction of additional groundwater monitoring wells, surveying to establish the elevations of key points within the aquifer system, additional water level monitoring and pump tests to further refine the groundwater model, and additional sampling and laboratory analysis to provide data that will enhance development of parameters for the contaminant transport analysis”</i>
1-5	1.7	Added to Paragraph 1: <i>“Preparatory work is currently in progress to update the Numerical Groundwater Model and the Contaminant Transport Analysis that were utilized as the basis for the 2008 Groundwater Protection Plan. This section will be revised following the Numerical Groundwater Model and the Contaminant Transport Analysis updates, if necessary.”</i>
2-3	2.2.2	Revised end of Paragraph 1 to: <i>“Methods and criteria for investigations and response actions conducted under the SCP are described in the DOH Office of Hazard Evaluation and Emergency Response (HEER) technical guidance manual (TGM) for the Implementation of the Hawaii State Contingency Plan (DOH, 2009) hereafter referred to as the DOH-HEER TGM. The DOH-HEER TGM describes a three-stage process to determine whether further action is necessary for a site: Site Investigation - determine the extent and magnitude of contamination; Environmental Hazard Evaluation - determine the presence or absence of potential environmental hazards; Response Action - determine appropriate actions to address the identified hazards. The DOH-HEER TGM indicates that the DOH ‘Tier 1 EALs may be used to identify contaminants above levels of potential concern. The investigation of contaminants below the EALs is generally not necessary.”</i>
2-4	2.2.3	Revised end of Paragraph 1 to: <i>“Regulations and requirements are explained</i>

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		in detail in the <i>Technical Guidance Manual for Underground Storage Tank Closure and Release Response</i> , (DOH, 2000), hereafter referred to as the DOH-UST TGM, and the <i>Evaluation of Environmental Hazards at Sites with Contaminated Soil and Groundwater</i> (DOH, 2011 revised January 2012), hereafter referred to as the DOH-HEER EHE guidance.”
2-4	2.2.3	Added as Paragraph 2: “A cross reference table for the requirements of EHEs as specified in the DOH-HEER EHE Guidance is provided in Appendix F.”
2-4	2.2.4	Deleted this section, “EALs as ‘To be Considered’ Guidance”
2-5	Table 2-1	Deleted Reporting Requirements for UST Release Response

