



STATE OF HAWAII
DEPARTMENT OF HEALTH

P. O. BOX 3378
HONOLULU, HAWAII 96801

In reply, please refer to
HEER OFFICE

99-258-db

June 25, 1999

Ms. Jan Yokota
Executive Director
Hawaii Community Development Authority
677 Ala Moana Boulevard, Suite 1001
Honolulu, HI 96813

Dear Ms. Yokota:

I am writing to follow up on your recent conversation with Gary Gill, Deputy Director for Environmental Health, regarding the HCDA environmental assessment work that has been performed under the Brownfields grant from the U.S. Environmental Protection Agency of the Kaka'ako makai area. I know this information is important to you and the prospective developers of the Kaka'ako makai area, and that time is a crucial factor in the development process. We have reviewed the Phase I and Phase II project reports prepared by your consultant, Edward K. Noda (EKNA), and I want to clarify the degree to which we feel you and prospective developers can rely upon the information in these reports.

In general, the work that has been done provides a great deal of valuable environmental information concerning the project area. However, the Phase I environmental assessment focused on potential problems that may exist as a result of "current" operations on the various parcels of property and, in proper fashion, the Phase II sampling program was aimed at further investigation of the potential problems identified in the Phase I study. In this context, the current investigation conducted to date is accurate and useful.

However, there are two important limitations that you and the prospective developers should be aware of regarding the investigation. First, because of the initial focus on current operations, there may have been historical uses of the property and other investigative reports that should be identified which suggest additional potential environmental problems. There are a variety of databases and other sources of historical information which we feel have been overlooked and, to be complete and thorough, need to be further investigated.

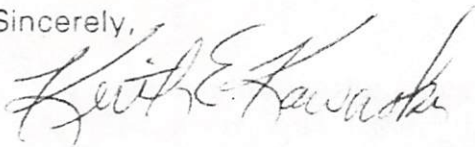
Ms. Jan Yokota
June 25, 1999
Page 2

Second, the Phase II sampling program, as is to be expected, points to certain areas of concern that need to be further investigated to determine the full extent of contamination and what, if any, remedial action needs to be taken. This is not a shortcoming in the current scope of investigation. Environmental investigations by their very nature are often complex undertakings which require this type of iteration or phasing because each new step relies on the information developed in the previous ones. In this regard, the current investigation indicates the need to conduct additional sampling to fully define the contamination that has been found.

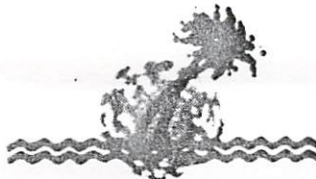
To summarize, while a great deal of useful environmental information and data have been developed to date, we believe that considerably more effort needs to be devoted to the environmental aspects of the Kaka'ako development to make sure that the public health and environment are fully protected. The Department of Health remains committed to working cooperatively with HCDA and the prospective developers to make sure this environmental work is done properly and to the State's satisfaction. As the Brownfields grant draws to a close, our expectation is that the environmental investigation will continue by following the guidance set forth in the State Contingency Plan and our Technical Guidance Manual, and that the Hazard Evaluation and Emergency Response (HEER) Office would oversee the work and cooperate with you to assure that the investigation is completed properly.

We recognize the importance of this project and hope that HCDA's schedule will not jeopardize a complete environmental investigation and remedial action, if necessary. The HEER Office will be as responsive as possible to whoever does the additional investigation to avoid any unnecessary delays in the development of this area. We appreciate your interest in protecting the environment and would be happy to discuss this further with you, the prospective developers, and their consultants.

Sincerely,



KEITH E. KAWOOKA, D.Env.
Manager



The Health State

HAWAII STATE DEPARTMENT OF HEALTH

P. O. BOX 3378
HONOLULU, HAWAII 96801

STATE OF HAWAII
DEPARTMENT OF HEALTH

HAZARD EVALUATION
AND
EMERGENCY RESPONSE OFFICE

DATE: 5/31/99 NO. OF PAGES: 5

TO: Steve Miyamoto

COMPANY: HEDA

TELEPHONE: _____ FAX: 599-2613

FROM: Laura Young

TELEPHONE: (808) 586-4249 FAX: (808) 586-7537

COMMENTS:

**EPA Region IX Review/Comments for the
Phase II Environmental Field Investigation
Kaka'ako Brownfield Project
May 21, 199**

Steve,

These are comments from Tom Mix at EPA, he will try to get you a copy of his comments next week. For now these are the comments he gave me over the phone on Thursday.

Overall the document does not flow well and is organizationally confusing. Information on sampling procedures and QAQC should go into references or appendices.

The Introduction is okay.

Each unit should be presented once with all historical info, overview of samples (soil, gw, sediment) and analysis and then provide the highlights of what was found.

