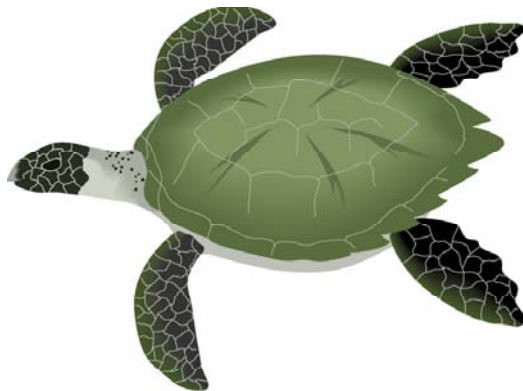




**United States Air Force
15th Air Base Wing
Environmental Restoration Program**

***Final*
WORK PLAN
FOR SITE INSPECTIONS
AT AREAS OF CONCERN 18, 20, AND 21
Bellows Air Force Station
Oahu, Hawaii**



**APPENDIX G
Comments and Responses**

Appendix G

Comments and Responses

In the final version of this document, this section will contain comments and responses related to the draft version.

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TECHNICAL REVIEW COMMENTS
DRAFT WORK PLAN FOR SITE INSPECTIONS AT AREAS OF CONCERN (AOCs) 18, 20, and 21
BELLOWS AIR FORCE STATION, OAHU, HAWAII
Reviewer: Teresita Salire, Hawaii Department of Health; March 8, 2002

Item	Site	Page	Comments	Contractor Response
1.	AOC 20	--	Why are surface and subsurface soil samples not co-located or will not be taken from the same borings?	Surface soil sample locations will be adjusted to be co-located with the subsurface soil boring/sample locations. Some surface soil samples immediately adjacent to the former building footprints will be retained in order to detect spills/releases from the motor pool buildings.
2.	AOC 21	--	Why no subsurface soil samples?	There are three subsurface soil samples planned for AOC 21 (see Section 2.3.2 in Appendix C (FSP) and Table C-3). The subsurface soil samples will be collected from the soil borings prior to installation of the monitoring wells. On the legend on Figure C-3, the symbols were switched; they have been corrected to illustrate the locations of the planned borings and subsurface soil samples.
3.	AOC 18	--	A sixth trench should be added and should be located midway between the southernmost trench and the trench east of the southernmost trench. It should be positioned at the bend and extend a little (~5 feet) to the no anomaly area.	A sixth trench and soil sample will be added as requested to investigate the area described.
4.	General	--	TPH soil samples should also be collected and prepared using EPA Method 5035.	Soil samples will be analyzed for TPH-purgeable (gasoline-range hydrocarbons, which are considered to be VOCs) and will be collected using Method 5035. Soil samples to be analyzed for TPH-extractable (diesel- and heavier-range hydrocarbons) are poorly volatile and do not need preparation using Method 5035

Cotter, Jeff/HNL

Subject: RE: dist list and memo for AOC WP

-----Original Message-----

From: Petersen Mark K GS-12 15 CES/CEVR [mailto:Mark.Petersen@hickam.af.mil]

Sent: Tuesday, April 09, 2002 5:17 PM

To: Cotter, Jeff/HNL

Subject: dist list and memo for AOC WP

Hi Jeff:

Note the new address for C&C.

-----Original Message-----

From: Nagamine, David [mailto:dnagamine@co.honolulu.hi.us]

Sent: Monday, April 08, 2002 11:22 AM

To: 'Mark.Petersen@hickam.af.mil'

Subject: 2/06/02 Letter Draft Work Plan for AOC 18, 20 and 21

Hi Mark,

I just spoke with your supervisor, Todd Lanning. This is an Email to confirm that we do not have comments on the subject draft work plan. Please continue to send us documents for review. Our office moved from Honolulu to Kapolei in early March – Please mail docs to:

Mr. Timothy Steinberger, Director
Department of Environmental Services
City and County of Honolulu
1000 Uluohia Street, Suite 308
Kapolei, HI 96707

Mahalo, David Nagamine
Tel. 692-5368

04/10/2002

TECHNICAL REVIEW COMMENTS
Jim Andrews Comments on the Draft Work Plan for AOCs 18, 20 and 21
Following a Site Visit on April 4, 2001
Bellows Air Force Station, Hawaii

