



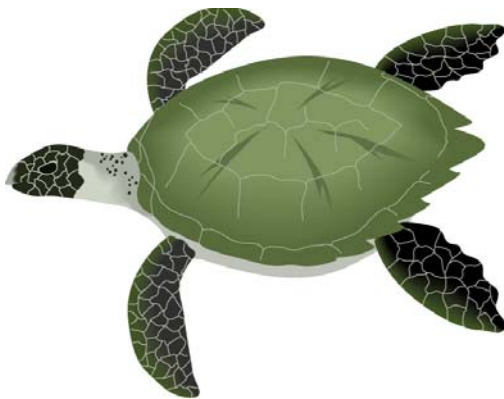
United States Air Force  
15th Airlift Wing  
Environmental Restoration Program

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*Final*  
WORK PLAN

FEASIBILITY STUDY AT  
SITES LF01, LF23, LF24, AND AOC 18,  
BELLOWS AFS AND MCTAB

BELLOWS AIR FORCE STATION  
OAHU, HAWAII



APPENDIX I  
Review Comments and Responses

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**REVIEW COMMENTS AND RESPONSES**  
**Draft Work Plan, Feasibility Study at Sites LF01, LF23, LF24, and AOC18**  
**Bellows Air Force Station, Oahu, Hawaii**

**Reviewer: Steven P. Mow, Hawaii Department of Health, Office of Hazard Evaluation and Emergency Response**

ITEM	SECTION	COMMENT	RESPONSE
1.	Figure B-1	Coverage at the northern portion of LF01 seems sparse. Please indicate why no samples are being taken in this region of the site.	The intent of the surface soil sampling for TCLP metals is to assist with evaluation of disposal options for soil if the selected remedial action includes excavation/disposal of soil (i.e., determine if the soil needs to be treated as a hazardous waste due to high concentrations of metals). Accordingly, the sampling locations proposed for the southern and southwestern portions of LF01 are where elevated concentrations of metals were detected in surface soil in the previous LF01 investigation. This is discussed in Section 3.4.2 of the Work Plan and in Table 3-1 (Data Quality Objectives). The northern portion of LF01 did not exhibit elevated concentrations of metals based on previous grid sampling (approx. 50 x 50 ft grid), and is therefore not proposed for TCLP sampling.
2.	Appendix H	<i>Potential ARARs and TBC Criteria</i> - The draft Department of Health Environmental Action Levels (EALs) should be a TBC as well as Tier 1 Action Levels.	The Interim Draft HDOH EALs will be added to Table H-2 (Potential Chemical-Specific ARARs) as TBC criteria for soil and groundwater.
3.	Appendix H	<i>Potential ARARs and TBC Criteria</i> - The term "potentially applicable" should not be used. Either the requirement is, or is not applicable.	The term "potentially applicable" will be replaced everywhere with text to describe how the criteria is applicable to the particular issue. For example, under Protection of Archaeological Resources, 43 CFR 7.4(a), the current ARAR assessment states "Potentially applicable for intrusive activities". This will be changed to "Applicable if intrusive activities disturb or uncover cultural resources."
4.	Appendix H	<i>Potential ARARs and TBC Criteria</i> - Potentially relevant is not an ARAR. The requirement has to be appropriate <b>and</b> relevant to be considered an ARAR.	All criteria that state "Potentially relevant" will be changed to "Relevant and Appropriate"

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ITEM	SECTION	COMMENT	RESPONSE
5.	Appendix H	<i>Potential ARARs and TBC Criteria</i> – Why are landfill closure and post closure requirements not addressed in this ARAR table?	Landfill closure and post-closure requirements will be added to Table H-3 (Potential Action-Specific ARARs).