

June 2, 2021

TO: DOH HEER Office

RE: Submittal of the Project-Specific Construction EHMP (C-EHMP) for the County of Hawaii Department of Parks and Recreation Kolekole Gulch Park Accessibility Improvements, Job No.: PR-4477, Wailea, South Hilo, Hawaii, TMK: (3) 2-8-015:015

Submitted by:

**Lehua Environmental Inc.
P.O. Box 1018
Kamuela, Hawaii 96743**

on behalf of The County of Hawaii Department of Parks and Recreation

Table 1: Pre-Construction Evaluation of Environmental Issues at Your Site

Yes	No	
X		Are concentrations of COPCs above the lowest unrestricted Tier 1 EAL ¹ ? ²
	X	Has the release been reported to the HDOH HEER Office? ²
	X	Are concentrations of COPCs above the construction worker EAL?
	X	Has the extent of contamination been fully delineated (both vertically and laterally)?
	X	Have sufficient soil vapor samples been collected in areas where a future building will be present?
	X	Is there an ongoing release at the site that must be mitigated prior to construction?
	X	Does contaminated media need to be removed or remediated prior to construction?
	X	Are COPC concentrations and contaminated media unknown but presumed or suspected to be present at the site at potentially hazardous levels based on historic site activities or other evidence? ¹
X		Will demolition of structures be conducted at the site prior to redevelopment?
X		If demolition will occur, has asbestos and lead-paint abatement been completed prior to demolition in accordance with all State and Federal regulations?

EAL= Environmental Action Level

COPC=Chemical of Potential Concern

¹If no contaminants are present or suspected to be present at the site at concentrations greater than the lowest unrestricted Tier 1 EAL then a C-EHMP is not required. The lowest Tier 1 EAL is defined as the EAL for unrestricted land use where groundwater is a potential drinking water resource and the nearest surface water body is less than 150 meters away.

²All releases must be reported to the HEER Office Emergency Preparedness and Response Section (EP&R) by calling (808) 586-4249 and following up with a written Release Notification

Following construction, contact the HEER Office to confirm that all contamination was managed in accordance with the approved C-EHMP. At a minimum, please submit all appropriate manifests, tracking logs, and photos. If contaminated media will be left on-site following the completion of construction, then a Site-Specific Environmental Hazard Evaluation (EHE) must be conducted and a separate Environmental Hazard Management Plan (EHMP) will have to be prepared to manage the contamination in the long-term. If the site already has an EHE-EHMP, then the EHE-EHMP must be updated following redevelopment to incorporate changes to the site. EHEs and EHMPs must be submitted to the HDOH for review and approval following the completion of construction activities detailed in this C-EHMP.

Project-Specific Construction EHMP (C-EHMP)

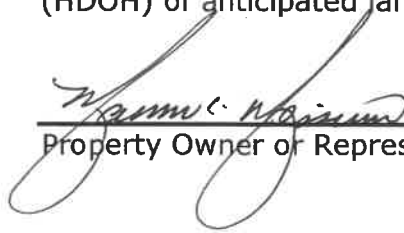
For

**County of Hawaii Department of Parks and
Recreation Kolekole Gulch Park Accessibility
Improvements, Job No.: PR-4477,
Wailea, South Hilo, Hawaii
TMK: (3) 2-8-015:015**

Signatures

This document is not finalized until it is signed. A signed copy will be present on-site at all times.

I certify that as property owner, I am responsible for ensuring all parties who work or reside at my site are aware of the contamination at my property, and the associated hazards, and that the information in this document is true and accurate to the best of my knowledge. I am responsible for ensuring compliance with all land use controls as well as advance notifications to the Hawaii Department of Health (HDOH) of anticipated land use changes or groundbreaking activity at my property.



MAURICE C. MESSINA

Director

Property Owner or Representative of Property Owner

I certify that I am a qualified environmental professional, capable of ensuring compliance with the requirements of this Construction Environmental Hazard Management Plan (C-EHMP). It is my duty on this project to understand the requirements of this document and be on site during ground-breaking activities. I will communicate hazards, management protocols, and other C-EHMP requirements to construction professionals at the site. I will document such activities, and communicate with HDOH, as needed.

Qualified Environmental Professional

As Construction Manager, I am responsible for understanding the requirements of this C-EHMP, effectively communicating the requirements and hazards to my crews and subcontractors and providing the required training and personal protective equipment to site workers. I will work with the Qualified Environmental Professional to ensure compliance with this C-EHMP during work at this property.

Construction Manager

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Acronyms

BMP	Best management practices
C-EHMP	Construction Environmental Hazard Management Plan
COPC	Chemical of potential concern
cy	Cubic yard
EAL	Environmental Action Level
EHE	Environmental Hazard Evaluation
EHMP	Environmental Hazard Management Plan
HAR	Hawaii Administrative Rules
HASP	Health and Safety Plan
HAZWOPER	Hazardous Waste Operations and Emergency Response Standard
HDOH	Hawaii Department of Health
HEER	Hazard Evaluation and Emergency Response
HIOSH	Hawaii Department of Labor and Industrial Relations, Occupational Safety and Health
HRS	Hawaii Revised Statutes
LEL	Lower explosive limit
LEPC	Local Emergency Planning Committee
MI	Multi-increment
NRC	National Response Center
PEL	Permissible exposure limit
PID	Photoionization detector
PPE	Personal protective equipment
PQL	Practical Quantitation Limit
OEP	Qualified environmental professional
SAP	Sampling and Analysis Plan
SHWB	Solid and Hazardous Waste Branch
TGM	Technical Guidance Document
USCG	United States Coast Guard
VOC	Volatile organic compound

1.0 Introduction

This Project-Specific Construction Environmental Hazard Management Plan (C-EHMP) provides guidance to environmental consultants, owners, operator, tenants, and construction/utility workers, who are proposing construction-related and ground-disturbing activities that change building configuration and property use at sites with known or presumed contamination (renovation/redevelopment). Examples of such activities include, but are not limited to demolition, grading, excavation, trenching, or drilling at sites with identified or potential contamination. These guidelines should be used by all who may be hired to assist any of the activities described above to keep workers, site users, the environment, and the general public safe from contact with contamination on site and prevent COPCs from leaving the site without proper management. Not adhering to this plan may have serious consequences including, but not limited to stopping construction and being liable for any damage or harm caused by onsite contamination.