Item	Comments	Response
1	<p>First , I would like to thank all those who attended the SI, (K.T. Matolcsy/15 CEVR, Jeff Cotter/CH2M HILL , and Mark Petersen/15CEVR). But I would like to point out that the USMC (Maj. Rouse, nor Randall Hu) <i>[did not]</i> show up for this important meeting. As the property owner through the so-called land transfer the Marines should be involved in these discussions and decisions don't you agree?</p>	<p>Representatives from the USMC were unable to attend the meeting due to previous commitments. From now on, 15 CEVR (Hickam AFB, Civil Environmental Flight) will attempt to coordinate meeting times that are amenable to everyone's schedule for maximum participation.</p>
2	<p>I wish he <i>[USMC representatives]</i> could have been there to see the Marines running all over the AOC sites as we did. It was clear that these marines training at Bellows were not aware or informed of the areas under restoration. Is their health and safety at all a concern here? What responsibility does the AF/MC have to inform these potential receptors?</p>	<p>15 CEVR has notified the Marines of the concern and will be providing the Marines with updated site information as the project proceeds. For the AOCs covered under this SI, there is no visible evidence of an unacceptable or imminent threat to human health or the environment (e.g., dead or stressed vegetation, stained soil, strong odors, etc.) from surface contamination. Subsurface soil or groundwater may also be contaminated but there is no current exposure pathway to marines walking through the area. Digging and excavation activities are restricted throughout Bellows due to the potential to disturb cultural resources. If unacceptable (e.g., soil contaminants above action levels) surface soil contamination is identified, the appropriate warning signs and restrictions will be initiated as warranted. Therefore, no site restriction is necessary at this time until site characterization identifies a realistic threat in surface soil.</p>
3	<p>What liabilities are involved with respect to their physical safety at sites that are currently being worked on? At AOC18, If a Marine fell into the huge crater and sink hole that is densely covered by brush and foliage and got seriously injured, who is going to be responsible? Maj. Rouse? USAF?</p>	<p>Your comments are consistent with concerns brought to 15 CEVR's attention by Randall Hu/USMC prior to our April 4 site visit. Accordingly, 15 CEVR will have CH2M HILL install a bright yellow rope and warning sign near the sinkhole to warn Marines walking through the brush.</p>

TECHNICAL REVIEW COMMENTS
Jim Andrews Comments on the Draft Work Plan for AOCs 18, 20 and 21
Following a Site Visit on April 4, 2001
Bellows Air Force Station, Hawaii

Item	Comments	Response
4	At AOC 21, a "Decon Building" (we don't even know what that means yet. We don't know enough about this site to allow anyone to walk through or play war games on it until its been determined to be free of suspected contamination etc. This site should be roped off! for various reasons and signs posted.	See response to Comment 2 above. We concur with your suggestion to provide warning signs and ensure personnel safety if an unacceptable risk is identified.
5	As I have suggested to you, now would be a great time to collectively group all these AOC sites or at least the former DP17 area and request another HRS (Hazard Ranking System) screening from EPA. With new data it will help clear up the readings of the past and possibly re-submit for NPL listing again. I'll talk to Tess at DOH for their support on this as well.	Carolyn Douglas, EPA Region 9, at 415-972-3092, can be contacted for further information or to request a review of the site(s) and the associated HRS. 15 CEVR would be happy to assist with this request. However, recent discussions with Tess Salire of the Hawai'i Department of Health (DoH) indicate that the sites would very likely not score higher than 28.5, which is generally the EPA score at which sites are eligible for the National Priorities List (NPL). This is because there are no drinking water wells within 2 miles of Bellows, and recent investigations of both Restoration and Underground Storage Tank sites at Bellows have generally not detected metals in groundwater at concentrations greater than three times background levels.

