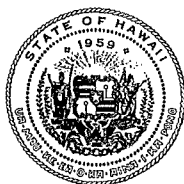


DAVID Y. IGE
GOVERNOR OF HAWAII



BRUCE S. ANDERSON, Ph.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File:
2019-366 SL

June 12, 2019

Mr. Scott Glenn, Director
Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813*

Facility/Site: Iwilei Center

Subject: Notification of Application to Participate in Hawaii Voluntary Response Program

Dear Mr. Glenn:

The Hawaii Department of Health (HDOH), Hazard Evaluation and Emergency Response (HEER) Office recently received an application from Mr. Bryan Li of Iwilei Center, LLC to participate in the Hawaii Voluntary Response Program (VRP) for a property located on three parcels in Honolulu at:

- 866 Iwilei Road, 414 Kuwili Street, 418 Kuwili Street, 420 Kuwili Street, TMK Number (1) 1-5-007: Parcel 009)
- 505 Kaaahi Street, TMK Number (1) -1-5-007: Parcel -029)
- 850 Iwilei Road and 860 Iwilei Road, TMK Number (1) -1-5-007: Parcel 0-30)

In accordance with the Hawaii Environmental Response Law, HRS 128D, Sub-Section 31, we are sending you this short summary of the details of the application.

The Property consists of two buildings within three parcels and encompasses approximately 3.83 acres. The Property is currently used for industrial-commercial purposes. Building area totals approximately 160,000 square feet across two stories. The entire complex was constructed in phases, with the initial ground floor areas constructed between 1956 and 1959, and the second story areas constructed between 1959 and 1981. The first floor of the Property is a mix of high-cube industrial units and office units totaling approximately 102,000 square feet. The ground floor industrial space is currently only occupied by a food distribution user and the office space is dedicated to non-profit use. The second floor consists of a mix of light industrial, industrial office, and office users and totals approximately 57,000 square feet. Second story tenants are involved in manufacturing, construction services, printing and design, and law and health services.

Past structures and activities on the Property have included a railway car barn, railroad tracks, an equipment storage yard, a U.S. Army Dispensary, a bus and truck repair shop, a steam termite eradication kiln, an auto staging area, a machine and welding shop, warehouse buildings, and an

Mr. Scott Glenn
June 12, 2019
Page 2 of 2

auto paint building. In addition, a portion of the former Hawaiian Gas Products, Ltd facility occupied the north side of the Property. The Hawaiian Gas Products facility was used to manufacture various products including acetylene and compressed gasses. The Hawaiian Gas Products facility included an auto repair and welding shop, a lime kiln, and dehydrating room.

Migration of contaminants from the following off-site sources is of concern:

- (1) the adjacent HECO substation located to the north and northwest;
- (2) the site containing a former HECO parking lot, Nuuanu Auto and General Printing located to the north/northeast;
- (3) the IHS Office, identified as a brownfield site at 916 Kaamahu Place to the northeast;
- (4) Tony's Gas, identified as a brownfield site at 581 Dillingham Boulevard to the northeast;
- (5) Nakaoka Investments, identified as a brownfield site at 922 Kaamahu Place to the northeast;
- (6) a former railway barn, rotary, and associated activities shown on a 1914 Sanborn map immediately to the northeast; and
- (7) Hawaiian Gas Products, Ltd. adjacent to the north, as first shown on a 1927 Sanborn map.

The Property is also within the boundary of the *Programmatic EHE/EHMP Document, Iwilei District, Honolulu, Hawaii (March 2015, Ver. 2.0)* prepared by the Hawaii State Department of Health ("Programmatic EHE/EHMP"). The purpose of the Programmatic EHE/EHMP is "to specify consistent and effective practices for managing the following COCs if these are encountered during minor subsurface activities within the ID: petroleum-contaminated soil (PCS) and debris-contaminated soil (DCS) normally containing high levels of metals, petroleum- or dissolved metals-contaminated groundwater or elevated soil vapors.

Should there be any questions, or if you would like copies of additional files submitted for the site, please do not hesitate to call me at 586-5815. Thank you,

Sincerely,



Sven Lindstrom
Site Discovery, Assessment, and Remediation
Hazard Evaluation and Emergency Response Office
Hawaii Department of Health

Enclosure: Iwilei Center VRP Application

IWILEI CENTER, LLC
1288 Ala Moana Blvd., Suite 288
Honolulu, Hawaii 96814

May 23, 2019

Via hand delivery

Fenix Grange, M.S.
Hazard Evaluation & Emergency Response Office
Hawaii State Department of Health
2385 Waimano Home Road
Pearl City, HI 96782

