

FINAL REMOVAL ACTION REPORT

Former Pepeekeo Sugar Company Property Hakalau, Hawaii

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The logo for Integral Consulting Inc. features the word "integral" in a blue, lowercase, sans-serif font. A thin, grey, curved line starts from the bottom of the letter "i" and sweeps upwards and to the right, ending under the letter "l". Below the word "integral" is the text "consulting inc." in a smaller, grey, lowercase, sans-serif font.
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ACRONYMS AND ABBREVIATIONS

bgs	below ground surface
cy	cubic yards
Draft RAR	Draft Removal Action Report
DU	decision unit
EAL	environmental action level
EHMP	Environmental Hazard Management Plan
EPA	U.S. Environmental Protection Agency
ERM	Environmental Resources Management
ESA	environmental site assessment
HDOH	Hawaii Department of Health
Integral	Integral Consulting Inc.
MI	multi-increment
NIST	National Institute of Standards and Testing
PCB	polychlorinated biphenyl
PPE	personal protective equipment
RAL	removal action level
RAO	removal action objective
RCRA	Resource Conservation and Recovery Act
SMA	Special Management Area
SRM	standard reference material
SVOC	semivolatile organic compound
TCLP	toxicity characteristic leaching procedure
TPH	total petroleum hydrocarbons
UC Boulder	University of Colorado, Boulder
UECA	Uniform Environmental Covenants Act
XRF	X-ray fluorescence

1 INTRODUCTION

1.1 PURPOSE OF REPORT

This Removal Action Report presents alternative remedies to address elevated soil arsenic at the former Pepeekeo Sugar Company property in Hakalau, Hawaii. Each alternative is described in detail and evaluated in terms of effectiveness, implementability and cost. A recommendation is made on the preferred remedy to address the soil arsenic problem.

1.2 LOCATION AND SITE DESCRIPTION

The subject property (site) consists of approximately 8.7 acres of land along the coastline at Hakalau, Hawaii, which formerly housed Pepeekeo Sugar Company facilities (Figures 1 and 2). The parcel TMKs are 03-2-9-02: 79 and 81; the property is owned by Shropshire Group LLC. The site previously housed operations related to the Pepeekeo Sugar Company, supporting the plantation fields and the mill facility located north at lower elevation within the river floodplain. Historic aerial photographs (Figures 3 and 4) and a 1966 Sanborn Fire Insurance Map (Figure 5) provide information on facilities and operations that have existed on the subject property. Historic operations on the subject property included offices; warehousing; maintenance shops; storage for gasoline, oil, fertilizer and pesticides; seed dipping; and pesticide storage and mixing.

The site is bounded to the north and east by a steep cliff face above the Pacific Ocean shoreline. Along the northern property boundary, the cliff height ranges from 100 to 150 ft; the upper portion of the cliff slopes at about 45 degrees, whereas the lower portion is near vertical.

1.3 PREVIOUS INVESTIGATIONS

The Hawaii Department of Health (HDOH) performed soil sampling and analysis at the site during September 2007 and January 2008, focusing on former plantation company facilities most likely to have been contaminated by historical chemical releases. These included the pesticide mixing area, seed dipping vats, and a low-lying drainage area to the east of most operations.

The initial HDOH sampling was conducted in September 2007, with follow-up work in January 2008. In September 2007, HDOH collected six multi-increment (MI) surface soil samples from four decision units (DUs): two from DUs at the former pesticide mixing area (labeled "Poison Mixing" on the Sanborn Fire Insurance Map [Figure 5]), three replicate samples from a DU at the drainage area at the eastern portion of the site, and a single sample from a DU along the

southern flank of the former seed dipping vats. Locations of DUs are shown in Figure 6 with the historic Sanborn Fire Insurance Map as a reference.

Samples were analyzed for total metals, dioxins/furans, semivolatile organic compounds (SVOCs), organophosphorus pesticides, and organochlorine pesticides. Results of laboratory analyses are shown on Table 1, with only those compounds detected in one or more samples listed. Copies of the original laboratory reports are provided in Integral/ERM (2009, Appendix 1). For metals, arsenic was observed in the pesticide mixing area and drainage area at levels exceeding the HDOH environmental action level (EAL) (HDOH 2011b). Antimony was reported at concentrations above its EAL in pesticide mixing area soils. Cadmium was also reported slightly above its EAL in one of six samples. Pesticides, SVOCs and dioxins were reported at levels below EALs developed for unrestricted (residential) exposure scenarios by HDOH.

Based on the elevated arsenic identified in the September 2007 sampling, HDOH performed additional sampling and analysis of soils along the northern site perimeter in the area of the former pesticide mixing facility in January 2008. Three MI samples were analyzed for total arsenic and lead, and the sample with highest reported arsenic was analyzed for bioaccessible arsenic. Total arsenic was reported above EALs, whereas lead was below EALs. The sample with highest total arsenic concentration reported bioaccessible arsenic at 102 mg/kg. Based on this level of bioaccessible arsenic, the soil would be placed in the HDOH arsenic soil Category D (HDOH 2011a), which would typically require some form of remedial action (excavation, capping w/ clean soil, relocating under roadway or parking lot, etc.) in order to obtain a No Further Action letter from HDOH prior to residential or unrestricted land use.

A Phase II environmental site assessment (ESA) report (Integral/ERM 2009) was prepared by Integral Consulting Inc. (Integral) with the support of Environmental Resources Management (ERM), on behalf of the current owner of the subject property. The owner intends to redevelop the property for residential use and/or other uses. The ESA built upon the body of information including previous site investigation work performed by HDOH, historic aerial photographs, Sanborn Fire Insurance Maps, and additional soil sampling and analysis performed by Integral/ERM. The primary objective of the ESA was to determine the presence and extent of chemical contaminants in soil at the site.

The ESA was performed in conformance with a July 2008 soil sampling and analysis plan (ERM 2008a), a September 2008 sampling and analysis plan amendment (ERM 2008b), and dialog with HDOH on October 7, 2008. The intent of the assessment was to complete the soil evaluation and support the evaluation of a remedy for arsenic-impacted soil. The findings of Integral/ERM are included in the following Sections 2 through 4.

2 FIELD METHODOLOGY

For the ESA (Integral/ERM 2009), predominantly surface soil samples were collected, since contaminant impacts were probably introduced to the top of the soil column (as opposed to subsurface releases, e.g., underground storage tanks). Subsurface soil samples (vertical contaminant profiles) were collected from a series of trench excavations in areas that showed elevated arsenic based on surface soil X-ray fluorescence (XRF) mapping.

2.1 PHASE 1 – XRF SOIL SCREENING FOR ARSENIC, LEAD AND MERCURY

Comprehensive XRF soil screening was conducted across the 8.7-acre property on 22–24 July 2008, with infill sampling and analysis on August 27–28, 2008. An initial grid with 50-ft spacing was laid out by measuring tape and pin flags, and surface soils from 0 to 6 in. depth were collected at each sample location in zip-top plastic bags. An east-west oriented baseline transect was laid along the southern property boundary and labeled Transect A. Samples were collected at 50-ft intervals along this transect and labeled A50, A100, A150, etc. Successive parallel transects were laid out parallel to Transect A, at 50-ft spacing (see Figure 7).

Samples were analyzed using an Innov-X (Alpha series) field portable XRF instrument for arsenic, lead and mercury. Arsenic was the principal target of the investigation, with lead being a secondary concern because other sugar facilities have shown lead in soils around older buildings (apparently from lead paint weathering and incorporation into soils). Mercury was added to the target metal list for XRF screening to help resolve the issue of potential release from an on-site seed dipping facility. Detection levels for arsenic, lead and mercury were approximately 10 mg/kg.

Standard reference materials (SRMs) for arsenic were created using native soil from the Island of Hawaii that was known to contain less than 10 mg/kg arsenic. Site-specific SRMs at a range of arsenic concentrations were prepared by spiking these reference soils with known quantities of arsenic. SRMs at 50, 200, 800, 3,000, and 10,000 mg/kg were prepared. SRMs were analyzed by XRF before, during, and after analysis of field samples, and reported arsenic concentrations were corrected based on SRM calibration curves. For lead and mercury, commercial SRMs from the National Institute for Standards and Technology (NIST) were utilized, since they had certified lead and mercury content. (Note: NIST SRMs also had certified arsenic content; however, the presence of lead in these SRMs interferes with accurate XRF analysis for arsenic.)

The initial sampling and XRF analysis of soils was performed on the 50-ft grid. Soil arsenic levels were mapped and an area of elevated soil arsenic was observed near the location of the former pesticide mixing facility (Figure 8). Infill sample locations at 25-ft spacing were placed across this arsenic anomaly to improve delineation of the feature. During initial field screening,

samples were analyzed in field-moist condition; later, samples were dried in the laboratory and re-analyzed to provide more precise elemental composition.¹

2.2 PHASE 3 – TRENCHING AND VERTICAL PROFILING OF SOIL ARSENIC

Eight trenches were excavated at locations recommended by Integral, within the arsenic soil anomaly near the northern property boundary. The locations of test trenches are shown on Figures 7 and 8. Composite soil samples were collected at 4-in. (10-cm) intervals from the surface to the bottom of the trenches (from 3- to 7-ft depth). Samples were analyzed by portable XRF as per surface soil samples.

2.3 PHASE 3 – DECISION UNIT MULTI-INCREMENT SAMPLING AND ANALYSIS

After the XRF soil screening phase and review of soil screening results, DUs were established, in consultation with HDOH staff, based on a combination of screening results and prior facility operations as determined from review of the Sanborn Fire Insurance Map. A sampling and analysis plan amendment was prepared for HDOH review, showing the proposed DU layout and proposed analytical suites. Based on dialog with HDOH on October 7, 2008, the sampling plan was slightly modified to include chlordane in several DUs around older building footprints and mercury in a DU down gradient from the former seed dipping operation. The DUs sampled are shown on Figure 9, and described in Table 2.