TECHNICAL REVIEW COMMENTS
Jim Andrews Comments on the Draft Work Plan for AOCs 18, 20 and 21
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Item	Comments	Response
6	<p>If previous HRS scoring at site LF01 was 46, why wasn't it put on the NPL list? If it was when did it become deleted from the list? Also, When and Who determined back in 1997 that no further response was required at LF01? And How? Got Documents regarding? Why wasn't the RAB kept informed of this important decision and its future impacts? My suggestion is to take all the landfill areas of concern and re-test (HRS) them all.</p>	<p>EPA and the State make the decision whether or not to list a site on the NPL, and Bellows AFS has not been listed, or listed and de-listed.</p> <p>No decision recommending "no further response" has been made for LF01.</p> <p>Executive Summaries for all reports concerning Site LF01 have been distributed to RAB members. The full report has been, and is, available upon request and is in the Bellows Information Repository. 15 CEVR will continue to receive comments and will ensure that the RAB is kept informed through regular RAB meetings.</p> <p>Re-scoring the sites is a regulatory function and responsibility that the Air Force will fully support, and 15 CEVR has discussed re-scoring with DoH (see response to comment number 5).</p>

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Item	Comments	Response
7	<p>I don't see how the first contractor could have missed AOC18 during the Preliminary Assessment/Site Inspection (PA/SI) of DP17 and recommend no remedial action be taken there. It has moved so fast that now we're back at the site and the present contractor has to revisit the site and there still isn't enough data to close this site on record. But yet, the site is listed as No Further Remedial Action Planned (NFRAP)? When and How did AF arrive at this decision without community input (DP17)?</p>	<p>DP17 was recommended for further investigation and that is why it was part of the Bellows Operable Unit (OU) 1 EE/CA. During the EE/CA, a thorough site reconnaissance was conducted at which time AOC 18 was discovered. The AF made the decision at that time to not include AOC 18 in the DP17 investigation, but rather to designate it as an AOC for future investigation. Excluding AOC 18, the only other area of concern identified in DP17 was within the revetment that was investigated as described in the DP17 Informal Technical Information Report (ITIR). The investigation and risk assessment at DP17 determined that further investigation was not warranted (executive summary distributed to the RAB). DP17 (and DP06, and SD22) was discussed during the August 7, 2000 Bellows RAB meeting, including notification, that based on sampling results, no further action was recommended for DP17, DP06, and SD22. DP 17 was closed and a NFRAP was signed by the AF and DoH in September 2000.</p> <p>The AF and DoH closure (NFRAP) of sites DP17, DP06 and SD22 was also discussed at the last RAB meeting on March 15, 2001.</p> <p>Long-term groundwater monitoring is currently being conducted around site LF01, which is in the vicinity of AOC 18. The current SI investigation at AOC 18 will assess any contamination and potential migration pathways</p> <p>15 CEVR will examine the aircraft revetments to look for any new areas that warrant additional investigation.</p>

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Item	Comments	Response
8	If property can be transferred "contaminated", what CERCLA law or section regarding this amended (42 U.S.C .1290(h)(3)(B)and (4)(D)what exceptions to this law apply in the transfer at Bellows?	CERCLA Section 120(h)(3) allows for the early transfer of contaminated property to another entity provided that a covenant exits warranting that there is a remedial plan in effect to address any contamination on the property. The Agreement between the USAF and USMC contains language regarding cleanup responsibility, which is also summarized in the Bellows Management Action Plan (MAP).
9	Finally, What about the cultural resource management plan for Bellows? Is it updated? I would like a copy ASAP please. All AOC's are located in moderate to high archaeological areas of Bellows, What care is being taken to recognize this fact and what precautions are being taken to insure the Marines training at Bellows are aware of these sensitive areas while training?	<p>Copies of the Cultural Resources Management Plan (CRMP) will be provided. There is an archaeological monitoring plan for site inspection at AOCs 18, 20, and 21 (10-31-01), and archaeological monitoring will be performed during field activities. The SI Work Plan, and proposed SI fieldwork has been reviewed by the Office of Hawaiian Affairs and the State Historic Preservation Office (SHPO) pursuant to Section 106 requirements. The concurrence letters from OHA and SHPO are included in Appendix A of the Work Plan.</p> <p>The Marines are under orders not to engage in any excavation or digging at Bellows due to the potential to disturb cultural resources. 15 CEVR will contact the Marines to find out how the Marines inform their personnel of this restriction.</p>