Additional Details Regarding the Usability of the C-EHMP

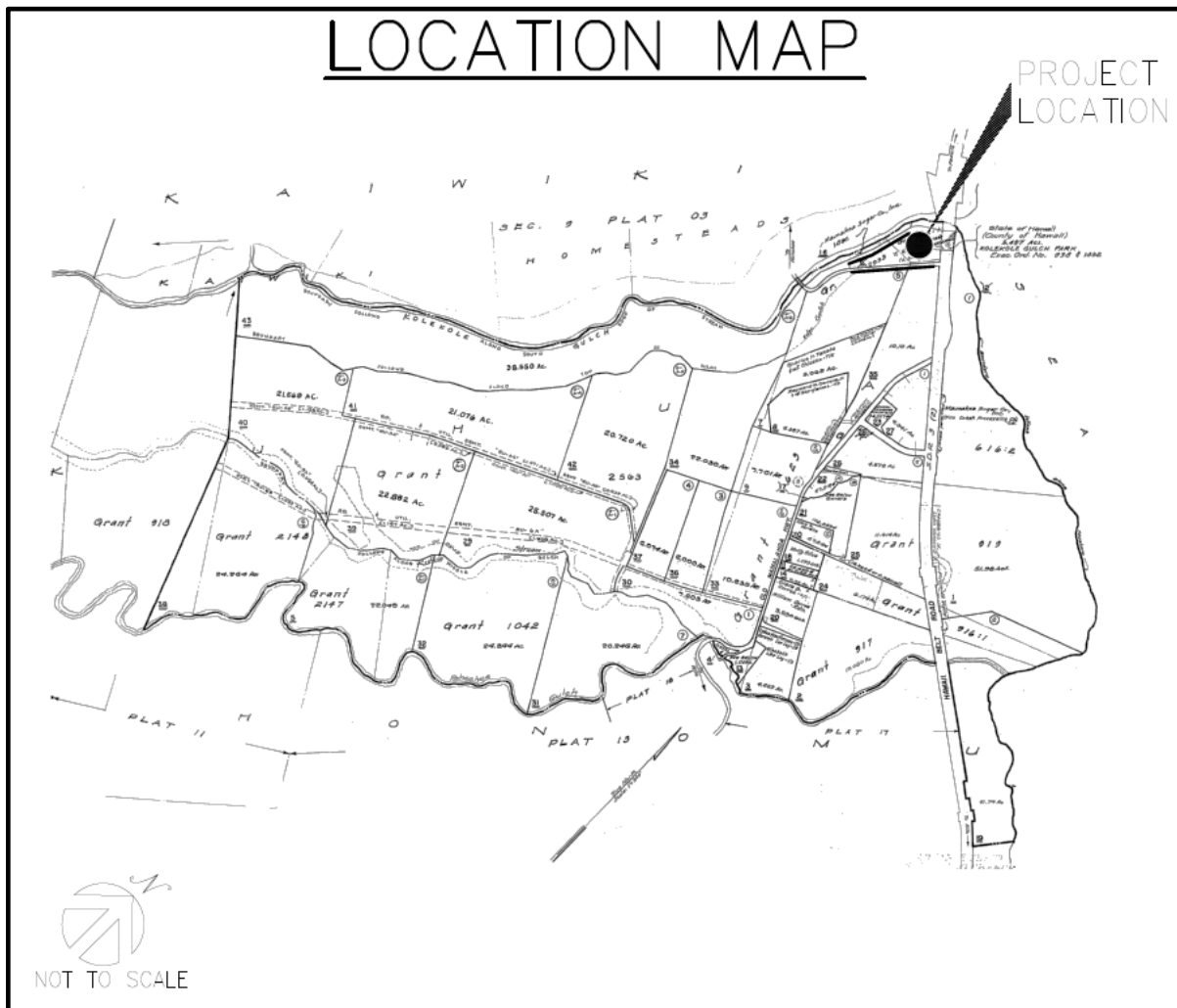
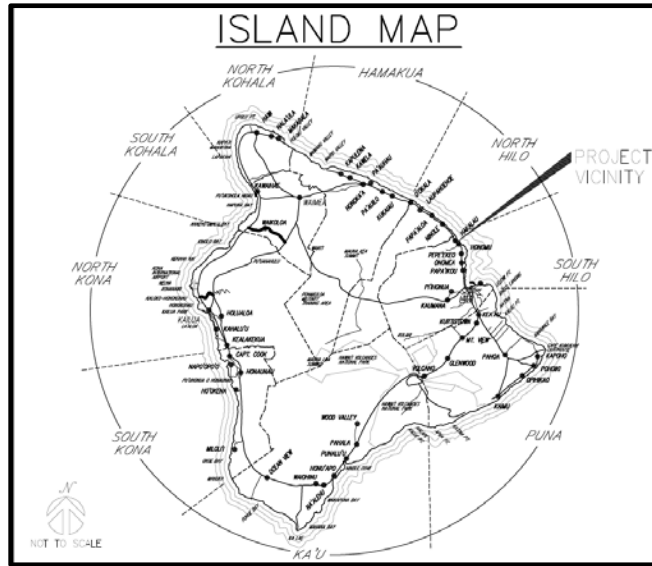
These guidelines are specific to the demolition and/or construction phase(s) of the specific project described in Section 6.0 below only and do not address the ongoing operations subsequent to construction. Future projects at the site will require a separate C-EHMP if contaminated media will be impacted. Once 100% of the design is complete, update this plan with the actual construction methodology.

If contaminated media will be left on-site following the completion of construction, then an Environmental Hazard Evaluation (EHE) must be conducted and a separate Environmental Hazard Management Plan (EHMP) will have to be prepared to manage the contamination in the long-term. If the site already has an EHMP, then the EHMP must be updated following redevelopment to incorporate changes to the site. EHEs and EHMPs must be submitted to the HDOH for review and approval following the completion of construction activities detailed in this C-EHMP.

2.0 Background

The C-EHMP applies to the property shown in **Figure 1**.

Figure 1: Site Location Map



The property is also identified by the following.

Address	None
TMK #	(3) 2-8-015:015
Latitude/Longitude	19°52'55.8"N 155°07'10.3"W

Site Conditions

Distance to Nearest Surface Water Body	1 meter
Approximate Depth to Groundwater	2 feet
Is the Property Above or Below UIC Line	Above
Is the first-encountered groundwater classified as a potential source of drinking water in the Mink & Lau Aquifer Identification and Classification Report?	Yes
Current Property Use Type (Residential, Commercial, Zoning, etc.)	Public County Park
Proposed/Future Property Use Type (Residential, Commercial, Mixed Use Zoning, etc.)	Public County Park
Typical Soil Profile from Surface to Groundwater (Include Depth Range, Lithology)	Hilo-Rock outcrop, characterized as hydrous silty clay loam, well drained with high runoff potential.
Utilities Serving Site (e.g., Storm Drains, Electrical, Gas, Water, Sewer [Cesspool, Septic, Other])	HELCO Electric, County Department of Water Supply, Portable Toilets.

2.1. Existing Environmental Conditions

A Phase II Environmental Site Assessment (ESA) was completed at the Site by ESI in 2017 that included surface and subsurface multi-incremental (MI) soil sampling (ESI, 2017). An additional Phase II ESA was completed by LEI in July 2019 that included collection of surface and subsurface multi-incremental (MI) soil samples from a set of decision units for laboratory analysis of arsenic, lead, and organochlorine pesticides (OCP). Chemicals of potential concern (COPCs) were determined based on previous investigations and land use at the Site. Both Phase II ESA soil investigations revealed that lead was the only COPC at the Site. Therefore, lead is a COC for this project.

2.2. Chemicals of Potential Concern

The following chemicals of potential concern (COPCs) have been detected above the most restrictive unrestricted EAL and may pose a hazard.

Media: Soil

COPC	Concentration Range	EAL*
Lead	70-415 mg/kg	200

* EAL for Unrestricted Use; < 150m from surface water; above drinking water

COPC=Chemical of Potential Concern

The areas with concentrations exceeding the EAL for lead within the area of planned disturbance are depicted in **Figure 2** and **Figure 3**.

Figure 2: Lead Hazard Map (LEI 2019)