Each DU was sampled using a MI sampling technique. Approximately 30–40 discrete sample increments of surface soil were collected from each DU based on a random and distributed pattern of sample locations. At each sample location, a surface soil sample increment was collected from a depth of 0 to 6 in. below ground surface (bgs) using a pick and stainless steel trowel. Each collected sample increment, of consistent volume, was placed along with other previously collected increments into a clean glass bowl and homogenized with a stainless steel trowel. Large rocks, sticks and other debris were selectively removed from the sample. The 30+ sample increments were composited and homogenized in the field to create a single representative “average” MI sample. The MI sample was itself split into smaller containers for various laboratory analyses (metals, polychlorinated biphenyls [PCBs], etc.) using an MI subsampling technique where 30 or more small subsamples were taken from the master sample to create the subsample.

¹ Moisture will reduce the XRF response for all elements. Site-specific SRMs created for use in this project used air dried soils and, therefore, analysis of air-dried field samples provided the most accurate assessment of elemental composition when calibrating with SRMs.

2.4 BIOACCESSIBLE ARSENIC ANALYSIS

A subset of 12 soil samples was selected for analysis of total and bioaccessible arsenic at the University of Colorado, Boulder (UC Boulder). Samples were chosen across a range of total arsenic concentrations, as determined by XRF, to determine the correlation between total and bioaccessible arsenic. Seven samples were selected from the surface soils (generally fill soils), whereas five samples were selected from a vertical sequence of Hilo Series soils from within excavation test pit TP2.

Prior to shipment UC Boulder, MI samples were pre-processed by air drying, sieving to <0.25 mm and splitting at the University of Hawaii, Manoa. Samples were analyzed at UC Boulder for total and bioaccessible arsenic. Total arsenic was determined by extracting soil with a combination of nitric, hydrochloric, and hydrofluoric acids (Farrell et al. 1980) in order to obtain total arsenic data more consistent with XRF measurements than would be obtained from U.S. Environmental Protection Agency (EPA) extraction method 3050B. Bioaccessible arsenic extraction and analysis was performed in accordance with the method described in Drexler and Brattin (2007).

3 SAMPLING AND ANALYSIS RESULTS

For the ESA (Integral/ERM 2009), predominantly surface soil samples were collected, since contaminant impacts were probably introduced to the top of the soil column (as opposed to subsurface releases, e.g. underground storage tanks). Subsurface soil samples were collected from a series of trench excavations in areas that showed elevated arsenic based on surface soil XRF mapping.

3.1 PHASE 1 – XRF SOIL SCREENING FOR ARSENIC, LEAD AND MERCURY

The initial sampling and XRF analysis of arsenic, lead and mercury in surface soils was performed on the 50-ft grid. Infill sample locations at 25-ft spacing were placed across an observed higher concentration arsenic anomaly near the former pesticide mixing area to improve delineation of the feature. Soils were tested by XRF in field-moist condition within zip-top plastic bags, and calibrated using site-specific and NIST SRMs. It should be noted that total metals measured by XRF is typically higher than that measured using the standard EPA chemical extraction and analysis method (EPA 3050B/6010). This may in part be due to less than complete removal of all metals from soils using the EPA 3050B extraction procedure. Maps showing the location of XRF soil screening sample locations and a contour map of surface soil arsenic concentrations are provided as Figures 7 and 8. Arsenic soil levels greater than 100 mg/kg are generally confined to the area surrounding the former pesticide mixing area and the soils to the east—or downhill of the pesticide mixing area. Two other area areas showed arsenic above 100 mg/kg: 1) an isolated finding at the east of the property at location F600, and 2) around the northwestern warehouse at locations I0 and H100. Maximum concentrations of arsenic in surface soils were observed at sample location K300, at a level of greater than 10,000 mg/kg (1percent arsenic by weight).

Lead and mercury were also measured using the Innov-X portable XRF. Concentrations of these two metals did not appear to be elevated above background soil levels, and were generally below the HDOH EALs for unrestricted land use exposure. Only a few samples had lead and mercury concentrations as measured by XRF above EALs; these samples were not significantly above EALs and were not spatially clustered (see Integral/ERM [2009] for further details).

3.2 PHASE 2 – TRENCHING AND VERTICAL PROFILING OF SOIL ARSENIC

Eight trenches, or “test pits” were excavated in site soils at locations within the dominant arsenic anomaly sourced from the former pesticide mixing area. Figures 7 and 8 show the

locations of the trenches, labeled TP1 through TP8. Once trenches were dug, soils were examined and logged by a geologist. The soil profile consisted of organic-rich, mixed sandy to gravelly loam (mixture of native soils and fill materials) overlying silty clay loams of the Hilo Series.

Within each trench, composite soils samples were collected at 10 cm bgs, 20 cm bgs, and then at successive 20-cm depth intervals bgs to the bottom of the test pit. The composite samples were individually packaged in zip-top plastic bags and measured for arsenic content by XRF. Data results are provided in Integral/ERM (2009, Table 3 and Figures 11 and 12).

Test pit 2 (TP2) showed the highest concentrations of arsenic, at a maximum of 12,000 mg/kg at a depth of 80 cm. TP3, 55 ft south of TP2, showed nearly similar high arsenic concentrations. In both of these two test pits, arsenic levels over 100 mg/kg extended to the base of the excavation; however, concentrations showed significant decline deeper than 100 cm. The high concentrations in the subsurface at TP3 were not observed in the surface soils, probably because of more recent grading and fill placed at this location. Concentrations were significantly lower than those observed at TP2 and TP3 at all other test pit locations, but concentrations above 100 mg/kg were still prevalent.

While the subsurface extent of soil arsenic can be generally understood from profiles in eight test pits, the subsurface extent is not as well defined as for the surface soils. For example, the area of the soil arsenic anomaly surrounding and downgradient from the former pesticide mixing area has been mapped in surface soils with approximately 30–40 sample locations, whereas only 8 locations have been excavated to allow vertical profiles. During future removal action efforts, additional subsurface characterization will be required to confirm that all subsurface arsenic impacts have been addressed.

3.3 PHASE 3 – DECISION UNIT MULTI-INCREMENT SAMPLING RESULTS

MI surface soil samples were collected from five DUs on October 7, 2008, as shown on Figure 9. Samples were analyzed for metals, total petroleum hydrocarbons (TPH), PCBs, chlordane, or mercury depending on the DU and prior activities in that area. Table 3 shows the analytical results for the soil samples, and a comparison to HDOH Tier 1 EALs.

Mercury in soils from DU01, collected downgradient from the former seed dipping area was reported at 2.48 mg/kg, below the EAL of 4.7 mg/kg. This finding is consistent with the HDOH soil mercury finding of 1.06 mg/kg in their sample (HSDV-DU-1) collected adjacent to the former seed dipping tank area (see Table 1).

For DU02 through DU05, Resource Conservation and Recovery Act(RCRA) eight metals and petroleum hydrocarbons were analyzed. Arsenic was, as expected, present at concentrations above the Tier 1 EAL. All other metals were reported at concentrations below EALs. Gasoline-

and oil-range hydrocarbons were not detected; however, diesel-range hydrocarbons were present, but at concentrations below the EAL. PCBs and chlordane were analyzed for DU02 and DU03, the locations of former plantation buildings now removed, and were not detected.

In summary, there is no evidence of significant site impacts at concentrations above EALs from chemical compounds from former or current operations, other than arsenic. HDOH reported cadmium in one DU just at the EAL concentration (Table 1). This level is not believed to represent a human health or environmental hazard.

3.4 BIOACCESSIBLE ARSENIC ANALYSIS

A subset of 12 soil samples was selected for analysis of total and bioaccessible arsenic. Samples were chosen across a range of total arsenic concentrations, as determined by XRF, to determine the correlation between total and bioaccessible arsenic. Seven samples were selected from the surface soils (mixed native and fill soils), and five samples were selected from a vertical sequence of Hilo Series soils from within TP2.

Prior to shipment to UC Boulder, MI samples were pre-processed by air drying, sieving to <0.25 mm and splitting at the University of Hawaii, Manoa. Samples were analyzed at UC Boulder for total and bioaccessible arsenic. Total arsenic was determined by extracting soil with a combination of nitric, hydrochloric, and hydrofluoric acids, in order to obtain total arsenic data more consistent with XRF measurements. Bioaccessible arsenic extraction and analysis was performed in accordance with the method described by Drexler and Brattin (2007).

Results of total and bioaccessible arsenic analysis for the fine fraction (<0.25-mm fraction) soils are provided in Integral/ERM (2009, Table 5). Bioaccessible arsenic in soils ranges from as low as 0.7 mg/kg to nearly 7,000 mg/kg (at K300 surface location). The percentage of total arsenic that is bioaccessible ranges from as low as 1 percent in samples with low total arsenic to as high as 37 percent in the highest arsenic contaminated soils.

HDOH evaluates human health hazards from soil arsenic using the bioaccessible fraction (HDOH 2011a). Soils with bioaccessible arsenic below 23 mg/kg are considered minimally impacted, and are “within acceptable health risks for long-term exposure”. Site with soils in this so called Category B are suitable for unrestricted land use. Category C soils (moderately impacted) have bioaccessible arsenic levels from 23 to 95 mg/kg, and sites with these soils are not suitable for unrestricted land use. Sites with Category C soils may be suitable for certain commercial or industrial land uses, but would require remediation for unrestricted (i.e., residential) uses. Category D soils with bioaccessible arsenic above 95 mg/kg (heavily impacted) require remedial action irrespective of future land use.

A comparison has been made between total arsenic as measured by XRF with bioaccessible arsenic (Integral/ERM 2009). This correlation allows one to predict the areas and soil volumes

mapped by XRF at certain bioaccessible arsenic thresholds. For a given total arsenic concentration, surface soils have a higher percentage of bioaccessible arsenic than subsurface soils. Therefore, surface soil and subsurface soils (Hilo Series) are evaluated separately. Surface soils show that about 8 percent of total arsenic (measured by XRF) is bioaccessible, whereas subsurface soils show that about 4 percent of XRF-measured arsenic is bioaccessible. Using these correlations, we can predict the XRF-measured arsenic levels that would correspond to the HDOH Tier 2 EAL thresholds (HDOH 2011a) for bioaccessible arsenic, as shown in Table 4.