2019 MAY 24 PM 3:50
HAWAII STATE DEPARTMENT OF HEALTH

Subject: Hawaii Voluntary Response Program Application
866 Iwilei Road, 414 Kuwili Street, 418 Kuwili Street, 420 Kuwili Street
and 505 Kaaahi Street., Honolulu, Hawaii 96817 (TMK 1-1-5-7-9
and 1-1-5-7-29), and 850 Iwilei Road and 860 Iwilei Road
(TMK 1-1-5-7-30), Honolulu, Hawaii

Dear Ms. Grange:

This application is submitted by Iwilei Center, LLC ("Iwilei Center") to enter into a Voluntary Response Program ("VRP") agreement with the Hawaii Department of Health for 866 Iwilei Road, 414 Kuwili Street, 418 Kuwili Street, 420 Kuwili Street and 505 Kaaahi Street., Honolulu, Hawaii 96817 (TMK 1-1-5-7-9 and 1-1-5-7-29), and 850 Iwilei Road and 860 Iwilei Road (TMK 1-1-5-7-30), Honolulu, Hawaii (collectively, the "Site"). The information below follows the outline in the VRP Eligibility and Application Checklist available on the Hawaii Department of Health website at <http://eha-web.doh.hawaii.gov/eha-cma/documents/d830d679-9cab-4028-a1cc-8cbb1837e586>.

A. Statutory Criteria. The Site is not listed on the National Priorities list pursuant to CERCLA, and is not a site for which an order or other enforcement action has been issued under CERCLA.

The US Coast Guard has not issued a federal letter of interest and the Site is not subject to corrective action under Subtitle C of RCRA or HRS Chapter 342J.



137683

Information about the Requesting Party. Iwilei Center is the requesting party and the primary contact for Iwilei Center is:

Bryan Li
Iwilei Center, LLC
1288 Ala Moana Blvd, Suite 288
Honolulu, HI 96815
Telephone: (808) 738-8403
E-Mail: bryan@blacksandcapital.com

B. Information about the Property Owners. The property at 866 Iwilei Road, 414 Kuwili Street, 418 Kuwili Street, 420 Kuwili Street and 505 Kaaahi Street., Honolulu, Hawaii 96817 (TMK 1-1-5-7-9 and 1-1-5-7-29) is owned by 300, LLC. The property at 850 Iwilei Road and 860 Iwilei Road (TMK 1-1-5-7-30) is owned by 3900, LLC. The primary contact for 300, LLC and 3900, LLC is Giorgio Caldarone, whose contact information is:

Giorgio Caldarone
Managing Director – Hawaii Real Estate
The Harry and Jeanette Weinberg Foundation
3660 Waialae Ave., Suite 400
Honolulu, HI 96782
Telephone: (808) 924-1000
E-Mail: gcaldarone@hjweinberg.org

C. Current Information about the Property. The property is about 3.83 acres in size, and further location information is provided below:

Street Addresses: 866 Iwilei Road, 414 Kuwili Street, 418 Kuwili Street, 420 Kuwili Street, 505 Kaaahi Street, 850 Iwilei Road and 860 Iwilei Road.

Latitude and Longitude: the latitude(north) is approximately 21.3166390 – 21° 18' 59.90" and longitude (west) is approximately 157.8665730 – 157° 51' 59.66"

TMKs: 1-1-5-7-9, 1-1-5-7-29 and 1-1-5-7-30.

D. Current and Historic Information about the Property

Current Property Use: The Property consists of 2 buildings within 3 parcels and encompasses approximately 3.83 acres. The Property is currently used for industrial-commercial purposes. Building area totals approximately 160,000 square feet across two stories. The entire complex was constructed in phases, with the initial ground floor areas constructed between 1956 and 1959, and the second story areas constructed between 1959 and 1981. On-site parking is

provided on the eastern, southern and western perimeter of the Property, as well as on the second floor, which is accessed from a concrete drive ramp off Iwilei Road. Most of the concrete ramp is located on the adjacent property (now the Iwilei Senior Center), and the subject property has a perpetual easement to use the ramp. The first-floor warehouse was built with cast-in-place concrete. First floor exterior walls and some separation walls are concrete masonry unit ("CMU"). The second-floor improvements are constructed with prefabricated metal structures. The structure is classified as type 2 non-rated under the uniform building code ("UBC").

The first floor of the Property is a mix of high-cube industrial units and office units totaling approximately 102,000 square feet. The ground floor industrial space is currently only occupied by a food distribution user and the office space is dedicated to non-profit use. The second floor consists of a mix of light industrial, industrial office, and office users and totals approximately 57,000 square feet. Second story tenants are involved in manufacturing, construction services, printing and design, and law and health services.