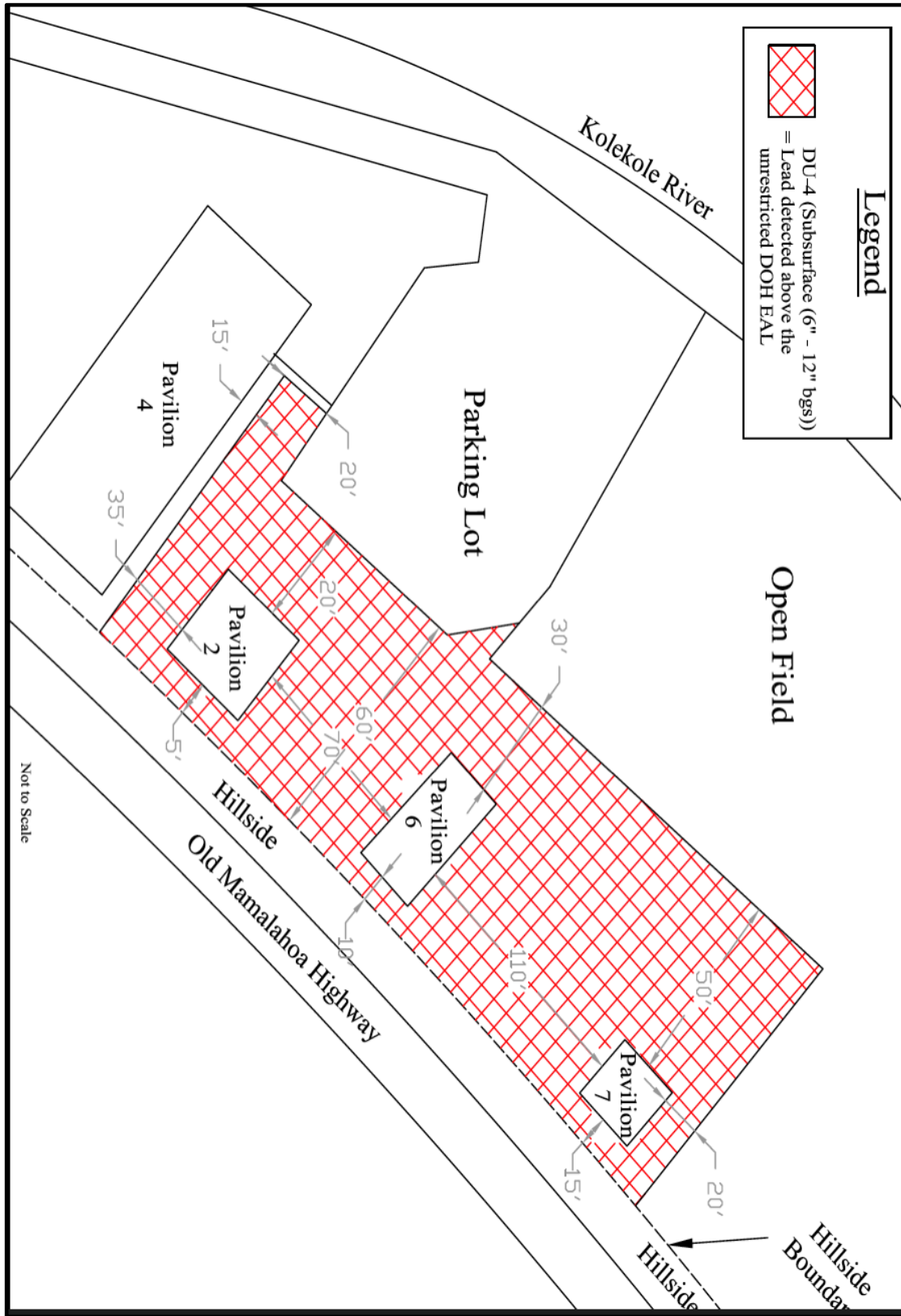
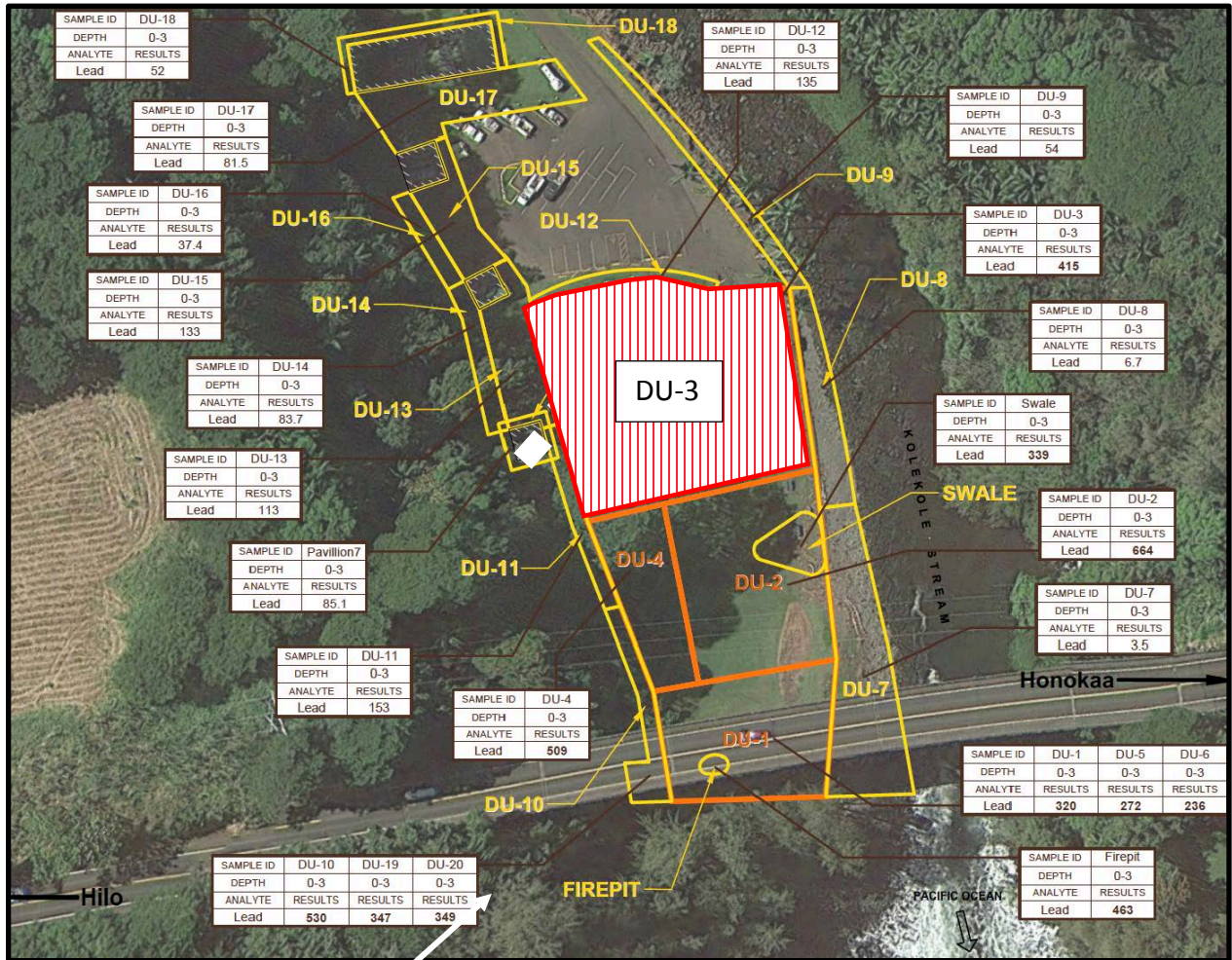


Figure 3: Lead Hazard Map (ESI, 2017 Phase II ESA)



2.2.1 Chemicals of Potential Concern and Construction Materials

Question	Yes	No
Are storm drains (including interceptors) or will storm drains be present at the site?	X	
Will any portion of a storm drain (including interceptors) be present at an elevation that is potentially in contaminated groundwater?		X
Will any portion of a utility corridor be present at an elevation that is potentially in contaminated groundwater?		X
Will a portion of any other utility or subsurface structure (other than foundations) extend potentially into contaminated groundwater?		X
Are any potentially flammable or explosive COPCs present at the site (e.g., methane, total petroleum hydrocarbons as gasoline, etc.)?		X
Will any electrical lines/utility corridors be subsurface?		X
Are any COPCs in vapors present at or above 10 % of the LEL?		X
Will any elevator shafts or escalator pits, potentially extend into contaminated groundwater?		X

Construction Materials Assessment

Construction Material in Contact with Contaminated Media	COPC, Concentration and Media	Proposed Material to be used	Material Safe with COPC	
			Yes	No
Imported Clean Fill	Lead, 415 mg/kg, soil	Imported Clean Fill	X	
Asphalt	Lead, 415 mg/kg, soil	Asphalt	X	
Concrete	Lead, 415 mg/kg, soil	Concrete	X	

COPC=Chemical of Potential Concern

3.0 Summary of Potential Environmental Hazards

Potential environmental hazards posed by the identified lead-containing soil include the following potential exposure pathways:

Direct exposure to impacted soil by construction workers, park staff and users at the Site is the main potential environmental hazard pathway for human receptors through means of unintentional ingestion of solid and/or airborne soil particles during construction.

Impacts to terrestrial habitats are potential environmental hazards posed by contaminated soils at the Site. The planned BMPs, including silt fences, absorbent booms and covering soil stockpiles with poly sheeting would minimize/eliminate runoff/erosion of impacted soil to the affected environment.

Environmental Hazard Table

COPC	Media			Hazard					Potential Receptors				
	Soil	Water	Vapor	Direct Exposure	Leaching	Gross Contamination	Ecotoxicity	Vapor Intrusion	Construction Workers	Site Visitors	Site Occupants	General Public	Future Site Users
Lead	X			X		X	X		X	X	X	X	X

COPC=Chemical of Potential Concern

Below is a simplified chart detailing short and long-term exposure hazards to lead.

Chronic and Acute Direct Exposure Hazards

COPC	Direct Exposure Hazard				Acute Exposure	Chronic Exposure
	Ingestion	Inhalation	Absorption	Injection		
Lead	X	X			<p>pain, muscle weakness, numbness and tingling, and, rarely, symptoms associated with inflammation of the brain. Abdominal pain, nausea, vomiting, diarrhea, and constipation</p>	<ul style="list-style-type: none"> • Abdominal pain • Constipated • Depressed • Distracted • Forgetful • Irritable • Nauseous/Sick <p>People with prolonged exposure to lead may also be at risk for high blood pressure, heart disease, kidney disease, and reduced fertility.</p>

COPC=Chemical of Potential Concern

References:

NIOSH Pocket Guide to Chemical Hazards, 2007
DOH TGM EHE Guidance, 2008

Hazard Maps

Detailed Hazard Maps are included as **Figure 2 and Figure 3** of this C-EHMP. Hazard Maps delineate the location of known or presumed contamination at the site within the area of disturbance and what type of hazard the contamination represents. Not all contamination is a Direct Exposure Hazard to Construction Workers and other Site Users, however, all contaminated media must be properly handled and disposed of in accordance with the guidance in this C-EHMP. Mishandling of contaminated media could result in spreading the contamination to uncontaminated areas of the site or to uncontaminated off-site locations, which could result in fines and other penalties.

4.0 Notification Requirements

The effective environmental management of any project requires a coordinated effort from all individuals involved. The following sections outline the need to identify the responsibilities of key personnel involved in project construction.

4.1. Key Project Personnel

The project owner (owner/developer) is expected to maintain a list of project contacts throughout the construction phase of the project.