By this analysis, surface soils with total arsenic by XRF between 288 and 1,188 mg/kg are likely Category C soils, and with total arsenic by XRF above 1,188 mg/kg are likely Category D soils. For subsurface soils with half the percentage total arsenic as bioaccessible, the thresholds for Category C and D soils are twice as high as for surface soils. Reviewing the XRF soil arsenic contour mapping on Figure 8, the soils shaded dark pink to red likely contain Category C and D soils. Category D soils are confined to dark red areas contiguous with the former pesticide mixing area.

3.5 EVALUATION OF HAZARDOUS WASTE POTENTIAL

Because of the high concentrations of arsenic observed in soil at the former pesticide mixing area, and the potential for future excavation and relocation or landfill disposal of arsenic-impacted soils, a composite sample was collected to evaluate the hazardous waste characteristic by the toxicity characteristic leaching procedure (TCLP).

The composite sample (ID: OG-TP2) was collected from the walls of excavation TP-2, which showed the highest concentrations of soil arsenic in vertical profiles. The composite sample consisted of equal amounts of sample collected every 20 cm from surface (0 cm) to 120 cm depth. This sample location is expected to represent the most highly arsenic-impacted soil that might be excavated in a future remediation project.

The sample was prepared and analyzed at Test America laboratory in Aiea, Hawaii. The field-moist sample was sieved to <2-mm particle size, and subsampled for a 10-g aliquot for total arsenic analysis by EPA Methods 3050B/6010B (larger sample size than required by EPA); a separate subsample was utilized for TCLP extraction and analysis (EPA Methods 1311/6010B). The laboratory reported 1,820 mg/kg total arsenic in the sample (not dry-weight corrected), but no detection of arsenic in the TCLP extract (at a reporting limit of 0.5 mg/L). Based on these findings, it is highly unlikely that excavated soils would be considered a hazardous waste under federal solid and hazardous waste regulations (RCRA).

3.6 ESTIMATED VOLUMES OF ARSENIC CATEGORY C AND D SOILS

Based on XRF analysis and mapping of surface soils, XRF analysis of subsurface soils from trenches, and correlation of total arsenic by XRF to bioaccessible arsenic, we have estimated the volume of soil exceeding the Category C lower limit of 23mg/kg bioaccessible arsenic and the Category D lower limit of 95mg/kg bioaccessible arsenic.

It is estimated that approximately 6,100 cubic yards (cy) of soil exceed the Category C lower limit, and 800cy of soil exceed the Category D lower limit. By difference, approximately 5,300 cy of soil are Category C.

4 CONCEPTUAL SITE MODEL AND ENVIRONMENTAL HAZARDS

4.1 CONCEPTUAL SITE MODEL

Former facilities and operational areas at the site, related to the former sugar plantation, are potential locations for the release of chemical contaminants. Sampling of soils was performed at and around those facilities/operations to identify potential soil impacts. Prior studies by HDOH and the current ESA (Integral/ERM 2009) evaluated a suite of chemicals likely to have been handled onsite based on known or suspected operations. Soils samples were collected around former facilities/operations using a DU/MI sampling approach, coupled with site-wide XRF screening of discrete surface soil samples and test pits for arsenic and several other metals. Concentrations of detected contaminants were compared to HDOH EALs under the following conditions: current and future land use was considered to be unrestricted; the aquifer below the site was not considered as a drinking water source; and the distance to the nearest surface water body was less than 150 m.

Arsenic in soil represents the predominant contamination issue. Soils in the vicinity of the former pesticide mixing area ("source area") show high arsenic concentrations in surface soils, and impacts extend to a depth of 1.5 to 2 m below grade in the source area. The source area arsenic-contaminated soils appear to extend northward toward the top of the cliff face (see Figure 8). Elevated soil arsenic is also present at topographically lower levels (downhill) from the source area, however only in the shallow soils (typically <0.5-m depth). This pattern is consistent with downhill migration of surface soils from the source area over time, possibly the result of stormwater transport when surface vegetation was not adequate to prevent soil migration and/or grading and relocation of surface soils. Several isolated areas of soil arsenic that were observed during the site-wide XRF screening work do not appear to be connected to the predominant source area at the former pesticide mixing area. These isolated soil arsenic areas may be the result of secondary releases or translocation of soils from the primary source area during site operations or by subsequent landscaping efforts.

4.2 ENVIRONMENTAL HAZARD EVALUATION

Chemicals detected in soil were evaluated using the HDOH EAL "Surfer" tool. Maximum values observed in decision unit sampling and laboratory analyses from either the previous HDOH study or in this study were used for screening. Table 5 presents a summary of soil environmental hazards as calculated using the EAL "Surfer" tool. There is evidence of significant soil impact from arsenic at concentrations well above Tier 1EALs. Antimony and

cadmium were also reported in site soils at concentrations slightly above EALs in one or more samples.

Groundwater is not considered to be at risk from the elevated soil arsenic levels observed onsite. In test pits, the highest arsenic levels were within the upper 1.5 m of the soil profile in the former pesticide mixing area. Concentrations decreased at depth, indicating that they had only penetrated several meters through the dense, clay-rich Hilo Series soil profile. Surface water is not considered to be at risk, as long as soils are not disturbed and not allowed to migrate to the adjacent Pacific Ocean via stormwater runoff. The site is currently highly vegetated, and the owner is managing site activities to ensure no disruption of impacted soils occurs.

Human direct contact with arsenic-impacted soils presents the dominant potential risk pathway. To prevent such exposure, the arsenic-impacted soil areas are being managed in a highly vegetated state, and no excavation is being allowed in impacted areas. A map showing the Environmental Hazards at the site is provided in Figure 10. The pink and red shaded areas on the map are surface soils with soil arsenic concentrations greater than 50 mg/kg, as determined by XRF.

4.3 SUMMARY OF POTENTIAL ENVIRONMENTAL HAZARDS

During the course of the ESA, Integral/ERM: 1) reviewed historic aerial photographs and fire insurance maps, 2) evaluated previous soil investigations by HDOH, 3) performed comprehensive surface soil mapping of arsenic, lead and mercury, 4) conducted vertical soil arsenic profiling in a series of test pits at the dominant soil arsenic anomaly, and 5) conducted MI surface soil sampling at five DUs to evaluate soils for a range of chemical compounds.

Based on the body of information, the only significant environmental condition identified that is likely to represent a human health or environmental hazard is arsenic in surface and subsurface soils. The dominant soil arsenic anomaly as observed in surface soils is in the vicinity of the former pesticide mixing area, and contiguous soils downgradient (east) of this arsenic source area. Several other lower concentration but relative isolated soil arsenic anomalies were also observed.

Test pits were excavated to determine the vertical extent of soil arsenic impacts within the dominant arsenic anomaly observed in surface soils. At the two test pits closest to the former pesticide mixing facility, arsenic exceeding 100 mg/kg extended to the full depth of the test pits (6–7 ft below grade). At other locations, the soil arsenic impacts only extended several feet deep or less. In each test pit, the deepest sample showed concentrations of total arsenic by XRF less than 1,000 mg/kg. Remedial measures are recommended to address the recognized soil arsenic condition.

Based on the elevated soil arsenic levels, a general precaution is advised for persons working on or visiting the property. Until a removal action is performed to address the elevated arsenic, persons should avoid contact with and removal of contaminated soil. The land owner will exercise general oversight of the site, preventing contact with and removal of soil by others. The site will also be maintained in a vegetated state to prevent soil erosion and consequent downgradient movement of contaminated sediment.

In discussions with HDOH, former plantation workers mentioned the possibility of seed dipping effluent being directed to a sump along the eastern slope of the site. Prior to implementing the selected remedy for site soils, HDOH recommends a focused soil sampling in the vicinity of the former seed effluent sump and analysis for mercury and Benlate (benomyl) used as fungicides in seed treatment. Any soils impacted by these compounds will be excavated and properly managed along with arsenic-impacted soils.

5 REMOVAL ACTION SUMMARY

Soils containing arsenic at the former Pepeekeo Sugar Company property present a potential direct exposure risk to humans and may present terrestrial ecotoxicity hazards. Based on these findings a removal action is recommended. In order to determine the most appropriate removal action approach, an evaluation of removal action alternatives was performed. The goal of this process is to screen and evaluate options that would be effective, technically and administratively feasible, and cost effective at addressing the soil arsenic issue at the subject property.

It should be noted that the arsenic source area (former pesticide storage/mixing site) extends northward to near the steep cliff edge. This physical configuration presents safety hazards and construction risks, as outlined in a March 18, 2014 letter from Dr. Jack Lockwood to John Peard (HDOH). Dr. Lockwood's expert opinion (in Appendix A) provides certain technical feasibility constraints that are considered in the evaluation of remedies provided below. Principally, he opines that excavation deeper than 1 ft below existing grade, within 25-40 ft of the upper edge of the cliff face, would create a serious instability hazard and should be avoided. Consistent with Dr. Lockwood's advice, we herein consider a buffer zone of 40 ft from the cliff edge to be a construction hazard zone. The 40-ft hazard buffer is also consistent with the 40-ft shoreline setback in County planning rules. For the remainder of this document, we will refer to this 40-ft construction hazard zone as the "40-ft shoreline setback."

5.1 REMOVAL ACTION OBJECTIVES

The primary focus of the removal action is to address elevated arsenic in the soils at the site to provide protection of human and ecological health by preventing exposures to arsenic-impacted soils. The removal action objectives (RAOs) are as follows:

1. Remediate portions of the property anticipated for future unrestricted (residential) land use to appropriate bioaccessible arsenic soil concentrations, herein defined as removal action levels (RALs)
2. Prevent migration of contaminants to surface or groundwater
3. Minimize potential risk to human health or ecological receptors from exposure to arsenic impacted soil, during and after the removal action.

