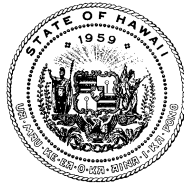


JOSH GREEN, M.D.
GOVERNOR OF HAWAII
KE KIA'ĀINA O KA MOKU'ĀINA 'O HAWAII



KENNETH S. FINK, MD, MGA, MPH
DIRECTOR OF HEALTH
KA LUNA HO'OKELE

STATE OF HAWAII
DEPARTMENT OF HEALTH
KA 'OIHANA OLAKINO
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File:
210931 SL

July 12, 2024

Daniel Simonich
Kuhio Park 2, LLC
737 Bishop Street
Suite 202
Honolulu, Hawaii 96813
Sent via e-mail to: dsimonich@tmo.com

Facility/Site: Kuhio Park Terrace, Units D1 and D2

Subject: Comments on Draft Site Investigation Work Plan, Kuhio Park Terrace Low-Rise Apartments Property Located at Ahonui and Linapuni Streets, Tax Map Key Nos. (TMKs) No: (1) 1-3-039: Parcels 006 and 008, Kalihi-Palama, Honolulu, Oahu, Hawaii, FAI Project Number 24-2398; dated June 13, 2024

Dear Mr. Simonich,

The Hawaii Department of Health (HDOH) Hazard Evaluation and Emergency Response (HEER) Office has reviewed the draft site investigation work plan for the Kuhio Park Terrace (KPT) property referenced above and has the following comments:

1. Please elaborate on how the Contaminants of Potential Concern (COPCs) were selected for this project. The COPCs lead and pesticides (dieldrin and endrin) are listed in the work plan as having been detected at other areas of the property in previous investigations. But how did you rule out other COPCs that could be present in different areas of the property. For example, could elevated concentrations of arsenic be present anywhere? If previous investigations were limited to building perimeters, could arsenic be present under the slabs? Were other COPCs identified in the Phase I Environmental Site Assessments that should be considered in this investigation? Are PCBs or petroleum contaminants potentially present anywhere at the property? Please expand this discussion and include additional COPCs that may be present at the site, if any, in this investigation.
2. Section 2.1.3, please provide an approximate depth to groundwater at the site (both the upper and lower aquifers) and provide a reference for the information.

3. It is unclear how you plan to sample under the buildings. Will you core through the slabs? Or will the buildings be demolished prior to sampling? If the buildings will be demolished prior to sampling, then a Qualified Environmental Professional (QEP) with at least five years' experience in environmental oversight should be present when potentially contaminated soil will be encountered or disturbed, and all workers should have appropriate hazardous materials training. Please include additional details as to how samples will be collected from beneath the buildings.
4. Section 4.4:
 - a. Please state how many increments will be collected for each sample. The HEER Office Technical Guidance Manual (TGM) recommends 50 increments per sample. If less than 50 increments will be collected, provide a justification for collecting fewer than the recommended number and state that as a result the data may have limited usability.
 - b. Please provide additional description of how/where increments will be collected across each DU such that they are spaced in a "systematic random" configuration as described in the TGM to ensure representative coverage.
 - c. It is unclear how the trowel and end cap will be used to collect representative soil increments from the acetate liners, please provide more description and note that all increments from all samples should be equivalent in mass and represent the entire depth range of the increment.
 - d. Is the slide hammer sampler a hand tool? Please elaborate. How deep will the sampler be driven into the ground?
5. Section 4.7: Will the slide hammer require decontamination between samples? If so, please include in the description. Note, decontamination of tools will not be required between the collection of sample increments within a single DU area.
6. Please include a section discussing how replicate sample data will be used to evaluate the accuracy of the analytical data and the data usability.
7. This work plan only includes sampling to a depth of one foot below ground surface (bgs). Please state what conclusions will be made and actions taken if contamination is encountered in the deeper layers of soil. Will additional sampling be conducted to characterize the vertical extent of the contamination? Does the proposed future work only involve disturbing the top one foot bgs of soil?
8. Please also state that a final report of the investigation findings will be provided to the HEER Office for review.
9. Although not the purview of the HEER Office, please note that this work plan should include a Health and Safety Plan (HASP) for the workers who will be conducting the sampling. All workers who may come into contact with contaminated media must have adequate hazardous materials training, including HAZWOPER training certification, and should be overseen by a QEP with at least five years' experience in site investigations. It

Mr. Daniel Simonich

July 12, 2024

Page 3 of 3

would be appropriate to include a brief section in this work plan on worker training requirements with a reference to the project-specific HASP.

Should there be any questions, please do not hesitate to contact me at 808-586-5815 or via e-mail at sven.lindstrom@doh.hawaii.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sven Lindstrom', followed by a horizontal line.

Sven Lindstrom

Voluntary Cleanup Program Specialist

Site Discovery, Assessment, and Remediation

Hazard Evaluation and Emergency Response Office

Hawaii Department of Health

cc: Andrew Tang, HPHA (via e-mail)
Noah Kippen, FAI (via e-mail)