The key project personnel are as follows. An updated key project personnel list needs to be maintained throughout the project and submitted to HDOH in writing whenever a change in key project personnel occurs.

Role	Company	Name	Phone #	e-mail
Construction Project Manager	County of Hawaii	TBD	TBD	TBD
Construction Foreman	TBD	TBD	TBD	TBD
Onsite Qualified Environmental Professional	TBD	TBD	TBD	TBD
Qualified Environmental Professional (Project Manager)	TBD	TBD	TBD	TBD

Role	Company	Name	Phone #	e-mail
Owner	County of Hawaii	TBD	TBD	TBD
Operator	County of Hawaii	TBD	TBD	TBD
Developer				
NPDES Permit contact	NA	NA	NA	NA
County Building Permit contact	TBD	TBD	TBD	TBD
HDOH HEER Office Project Manager	TBD	TBD	TBD	TBD
Landfill Disposal Contact	TBD	TBD	TBD	TBD
Waste Transporter Contact	TBD	TBD	TBD	TBD
Contact Export Site (if exporting soil)	TBD	TBD	TBD	TBD
Contact Import Site (if importing soil)	TBD	TBD	TBD	TBD

NA = not applicable
TBD = to be determined

In addition, if site conditions or planned building configurations change following submittal and acceptance of this C-EHMP by the HDOH HEER Office, then the following agencies must be notified at least 90 days prior to conducting ground disturbing activities or as soon as the change has been identified. Please note that if HDOH is notified of a change in site conditions or planned building configuration less than 90 days prior to ground disturbing activities, there could be delays in construction if additional assessment work needs to be conducted. The initial notification of construction activities and any changes can be submitted through the HDOH e-permitting portal using the website link below.

Agency	Phone	Link/Website
HDOH HEER Office	808-586-4249	https://eha-cloud.doh.hawaii.gov/epermit/app/#/formversion/ed9ca916-7863-459b-b5dd-e66f881381d5

5.0 Requirements for Onsite Environmental Oversight

On-site monitoring is a key component of ensuring that the procedures documented in this C-EHMP are implemented properly and function as intended (e.g. appropriate installation and location of erosion and sediment control measures, cleanliness of equipment, suitability of secondary containment for fuel storage, screening of potential contaminated material, and stockpile segregation, etc.). A qualified environmental professional (QEP) will be retained as the environmental monitor to provide guidance on implementing the recommended measures and to develop additional mitigation measures if the need arises. The onsite QEP will have at least 5 years of experience providing environmental oversight for construction projects and must have completed HAZWOPER 40-hour training with current 8-hour refresher.

Monitoring events will be conducted at an appropriate frequency based on specific work tasks/procedures and the potential for adverse impacts to occur. An appropriate schedule (frequency and duration of site visits) will be established between the QEP and all involved regulatory agencies regarding when the QEP is onsite. In general, the QEP will be familiar with the day-to-day conduct of project activities and be on-site during activities with the potential to impact human health or the environment, when contaminated media will be disturbed, when mitigation measures are implemented, or as determined in discussion with the regulatory agencies. Monitoring should be conducted with greater frequency during periods of inclement weather (e.g., heavy precipitation, strong winds) and during critical components/tasks of the project, such as working in contaminated groundwater. The QEP will be onsite whenever potentially contaminated soil or groundwater may be disturbed and when hazardous vapors may be present. If demolition activities include abatement of lead-based paint or asbestos, abatement activities must be completed in accordance with all State and Federal laws and regulation prior to demolition. This is necessary to ensure the protection of construction workers, the general public, and the environment. Key monitoring stages may include, but are not necessarily limited to:

- During pre-construction geotechnical and/or environmental sampling
- During soil exposing (e.g., concrete/asphalt removal) and soil movement activities (e.g., demolition, grading, excavation, soil stockpiling, soil disposal etc.)
- During dewatering activities
- Prior to and after heavy rain/storm events
- During engineering control installation and testing
- During installation of erosion and sediment control measures

The primary responsibility of the QEP is to ensure that the environmental and human health protection measures are implemented and are adhered to and that any movement, transport, and disposal of contaminated material (onsite and to an offsite location) is properly documented.

Typical responsibilities of the QEP include those identified below:

- Direct the segregation of contaminated soil.
- Communicate the requirements of the C-EHMP to project members during pre-job and tailgate meetings.
- Remain onsite as per the schedule established between parties prior to project start. The QEP will remain on-call during non-critical work periods to respond to emerging environmental issues.
- Review the contractor’s work procedures to ensure functionality and compliance with the C-EHMP and applicable regulations, standards and best management practices (BMP).
- Provide advice in preparing for work activities in a manner that mitigates adverse environmental or health effects.
- Exercise the authority to modify and/or halt any construction activity at any time if deemed necessary for the protection of human health and the environment.
- Advise project members if project activities have caused or are likely to cause an environmental incident and make recommendations for corrective action.
- Monitor compliance with the C-EHMP and relevant permit conditions.
- Liaise directly with project members and provide technical advice for the purpose of resolving situations that may impact human health and the environment as they arise.
- Maintain complete records of activities related to the implementation of the C-EHMP. This should include any measurements taken (e.g. air monitoring, manifests, truck receipts, truck counting spreadsheets etc.), photographs and incident reports.
- Complete and submit environmental monitoring reports to the HDOH HEER and report any unanticipated adverse effects to the environment. Such reports must include the nature of the effect, its cause, mitigation and/or remediation implemented, and whether a work stoppage was ordered, as well photographs, analyses, and measurements, if applicable.
- Report unanticipated encounters with contamination at the site in accordance with HRS 128D. Reportable releases include contamination not already identified at the site, as well as tanks, drums, and/or abandoned pipelines that are not identified in advance and are encountered during excavation.

Table of Project Activities when QEP Must be Present

Activity	Planned at Site?		QEP Will Be Present?		Monitoring Equipment to be Used by QEP
	Yes	No	Yes	No	
Environmental Sampling	X		X		Soil sampling tools
Geotechnical Sampling	X			X	
Silt Fence Installation	X			X	
Demolition	X		X		
Grading	X			X	
Excavation	X		X		
Pile Installation		X			

Activity	Planned at Site?		QEP Will Be Present?		Monitoring Equipment to be Used by QEP
	Yes	No	Yes	No	
UST Removal		X			
Dewatering		X			
Utility Trenching		X			
Soil Stockpiling	X		X		Soil sampling tools
Soil Export/Import	X		X		Soil sampling tools
Vapor Barrier Installation		X			
Vapor Extraction		X			
Confined Space Work		X			
Work Below High-Water Mark		X			
Engineering Control Installation and Testing		X			
Pipeline Tapping		X			
Installation of Erosion/Sediment Controls	X		X		
Prior to/During Rainstorm Events	X		X		

Additional details regarding QEP monitoring schedule: The QEP will be on-site to collect soil samples from any residual soil generated that cannot be reused on-site for disposal characterization. This will occur during or after the site grading phase of construction.

6.0 Construction Activities

Construction activities planned at the Site include demolition of one existing pavilion, concrete pads, railings and walkways at the Site, followed by minor grading, installation of construction BMPs, basecourse/fill, and construction of one pavilion, one comfort station, a water tank and pump house, and interior/exterior existing pavilion ADA and other renovations at the existing Site buildings. Figure 4 depicts the construction plan.

Planned Types of Excavations:

Excavation Type	Maximum Depth
Grading	12 inches below ground surface

7.0 Soil Management Plan

The purpose of this section is to ensure that contaminated soil is properly handled and managed. If the full extent of contaminated soil is unknown (e.g., if the contamination is not delineated), then all soil at the site must be treated as potentially contaminated. The management of potentially contaminated soil will be overseen by an onsite QEP.