5.2 REMOVAL ACTION LEVEL

The RAL is the target concentration of bioaccessible arsenic that will be achieved by the removal action to allow appropriate site land use. Considering the planned unrestricted (residential)

land use for the majority of planned parcels on the subject property, a RAL of less than or equal to 23 mg/kg bioaccessible arsenic is recommended for areas of the site considered for future residential use. Areas meeting this RAL will have all soils in Category C and D addressed.

5.3 SUMMARY OF REMOVAL OPTIONS

Based on the above-stated RAOs and RAL, we provide the following removal alternatives for consideration. Since leaching of site contaminants and impact to groundwater do not represent a site risk, the removal alternatives considered consist of proven methods for eliminating human direct contact risk and terrestrial ecological risk. There are several alternatives or options that have the potential to meet the RAOs for the site, including the following:

1. No Action (does not meet RAOs, included for comparative baseline)
2. Excavation and Offsite Landfill Disposal of Arsenic Category C and D Soils
3. Onsite Containment Cell for Arsenic Category C and D Soils
4. Onsite Containment Cell for Arsenic Category C Soils, Offsite Landfill Disposal of Arsenic Category D Soils
5. Onsite Consolidation and Capping of Arsenic Category C and D Soils at Source Area.

5.4 REMOVAL ALTERNATIVES EVALUATION CRITERIA

Each alternative was evaluated against the following three performance criteria:

1. Effectiveness
2. Implementability
3. Cost

The *effectiveness* criterion addresses the ability of the remedial alternative to provide:

- Overall protection of human health and the environment
- Achievement of RAOs
- Short-term effectiveness
- Reduction of toxicity, mobility, and volume of contaminants by treatment
- Long-term effectiveness and permanence
- Compliance with regulatory requirements

The *implementability* criterion addresses:

- Technical feasibility (i.e., technology, reliability, and implementation limitations, e.g., terrain, logistics)
- Amount of time to implement
- Complexity (e.g., number of steps to complete)
- Administrative feasibility (local land management, permits, right-of-ways, zoning)
- Suitability of land for future uses
- Availability of equipment, materials and services

The *cost* criterion addresses:

- Overall cost to implement the removal action

6 REMOVAL ALTERNATIVES EVALUATION

The four alternatives carried forward are evaluated herein. Supporting cost estimates for each alternative is provided in Tables 6 through 9.

6.1 ALTERNATIVE 1 – NO ACTION

The No Action alternative, included as a comparative baseline, consists of no removal actions and leaving the site in its current condition. Under this alternative, no engineering features or institutional controls (signage, deed notices, etc.) are employed to prevent potential human or ecological risks from exposure to arsenic-impacted soils.

6.1.1 Effectiveness

The No Action alternative would not achieve RAOs and, most importantly, would not protect against incidental human direct contact with arsenic-contaminated soil.

6.1.2 Implementability

There are no issues of implementability for the No Action alternative, since by definition no action is planned.

6.1.3 Cost

There is no cost associated with the No Action alternative.

6.2 ALTERNATIVE 2 – EXCAVATION AND OFFSITE LANDFILL DISPOSAL

Excavation and landfill disposal of arsenic-contaminated soils exceeding the RAL constitutes the second remedial alternative for evaluation. The general tasks under this option include delineating soil removal boundaries, characterizing soil for disposal, excavating and transporting soil to a local landfill, conducting post-excavation confirmation sampling, backfilling excavations with clean soil, and restoring the site with vegetative ground cover. This alternative is based on the assumption that all the soil meets regulatory levels and is not considered hazardous waste requiring offsite landfill disposal.

TCLP was conducted on the composite soil sample (OG-TP2) collected from the walls of excavation TP-2, which had the highest concentration of soil arsenic in vertical profiles. Total arsenic in the sample was 1,820 mg/kg, but there was no detection of arsenic in the TCLP extract (refer to Section 3.5). Based on these findings, it is highly unlikely that that excavated soils

would be considered a hazardous waste under federal solid and hazardous waste regulations (RCRA).

The only solid waste landfill on the Island of Hawaii that is permitted to accept contaminated soil is the West Hawaii Landfill near Waikoloa, managed by Waste Management, Inc. This facility is located approximately 65 miles from Hakalau via the Hawaii Belt Road through the town of Waimea.

Soils exceeding the unrestricted land use RAL (Category C and D soil with bioaccessible arsenic above 23mg/kg) are shown as dark pink and red shaded areas on Figure 10. Approximately 6,100 cy of soil is estimated to require removal and disposal under this alternative. Considering 1.755 tons of soil per in-place cubic yard (130 lb/ft³, average for moist clay soil), some 10,700 tons would require excavation and disposal. Further detail on scope elements for this alternative is provided in Table 6.

6.2.1 Effectiveness

Excavation and offsite disposal of soils exceeding the unrestricted land use RAL would be an effective long-term remedy to meet RAOs. It would eliminate the potential for human direct contact risks associated with arsenic-contaminated soils and minimize risk to potential environmental receptors at the site. This alternative would remove arsenic to the acceptable RAL, and thereby reducing the toxicity, mobility, and volume of contamination at the property; however, the impacted soil would still exist to be disposed at a permitted landfill facility. Short-term effectiveness, during and immediately after the removal action, is only moderate since there is potential exposure to site workers and the community during implementation of the soil excavation, transport and disposal. Short-term effectiveness can be improved by strong engineering and management controls, such as personal protective equipment (PPE) for workers and air monitoring and mitigations for dust suppression, dust barriers, etc. This alternative would be in compliance with regulatory requirements.

6.2.2 Implementability

The excavation and offsite disposal of soil can be implemented using traditional construction techniques. This alternative is simple in approach, i.e., "dig and haul." Dust control and soil erosion control measures must be implemented during excavation and loading activities to ensure community and worker health and safety. Large volumes of soil, approximately 10,700 tons or 535 20-ton loads, would have to be transported by truck over local roadways, resulting in increased truck traffic and potential neighborhood disturbances. This alternative is expected to require a Special Management Area (SMA) permit under Coastal Zone Management program. Local permitting is expected to be required in order to perform soil excavation work. This would include stormwater and soil erosion permitting.

Based on the opinion of Dr. J. Lockwood, excavation within the shoreline setback up to 40 ft from the upper edge of the cliff face should be avoided, since it presents an unacceptable safety hazard by potentially creating fractures in compacted ash soils with risk of triggering a catastrophic landslide. A portion of the source area Category C and D arsenic-contaminated soils are located within the 40-ft shoreline setback, and cannot be safely excavated. Based on the above-stated slope stability hazard, there is a substantial technical feasibility limitation for a large-scale soil excavation remedy, making implementation of this alternative nearly impossible.

6.2.3 Cost

The total estimated cost for the Excavation and Offsite Landfill Disposal alternative, to meet the unrestricted land use RAL, is estimated at \$1,844,000. Details are provided in Table 6.

6.3 ALTERNATIVE 3 – ONSITE CONTAINMENT CELL FOR CATEGORY C AND D SOILS

The removal and relocation of impacted soils to an onsite containment cell is a proven removal technology designed to improve the condition of targeted property and eliminate direct contact hazards associated with a contaminated soil or waste material.

Soils exceeding the unrestricted land use RAL of 23 mg/kg bioaccessible arsenic would be excavated and relocated to an engineered soil containment cell in the southwest corner of the property (Figure 11). The containment cell would be created by excavating clean soils (<23 mg/kg bioaccessible arsenic) to a pre-defined extent, with excavated clean soils stockpiled. After excavation and relocation of arsenic-impacted soils (Category C and D soils) in the containment cell, the stockpiled clean soil would be used for backfill of the soil removal excavation areas.

The containment cell would be excavated in clean Hilo Series clay loam soils in the western portion of the property, on a parcel that will remain in Industrial or Commercial zoning and will not be used for future residential redevelopment. The cell would extend approximately 8–10 ft deep into the clay soils, with sufficient extent (approximately 0.5 acre) to allow placement of all arsenic-impacted soils. The more heavily arsenic contaminated Category D soils would be placed in the containment cell first, in portions of the cell excavated to >10 ft below the final closed cell grade. Moderately arsenic-contaminated Category C soils would be placed above Category D soils. After arsenic-impacted soil placement, a demarcation barrier (e.g., geomembrane) and labeled warning tape would be placed above the contaminated soil and covered by at least 2 ft of clean cover soil and an asphalt final surface. In this fashion, Category D soils would be positioned at depths of 10 ft or greater below final grade. The placed soil and cover soil geometry would be designed to promote runoff of surface water from the cell.

Finally, the containment cell area would be paved with asphalt to ensure long-term stability and prevent erosion. Stanchions would be placed at the four corners of the containment cell area, with signage indicating that arsenic-contaminated soils are present beneath the paved area.

Institutional controls would include deed notice in the form of an environmental covenant consistent with Hawaii's Uniform Environmental Covenants Act (UECA), and an Environmental Hazard Management Plan (EHMP), implemented as a final component of this removal action alternative.

6.3.1 Effectiveness

Storage within an onsite containment cell is an effective remedy to eliminate the potential for human and ecological direct contact with exposed arsenic-contaminated soils. The soils that present a potential short-term hazard by direct contact (Category D soils) are placed more than 10 ft below grade, effectively mitigating the potential for accidental exposure during unauthorized construction activities (if any were to occur). Arsenic in the Hilo Series clay-rich soils does not present a significant leaching hazard, and underlying groundwater is not used for drinking water purposes. Considering these factors, this remedy effectively mitigates human health and environmental hazards. This scenario is not considered a permanent solution, since the arsenic-contaminated soil has not been completely eliminated, but it does meet long-term effectiveness goals. Overall this alternative would protect human health and the environment. Storage in an onsite containment cell would not reduce the toxicity or volume of the arsenic-contaminated soil, but the engineered containment cell with demarcation barrier would provide a secure storage receptacle for the arsenic-impacted soil—preventing direct contact risks and significantly decreasing the mobility potential.