The Executive Summary should go over what was important in each unit and any recommendations for work that is necessary before the development can proceed. A table format would be useful to organize information in the Executive Summary.

Tom Mix does not recommend that the report be finalized and distributed in its current format.

**Department of Health - HEER Review/Comments for the
Phase II Environmental Field Investigation
Kaka'ako Brownfield Project
May 21, 199**

Comment No.	Section No.	Paragraph No.	Comment	Response to Comment
1	General		Acronyms should only be defined at the first usage.	
2	2	6	Last sentence. Add the appropriate year and reference to the statement "...the most current version for the USEPA Region IX PRGs."	
3	2 or 4.2	6 or 5	Further describe each of the sources for action levels and the rationale for their selection and applicability. For example, explain and justify the usage of residential vs. industrial PRGs and the usage of cancer vs. non-cancer endpoints.	
4	3.3	8	Include soil lithology information obtained from the investigation to supplement the USDA classification.	
5	4.0	3	Explain why no contamination is expected at depths below the 2 feet of imported fill soil.	
6	4.3.1	General	This section provides general sampling rationale for soil and sediment sampling activities. Include rationale for groundwater sampling activities.	
7	4.3.1	General	The text associated with Unit 5 indicates that metal concentrations detected at this site will be considered representative of background conditions. Which samples were used to establish background conditions for other analytes and media? Recommend adding an additional section that outlines the source, frequency, and analytical program for QA/QC samples.	
8	5.3	1	Last sentence. Specify which analytical methods were used for TPH-g and TPH-d, metals, VOCs, SVOCs, and pesticides/PCBs.	

9	7	Tables	<p>Recommend providing the number of samples collected per media and the associated analytical suite in the “Summary of Parameters Close to or Exceeding Applicable Requirements” table. Without this information, the reader must refer to other sections of the report to determine if other constituents were not detected or if they were not included in the sampling and analytical approach.</p> <p>Add references for the PRGs and TGM to the note at the bottom of the table.</p> <p>Suggest deleting “or mg/l” in the column for concentrations on all tables, except Unit 6. In the table for Unit 6, there should be a way for the reader to easily differentiate the proper units for each reported concentration.</p> <p>What does the term “PRG-maximum” refer to?</p>	
10	7	General	<p>The discussion of detected constituents often compares analytical results to more than one action level, but does not offer an explanation or conclusions for the various comparisons. For example, in Section 7.8, the text explains that lead is present at concentrations that exceed the DOH action level, but below industrial PRGs. Request that the comparisons follow a systematic approach that is clearly outlined in the purpose and objective of this investigation.</p>	
11	7	General	<p>Include a discussion of analytical results for background and QA/QC samples. Also, indicate how, if at all, these results were used in evaluating analytical data for investigative samples.</p>	
12	7	General	<p>Include a discussion of headspace results. For example, summarize PID readings provided in the boring logs for each of the 10 units.</p>	

12	7	General	<p>There are multiple references to an upper screening level of 300 mg/kg for arsenic. How was this screening level concentration derived? On page 31, it states that the industrial cancer endpoint is 300 mg/kg. However, according to the 1998 PRGs, the industrial cancer endpoint is 3.00 mg/kg. Please revise accordingly.</p>	
13	8.0	4	<p>This paragraph compares the chromium results to residential PRGs. However, the tables compare the chromium results to industrial PRGs. Which PRG is being used?</p> <p>The last sentence states that chromium is not considered to be a contaminant of concern. Add the justification and rationale for this conclusion.</p>	
14	8.0	General	<p>Add a discussion of TRPH and ethylbenzene in the conclusions.</p>	
15	Figures	General	<p>Provide call-out boxes on figures to show analytical results associated with each sampling location</p>	
16	Tables	General	<p>Positive and Estimated Detection tables (after boring logs)- please add units.</p>	



STATE OF HAWAII
DEPARTMENT OF HEALTH

P. O. BOX 3378
HONOLULU, HAWAII 96801

In reply, please refer to:
HEER OFFICE

99-171-

April 20, 1999

Ms. Jan S. Yokota
Executive Director
Hawaii Community Development Authority
Suite 1001
677 Ala Moana Blvd.
Honolulu, Hawaii 96813

re: VRP / Brownsfields Coordination - Kaka'ako Makai Redevelopment Project

Aloha Ms. Yokota,

It was a pleasure to have had the opportunity to meet you and Mr. Colin Yasukochi a few weeks ago when Davis Bernstein and I made the VRP/Brownsfields presentation before you and the prospective developers for the Kaka'ako Makai Development Project. Thank you so very much for your friendly, warm and receptive welcome. Please know that I certainly appreciated the courtesy that you extended me.