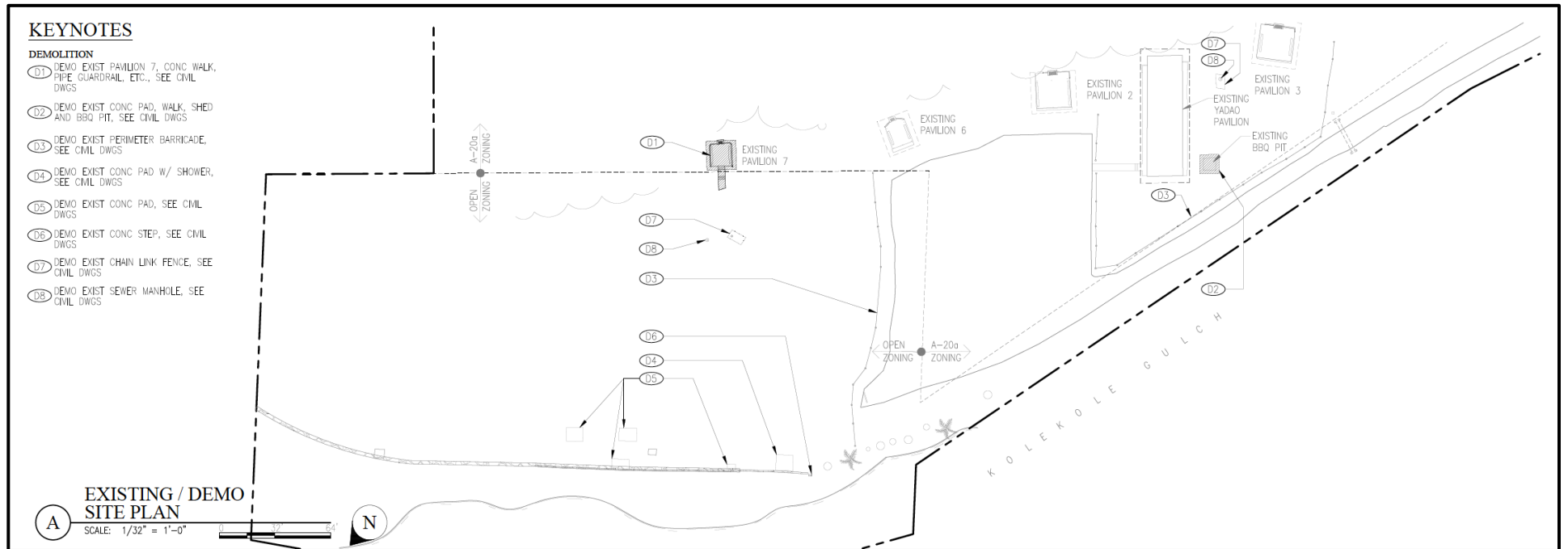
7.1. Soil Management

Soil disturbed at the Site will be continuously monitored and documented by a QEP with at least five years' experience in environmental oversight associated with construction projects. Where known or suspect contaminated soil is encountered during excavation, the appropriate response actions must be taken that conform with HDOH and EPA guidance, laws, and regulations. This includes proactive planning to ensure that workers have the appropriate level of PPE and that contaminated soil is managed properly when excavated. Tasks associated with properly managing contaminated soil include the following:

- Where contaminated soil is encountered, a QEP shall provide field oversight to ensure:
 - that known or suspect contaminated soil is segregated from clean soil,
 - that known or suspected contaminated soil is properly stored and covered with plastic sheeting,
 - that the contaminated soil is managed properly during and following excavation,
 - and that health and safety guidance related to potential exposure of workers to COPCs is provided.
- Workers who may come into contact with contaminated soil must wear the appropriate level of PPE.
- Workers who may come into contact with contaminated soil must have required training (at a minimum, 40-hour HAZWOPER certification and current 8-hour annual refresher training).
- Soil trucked offsite should be drained of fluids and the load must be covered with a dust screen during transport.
- If newly encountered soil contamination is discovered at a previously unknown source or location, the HDOH HEER Office must be immediately notified of its discovery by reporting it as a new release.

Figure 5 shows that area of potential soil disturbance planned during construction activities.

Figure 4: Area of Disturbance



7.1.1 Field Identification of Contaminated Soil

Some COPCs, including, but not limited to metals, dioxins, pesticides, and polychlorinated biphenyls, cannot be identified in the field through visual and olfactory observations. In some cases, previous sampling or historical research into previous industrial operations may have identified areas where these COPCs are likely present at concentrations above the most restrictive HDOH EALs that are targeted for excavation. If your site contains COPCs that are not identifiable via qualitative field observations, the contaminated soil must be managed in a manner protective of site workers, the public, and the environment. Prior delineation is critical to ensure safe management practices. Areas of known or suspected contaminated soil are depicted in **Figures 2 and 3**. Soils in these areas must be segregated and stockpiled separately from clean soil.

Other types of contaminated soil *may* be identified in the field through visual and olfactory observations. Petroleum contaminated soil typically exhibits petroleum staining and/or a petroleum hydrocarbon odor. Free product may or may not be observed. Solvent-contaminated soil typically exhibits a solvent or sweet-smelling odor, and in some instances free phase product may be present. Petroleum contaminated soil may be also detected indirectly via a rotten egg odor stemming from anaerobic degradation of the product that produces hydrogen sulfide in oxygen starved zones. Suspect contaminated soil should be segregated from clean material. Soil with a strong petroleum or solvent odor and/or free phase product should be segregated separately from the moderately impacted soil, as soil that is considered grossly contaminated must be removed, may not be replaced in the excavation and must be properly disposed of. During excavation of known or suspected contaminated soil, the QEP must perform the following activities:

- Monitor the location of excavation activities to ensure that soil depicted on hazard maps is properly managed as contaminated, even when there is no field evidence of contamination.
- Visually screen soils for staining, debris, soil waste, discoloration, or other evidence of contamination as the soils are removed from the excavation.
- Check for petroleum or other unusual chemical odors emanating from the soil.
- Collect soil screening samples in sealable inert bags and test the headspace within each bag for volatile organic compounds (VOCs) using a PID and following the Maine Department of Environmental Protection PID Bag Headspace Test procedure described in detail in Section 8.4.2 of the Technical Guidance Manual (TGM). Prior to testing, PID meters must be calibrated in accordance with device manufacturer instructions.
- Use the field observations, VOC measurements, and any other field screening tests, such as the glove and paper towel tests, to segregate the soil properly.

The only COPC for the site is lead, which was detected in surface soil above the DOH Unrestricted EAL within DU-4; around pavilions 2, 6 and 7 (Figure 2 and Figure 3). Lead is not able to be detected in the field by olfactory sense or PID. Therefore, all subsurface soil disturbed in the affected area must be handled and disposed as lead-containing soil.

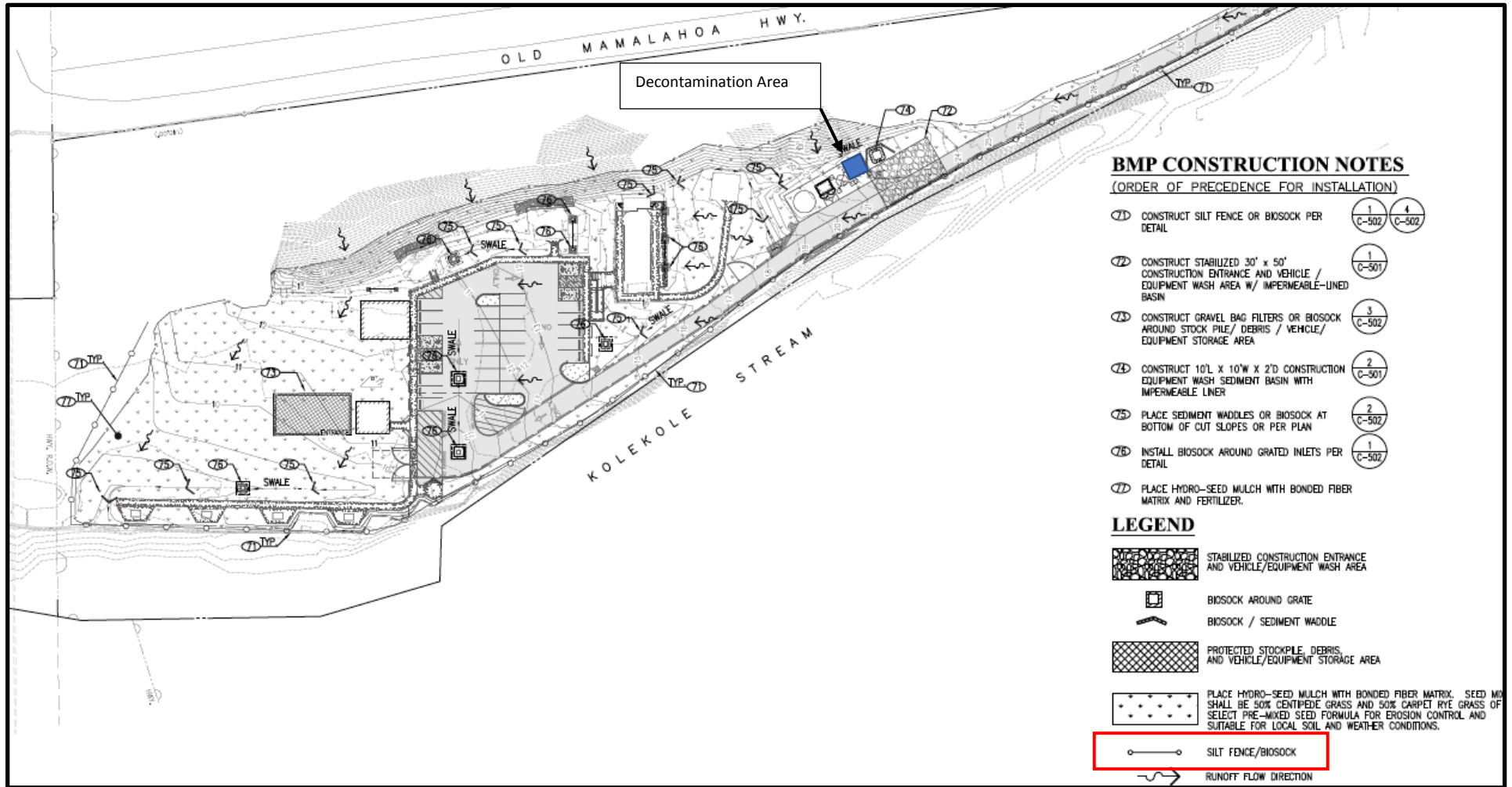
7.1.2 Dust and Erosion Control

Dust and erosion controls at the Site will be monitored and documented by a QEP with at least five years' experience in environmental oversight associated with construction projects. Prior to excavation activities, the Contractor and the QEP must evaluate and establish erosion control and dust control measures. The erosion control and dust control measures must prevent impacted soils from migrating away from the excavation area. Typically, Best Management Practices (BMPs) are employed to control erosion and prevent the spread of contamination via runoff or wind.