Long-term effectiveness of the cover system (demarcation barrier, cover soil and asphalt pavement) for the containment cell can be increased by engineering and institutional controls to prevent unwanted intrusive activities. Engineering controls include an asphalt paved surface and visible subsurface barriers (geotextile fabric, buried warning tape, perimeter stanchions, etc.). Institutional controls will ensure that the location and engineering features of the containment cell are known and documented to ensure long-term safety.

Short-term effectiveness is lessened by potential exposure to workers and the community during implementation of the excavation, encapsulation, and demarcation of the contaminated soil. This exposure risk can be overcome by proper worker PPE, air monitoring, and mitigations such as dust suppression, dust barriers, etc. This alternative would be in compliance with regulatory requirements. The onsite containment cell allows complete removal of soils to the RAL in areas planned for future residential development.

6.3.2 Implementability

This alternative avoids transporting a large quantity of contaminated soil over public roadways, and will not consume valuable landfill space. An engineering design and construction plans would be described in a removal action work plan that would be prepared in advance of work to ensure proper implementation. All engineering and construction components of this remedy are readily implemented using standard environmental remediation and civil construction techniques. Dust control and soil erosion control measures will be implemented during soil excavation, relocation, and grading activities to prevent nuisance and contaminant migration. Because of the proximity of the source area to the near-vertical cliff (approximately 30 ft), care must be taken to ensure safe working practices near the cliff and prevent contaminated soil erosion and migration from the worksite.

This alternative is expected to require a Special Management Area (SMA) permit under Coastal Zone Management program. Local permitting is expected to be required in order to perform soil excavation work and build an onsite soil containment cell. This would include stormwater and soil erosion permitting. Institutional controls include UECA environmental covenant and EHMP, recorded for the area of the property where the soil containment cell is placed.

Similar to Alternative 2, this alternative would require excavation of all Category C and D soils from the source area. Due to the technical feasibility limitation described by Dr. J. Lockwood, outlined in Section 6.2.2 (above), this alternative cannot be readily implemented.

6.3.3 Cost

The total estimated cost for the Onsite Containment Cell for Category C and D Soils alternative is \$389,000. Details are provided in Table 7.

6.4 ALTERNATIVE 4 – ONSITE CONTAINMENT CELL FOR ARSENIC CATEGORY C SOILS, OFFSITE LANDFILL DISPOSAL OF ARSENIC CATEGORY D SOILS

This remedy alternative is a combination of Alternatives 2 and 3, consisting of an onsite containment cell for Category C soils, coupled with offsite landfill disposal of Category D soils. Based on our analysis of soil arsenic levels, there are approximately 5,300 cy of Category C soils and approximately 800 cy of Category D soils. Under this alternative, the Category C soils would be relocated to a containment cell in the same location and with the same engineering features as described in Alternative 3. The containment cell would be excavated in clean Hilo Series clay loam soils in the western portion of the property, on a parcel that will remain in Industrial or Commercial zoning and will not be used for future residential redevelopment. The slightly lower soil volume for onsite containment in this alternative versus Alternative 3

(5,300 cy versus 6,100 cy) would result in a proportionally smaller containment cell volume. Category D soils would be transported for disposal at the West Hawaii Landfill.

As for Alternative 3, institutional controls would include UECA environmental covenant and an EHMP.

6.4.1 Effectiveness

This remedy alternative is highly effective. The soils with highest arsenic contamination (Category D soils) are removed from the site and disposed in a permitted landfill facility. Please refer to the effectiveness discussions for Alternatives 2 and 3 for details.

6.4.2 Implementability

This alternative is expected to require a Special Management Area (SMA) permit under Coastal Zone Management program. Local permitting is expected to be required in order to perform soil excavation work and build an onsite soil containment cell. This would include stormwater and soil erosion permitting. As for Alternatives 3, institutional controls would include a UECA environmental covenant and an EHMP, recorded for the area of the property where the soil containment cell is placed.

Similar to Alternatives 2 and 3, this alternative would require excavation of all Category C and D soils from the source area. Due to the technical feasibility limitation described by Dr. J. Lockwood, outlined in Section 6.2.2 (above), this alternative cannot be readily implemented.

6.4.3 Cost

The total estimated cost for the Onsite Containment Cell for Arsenic Category C Soils, Offsite Landfill Disposal of Arsenic Category D Soils alternative is \$580,000. Details are provided in Table 8.

6.5 ALTERNATIVE 5 – CONSOLIDATION AND CAPPING OF ARSENIC CATEGORY C AND D SOILS AT SOURCE AREA

This alternative contemplates consolidation of soils with arsenic levels above the RAL in the local area of the former pesticide mixing facility (“source area”, where the highest arsenic concentrations are observed extending to greatest depth). Shallow arsenic impacted soils from outlying areas will be excavated and relocated above the impacted soils in the source area. Soils in the source area would not be moved, with the exception of limited Category D soils identified in the top foot of soil within the 40-ft shoreline setback area and any limited Category C and D soils identified in shallow soils outside of the designated consolidation/capping area, which will be excavated and either placed within the

consolidation/capping area or landfill disposed (West Hawaii Landfill). To the extent possible, if there are excess arsenic-contaminated soils that need to be landfill disposed, they should consist of Category D soils.

Remaining Category C and Category D soils would be covered by clean soils to minimum required depths (see details in Section 7). Therefore, some Category D soils (heavily arsenic impacted) would remain at depths below 3 ft of the surface in the designated consolidation/capping area, increasing the potential for direct exposure in the event of unauthorized construction activities. A capping system, composed of a demarcation barrier (geotextile), labeled warning tape, and a minimum 24 in. thick clean soil layer, would be placed over the consolidated materials. The capped surface would be gently sloped to shed stormwater onto the adjacent land surface. Under this remediation scenario, the footprint of arsenic-impacted soils is greatly lessened, and areas where arsenic-contaminated soils have been removed are available for redevelopment and reuse. The capped soil containment area would only be suitable for use as open space within a future residential development.

Capping of impacted soils is a proven remedial technology to eliminate human and ecological direct contact risks. For arsenic-impacted clay loam soils at subject property, in a setting without an underlying drinking water source, contaminant leaching does not present an issue and, therefore, an impervious capping system is not required.

The approximate areas where soils will be excavated, and the area of consolidation and capping, are shown on Figure 12. The cap area is estimated to be about 200 ft long (east-west dimension) by 100 wide (north-south dimension), or 20,000 square ft. The parcel containing the capped area will not be used for future residential redevelopment. As for Alternatives 3 and 4, institutional controls would include a UECA environmental covenant and an EHMP, recorded for the area of the property where the soil containment cell is placed.

6.5.1 Effectiveness

Capping is an effective remedy to eliminate the potential for human and ecological direct contact with exposed arsenic-contaminated soils. Arsenic in the Hilo Series soils does not present a significant leaching hazard, and underlying groundwater is not used for drinking water purposes. The planned clean soil cap will prevent direct contact with arsenic-contaminated soils and be a deterrent to unwanted intrusion. Considering these factors, this remedy effectively mitigates environmental hazards. This scenario is not considered a permanent solution, since the arsenic-contaminated soil has not been completely eliminated, but it does meet the long-term effectiveness goals. Only limited removal of Category D soils from the top 1 ft of soils within the 40-ft shoreline setback area or areas outside the planned consolidation/capping area (if identified) would occur. Soils exceeding the capacity of the consolidation/capping area will be landfill disposed at the West Hawaii landfill. Overall this alternative would protect human health and the environment. Consolidation and capping

would not reduce the toxicity or volume of the arsenic, but the engineered cover system would prevent direct contact risks. Since some Category D soils would be located below 3 ft of the final containment surface, there is a limited potential for direct contact hazard during unauthorized construction activities (if they were to occur).

Long-term effectiveness of the cover system (demarcation barrier and clean soil layer) can be improved by engineering and institutional controls to prevent unwanted intrusive activities. Engineering controls include physical and visible subsurface barriers (robust geotextile and warning tape). Institutional controls will ensure that the location and engineering features of the containment cell are known and documented to ensure long-term safety.

Short-term effectiveness is lessened by potential exposure to workers and community during implementation of the excavation, encapsulation and demarcation of the contaminated soil. This exposure risk can be overcome by proper worker PPE, air monitoring, and mitigations such as dust suppression, dust barriers, etc., to be carried out under a site-specific dust control plan for the operation. Because of the proximity of the source area to the steep shoreline cliff, care must be taken to ensure safe working practices near the cliff and prevent contaminated soil erosion and migration from the worksite. This alternative would be in compliance with regulatory requirements.

The source area, where consolidation and capping would occur, is located adjacent to the steep cliff face above the Pacific Ocean. Although the underlying substrate (clay soils on lava rock) appears stable (if not disturbed), there may be long-term concerns about the safety of leaving arsenic-impacted soils in such close proximity to a known erosional feature.

6.5.2 Implementability

This alternative is technically feasible, as it avoids transporting a large quantity of contaminated soil over public roadways, and will not consume valuable landfill space. All engineering and construction components of this remedy are readily implemented using standard environmental remediation techniques. Dust control and soil erosion control measures will be implemented during soil excavation, relocation and grading activities to prevent nuisance and contaminant migration. Because of the proximity of the source area to the steep cliff, care must be taken to ensure safe working practices near the cliff and prevent contaminated soil erosion and migration from the worksite. Land use restrictions, in the form of a deed notice (environmental covenant) and an associated EHMP, will be recorded for the area of the property where the soil consolidation and capping is placed.

6.5.3 Cost

Total estimated cost for the Consolidation and Capping of Arsenic Category C and D Soils at Source Area alternative is \$332,000. Details are provided in Table 9.