Operational History:

A 1914 Sanborn map shows that there were no structures on the Property at the time. A Railway Car Barn and Railway Rotary were located immediately to the northeast of the Property. The Railway Car Barn appears to extend onto Parcel 029. A Machine Shop, Paint Shop, and Boiler Room are present on the 1914 Sanborn in the area of the Rail Track Rotary. Iwilei Road was present to the south and Pine Street was present to the north.

The 1927 Sanborn map shows Railroad Tracks on the northeast side of Property. In addition, the 1927 Sanborn map shows an Equipment Storage Yard being present on the Property along the northeast side, along with a U.S. Army Dispensary near the south corner of the Property. The Railway Car Barn to the northeast is labeled Passenger Coach Barn. Kuwili Road is present to the east of the Property. Located northwest and across Kuwili Road is an area labelled Outdoor Transformer Station. The property adjacent to the north is labelled Hawaiian Gas Products, Ltd. Based on the Sanborn map, it was used for manufacturing acetylene and compressed gasses. Love's Biscuit and Bread Company and the County Jail were located across Iwilei Road to the south.

The 1950 Sanborn map shows an Auto Repair and Welding Shop, a Lime Kiln, a Dehydrating Room, and Equipment Storage yard on the north side of the Property; Hawaiian Gas Products, a Bus and Truck Repair Shop near the center of the Property. Hawaiian Gas Products appears to have expanded onto the north half of the Property. Associated with the Hawaiian Gas Products site is Manufacturing of Bleaching Fluid, Gas Storage, and a Repair Shop. The HFD Station is present across Kuwili Street to the southeast. The County Jail and Love's Biscuit and Bread

Company are still present. The Railway Rotary is still present. In addition, there is a Steam Termite Eradication Kiln that overlaps the north corner of the Property.

The 1955 Sanborn map shows the Railway on the Property is no longer present. In addition it shows an Auto Staging Area on the south side of the Property, and a Machine and Welding Shop near the center of the Property. Other than the items mentioned above, there does not appear to be significant changes at the Property or surrounding area from 1950 to 1955. The Railroad Tracks on the Property were no longer present. In 1955 the Property remains largely unchanged from 1950.

The 1963 Sanborn map shows the Property now consisted of one large building used by Dillingham Corporation. The south portion of the warehouse is labelled Bureau of Customs. Hawaiian Gas Products had become Gaspro Ltd. and is still present northeast and adjacent to the Property. The Outdoor Transformer Station is now labelled HECO Iwilea Substation. The County Jail is now labelled County Medical Examiner. The HFD Station is still present. The Railway Car Barn adjacent to the northeast had been removed and was a Truck Yard. The County Jail was not present to the southwest, and had been replaced by a County Medical Examiners Facility and commercial warehouses. Gas Cylinder Storage was present to the west, across Kuwili Road and south of the HECO Transformer Station. The Steam Termite Eradication Kiln and Railway Rotary are no longer present.

The 1974 Sanborn map shows a building labelled Auto Paint on Parcel 029. In addition, it shows the main building on the Property to be occupied by Island Movers. The 1974 map does not show the Railroad Rotary or the Gaspro Ltd. facility. The former Gaspro Ltd. site is now labelled HECO Electrical Transfer Yard. The area occupied by the Railroad Rotary is now occupied by warehouses, buildings, and roads. One of the buildings is labelled Auto Paint. Love's Biscuit and Bread Company is now labelled The Salvation Army. The County Medical Examiner Facility, HFD Station, and HECO Iwilea Substation are still present,

Between 1974 and 1985 there does not appear to be any significant changes to the Property or surround area. The warehouse on the Property was occupied by Island Movers, Inc., and the south portion remained occupied by the Bureau of Customs. The Gaspro facility to the north of the Property is now the HECO Transformer Yard. The area to the northeast consists of warehouses.

By 1985, the 2nd story structures had been added to the warehouse on the Property. The south portion of the warehouse was no longer in use by the Bureau of Customs.

The 1993 Sanborn map shows that the HFD Station and the Auto Paint building on Parcel 029 are no longer present.

Known or suspected contamination. No records pertaining to environmental investigation on the Property have been located. Soil vapor sampling is currently being conducted by Environmental Science International (“ESI”).

A Phase I Environmental Site Assessment being prepared by ESI and will likely identify the following recognized environmental conditions:

Former industrial operations at the Property, including the following:

- Equipment Storage Yard.
- Railroad Tracks.
- Steam Termite Eradication Kiln.
- Hawaiian Gas Products Site.
- Auto Repair and Welding Shop.
- Lime Kiln.
- Dehydrating Room.
- Bus and Truck Repair Shop.
- Auto Staging Area.
- Machine and Welding Shop.
- Auto Paint Shop.
- Leaking Electrical Transformer.