Dust control measures should ensure compliance with ambient air quality standards established in the Hawaii Administrative Rules (HAR) 11-59 and should comply with air pollution control requirements specified in HAR 11-60.1. During excavation and handling of impacted soil, the following dust control measures must be implemented to minimize dust generation:

- Dust/silt fences: BMPs associated with erosion control measures shall include the installation of silt fencing in the vicinity of the excavation and along the site perimeter. Dust barriers must be used where extensive excavation is anticipated. The locations of dust fences that will be constructed for this site are depicted on **Figure 6**.
- Equipment decontamination: BMPs to control the transport of contaminated soil from the site and within the site shall be used to limit the tracking of soil away from the excavation area. Decontamination areas should be set up adjacent to excavation areas where contaminated media will be disturbed, adjacent to stockpile areas, and where vehicles and equipment leaves the site. Decontamination protocols are described in Section 14.0. The locations of decontamination areas are depicted on **Figure 6**.
- Wetting/misting: BMPs associated with dust control measures shall include the use of water to be sprayed on the soil during excavation activities. During excavation, water shall be sprayed on the surface of the soil to prevent dust from being generated. However, the amount of water used for dust control shall be minimized as to not create run-off away from the excavation.

Figure 5: Dust Fence Plan



7.1.3 Excavation and Stockpiling

Suspect contaminated soil must be stockpiled and segregated from clean soil. The following tasks must be performed with respect to managing contaminated soil.

- Contaminated soil will be segregated from uncontaminated soil.
- Water contained within excavated soils will be allowed to drain back into the excavation prior to stockpiling the soil.
- Stockpile contaminated soil in a 20-mil plastic-lined, bermed area. The stockpiles must be covered with plastic sheeting at the end of each day and during any major wind or rain events. The plastic sheeting must be secured with enough ballast so that it will not be dislodged by strong winds.
- Underlay the edges of the plastic sheeting with clean soil or other material to create a berm around the stockpile.
- Ensure that the height of the berm will be sufficient to prevent storm water runoff or run-on from breaching it. The contaminated soil must be placed inside the bermed area on top of the plastic sheeting.
- Soil stockpiles shall be located away from storm drain inlets, surface waters, and storm water drainage pathways/channels.
- Stockpile soil that has a strong petroleum or solvent odor and/or free phase product separately from both clean and moderately impacted soil. This soil may not be reused and must be properly disposed of.
- Soil stockpiles must remain on-site and cannot be transported or stored off-site without prior authorization or characterization.

7.2. Soil Reuse and Disposal

Prior to reuse of soil off-site or disposal at a licensed disposal facility, all soil will be sampled to ensure that it is appropriately characterized so the final disposition of the soil may be determined. Figure 5 shows the planned grading locations for soil disposal. If other locations are later planned following approval of this plan, then the HEER Office must be notified and provide approval prior to any material being transported.

The current plan for soil disposal is to remove the top 18 inches of lead-impacted soil within the DU-3 and DU-4 area shown in Figure 2 and Figure 3. The soil will be segregated, covered with plastic sheeting, filter socks and protected from erosion/runoff prior to proper disposal of impacted soil at the West Hawaii Landfill in accordance with landfill and County rules.

Chemicals to Analyze	Analytical Method	Sampling Frequency (CY per Sample)
Lead	EPA 6020B	400

All soil samples should be collected in accordance with the HEER Office TGM. This requires the collection of multi-increment soil samples to properly characterize the soil.

Off-site Disposal/Re-Use Table

	Re-Use Location	Disposal Location
Name of Re-use or Disposal Location	NA	West Hawaii Landfill
Address of Re-use or Disposal Location	NA	71-1111 Queen Ka'ahumanu Highway, Waikoloa Village, HI 96738
Land Use (Site Zoning)	NA	Agricultural (A-20)

NA=not applicable

This information will be communicated to the soil hauler and it will be ensured that the hauler only dispose of soil at locations approved in this plan. The QEP will monitor and review hauling manifests and disposal records to ensure adherence to the plan. Disposal of soil at a location not previously approved could result in fines.

On-site Reuse of Known or Suspect Contaminated Soil

No planned reuse of contaminated soil is planned onsite. In the event that the plan changes, the following paragraph is included to provide guidance for reuse of contaminated soil:

In general, contaminated soil may be re-used on-site. Contaminated or suspect-contaminated soil will be replaced in the same area and at a similar depth as where the soil was originally excavated. Exceptions may apply based on site-specific hazard situations. HDOH HEER Office guidance should be reviewed to ensure proposed re-use is in line with current guidance. The QEP will ensure that contaminated soil is not spread to uncontaminated areas of the site without prior approval from HDOH. Excess soil generated from the lead-impacted soil area (shown in Figure 2 & Figure 3) shall be properly isolated from other soil, and handled and disposed at the West Hawaii Landfill in compliance with this plan, OHSA, DOH and landfill rules.

7.2.1 Soil Sampling for Re-Use

No soil is planned for exported re-use.

7.2.2 Stockpile Sampling for Disposal at a Disposal Facility

If soil will be disposed of at an appropriate permitted waste disposal facility the MI sampling requirements are as follows:

	Disposal Facility Requirements
Stockpile Volume (cy) per sample	400
# of increments per MI sample	30

7.2.3 Record Keeping

A log of all soil that leaves the Site and its final disposition will be maintained by the QEP (Example in **Appendix C**). All waste manifests, truckload counts at source and receiving site, weigh tickets, and soil profiles will be included in a final report documenting the environmental oversight conducted during construction. The report will be submitted to the HEER Office at the conclusion of the project. In addition, whenever soil is exported from the site, summary reports of the disposal records, including copies of documents, will be submitted to the HEER Office on a weekly or monthly basis, unless waived in writing by the HEER Office project manager. For all soil disposed of at a disposal facility a manifest with all required signatures will be submitted.

8.0 Groundwater Management Plan

Estimated Depth to Groundwater at Site:	2 feet		
Proposed Maximum Excavation Depth:	1 foot		
Estimated Direction of Groundwater Flow:	north		
Will Contaminated Groundwater be Encountered During this Project?	Yes	No	Unknown
		X	
Will Groundwater from this Site be Dewatered into the Sanitary Sewer System?		X	
Will Groundwater from this Site be Dewatered into the Storm Sewer System?		X	
Does the Contractor have a Dewatering Permit Issued by the County and/or HDOH Clean Water Branch?		X	
Is Free Product Known or Suspected to be Present at the Site?		X	

The current construction plans do not anticipate encountering groundwater at this site; therefore, a groundwater management plan is not needed for this C-EHMP. If plans change or new information indicates that groundwater will be impacted, then this C-EHMP will be revised and re-submitted to the HEER Office for review and approval at least 90 days prior to conducting groundwater disturbing activities or as soon as the change has been identified.”

9.0 Free Product Management Plan

The purpose of the free product management plan is to ensure proper handling and management of free product that may be encountered. Free product is generally encountered floating on the groundwater or at the capillary fringe, and typically presents as either free-flowing, black or brown, viscous product; a thin layer of black or brown product; a discontinuous layer of product (e.g., spots or globules); or a petroleum hydrocarbon sheen. In areas where groundwater level is tidally influenced there may be increase in the amount of free product at either high or low tide.