6.6 COMPARISON OF ALTERNATIVES AND RECOMMENDATION

Table 10 provides a comparison of the removal action alternatives presented herein. Of the four removal action alternatives presented, Alternative 1 (No Action) does not meet the minimum requirements of protecting human health and the environment, since RAOs are not achieved and, in particular, because hazards posed by soils containing arsenic above the RAL are not addressed.

Comparison of Alternative 2 (excavation and offsite landfill disposal), Alternatives 3 (onsite containment cell), Alternative 4 (combination of onsite containment cell and offsite landfill disposal) and Alternative 5 (consolidation and onsite capping) on the basis of effectiveness, implementability, and cost, provides some noticeable contrasts.

In terms of effectiveness, all four remedies are generally effective at preventing human direct contact exposure with contaminated soils. Since arsenic in soil cannot be eliminated, the differentiator is the location where the material will reside for the long term. Alternative 2 provides the greatest long-term effectiveness since the contaminated soil is moved to a permitted landfill facility designed and managed for the purpose of long-term storage of solid waste materials. Alternative 4 provides the next best effectiveness since the highest concentration arsenic soils (Category D soils) are landfill disposed, and only moderately-impacted arsenic soils are contained onsite. Alternative 3 is nearly equivalent to Alternative 4 in effectiveness, since the heavily arsenic-impacted soils (Category D soils) would be placed at the base of the containment cell, more than 10 ft below final grade, minimizing the potential for disturbance by unauthorized construction activities. Alternative 5 (consolidation and onsite capping) is less effective than the other two remedies since materials remain near the cliff, and in close proximity to areas planned for residential redevelopment. In addition, Category D soils would remain below 3 ft of the surface, increasing the potential for direct contact hazard by unauthorized disturbance.

From a technical and construction perspective, only Alternative 5 can be readily implemented. Alternatives 2, 3 and 4 all include significant excavation within the 40-ft shoreline setback adjacent to the cliff face, in which slope failure hazard is extreme. Alternative 2 (excavation and offsite landfill disposal), and to a lesser degree Alternative 4, involves significant truck traffic through the local community and across county roads, which increases traffic safety risk and nuisance issues, whereas Alternative 3 keeps soil relocation activities confined to the site, and Alternative 5 involves only limited removal of shallow Category D soils that are identified less than a foot from the surface. Alternatives 2, 3, 4, and 5, will require SMA permitting under the Hawaii Coastal Zone Management Act provisions. Community input will be provided through the HDOH removal action approval process and county SMA permitting process. Alternatives 3, 4 and 5, which include onsite containment of arsenic impacted soils with engineering controls will require land use restrictions, in the form of a deed notice (environmental covenant) and an associated EHMP.

Alternative 2 (excavation and offsite landfill disposal) provides the least restrictions on future use and redevelopment at the property, in that no areas are subject to land use restrictions designed to prevent intrusion through the impounded soil capping system. Alternatives 3 and 4 (onsite containment cell) provide only minor land use restriction by placing the contaminated soil in an area away from the coastline that is not planned for future residential development. Alternative 5 has the greatest impact on future use of the property, in that a portion of the ocean-fronting property will be used for long-term containment of contaminated soil and cannot be used for purposes other than open space or recreational activities.

The cost of Alternative 2 (excavation and offsite landfill disposal) is the highest of all alternatives at \$1,844,000. For the onsite remedies, Alternatives 3 and 4 (which include an onsite containment cell) have a higher cost than Alternative 5 (consolidation and capping at the source area, with only limited removal of shallow Category D soils), because there is more material handling and a more robust engineered cover system. Alternative 4, consisting of a combination of offsite landfill disposal and an onsite containment cell, is estimated to be approximately \$200,000 higher cost than the Alternative 3 (all soils in onsite containment cell), providing increased long-term benefits due to removal of highly contaminated soils to a more controlled environment. Based on comparison of the remedial alternatives, Alternative 5 provides the best balance of effectiveness, implementability and cost, is the only alternative that is technically feasible to construct, and is recommended for selection by HDOH as the approved removal action alternative.

7 CONCEPTUAL DESIGN AND IMPLEMENTATION

This section provides a description of the conceptual design for implementation of Alternative 5, consisting of consolidation and capping of arsenic Category C and D soils at the source area.

7.1 SUPPLEMENTAL INVESTIGATION AND REMOVAL ACTION WORK PLAN

Following HDOH approval of the recommended remedy, a removal action work plan containing construction specifications and implementation plans, will be prepared and submitted to HDOH for review and comment before commencing work. A supplemental soil investigation will be performed, with results incorporated into the work plan. The supplemental investigation will 1) more precisely determine the spatial distribution (extent) of Category C and D soils, 2) support containment cell design and localized shallow excavation and consolidation of soils located outside the capping area, and 3) confirm the subsurface contamination boundaries of the planned consolidation area to ensure it is optimally placed, and that no contamination above relevant HDOH EALs remains in subsurface soils outside the consolidation/cap area. Estimated areas and thicknesses of Category C and D soils will be documented in figures included in the work plan. The supplemental investigation will also include study of soils in the vicinity of the former seed dipping effluent at the east of the property.

7.2 SOIL REMOVAL, CONSOLIDATION AND CONFIRMATION TESTING USING INCREMENTAL SAMPLING

Sampling and analysis of surface soils performed to date provides good definition of the extent of soil impacts above the RAL. Supplemental soil investigation will also be conducted to support development of the work plan as described in Section 7.1. Further arsenic delineation, especially in the subsurface, will be conducted during the soil excavation activities by use of a handheld XRF device. All soils outside of the final consolidation/capping area exceeding the RAL (Category C and D soils) will be excavated. Based on test pit sampling, arsenic-contaminated soils outside of the consolidation area are expected to be shallow (no more than 1 ft depth). This will be confirmed during the supplemental site investigation. Excavated Category D soils will be transported by truck for disposal at the West Hawaii landfill, whereas excavated Category C soils will be relocated to the consolidation/capping area. Within the 40-ft shoreline setback area and within the planned consolidation/capping area, the upper 1 ft of Category D soils will be excavated and landfill disposed. According to Dr. Lockwood (see Appendix A), soils can be safely excavated to a depth of 1 ft within the 40-ft shoreline setback,

using long-reach excavator or by manual methods. Clean soil capping provisions for the 40-ft shoreline setback zone and areas outside the setback are described in Section 7.3, below.

Confirmation MI sampling and analysis for bioaccessible arsenic levels will be performed after soil removal has been conducted. Sampling DUs will be laid out around the perimeters of the capping/consolidation area, and other areas beyond these DUs where arsenic-contaminated soils were removed. MI samples will be collected from two depth levels, 0–6 and 6–12 inches below final excavation or undisturbed soil levels. Each proposed residential and commercial/industrial lot (see preliminary lot boundaries on Figure 7) will be considered a DU, and a MI surface soil sample will be collected from each lot to confirm attainment of RAL. One lot will be selected for triplicate analysis for determination of sampling and analysis quality assurance (measurement variance).

7.3 CONTAINMENT CELL DESIGN AND IMPLEMENTATION

The preliminary design extent of the soil consolidation and capping area is shown on Figure 12, and is approximately 0.5acre in dimension (100 by 200 ft). A soil cap of minimum 3 ft thickness will be placed over any Category D soils, and a minimum 2 ft clean soil cap will be placed over any Category C soils. Within the 40-ft shoreline setback, all capping soils shall consist of clean soil material. Outside of (south of) the 40-ft shoreline setback, above Category D soils, the lower 1 ft of the minimum 3 ft soil cap may be composed of relocated Category C soils. To the extent possible, if there are excess arsenic-contaminated soils that need to be landfill disposed, they should consist of Category D soils.

The containment cell capping components will consist of the following elements from bottom to top:

- Substrate Soil – Hilo Series silty, clay loam soils at the source area containing arsenic at Category C and D levels. Within the 40-ft shoreline setback from the cliff edge, the upper 1 ft of Category D soils will be removed and disposed in the West Hawaii landfill.
- Relocation of Category C Soils (moderately arsenic contaminated) from areas outside of the consolidation and capping area – These soils are anticipated to create an approximate 6 in. lift of soils on top of existing source area soils. Soils will be placed only in the portion of the planned cap area outside of the 40-ft shoreline setback. Based on final design grades, the relocated soils may be placed as a wedge in the eastern (downslope) position to allow for a lower slope final cap surface. Soils will be compacted, using hand machinery within the 40-ft shoreline setback.
- Demarcation Barrier – A layer of geotextile fabric will be placed over the arsenic contaminated soils in the consolidation/capping area. The geotextile fabric is intended to provide a physical separation between arsenic-impacted soils below and clean cover materials above. In addition to preventing mixing of arsenic-contaminated soils with

overlying construction materials during cap placement, it will function as an indicator of the location of impacted soils in the event of future subgrade intrusions. A labeled metal warning tape will be placed in a 10-ft grid across the geotextile, with printed warning indicating arsenic-contaminated soils are located below.

- **Clean Cover Soils** – Soils devoid of debris or other waste materials, and capable of sustaining vegetative growth, will be placed over the demarcation barrier and contoured to final grade specifications. A minimum thickness of 2 ft of cover soils will be placed above Category C soils and a minimum 3 ft of cover soils above Category D soils. The clean cover soils are expected to be composed of native clay-rich soils from a local borrow area or from uncontaminated areas of the site (for example the southern half of the property).

