

Enclosure (2) - Response to DOH Comments on Site Characterization Report, November 2021 JP- 5 Release in Adit 3, Operable Unit 1, Red Hill Bulk Fuel Storage Facility

1. *General Comment – The Revised Site Characterization Report clarifies that the document does not address releases in the Adit 3 area that may have occurred before the November 20, 2021, JP-5 release. Note that, in accordance with HAR Chapter 11-280.1 and the 2022 EO, all releases from the UST system must be investigated, regardless of age. Therefore, the NCTF-RH must still address any historical releases in the area. This may be done in other documents, given the limited scope of the subject report.*

NCTF – RH Response – Comment acknowledged.

2. *General Comment – While there are recommendations to fill data gaps prior to conducting an Environmental Hazard Evaluation (EHE), a data gap analysis was not presented. Consequently, if data gaps are identified during the EHE, additional site investigation activities may be required.*

NCTF – RH Response – Comment acknowledged.

3. *Section 9.1.2, PDF page 61 – States that Section 9.3 of the DOH Hazard Evaluation and Emergency Response Office Technical Guidance Manual (TGM) identifies soil borings as parts of the light non-aqueous phase liquid (LNAPL) characterization and includes delineation methods for LNAPL in soil. This information is not included in Section 9.3 of the TGM, nor was DOH able to find it elsewhere in the TGM. When citing guidance or other references in future submissions, ensure that the correct document is cited.*

NCTF – RH Response – Comment acknowledged. The cited section has been removed from the current TGM. Based on DOH's introduction, indicating that no revisions to the document are required based on these comments, the Navy will not revise this document and will ensure that the most recent version of the TGM is referenced in future reports.

4. *Section 9.3, PDF page 67 – The DOH agrees that conducting a topographical land survey is a good first step in determining whether South Halawa Stream is a gaining or losing stream in the Adit 3 area. We assume this survey will include the stream bottom both above (upgradient of) and below (downgradient of) Adit 3. In addition, due to the transitory nature of South Halawa Stream, we recommend installing data loggers to monitor the water table in the perched aquifer closest to the stream to determine if the groundwater could feed the stream at times.*

NCTF – RH Response – Comment acknowledged. The Navy is working with the Hawaii Department of Health to evaluate whether the channelized portion of South Halawa Stream that runs adjacent to Adit 3 is a gaining or losing stream throughout the year. These studies are moving forward associated with other site characterization tasks. For example, the Navy has submitted a work plan to install one or more shallow wells adjacent to South Halawa Stream associated with the Holding Tank and Leach Tank site characterization and includes a plan to survey the bottom of South Halawa Stream.

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5. *The DOH has no concerns with NCTF-RH conducting the proposed actions to gather additional data in the OU-1 area, and we look forward to receiving the results of this additional data collection and evaluation. We note, however, that this investigation is a small portion of the overall site assessment and release response actions required for UST closure, and it remains unclear how this site investigation will tie into the overall project. As stated in our December 19, 2023 and August 12, 2024 letters, the NCTF-RH must, at some point, holistically present and evaluate the data collected during all site assessment and investigations in a manner that demonstrates its applicability and technical adequacy (HAR § 11-280.1-63(b) and 72(a)).*

NCTF – RH Response – Comment acknowledged.