

## Enclosure (2) - Response to DOH Comments on Draft Site Characterization Work Plan, Holding Tank-Leach Tank

1. *In reference to Section 4.3, Enclosure (1) states that, “the collection of incremental subsurface soil samples at the site is impractical due to numerous cobbles and boulders in this area (refusal was frequently encountered during the previous phase of sampling and it is very unlikely that additional borings than those currently proposed could be completed).” In the event of refusal, conduct step-out borings and document the refusals.*

**NCTF - RH Response** – The Navy’s preference is to retain the approach that is currently stated in Section 4.3 of the work plan: “If the borehole cannot be advanced, then the borehole will be abandoned and re-attempted within 3 horizontal ft of the original.” The Navy would like to conduct another boring before conducting step-out borings. All refusals will be documented.

2. *Make the following revisions to the HT-LT Work Plan Section 4.4 (PDF page 18) (**red italicized indicates new text, strikethrough indicates text to remove**).*
  1. *If COPC concentrations in **the subsurface are not detected at a concentration above the most conservative DOH Tier 1 Environmental Action Level (EAL)** soil ~~do not exceed PSLs~~ in any sampling location, then recommend ~~no further action~~ **no further sampling unless reasonable evidence indicates additional sampling is needed (e.g., data gaps remaining, field observations)**.  
*If COPC concentrations in subsurface soil **are detected at concentrations above the most conservative DOH Tier 1 EALs** ~~exceed PSLs~~, then evaluate if exceedances are delineated laterally and vertically with additional borings. If exceedances are delineated, then no additional subsurface soil sampling will be conducted **unless other reasonable evidence or reasoning indicates additional sampling is needed (e.g., data gaps remaining, field observations)**.  
*If exceedances are not delineated, then conduct step-out borings to further delineate the lateral extent of contamination, or deeper borings to further delineate the vertical extent of contamination.***

**NCTF - RH Response** – Acknowledged and partially accepted; the work plan was updated to replace the reference to PSLs with “the most conservative DOH Tier 1 EAL”. However, the Navy believes that any reasonable circumstances which might indicate a need for additional sampling are covered in the existing Decision Rules, such as conducting step-out or deeper borings when exceedances are not clearly delineated.

2. *If **none of the COPC concentrations in perched** groundwater samples collected during 1 year of quarterly monitoring ~~do not exceed PSLs~~ **are not detected above the most conservative DOH Tier 1 EALs**, then recommend ~~no further action~~ **sampling unless reasonable evidence indicates additional sampling is needed.***

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*If COPC concentrations in perched groundwater exceed PSLs **the most conservative DOH Tier 1 EALs**, then conduct a longer temporal study or install additional step-out perched groundwater monitoring wells down gradient of the source area to define the extent of perched groundwater impacts.*

*If COPC concentrations in basal groundwater exceed PSLs **the most conservative DOH Tier 1 EALs**, then conduct an expanded study to include more existing basal wells at the Facility and install more basal groundwater monitoring wells downgradient of the source area to define the extent of basal groundwater impacts.*

**NCTF - RH Response** – Acknowledged and partially accepted; the work plan was updated to replace the reference to PSLs with “the most conservative DOH Tier 1 EAL” and to insert “perched” before groundwater. However, the Navy believes that any reasonable circumstances which might indicate a need for additional sampling are covered in the existing Decision Rules.

- 3. If quarterly perched groundwater level monitoring for 1 year indicates that the elevation of South Halawa Stream is higher than the elevation of the perched groundwater (i.e., the stream is not receiving water from the perched groundwater due to relative elevation), then recommend no further action **unless other reasonable evidence indicates that further action is needed.** ~~If the elevations of South Halawa Stream and perched groundwater indicate that the stream is gaining (i.e. perched groundwater is seeping into the stream),~~ **If water levels indicate that the perched groundwater is seeping into the stream, then collect surface water samples at the locations most likely influenced by this seepage for analysis of COPCs.***

**NCTF - RH Response** – Acknowledged and partially accepted; the work plan was updated to reflect the proposed changes related to seepage. However, the Navy believes that any reasonable circumstances which might indicate a need for additional sampling are covered in the existing Decision Rules.