

Pallarino, Bob

From: Pallarino, Bob
Sent: Wednesday, January 13, 2016 8:36 AM
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Subject: EPA/DOH Comments on the Section 6 and 7 Meeting Minutes

Jimmy,

The following are comments from the Hawaii Department of Health (DOH) and the U.S. EPA (EPA), regarding the Red Hill Administrative Order on Consent (AOC) Meeting Summaries received on December 18, 2015. The meeting summary a 31 page document received from James (Jimmy) Miyamoto, Navy and DLA Red Hill Project Coordinator. These comments are applicable to the Section 6 & 7 Meeting summary, which begins on page 29 of the document.

COMMENTS

1. Page 29, Attendees – DOH attendees included William Mark Frasier. For EPA attendees, Tom Huetteman’s name was spelled incorrectly (no “r” in Huetteman).
2. Page 29, Introductory paragraph – Add a third sentence to this paragraph which states “In some cases the details of tasks presented in the attached Preliminary Work Plan/Statement of Work Task List for AOC SOW Section 6 and Section 7 were modified from their original description as presented in Attachment 2, “Red Hill Bulk Fuel Storage Facility AOC SOW Section 6 and Section 7”.
3. Page 30, Bullet #14 - Suggest a modification of the language in this item because the original language could be construed that the Navy has determined specific locations for the four new monitoring wells. Only general locations were discussed at the meetings and presented on maps supplied by the Navy. I suggest replacing bullet #14 with “The general locations proposed by the Navy for the four new monitoring well locations are acceptable. These monitoring wells will be installed as part of the current investigations and their continued use and a determination of their adequacy as sentinel wells will be evaluated in the final report.
4. Page 30, Bullet #15(c) – Suggest the language in this sub-bullet be revised to read “Whether RHMW04 provides groundwater quality data representative of ambient background conditions, and whether or not a new monitoring well **should be established to collect data that more accurately represent ambient background conditions.**
5. As part of the Meeting Materials, EPA and DOH received 12 files entitled “Red Hill AOC Scoping Meeting Summaries Section 6 & 7 Presentation 18 Dec 15” (numbered 1 through 12). The three page file “Red Hill AOC Scoping Meeting Summaries Section 6 & 7 Presentation 8 18 Dec 15”, includes the following table:

New and Proposed Well and Objectives Matrix

Well ID	Objective 1: Sentinels	Objective 2: Characterize Flow	Objective 3: Characterize Chemistry	Objective 4: Characterize Matrix	Objective 5: Other Uses
Recently Installed Monitoring Wells					
RHMW06	✓	✓	✓		✓
RHMW07			✓	✓	✓
Proposed New Monitoring Wells					
RHMW08	✓	✓	✓		✓
RHMW09	✓	✓	✓		✓
RHMW10	✓	✓	✓		✓
RHMW11	✓ ¹	✓	✓	✓ ²	✓

¹ Contingent if groundwater flow direction is towards the Board of Water Supply Halawa Shaft.

² Intend to collect subsurface data (i.e., evaluate flow paths, potential valley fill strata, etc.).

The Navy and DLA also provided the document “Red Hill Scoping Meeting Summaries Sections 6 & 7 Attach 1 18 Dec 15” which is the Preliminary Work Plan/Statement of Work Task List. This document provides an outline of the tasks that will be performed by the Navy and DLA to implement the requirements of the AOC SOW sections 6 and 7. That document lists Task #4: Expand the Monitoring Network and Conduct Sampling. A subtask under this task is to install new wells, which includes obtaining logging cores from the wells that are installed. EPA and DOH would like to ensure that the Navy and DLA agree, as discussed in the Scoping Meetings, that logging continuous cores will be performed for all proposed new monitoring wells. The table above, which we understand was created before our scoping meetings, implies that continuous core logging will only be performed on new monitoring well #11. The logging of continuous cores for all new wells should be reflected in the meeting minutes summary as the 27th agreed upon item on page 31 of the Scoping Meeting Summaries.

Thank you for providing the meeting materials and summaries in a timely manner. We are available to further discuss these comments if needed. Otherwise, please make the appropriate changes to the meeting summary document and resubmit it to EPA and DOH by January 19, 2016.

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