The consolidation and capping will be implemented in accordance with design specifications, which will be submitted for HDOH approval in a removal action work plan. Final design will require a site topographic survey in order to engineer fill geometries and determine final grade contours. The project will be implemented in accordance with the following sequence:

- Mobilization and Site Preparation – Accessible areas on the site will be identified for the storage of equipment and supplies and vehicle parking. Vegetation will then be cut to grade and removed to an adjacent disposition area. Erosion and sedimentation controls will be placed adjacent to and downgradient of the arsenic-impacted soil areas and the containment cell area to manage potential soil transport during storm events. A site perimeter (exclusion zone) surrounding the impacted soils areas will be established and marked with stakes and colored tape. Specific ingress and egress locations (contaminant reduction zones) will be marked to control equipment and personnel flow into and out of the construction areas and allow for decontamination of equipment and removal of worker personal-protective equipment. Specific locations for worker ingress/egress and PPE donning and decontamination will be established.
- Excavation and Landfill Disposal of Upper 1 ft of Category D Soils from within 40-ft shoreline setback – Category D soils at the surface, within the upper 1 ft interval, will be excavated and landfill disposed.
- Excavation and Relocation of Category C Soils – Category C soils outside of the footprint of the consolidation/capping area will be removed by excavator and transported by small dump truck or loader from the impacted soil areas to the consolidation/capping area. Category D soils excavated from outside the consolidation/capping area, if any, will be landfill disposed. Category C soils will be placed in the consolidation/capping area in accordance with design specification. During excavation work, soil arsenic concentrations in excavation sidewalls and bottoms of removal areas will be evaluated by portable XRF device to ensure that removal is completed to the designated RAL.

- Dust Control Measures for Excavation Activities – A written Dust Control Plan will be developed and approved by the HDOH HEER Office before implementation. Some or all of the following best practices will be implemented to reduce potential dust generation during excavation activities, to the extent practical:
 - Wet soil during excavation with hose from an onsite water truck, tank, or onsite supply.
 - Wet soil surface in trucks and implement effective covering prior to departure from site. Utilize trucks with most effective covers for dust control.
 - Inspect and wash off truck tires upon leaving the site.
 - Truck bed wash out after leaving soil at landfill, or require effective covering of truck bed prior to departure from landfill.
 - Erect and maintain a dust screen at perimeters of excavation site.
 - Continuously monitor for fugitive dust at the site perimeter to document dust controls are effective. Visual dust monitoring by trained site personnel will be conducted to maintain compliance and safety.
 - Assign supervision to ensure Dust Control Plan elements are implemented, followed, and revised as necessary to achieve control objectives.
 - Prohibit excavation work when wind speeds are in excess of a limit established to prevent dust migration from the worksite (track wind speed during work day to comply with the limit set).
 - Limit truck speeds through adjacent neighborhood to 15 MPH or lower.
 - Select routes of trucks and hauling times to minimize impact on adjacent neighborhood.
 - Notify community before the excavation/hauling work begins and identify the anticipated duration of the project.
 - Provide an opportunity for community members to review the written Dust Control Plan, or observe dust control measures that are implemented (from a safe distance).
 - Prohibit hauling work when rains create muddy conditions.
 - Provide protective berms at key points to keep water onsite to promote infiltration. Use silt fence or silt socks at perimeter of site to retain sediment.
 - Install stabilization pads at ingress and egress from site.
- Confirmation Sampling of Consolidation/Capping Area Perimeter and other Excavated Areas – After removal of soil, before backfilling occurs, MI sampling will be performed in DUs surrounding the consolidation/capping area and in other areas of contaminated soil excavation beyond the immediate perimeter. MI sampling will be conducted for

two depth intervals, 0–6 and 6–12 inches. MI sampling of surface soils (0–6 inches) will be conducted before clean soil backfill is placed, across all proposed residential and commercial lots (DUs) located outside of the consolidation/capping area. The MI samples will be processed and analyzed for total and bioaccessible arsenic content. Any DUs that do not meet the RALs will be further excavated until RALs are achieved.

- Backfill of Excavated Areas – Clean soils will be used to backfill excavation areas after completion of confirmation sampling and once it has been determined that RALs have been achieved. Shallow excavation areas may be locally graded without imported fill soil. Soil will be placed and compacted using standard construction equipment. Backfill soils and other disrupted areas will be vegetated with grasses according to specifications outlined in the removal action work plan. Erosion and sediment controls will remain in place and be inspected until vegetation is firmly established.
- Placement of Demarcation Barrier at Consolidation/Capping Area – Once all arsenic-impacted soils have been relocated and placed within the consolidation/capping area, a demarcation barrier consisting of geotextile material and a grid of metallic warning tape will be placed over the impacted soil extending to the lateral limits of the planned cap area.
- Placement of Final Cover at Containment Cell – A soil cap minimum of 3-ft thickness will be placed over any Category D soils, and a minimum 2-ft clean soil cap will be placed over any Category C soils. Within the 40-ft shoreline setback, all capping soils shall consist of clean soil material. Outside of the 40-ft shoreline setback, above Category D soils, the lower 1 ft of the minimum 3-ft soil cap may be composed of relocated Category C soils. Once placed on the containment cell, the soils will be graded to match design grade using survey stakes for elevation guidance. Soils will be placed in no greater than 1-ft lifts and compacted with heavy equipment between lifts (e.g., five passes of bulldozer). Within the 40-ft shoreline setback adjacent to the cliff edge: heavy equipment will not be operated within 15–20 ft of the cliff edge, so soils may be compacted using hand equipment. Once clean cover soils have been placed and are revegetated, site controls for management of exposure to site contaminants can be removed.
- Final Documentation and Placement of Institutional Controls – Upon completion of the removal action work, a removal action completion report will be submitted describing the work performed and certifying attainment of the RAL. Along with the completion report, an EHMP will be submitted, with descriptions and survey information regarding the capped area, and including description of long-term maintenance activities necessary for the cap. A UECA environmental covenant will be required for the parcel contained the capped arsenic-contaminated soils. The EHMP, UECA environmental covenant, and a No Further Action letter from HDOH, will be recorded with the property deed to provide future notice of the environmental conditions.

8 CONCLUSIONS AND RECOMMENDATIONS

This removal action report addresses the need for remedial action of arsenic-impacted soils at the subject property. Based on soil investigations at the site, it has been determined that arsenic is present at concentrations requiring a response action. RAOs have been developed as follows:

1. Remediate portions of the property anticipated for future unrestricted (residential) land use to appropriate bioaccessible arsenic soil concentrations, herein defined as the RAL
2. Prevent migration of contaminants to surface or groundwater
3. Minimize potential risk to human health or ecological receptors from exposure to arsenic impacted soil, during and after the removal action.

Four removal action alternatives (plus the No Action alternative) were evaluated in term of effectiveness, implementability, and cost. Alternative 5, Consolidation and Capping of Arsenic Category C and D Soils at Source Area, was determined to be the optimal remedy. All other alternatives (2, 3 and 4) included significant excavation of arsenic-impacted soils from within the 40-ft shoreline setback adjacent to the cliff face, and were determined to be technically infeasible due to slope stability concerns.

Upon approval of the recommended removal action alternative by HDOH, a removal action work plan will be prepared to provide design specifications and guidance in implementing the proposed remedy.

9 PUBLIC REVIEW AND COMMENT PROCESS, DRAFT REMOVAL ACTION REPORT

9.1 DRAFT REMOVAL ACTION REPORT REVIEW AND COMMENT PROCESS

Public comment on the proposed site remediation plan described in the Draft Removal Action Report (Draft RAR), dated April 25, 2013, was solicited and accepted during a public comment period from May 15, 2013 through June 20, 2013. In addition, a public meeting to describe and discuss the proposed site remediation was held at the Honomu Gym in Honomu, from 6:00 to 7:30 PM on May 23, 2013. Comments from those attending the public meeting or sending in comments during the public comment period were noted for response (see Response to Comments Summary section). Additional elements of the Draft RAR Review and Comment Process included:

- A public notice regarding the availability of the Draft RAR, planned public meeting, and contact information to make comments or get additional information was published in the *Hawaii Tribune Herald* newspaper on May 15, 2013.
- The Draft RAR and other site environmental documents were provided for access in the Hilo Public Library during the public comment period.
- A letter inviting Draft RAR review and comment, along with a three-page “fact sheet” on the site, were mailed directly to approximately 27 nearby residents, landowners, or interested parties (including area political representatives and planning agency representatives).
- A notice about the Draft RAR, public meeting, and public comment period was published in the May 23, 2013 edition of *The Environmental Notice*, the semimonthly bulletin of the HDOH Office of Environmental Quality Control.
- An announcement and electronic copy of the site Public Notice, Fact Sheet, and Draft RAR were posted on the “What’s New” Section of the HDOH HEER Office website during the public comment period.

9.2 FINAL SITE REMEDY SELECTED

In the Draft RAR, **Alternative 4: Onsite Containment Cell for Arsenic Category C Soils, and Offsite Landfill Disposal of Arsenic Category D Soils** was identified as a suggested “preferred” remediation option. However, based on consideration of all the Draft RAR remediation options presented, discussion at the public meeting in Honomu, comments received after the public meeting, discussions with the Hawaii County Planning office

regarding cliff stability issues at the site, and additional site evaluation by a geologist from Geohazards Consultants International, the HEER Office has selected **Alternative 5: Consolidation and Capping of Arsenic Category C and D Soils at Source Area** (another alternative proposed in the Draft RAR), as the final removal action to be implemented at the former Hakalau pesticide mixing site. However, as a result of HEER Office concerns to reduce arsenic contamination to the extent feasible at the site, removal of a limited amount of Category C or D soils is incorporated in this final remedy selection (based on limitations of soil removal to only the top foot of soil to protect cliff stability). In addition, due to concerns expressed at the public meeting and in public comments, specific protocols and a management plan to control any potential soil or dust exposures related to the excavation/removal work at the site or during transport of soil to the West Hawaii Landfill will be required as part of the remedy implementation (see section below for more detail). The HEER Office believes this remediation option provides the best feasible and effective alternative available, provides long-term protection from soil arsenic exposures at the site, and minimizes any threats to the adjacent cliff stability.

