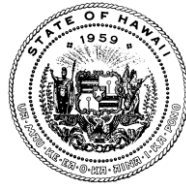


JOSH GREEN, M.D.
GOVERNOR OF HAWAII
KE KIA'ĀINA O KA MOKU'ĀINA 'O HAWAII



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In reply, please refer to:
File:
211243 AH

August 13, 2024

Major Jeff Hart, Director
MCBH Environmental Compliance and Protection Division
Building 1359
MCBH Kaneohe Bay, Hawaii 96863
Sent via e-mail to: jeffry.hart@usmc.mil

Facility/Site: Puuloa Range Training Facility

Subject: Review of Draft Site Investigation Report, Pu'uloa Range Training Facility Shoreline; dated August 2024

Dear Major Hart:

The Hawaii Department of Health (HDOH) Hazard Evaluation and Emergency Response (HEER) Office has reviewed the above-referenced report for the Puuloa Range Training Facility (PRTF) site and has the following comments:

General Comments:

1. The HEER Office understands that the Ewa Beach Community has expressed concerns that potential lead contamination in dust is migrating from PRTF to the west. Does the USMC consider the data collected during the site investigation sufficient in determining if there is a potential hazard to residents in the neighboring community? Additional soil sampling along the western perimeter of Range A (Alpha) may be necessary to investigate or rule out potential migration toward this community.

Specific Comments:

2. Section 2.3 (PDF pg. 11): This section states that the *Environmental Assessment for Shoreline Stabilization at Pu'uloa Range Training Facility, Oahu, Hawaii* (USMC, 2019) determined that in order to initiate measures to mitigate coastal erosion, a preferred alternative proposed retreating ranges C-F, installing protective sheet pile along the fast land boundary of ranges A-B, and revegetation.

- a. Aside from the Range F (Foxtrot) firing berm, has any of this work occurred, or are there future plans to implement this alternative? Please discuss the status of these plans in the report.
 - b. Further, when the HEER Office was consulted on the plans to move Ranges C-F further inland, we were told that USMC would relocate the soil that made up the berms on the seaward side of the ranges and the soil from the range floors to the new range sites and that confirmation soil sampling would then be conducted beneath the former footprints of the ranges. It was also communicated to the HEER Office that any residual contamination identified in the former range footprints would then be remediated. Is this still the plan?
 - c. Since Range F (Foxtrot) has already been relocated, can you verify that such confirmation sampling has been conducted?
 - d. Since samples collected adjacent to Range F (Foxtrot) were identified to have concentrations of lead exceeding the HDOH Tier 1 (unrestricted) Environmental Action Level (EAL), was that area included in the remediation conducted?
 - e. Please provide a separate report of all Range F (Foxtrot) relocation and remedial activities.
3. Section 10.2 (PDF pg. 26): The HEER Office does not agree that no further action is warranted at this time as lead and antimony have been identified at concentrations exceeding HDOH Tier 1 (unrestricted) EALs, with lead also exceeding the HDOH Commercial/Industrial EAL. Further, establishing institutional controls such as long-term monitoring is inappropriate at this time as the full nature and extent of contamination has not been determined. The elevated concentrations of these contaminants in the soil along the boundary of the USMC property indicate a potential release or potential threat of a release to the adjacent beach area and state waters. The elevated concentrations of these contaminants in the soil at these ranges may also have resulted in releases to the underlying groundwater. In accordance with Hawaii Revised Statute 128D and Hawaii Administrative Rule 11-451, further sampling is required to characterize the full nature and extent of these potential releases prior to evaluating remedial alternatives.

Thus, HDOH requests that the extent of lead and antimony be delineated by collecting additional Decision Unit Multi-Increment Samples (DU-MIS) of soil to the south of DUs 12, 13, 14, 15, 16, and 17 in accordance with the HEER Office *Technical Guidance Manual*. Ensure that all DUs are analyzed for lead, that DUs 15 and 16 are analyzed for antimony in addition to lead, that DU size does not exceed 5,000 sq. ft. or 100 cubic yards in volume, and that 100 increments are obtained per DU.

HDOH also requests that groundwater monitoring wells be installed and sampled in the firing range footprints and former Range F (Foxtrot) footprint to investigate potential leaching of lead and antimony to the shallow groundwater. Please prepare a draft sampling and analysis plan(s) detailing the above requests and submit for HDOH review and approval.

Major Jeff Hart
August 13, 2024
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If you have any questions or should you need a hardcopy of this letter, please feel free to contact me at 808-586-4249 or by email at allison.hutto@doh.hawaii.gov.

Sincerely,

Allison Hutto

Allison Hutto
Remedial Project Manager
Site Discovery, Assessment and Remediation
Hazard Evaluation and Emergency Response Office
Hawaii Department of Health