With respect to the Kaka'ako Makai project, I would like you to know that I am presently working to take on the lead VRP & Brownfields Coordination role from Davis as our transition of tasking and authority takes place. Needless-to-say however, Davis and I will continue to be working together on various aspects of this project and he will certainly still be available to assist in responding to any specific needs you may have that are associated with the project. In the same respect, I am pleased to tell you that Laura Young, from the HEER Office, will remain in the position of Project Manager for our associated (technical) environmental aspect of the project.

I invite and encourage you to feel most welcome to personally contact me, at any time, if I can be of any service to you in regard to this exciting project. I would also hope that you would not hesitate to contact me regarding any other issues that you may find pertinent to HCDA's future interests, . . . interests that specifically relate to either Brownfields redevelopment and/or VRP involvement.

In closing, thank you so very much for taking time out of your busy schedule to address this letter.

Most Sincerely,

A handwritten signature in black ink, appearing to read "Dennis R. Stebbins".

Dennis R. Stebbins, Ph.D.
Voluntary Response Coordinator & Brownsfields Program Manager

DRS/ds

cc: Mr. Colin Yasukochi
Mr. Bryce Hataoka
Mr. Davis Bernstein
Ms. Laura Young



**STATE OF HAWAII
DEPARTMENT OF HEALTH**

P. O. BOX 3378
HONOLULU, HAWAII 96801
November 4, 1997

In reply, please refer to:
HEER OFFICE

97-395-ly

Mr. Steven Miyamoto
Hawaii Community Development Authority
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

Dear Mr. Miyamoto:

The HEER Office has reviewed the Sampling and Analysis Plan (SAP) for the Kaka'ako Brownfield Project. Since this SAP was drafted before the Phase I was finalized, there are issues that are in the Phase I that are not addressed in the SAP. The SAP needs to address the impact the operations of the former Kewalo Incinerator on the study area. The structures on Units 2 & 4 are on reclaimed land that appears to have been used for the disposal of incinerator ash and other refuse. The incinerator was also cited by the Clean Air Branch for violations which may have led to area wide surface contamination by lead contaminated emissions. Studies conducted in the Kaka'ako area have detected lead at 2,500 ppm. EPA's Preliminary Remedial Goals (PRGs), which provide guidelines for cleanups, is 400 ppm for residential areas and 1,000 ppm for industrial areas.

It is recommended that all soil and groundwater sampling be conducted using direct push technology. This should allow for a larger number of samples points at varying depths necessary to characterize the area. This technology generally does not produce cuttings or hazardous materials that would necessitate the disposal as such under a separate contract at additional costs.

While lead has been mentioned in many of the environmental studies conducted in the Kaka'ako area other metals, organochlorine pesticides and PCBs have also been detected in soil and groundwater samples. These contaminants also need to be addressed in the SAP.

If you have any questions or comments, please call me at 586-7575.

Sincerely,

A handwritten signature in cursive script that reads "Laura Young".

Laura Young
Environmental Health Specialist

HEER

BENJAMIN J. CAYETANO
GOVERNOR OF HAWAII



LAWRENCE MIIKE
DIRECTOR OF HEALTH

RECEIVED
DEPARTMENT OF HEALTH

1998 JUN 10 P 12:41
STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. BOX 3378
HONOLULU, HAWAII 96801

In reply, please refer to:

June 8, 1998

94-064B/epo

Ms. Susan Tamura
Hawaii Community Development Authority
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

Dear Ms. Tamura:

Subject: Draft Supplemental Environmental Impact Statement
(SEIS)
Revised Kakaako Makai Area Plan
Honolulu, Hawaii
TMK: 2-1-15: 58, 59 and 60

Thank you for allowing us to review and comment on the subject document.

In addition to the comments that we made in our letter dated January 19, 1998 (attached), we have the following comments to make:

Hazard Evaluation and Emergency Response (HEER) Office

The State Department of Health, Hazard Evaluation and Emergency Response Office (HEER) and the Hawaii Community Development Agency (HCDA) are currently conducting the Kakaako Brownfield Project. The Brownfield Project is an investigation and site characterization of properties owned by the State of Hawaii in the Makai Area. At the completion of the Brownfield Project, contamination identified during the investigation shall be removed or remediated under Chapter 128D, Hawaii Environmental Response Law (HERL) and Title 451, the State of Hawaii Superfund Program. Until response actions at the various properties are completed, no construction activities should take place.

Should you have any questions on this matter, please contact Ms. Laura Young at the HEER Office at 586-4249.