Migration of Contaminants from the Following Potential Off-Site Sources:

- Adjacent HECO Substations.
- Former HECO Parking Lot, Nuuanu Auto, and General Printing.
- IHS Office.
- Tony’s Gas.
- Nakaoka Investments.
- Railway Barn, Rotary, and Associated Activities.
- Hawaiian Gas Products.

Permits Obtained By Any Facility on the Property: Approximately 70 building permits have been located dating from 1956 to 2014. Most are for minor work, interior work and electrical work. Key building permits for the primary structures are as follows:

Parcel 30	Original 1-story building: Permit No. 129776 (1956) Second story: Permit No. 75320 (1976)
Parcel 09	Original 1-story building: Permit No. 151078 (1958) Addition to/expansion of original 1-story building: Permit No. 155553 (1959) Two-story building with footprint of approx. 1,360 sf added on to the side of the 1-story building facing Kuwili Street: Permit No. 161264 (1959) Main second story improvements added: Permit No. 163209 (1981)
Parcel 29	This asphalt parking lot parcel is not improved. There is a permit for the installation of the entry gates: Permit No. 424370 (1998)

Description of the Intended Scope of Work. A soil vapor survey is underway, and the scope of any remedial work at the Site will be identified in a Remedial Alternatives Analysis to be completed at a later time. There are no planned changes to Site use. Implementation of this voluntary response project will ensure that the contaminants of concern pose an incremental cancer risk no greater than one in a million during a lifetime of exposure.

E. Description of Civil, Criminal, or Administrative Actions Related to the Property: Iwilei Center is not aware of any civil, criminal or administrative actions related to environmental matters at the property.

F. Consent of the Property Owner. Consent letters from the 300, LLC and 3900, LLC are enclosed.

G. Statement of Financial Viability. Iwilei Center will invest the required expertise and resources for the VRP project, and has adequate resources to complete the VRP project. Additional information is available upon request.

H. Application Fee: Enclosed is a \$1,000 processing fee for this application as required by Haw. Rev. Stat. 128D. We look forward to working with the Hawaii Department of Health on this voluntary response project.

Fenix Grange
May 23, 2019
Page 7

Very truly yours,

IWILEI CENTER, LLC



Bryan K.K. Li
Its Vice President

Encls: Letter of Consent from 300, LLC
Letter of Consent from 3900, LLC
\$1,000 Application Fee (check payable to Hawaii State Department of Health)

cc: Sven Lindstrom
Lisa A. Bail, Esq., Goodsill Anderson Quinn & Stifel LLP
Robert Chong, Environmental Science International

300, LLC

3660 WAIALAE AVENUE, SUITE 400
HONOLULU, HAWAII 96816-3260
TELEPHONE: (808) 924-1000

May 15, 2019

Fenix Grange, M.S.
Hazard Evaluation & Emergency Response Office
Hawaii State Department of Health
2385 Waimano Home Road
Pearl City, HI 96782

Subject: Hawaii Voluntary Response Program Application
866 Iwilei Rd, 414 Kuwili St., 418 Kuwili St., 420 Kuwili St. and
505 Kaaahi St., Honolulu, Hawaii

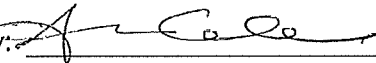
Dear Ms. Grange:

This letter is submitted in connection with the application by Iwilei Center, LLC to enter into a Voluntary Response Program agreement with the Hawaii Department of Health for fee simple land located at 866 Iwilei Road, 414 Kuwili Street, 418 Kuwili Street, 420 Kuwili Street and 505 Kaaahi Street, Honolulu, Hawaii 96817 (TMK 1-1-5-7-9 and 1-1-5-7-29) (collectively, the "Site").

As the Site owner, 300, LLC hereby gives its written consent for the proposed voluntary response action.

Very truly yours,

300, LLC

By: 
Its Vice President

3900, LLC

3660 WAIALAE AVENUE, SUITE 400
HONOLULU, HAWAII 96816-3260

May 15, 2019

Fenix Grange, M.S.
Hazard Evaluation & Emergency Response Office
Hawaii State Department of Health
2385 Waimano Home Road
Pearl City, HI 96782

Subject: Hawaii Voluntary Response Program Application
850 Iwilei Road and 860 Iwilei Road, Honolulu, Hawaii

Dear Ms. Grange:

This letter is submitted in connection with the application by Iwilei Center, LLC to enter into a Voluntary Response Program agreement with the Hawaii Department of Health for fee simple land located at 850 Iwilei Road and 860 Iwilei Road (TMK 1-1-5-7-30) ("Site").

As the Site owner, 3900, LLC hereby gives its written consent for the proposed voluntary response action.

Very truly yours,

3900, LLC

By: 
Its Vice President