Question	Yes	No	Unknown
Is free product known or suspected to be present at the site?		X	
Is the groundwater at the site tidally influenced?	X		
Is groundwater at the site confined?		X	
Will excavation activities at the site potentially encounter contaminated groundwater and free product?		X	

The current construction plans do not anticipate encountering groundwater at this site; therefore, a free product management plan is not needed for this C-EHMP. If plans change or new information indicates that groundwater will be impacted, then this C-EHMP will be revised and re-submitted to the HEER Office for review and approval at least 90 days prior to conducting groundwater disturbing activities or as soon as the change has been identified.

10.0 Storm Water Management Plan

Proactive actions must be taken to prevent storm water from coming into contact with contaminated soil at the site. The actions listed below will minimize the potential for contaminating storm water.

- Place contaminated soil on plastic sheeting in a lined, bermed area to prevent storm water from contacting contaminated soil.
- Open excavations should be backfilled as soon as practicable to prevent storm water and direct precipitation from entering the excavation. When possible, open excavations should be bermed to prevent storm water run-off from entering the excavation.
- In the event of heavy rain, ensure that all stockpiles of contaminated soil are covered with plastic sheeting and substantially secured.
- Regularly monitor the weather throughout the day for signs of approaching storms and/or heavy rains.

11.0 Vapor Management Plan

None of the COPCs identified or suspected to be present at the site contain significant volatile constituents that are anticipated to create a soil vapor hazard at the site during construction. Therefore, a vapor management plan is not needed for this C-EHMP. If new information indicates that hazardous soil vapors may be present, then this C-EHMP will be revised and re-submitted to the HEER Office for review and approval at least 90 days prior to conducting soil/groundwater disturbing activities or as soon as the change has been identified.

12.0 Spill or Release Response

Releases, should they occur, must be reported in accordance with HRS 128D and HAR 11-451. In addition to contractor releases, a release may include pre-existing contamination encountered during construction activities. If new contamination is discovered that is different from any known previously reported releases, the release must be reported as described in the abovementioned regulations.

12.1. Release Response

If a release occurs, the following actions must be taken:

- Determine the identity of what was spilled, the source of the spill, the volume of the spill, the severity of the spill, and if immediate emergency response actions are necessary.
- Stop work if contaminant releases are extremely large and cannot be contained. If an imminent threat to human health or the environment exists, or if human or environmental receptors are impacted (e.g., human receptors falling ill or suffering sudden illness), notify the Hawaii County Fire Department by calling 911.
- If the spill is of a volatile, flammable, or combustible liquid or vapor, possible ignition sources should be eliminated, and workers will be directed to remain upwind. In addition, monitor for explosive vapors using an LEL meter.
- Stop work if an unusually large release or contaminated area is encountered unexpectedly or if there is any release of chemicals or hazards not covered by the plan.
- Stop work and take immediate emergency response actions if a worker or member of the general public is injured.
- Eliminate the source of the spill to the extent practicable (e.g., shutting off a valve, righting an overturned container), if it is safe to do so. Do not attempt to stop a release from an active fuel pipeline.

- Protect sensitive ecological receptors threatened by the spill.

12.2. Release Reporting

In the event of a release of a hazardous substance that causes imminent threat to human health or the environment, the first call should be to 9-1-1. Example of releases requiring a call to 911 include, but are not limited to fuel or gas leaking from an active pipeline, an ammonia tank leak, or workers and/or the public becoming ill.

All releases must be reported to the HEER Office (808-586-4249 or 808-247-2191 after work hours) and the Local Emergency Planning Committee (LEPC) at 808-586-4424. Both agencies must be contacted by telephone or in person immediately following a release. Note, there is no penalty for reporting a release unnecessarily, but there are large penalties for not reporting a release.

If petroleum is observed on surface water, then notify the U.S. Coast Guard (USCG) through the National Response Center (NRC) at (800) 424-8802. Please note, petroleum observed on groundwater is not reportable to the NRC. For oil and hazardous substance spills that threaten or occur in navigable waters, the USCG is the lead agency

The on-site personnel responsible for ensuring that the appropriate release notifications are conducted are listed below. Please note, that in the case of an emergency or imminent threat to the environment, any on-site personnel can contact 911.

Personnel Responsible for Release Notifications

Name	Company	Title	Phone Number
TBD	TBD	TBD	TBD

13.0 Worker Protection

A site-specific Health and Safety Plan (HASP) must be prepared for the site in accordance with the appropriate occupational health and safety regulations. These regulations and requirements include but are not limited to the use of the appropriate level of PPE and appropriate personal hygiene steps associated with the identified COPCs as the site. A copy of the Site-Specific HASP will be completed by the contractor prior to the start of construction.

Administrative Controls for Protecting Workers from COPC Hazards (further detailed in the HASP) include:

- 40-hour HAZWOPER training and current 8-hour refresher required for all workers who may come into contact with contaminated media.
- A discussion of COPC hazards that may be encountered will be discussed during daily tailgate safety meetings.

- A QEP with at least five years' experience in environmental oversight associated with construction projects will be present when contaminated media will be moved or disturbed.

Engineering Controls for Protecting Workers from COPC Hazards (further detailed in the HASP) include:

- The appropriate level of PPE shall be selected based on the potential hazards and COPCs associated with the individual construction tasks. The level of PPE may be upgraded or downgraded depending upon the tasks being conducted and the level of contact with the soil. At a minimum, Modified Level D PPE consisting of Tyvek suits, chemical-resistant boots, and nitrile gloves is to be required for workers directly exposed to contaminated soils within the trenches and excavations.
- Stanchions (delineators) and hazard tape shall be used to delineate exclusion areas where COPCs are present and access is restricted.

14.0 Decontamination

Prior to excavation activities, the Contractor and the QEP must designate areas for decontamination activities. The QEP must also evaluate and establish decontamination procedures for personnel, tools, equipment and vehicles, prior to construction. Decontamination procedures for personnel and BMPs to limit direct exposure to COPCs is also discussed in the Site-Specific HASP that is will be completed by the contractor prior to the start of construction.

14.1. Decontamination of Tools and Personnel

Appropriate personal hygiene practices shall be adhered to at all times when handling potentially impacted soil. Washing facilities shall be made available on the jobsite to allow workers to wash their hands and avoid cross-contamination before eating, drinking, smoking, and/or heading home for the day.

After contact with the impacted soil, proper decontamination procedures shall be conducted including the removal, segregation, and disposal of PPE. Any used PPE shall be placed in plastic garbage bags, double bagged, and deposited in the site dumpster, or a municipal landfill.

Hand-held and manual tools in direct contact with impacted soil must be decontaminated to remove any contaminated soil or water prior to handling un-impacted material that are assumed to be uncontaminated and before they are removed from the work area. The decontamination of tools must include the following:

- At the excavation location, physically remove soil adhering to the surface of the equipment using appropriate hand tools. Soil removed during this step should be

placed back into the impacted area, excavation, or the appropriate stockpile following removal.

- Rinse off contaminated groundwater at the excavation location, allowing rinse water to drain back into the excavation or be collected in a container for proper disposal.
- While the tools are located at the excavation, water should be used to wash the surfaces of the tools that were exposed to impacted material. The water used to wash the exposed surfaces should be directed back to the impacted area or excavation and allowed to infiltrate.

During equipment decontamination, proper PPE shall be employed to minimize exposure to COPCs. Proper PPE should include Modified Level D PPE with nitrile gloves, rubber boots, waterproof Tyvek, and an appropriate face shield to protect against splash back during decontamination. The QEP shall designate Decontamination Areas for the donning and doffing of disposable PPE and for the cleaning of materials. Decontamination Area is depicted on **Figure 6**.

14.2. Decontamination of Vehicles and Equipment

Vehicle and equipment decontamination should occur following the use of vehicles and equipment (to include haul trucks and heavy machinery) in direct contact with impacted soil. The equipment decontamination procedures are intended to describe methods for reducing and controlling the spread of site COPCs to unimpacted portions of the site or un-impacted materials, and to off-site locations.

Equipment and vehicles in direct contact with impacted soil must be decontaminated to remove any contaminated soil before they leave the work area. The decontamination of vehicles equipment must include the following:

- At the excavation location, physically remove soil adhering to the surface of the equipment using appropriate hand tools. Soil removed during this step should be placed back into the impacted area, excavation, or the appropriate stockpile following removal.
- While the vehicle/equipment is located at the excavation, water should be used to wash the surfaces of the vehicle/equipment that was exposed to impacted material. The water used to wash the exposed surfaces should be directed back to the impacted area or excavation and allowed to infiltrate.

During equipment decontamination, proper PPE shall be employed to minimize exposure to COPCs. Proper PPE may include Modified Level D PPE with nitrile gloves, rubber boots, waterproof Tyvek, and an appropriate face shield to protect against splash back during decontamination. The Contractor and QEP shall designate Decontamination Areas for the decontamination of vehicles and heavy machinery. Decontamination Areas are depicted on **Figure 6**.

