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In reply, please refer to:  
File:

July 15, 2024

Rear Admiral Stephen Barnett  
Navy Closure Task Force – Red Hill  
850 Ticonderoga Street, Suite 110  
Joint Base Pearl Harbor-Hickam, Hawaii'i 96860  
[via email only: [stephen.d.barnett.mil@us.navy.mil](mailto:stephen.d.barnett.mil@us.navy.mil)]

Dear Rear Admiral Barnett:

SUBJECT: **DOH Response to:**

- 1. *Technical Memorandum: In-Progress Data Report, Adit 3 Site Characterization*, dated February 14, 2023; and**
- 2. *Working Draft Site Characterization Report, November 2021 JP-5 Release in Adit 3, Operable Unit 1*, dated May 2023**

On February 22, 2023, the U.S. Department of the Navy (Navy) provided, for the Hawaii'i Department of Health's (DOH's) awareness, *Technical Memorandum: In-Progress Data Report, Adit 3 Site Characterization*, dated February 14, 2023. On May 19, 2023, the Navy submitted for the DOH's review and comment, *Working Draft Site Characterization Report, November 2021 JP-5 Release in Adit 3, Operable Unit 1*, dated May 2023 (Site Characterization Report).

After reviewing both documents, the DOH is providing the enclosed comments to be addressed and incorporated as the Navy finalizes the Site Characterization Report. We understand there will be additional actions for the November 2021 and all previous release responses, as well as site assessment, site investigation, and remediation required for closure under the DOH's May 2022 Emergency Order. Accordingly, please submit a revised Site Characterization Report that addresses the enclosed comments within 45 calendar days of receiving this letter.

If you have any questions regarding this letter or its enclosure, please contact me at [KellyAnn.Lee@doh.hawaii.gov](mailto:KellyAnn.Lee@doh.hawaii.gov) or (808) 586-4226.

Sincerely,

KELLY ANN L. LEE  
Red Hill Project Coordinator

Rear Admiral Stephen Barnett  
July 15, 2024  
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Enclosure

c w/encl. via email only:

Matthew Cohen, EPA  
Jamie Marincola, EPA  
Ash Nieman, EPA  
RDML Marc Williams, NCTF-RH  
Lyndsay Kelsey, NCTF-RH  
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Joshua Stout, NCTF-RH

## Enclosure

DOH Comments on *Technical Memorandum: In-Progress Data Report, Adit 3 Site Characterization*, dated February 14, 2023 (Tech Memo), and *Working Draft Site Characterization Report, November 2021 JP-5 Release in Adit 3, Operable Unit 1*, dated May 2023 (Site Characterization Report)

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### General Comments on Tech Memo and Site Characterization Report

1. There are references throughout the Tech Memo and Site Characterization Report to "Appendix A" in the Hawai'i Department of Health's (DOH's) document *Evaluation of Environmental Hazards at Sites with Contaminated Soil and Groundwater*, dated Fall 2017. However, there is no "Appendix A" in this document. Provide clarification, as we are unable to determine the accuracy of statements referencing this DOH document.
2. To help us understand where sample locations of all media types are in relation to each other, include a figure depicting the locations of all trench samples, soil boring samples, soil samples, and groundwater samples.
3. Add a cross-sectional figure illustrating the depth where the perched aquifer was encountered for each boring and the total depth of each boring to show the U.S. Department of the Navy's (Navy's) current understanding of the perched aquifer.
4. The DOH Environmental Action Levels (EALs) have been updated since the Tech Memo and Site Characterization Report were submitted. Update the EALs in the revised Site Characterization Report.
5. The Site Characterization Report draws conclusions about the November 2021 release, which is not appropriate because this document only analyzes data from the Adit 3 tunnel, which is only a portion of the affected area. As the DOH has stated in past letters, conclusions and recommendations for the November 2021 release should be based on all available data. Clarify in the revised Site Characterization Report how this document fits into the overall site investigation and remediation of the 2021 and historical releases from the underground storage tank system. Explain that the data collected in the Adit 3 tunnel represents only a portion of the November 2021 release, and the conceptual site model and any conclusions and recommendations for the November 2021 release, will be based on all available data (e.g., data from the Adit 3 investigation, holding and leach tank investigation, and the collection, hold, and transfer tank investigation).
6. Include a section identifying data gaps in the revised Site Characterization Report. It is not appropriate to state in the conclusions that the comprehensive findings should be focused on filling data gaps without first identifying these data gaps.

## Enclosure

DOH Comments on *Technical Memorandum: In-Progress Data Report, Adit 3 Site Characterization*, dated February 14, 2023 (Tech Memo), and *Working Draft Site Characterization Report, November 2021 JP-5 Release in Adit 3, Operable Unit 1*, dated May 2023 (Site Characterization Report)  
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### Specific Comments on Site Characterization Report

7. **Section 7.3.3, PDF pages 49 and 50**
  - a. In the revised Site Characterization Report, include the January and February 2023 soil vapor sampling results.
  - b. It is stated that 11 soil vapor samples were analyzed for total petroleum hydrocarbons as gasoline range outside of hold-time, and the reported concentrations were flagged as estimated. It should also be noted that these results should be considered biased low.
  
8. **Section 10.1, PDF page 65** – The DOH disagrees with the Navy's assessment that only the area bounded by A3-050-BH/TW, A3-375-SVMP/TR/BH, and 2S+100-BH presents a potential threat to human health and the environment, as contaminants of concern were detected in soil and soil vapor at elevated concentrations outside of this area (e.g., A3+250-SV, A3+225-BH) and no laboratory analytical samples were collected to the east of A3-375-SVMP/TR.
  
9. **Figures 6-3 and 6-4, PDF pages 83 and 84** – To avoid confusion, use the same colors to represent the same areas on both figures. In addition, include the rationale as to why averages for Pearl Harbor Tunnel 2S+150 through 2S+300 are not included. Even if it may be clear that there are no high concentrations in this area, the data should still be evaluated and presented.