Underground Storage Tanks (USTs)

1. We have records of many underground storage tanks (UST), either existing or having existed, within the Kaka`ako Makai Area (the Area):

Facility ID	Facility Name	Address
9-102414	Look Lab	811 Olomehani St
9-101735	Produce Center Dev./Ltd.	651 Ilalo St
9-100893	Roberts Hawaii Tours	759 Kelikoi St
9-203234	KGU Radio Station	111 Ahui St
9-100212	GRG Enterprise Inc. Basin Marine	115 Ahui St
9-100124	Honolulu Corporation Yard	160 Ahui St
9-100248	Honolulu Ship Supply	506 Ahui St
9-103095	Collection and Maintenance Division	98 Koula St
9-102755	Electrical & Maintenance Serv. Division	160 Koula St
9-102984	Kewalo Incinerator	111 Ohe St
9-103086	Field Survey Office	135 Ohe St
9-100496	Central Division Headquarters	207 Keawe St
9-100135	Ala Moana Wastewater Pump Station	210 Keawe St
9-101490	Amfac Dist. HI - Bldg. Materials	465 Coral St

Additional USTs not listed in our records may also exist in the Area.

During the redevelopment of the area, it may be necessary to close some or all of these USTs. HCDA should note that UST closure is regulated under federal and state law, and must follow specific requirements, particularly the requirement to determine the presence of, and respond to, any releases of regulated substances from the UST being closed.

2. Releases of regulated substances have been discovered from some of these USTs and additional releases from others may be discovered in the future. HCDA should note that if not planned for in advance, UST release response activities may conflict with construction schedules. In addition, allowable future uses of UST release sites may be restricted if soil and ground water contamination caused by

such releases is not adequately addressed. Considering the extensive amount of construction and redevelopment planned for the area, we strongly recommend that HCDA plan adequately for investigating any potential contamination issues prior to setting construction schedules.

3. Although none were specifically mentioned in the draft supplemental EIS, if new USTs are to be installed in the area for the storage of motor fuel, used motor oil, emergency generator fuel, etc., HCDA should be aware that new USTs are subject to federal and state requirements. Owners of newly installed USTs must notify our Underground Storage Tank Section of the existence of such USTs within 30 days of installation. In addition, our Underground Storage Tank Section is developing new state administrative rules on USTs which, when finalized, will require permits for all new USTs. Finally, permits must be obtained from the applicable building and fire safety authorities before installation of any USTs.
4. We encourage HCDA to coordinate with the Department of Health in planning for the redevelopment of the Kaka`ako Makai Area in order to minimize the disruption to project schedules caused by the unanticipated discovery of soil and ground water contamination and the subsequent required response actions.

Should you have any questions regarding these comments, please contact Mr. Eric Sadoyama of our Solid and Hazardous Waste Branch, Underground Storage Tank Section at 586-4226.

Solid Waste

The State has a stated goal of reducing its solid waste stream by 50% by the year 2000. Therefore the Department of Health encourages the HCDA to incorporate waste reduction and recycling principles in the planning and implementation phases of its projects.

As part of these efforts, Hawaii Revised Statute requires state agencies undertaking roadway paving projects to purchase materials with a minimum of ten percent (10%) crushed recycled glass aggregate in all basecourse (treated and untreated) and subbase when the glass is available at a price no greater than that of the equivalent aggregate. Additionally, non-structural backfill shall utilize one hundred percent crushed glass when

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Ms. Susan Tamura
June 8, 1998
Page 4

94-064B/epo

available at a cost equal to or lower than the equivalent aggregate.

Please contact Mr. Lane Otsu of the Office of Solid Waste Management at 586-4240 with any questions on this matter.

Sincerely,



BRUCE S. ANDERSON, Ph.D.
Deputy Director for
Environmental Health

Attachment

c: Wilson Okamoto & Assoc.
OEQC
HEER ✓
SHWB
OSWM

BENJAMIN J. CAYETANO
GOVERNOR OF HAWAII

Via facsimile



STATE OF HAWAII
DEPARTMENT OF HEALTH

P. O. BOX 3378
HONOLULU, HAWAII 96801

BRUCE S. ANDERSON, Ph.D.

DIRECTOR OF HEALTH

In reply, please refer to:
HEER OFFICE

1994-1001

Captain Nihipali
City and County of Honolulu
Fire Prevention Bureau
3375 Koapaka Street, Suite H425
Honolulu, HI 96819

RE: Request to review underground storage tank files

Dear Captain Nihipali:


This letter is written to request the opportunity to review underground storage tank files at the Fire Prevention Bureau. The included maps (2) graphically depict the locations of the subject property areas. These properties are located within the Kakaako area and are comprised of the following tax map key identification numbers:

- (1) 2-1-58: 2, 6, 41, 47, 59, 60, 82, 83, 84, 85, 86, 91, 95, and 107
- (1) 2-1-60: 1, 2, 4, 5, and 6

The Hazard Evaluation and Emergency Response (HEER) Office is eager to review these files and would like to visit the Fire Prevention Bureau as soon as possible.

Thank you very much for your assistance with this request. If you have any questions, please call me at 586-7576.

Sincerely,


Janice K. Fujimoto
Environmental Health Specialist