15.0 Recordkeeping and Reporting Requirements

Detailed records of all environmental activities conducted during construction should be kept. These records may include air monitoring results, stockpile sampling, soil segregation, soil and/or groundwater sampling methodologies and results, dewatering activities, free product recovery, vapor suppression, soil disposal or re-use, and any other environmental activities conducted in association with construction activities.

In addition to maintaining these records, within 30 days of the completion of ground disturbing activities a removal action report summarizing the environmental activities conducted during construction is to be submitted to HDOH for review and comment. Guidance for preparation of a removal action report can be found in Section 18 of the HEER Office Technical Guidance Manual. The report should also include copies of all disposal receipts, truck logs, and laboratory analytical results, as well as a map illustrating the approximate GPS location(s) where any contaminated soil was encountered and/or reused onsite.

If contaminated media is left on site following the construction activity, the property owner must complete an Environmental Hazard Evaluation (EHE) and prepare an Environmental Hazard Management Plan (EHMP) to manage the contamination in the long-term. If the site already has an EHMP, then the EHMP must be updated following redevelopment to incorporate changes to the site. EHEs and EHMPs must be submitted to the HDOH for review and approval following the completion of construction activities detailed in this C-EHMP.

16.0 References

ESI, 2017, Environmental Assessment, Kolekole Beach Park, Mamalahoa Highway (Route 19) Honomu, Hawaii, ESI Project No. 116046, March 16, 2017.

HAR 11-59. Hawai'i Administrative Rules, Department of Health. Title 11, Chapter 59. Ambient Air Quality Standard. September 15, 2001.

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HAR 11-451. Hawai'i Administrative Rules, Department of Health. Title 11, Chapter 451, State Contingency Plan (SCP). August 2, 1995.

HDOH. State of Hawaii Department of Health (HDOH), Solid and Hazardous Waste Branch. *Use of HEER Office Environmental Action Level Guidance and HEER Office Technical Guidance Manual for Characterization and Remediation of Contaminated Properties Overseen by the Solid and Hazardous Waste Branch.* January 30, 2019.

HDOH. State of Hawaii Department of Health (HDOH), Hazard Evaluation and Emergency Response (HEER) Office. *Guidance for Stockpile Characterization and Evaluation of Imported and Exported Fill Material.* October 2017.

HRS 128D. Hawaii Revised Statutes. Hawaii Environmental Response Law (HERL), Chapter 128D. Website URL: https://www.capitol.hawaii.gov/hrscurrent/Vol03_Ch0121-0200D/HRS0128D/HRS_0128D-0001.htm

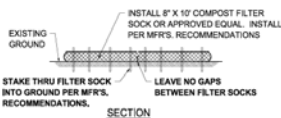
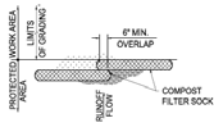
Integral, 2017a. Environmental Hazard Management Plan, Building Exterior Soils, Framework for Schools Statewide, prepared by Integral Consulting Inc. dated December 19, 2017. Prepared for Hawaii Department of Education Facilities Development Branch, Project Management Section.

Integral, 2017b. Soil Assessment Findings, Hazardous Material Assessments, Various Schools Statewide, prepared by Integral Consulting Inc. dated December 26, 2017. Prepared for Hawaii Department of Education Facilities Development Branch, Project Management Section. LEI, 2020.

Targeted Hazardous Materials Survey and Soil Screen Phase II ESA Report. Campus Repaving Project, Naalehu Elementary School 95-5547 Hawaii Belt Road, Naalehu, Hawaii 96722, DOE Job No.: Q13206-18. May 13, 2020.

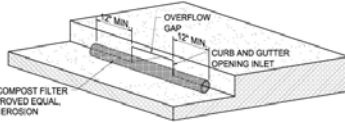
TGM. Technical Guidance manual for the Implementation of the Hawai'i State Contingency Plan. Website URL: <http://www.hawaiidoh.org/tgm.aspx>

EXAMPLE: Appendix A – BMPs



1. BARRIER SHALL BE CONSTRUCTED TO DIVERT OFF-SITE RUNOFF FROM ENTERING THE PROJECT AND TO COLLECT SEDIMENT IN RUNOFF FROM LEAVING THE SITE.
2. DIVERTED WATER SHALL BE DIRECTED TO EXISTING DRAINAGE STRUCTURES WHEN AVAILABLE. CARE SHALL BE TAKEN TO DIRECT THE DIVERTED RUNOFF IN A MANNER THAT DOES NOT ADVERSELY OR SIGNIFICANTLY AFFECT NEIGHBORING PROPERTIES.
3. WATTLE SHALL BE REGULARLY INSPECTED. BROKEN BAGS SHALL IMMEDIATELY BE REPAIRED OR REPLACED.
4. REMOVE TRAPPED SEDIMENT PRIOR TO REACHING HALF THE HEIGHT OF THE BARRIER. REMOVE SEDIMENT WHEN DRY BY SWEEPING AND COLLECTING.

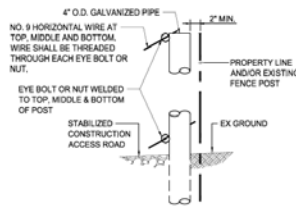
COMPOST FILTER SOCK FOR TEMPORARY EROSION CONTROL
NOT TO SCALE



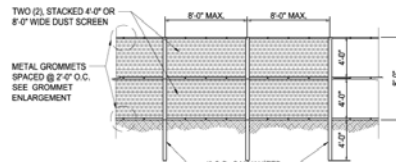
8" DIA. (MIN.) COMPOST FILTER SOCK OR APPROVED EQUAL CATCH BASIN EROSION CONTROL

- NOTES:**
1. CONTRACTOR SHALL INSTALL COMPOST FILTER SOCK AT CATCH BASIN FOR EROSION CONTROL PER MANUFACTURER'S SPECIFICATIONS.
 2. THE CONTRACTOR SHALL MAINTAIN THE AREA AND REMOVE ALL ACCUMULATED SEDIMENT AND DEBRIS FROM THE VICINITY AFTER EVERY RAIN OR AS DIRECTED BY THE ENGINEER.
 3. IN THE EVENT OF ABOVE AVERAGE RAINFALL, THE CONTRACTOR SHALL REMOVE INLET FILTERS FOR THE DURATION OF THE STORM EVENT AND REPLACE FILTERS ONCE THE STORM EVENT HAS PASSED.
 4. REMOVE TEMPORARY EROSION CONTROLS, SILT FENCES AND OTHER MEASURES AT COMPLETION OF PROJECT AND WHEN SITE IS STABILIZED.

CATCH BASIN INLET PROTECTION DETAIL
SCALE: 1" = 1'-0"

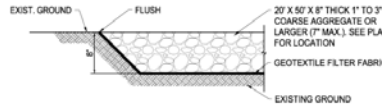


POST ENLARGEMENT
NOT TO SCALE

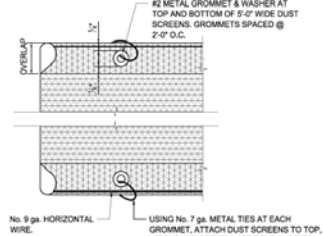


REAR ELEVATION
NOT TO SCALE

8-FT. DUST FENCE DETAIL
NOT TO SCALE



STABILIZED INGRESS/ EGRESS
NOT TO SCALE



GROMMET ENLARGEMENT
NOT TO SCALE

- NOTES:**
1. CLOTH BARRIER NOT SHOWN IN FRONT VIEW.
 2. CLOTH BARRIER TO BE A "WOVEN GEOTEXTILE" OR "NURSERY SHADE."
 3. BURLAP IS NOT ACCEPTABLE AS THE CLOTH BARRIER.
 4. VERTICAL SEAMS TO BE MADE OVER UPRIGHTS ONLY.
 5. ALL JOINTS TO BE SECURELY FASTENED BY MECHANICAL MEANS.
 6. THE CONTRACTOR AT HIS EXPENSE IS SOLELY RESPONSIBLE TO ADD AND/OR MODIFY THE DUST FENCING TO COMPLY WITH FEDERAL, STATE, AND LOCAL REGULATIONS AND REQUIREMENTS.
 7. CONTRACTOR SHALL MAINTAIN DUST FENCE UNTIL ALL WORK HAS BEEN COMPLETED.

NO.	REVISION	DATE	BY	APPROVED
DEPARTMENT OF EDUCATION NAALEHU ELEMENTARY SCHOOL CAMPUS REPAIRING THE (I) MAKE USE NAALEHU ELEMENTARY SCHOOL				
MISCELLANEOUS DETAILS				
BANTA & ASSOCIATES, INC.				

EXAMPLE: Appendix B = Soil Acceptance Agreement (***to be completed at a later date once final volume and chemical characterization of soil to be disposed is known***)

