



LIFE OF THE LAND

76 North King Street, Suite 203

Honolulu, Hawai'i 96817

Phone: 533-3454 henry.lifeoftheland@gmail.com

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John Peard, Project Manager
Department of Health, HEER Office
1582 Kamehameha Avenue
Hilo, HI 96720-4623

john.peard@doh.hawaii.gov

re DRAFT REMOVAL ACTION REPORT re Former Pepekeo Sugar Company Property, Hakalau

Aloha John

The Environmental Notice (May 23, 2013) included notice for the Draft Removal Action Report for former Hakalau Pesticide Storage/Mixing Site. "Relevant portions of the Administrative Record for this site are available for review at the Hilo Public Library (see Reference Desk) and the HDOH Environmental Health Building in Hilo"

Thank you for your reply email noting that the document is available on the web.¹ Additional information is also located on the Hazard Evaluation and Emergency Response Office (HEER) website.²

Having served on military Technical Review Committees and Restoration Advisory Boards (RABs) for the Army, Navy and Air Force, and having reviewed other Sugar Contamination sites our first thought was: Is the contamination limited to the site tested? Our second question was: Where is the airplane strip?

¹ Draft Removal Action Report for former Hakalau Pesticide Storage/Mixing Site
<http://eha-web.doh.hawaii.gov/eha-cma/documents/2f4b8089-4820-4d19-9a55-cb8c281066c3>

² <http://eha-web.doh.hawaii.gov/eha-cma/Org/HEER/>

The Table of Contents includes a list of 12 figures (maps) without any page numbers. They are located in the back of the Report. It appears to be on the Hilo side of Hakalau Bay about 5 miles from the former Pepeekeo Sugar Mill on Sugar Mill Rd, in Pepeekeo.

* A clear and easily understood map should be included in the first couple of pages that clearly shows where the site is and what lies around the site.

“Pepeekeo Sugar Company, located on the windward side of the island of Hawaii between Onomea and Honomu [] occupied approximately four miles along the ocean cliffs and extended from three to 18 miles mauka to 1600 feet in elevation on the slopes of Mauna Kea. The company, called the Metcalf Plantation, was started at Kaupakuea in 1857 [] In 1971 Wainaku, Hakalau, Pepeekeo, and Papaikou sugar companies were consolidated in a processing cooperative that also included independent cane growers. Two years later, Pepeekeo Sugar merged with Mauna Kea Sugar to form Mauna Kea Sugar Co., Inc., the state’s fourth largest sugar company with 18,000 acres of cane. The mills at Wainaku and Hakalau were closed as the Pepeekeo mill was modernized to double its capacity by 1974.”³

The doors shut in 1974 ... the cleanup documents are in the 2007-13 ... better late than never!

The HEER Sites of Interest EXCEL Spreadsheet⁴ included 9 Mauna Kea Sugar sites

Facility Site Name	TMK
Hakalau Sugar Plantation	329002079
Hakalau Sugar Plantation	329002080
Hakalau Sugar Plantation	329002081
Hilo Sugar Pesticide Mixing Area	396008032
Onomea Sugar Papaikou Mill Pesticide Mixing Area	327004118
Pepeekeo Airstrip	328009040
Pepeekeo Mill Herbicide Mixing Area	328008104
Wainaku Mill	326015001
Wainaku Mill	326015002

* What is the Big Picture?

* How do the Hakalau Sugar Plantation sites mesh with the other sites?

* Are they all contaminated?

* Are cleanups underway at the other sites? How were pesticides delivered to the airstrip?

³ Hawaiian Sugar Planters’ Association Plantation Archives Register of the Hilo Coast Processing Company (Pepeekeo Sugar Company) Pepeekeo, Hawaii 1889-1946 http://www2.hawaii.edu/~speccoll/p_hilocoast.pdf

⁴ <http://www.docstoc.com/docs/150916696/HEER-Sites-of-Interest-Lookup-Spreadsheet---Hawaii.gov#>

* Were pesticides loaded onto backpacks or vehicles for ground delivery? If so where?

The Ocean

It appears that the highest concentration of contamination that has been discovered is along Hakalau Bay.

* How far from the Bay was the nearest soil sample?

* How far from the Bay was the nearest contamination site?

* How far from the Bay was the nearest above action level site?

* Please provide a map showing all soil sample sites and contamination sites within a 1000 feet of the shoreline.

“The Hawaii Department of Health (HDOH) performed soil sampling and analysis at the site during September 2007 and January 2008, focusing on former plantation company facilities most likely to have been contaminated by historical chemical releases. These included the pesticide mixing area, seed dipping vats, and a low-lying drainage area to the east of most operations.” (page 1-1)

* Please show a map of the drainage area.

“In September 2007, HDOH collected six multi-increment (MI) surface soil samples from four decision units (DUs) [] Each DU was sampled using a MI sampling technique. [] The 30+ sample increments were composited and homogenized in the field to create a single representative “average” MI sample.” (pp. 2-1,2)

* Please provide a less technical description of “multi-increment,” “decision units,” “composited,” and “homogenized.”

“The only significant environmental condition identified that is likely to represent a human health or environmental hazard is arsenic in surface and subsurface soils.” (p. 4-2) Based on soil investigations at the site, it has been determined that arsenic is present at concentrations requiring a response action.” (p. 8-1)

* Based on the contaminants found, do they point to a particular pesticide or a group of pesticides?

Mahalo

Henry Curtis
Executive Director