9.3 MODIFICATIONS REQUIRED FOR IMPLEMENTATION OF REMEDY ALTERNATIVE 5: CONSOLIDATION AND CAPPING OF ARSENIC CATEGORY C AND D SOILS AT SOURCE AREA

The “preferred” alternative identified in the Draft RAR called for removal of all Category D soils to a landfill, and relocation of all Category C soils to an onsite containment area. This removal alternative was consistent with the general HEER Office objective to remove/eliminate heavily contaminated soils, if technically feasible, especially at potential residential-zoned areas. However, cliff stability issues from proposed excavations of soil near the cliff-face (up to ~8 ft deep) were raised by the Hawaii County Planning Office during discussion on the removal plans. The cliff stability concerns from proposed excavations were later confirmed through an evaluation by a geologist from Geohazards Consultants International, and became the primary factor in the HEER Office selection of the Consolidation and Capping Alternative as the final remedy. In addition, the majority of written public comments received by the HEER Office on the Draft RAR (9 of 15 comments received) supported an onsite consolidation and capping alternative as the first choice for the site.

Because of cliff stability hazards, Geohazards Consultants International recommended limiting any soil excavations, especially near the cliff-face, to 1 ft or less in depth. In light of this recommendation, removal of only a limited amount of Category D soils—no more than the top 1 ft of soil, primarily within the 40 ft setback from the cliff—was incorporated into the implementation of the consolidation and capping remedy selected. This will allow at least limited removal of high arsenic contaminated soils at shallow depth during the consolidation and capping implementation, thereby reducing potential for exposures and erosion of contaminated soils near the cliff. A soil cap minimum of 3-ft thickness will be placed over any

Category D soils, and a minimum 2-ft clean soil cap will be placed over any Category C soils. Within the 40-ft shoreline setback, all capping soils shall consist of clean soil material. Outside of the 40-ft shoreline setback, above Category D soils, the lower 1 ft of the minimum 3 ft soil cap may be composed of (consolidated) Category C soils. See the Section 7, "Conceptual Design and Implementation" for more details.

As noted above, implementation plans for the selected remedy alternative will be required to specifically address concerns of community members about the potential for soil or dust exposures during the limited soil excavation work (i.e., soil consolidation) or removal work (limited to Category D soils in surface, less than 1 ft deep, primarily in 40 ft setback area from cliff). Major elements to be addressed in a site soil and dust control program will include:

- **Dust control methods, to be described in an HDOH-approved Dust Control Plan, will include some or all of the following elements:**
 - Wetting during excavation with hose from an onsite water truck or tank.
 - Wetting of soil surface in trucks and effective covering prior to departure from site. Utilize trucks with most effective covers for dust control.
 - Inspect and wash off truck tires upon leaving the site.
 - Truck bed wash out after leaving soil at landfill, or require effective covering of truck bed prior to departure from landfill.
 - Cover open excavations outside work times if wind-generated dust could be a significant concern.
 - Erect and maintain a dust screen at perimeters of excavation site.
 - Continuously monitor for fugitive dust at the site perimeter to document dust controls are effective. Visual dust monitoring by trained site personnel will be conducted to maintain compliance and safety.
- **Administrative Controls:**
 - Written Dust Control Plan to be reviewed and approved by HDOH HEER Office before implementation.
 - Assign supervision to ensure Dust Control Plan elements are implemented, followed, and revised as necessary to achieve control objectives.
 - Prohibit excavation work when wind speeds are in excess of a limit established to prevent dust migration from the worksite (track wind speed during work day to comply with the limit set).
 - Limit truck speeds through adjacent neighborhood to 15 MPH or lower.

- Select routes of trucks and hauling times to minimize impact on adjacent neighborhood.
- Notify community before the excavation/hauling work begins and identify the anticipated duration of the project.
- Provide an opportunity for community members to review the written Dust Control Plan, or observe dust control measures that are implemented (from a safe distance).
- **Stormwater Controls:**
 - Prohibit hauling work when rains create muddy conditions.
 - Provide protective berms at key points to keep water on site and promote infiltration. Use silt fence or silt socks at perimeter of site to retain sediment on site.
 - Install stabilization pads at ingress and egress from site.

9.4 NEXT STEPS FOR IMPLEMENTATION OF THE SELECTED REMEDY

As noted in this Final Removal Action Plan (Section 7, “Conceptual Design and Implementation”), before site work begins on the selected remedy, an implementation work plan containing construction specifications will be prepared by the site consultant for review and approval by the HDOH HEER Office. Major elements of the implementation work plan will include 1) site preparation activities, 2) soil consolidation, excavation and disposal, 3) post-excavation confirmation sampling/analysis, and 4) site restoration. The soil/dust control plan discussed above will also be part of this overall site implementation work plan. The HEER Office will provide oversight to ensure the work is conducted as planned, and upon satisfactory completion of the work will ensure a long-term environmental hazard management plan and deed covenant is in place to protect the capped area. The capped area will remain as open space or passive use, with no residential or commercial development allowed.

9.5 RESPONSE TO COMMENTS SUMMARY

Comments and responses summarized below address both comments noted at the May 23, 2013 public meeting in Honomu (15–20 community members in attendance) and follow-up comments received via e-mail or mail after the public meeting.

PUBLIC COMMENT	HEER OFFICE RESPONSE
1. The majority of discussion at the public meeting and in follow-up e-mails supported Alternative 5 (Consolidation and Capping of Arsenic-Contaminated Soils in Place), over the suggested	The HEER Office generally supports options that result in complete cleanup or removal of contaminated soils, especially highly contaminated soils, from potential residential property, such as this site. Although dust or

PUBLIC COMMENT	HEER OFFICE RESPONSE
<p>“preferred” removal Alternative 4 (Onsite Containment Cell for Arsenic Category C Soils, Offsite Landfill Disposal of Arsenic Category D Soils). Rationale given for support of a Consolidation and Capping Alternative included:</p> <ul style="list-style-type: none"> • Best reduces potential for (contaminated) dust or soil exposure in the community. • Would cause “less risk” from disturbing the contaminated soil. • Keeps contaminated soils further away from existing residential homes and roadway. 	<p>soil exposures from short-term removal operations is a valid community concern, the HEER Office believes those concerns can be addressed by use of specific controls and best practices as part of a removal implementation plan. Onsite containment areas for contaminated soils that are not removed due to technical and/or economic considerations can also be designed and implemented in a manner that would make potential significant contaminated soil exposures (current or future) extremely unlikely. Consequently, the HEER Office supported Alternative 4 (Onsite Containment Cell for Arsenic Category C Soils, Offsite Landfill Disposal of Arsenic Category D Soils) for this site until the issue of cliff stability was raised by the Hawaii County Planning Office in discussions about the proposed removal actions, and this concern was subsequently confirmed by an evaluation by a geologist/consultant, who recommended excavations in the contaminated area (near the cliff) be limited to 1 ft deep. This drove the decision for the HEER Office to support a Consolidation and Capping approach (as supported by the majority of those who provided public comments), with the modification to allow a much more limited removal of shallow Category D arsenic soils to a landfill while implementing the Consolidation and Capping remedy. Specific controls/best practices were added to address potential soil/dust exposures during the limited soil consolidation and removal activities for this remedy (see Section 9.3, “Modifications Required for Implementation of Remedy Alternative 5: Consolidation and Capping of Arsenic Category C and D Soils at Source Area”).</p>

PUBLIC COMMENT	HEER OFFICE RESPONSE
<p>2. One comment suggested that binders be added to stabilize contaminated soils under Alternative 5 (Consolidation and Capping of Arsenic Category C and D Soils at Source Area).</p>	<p>Binding agents or compounds that may reduce the bioaccessibility of contaminants can be employed to reduce the potential for future exposures in some situations where contaminants are managed in place. In this case, due to the cliff stability issue and associated limitation on excavation depths near the cliff, effective incorporation of binding agents was not generally feasible. See responses to Comment #1 and #5. Successful implementation of the selected remedy, which includes a demarcation barrier between contaminated soils and cover soils as well as a long-term Environmental Management Plan for the containment area and an environmental covenant on the deed to the property, is expected to provide effective, long-term protection for contaminated soils managed onsite.</p>
<p>3. Most other discussion at the public meeting and follow-up e-mails generally supported the initial “preferred” removal Alternative 4 (Onsite Containment Cell for Arsenic Category C Soils, Offsite Landfill Disposal of Arsenic Category D Soils), with the suggested modification that the proposed onsite containment area for Category C arsenic soils be moved from the proposed mauka side of an existing warehouse to the makai side. This would locate the containment area further away from the existing residents in the community.</p> <p><u>Note:</u> a number of the comments supporting Alternative 5 (Consolidation and Capping of arsenic-contaminated soils in place) as noted in Comment #1 above also suggested this as their “second choice” if Alternative 5 was not selected.</p>	<p>As noted in response to Comment #1, the HEER Office had supported Alternative 4 as the preferred remedy until the cliff stability issue was raised by the County and confirmed by evaluation of a geologist consultant. The HEER Office was also supportive of relocating the proposed onsite containment area for Category C arsenic soils to the makai side of the existing warehouse under removal Alternative 4. Eventually, the cliff stability issue drove the decision to select a consolidation/capping remedy for the site, with the potential for only limited removal of shallow Category D arsenic soils during implementation of the consolidation/capping remedy. Under the consolidation/capping remedy selected, most all contaminated soils are consolidated and capped near the source area, and Category C arsenic soils are not excavated and moved to an onsite containment area.</p>

PUBLIC COMMENT	HEER OFFICE RESPONSE
<p>4. One comment supported Alternative 2 (Excavation and Offsite Landfill Disposal of all Category C and D soils).</p>	<p>As noted in Comment #1, HEER Office had originally supported Alternative 4 (Onsite Containment Cell for Arsenic Category C Soils, Offsite Landfill Disposal of Arsenic Category D Soils), thinking this was a reasonable balance of technical feasibility and cost. Alternative 4 would have resulted in complete removal of Category D arsenic soils, and remaining Category C soils would be in a deep containment cell, capped away from the cliff, and remain in area of the site that would be non-residential. As noted in Comment #1, the decision to adopt the Consolidation/Capping approach selected was driven by the concern regarding cliff stability.</p>
<p>5. Concern was expressed regarding how long a cap would effectively last.</p>	<p>Details on the general implementation strategy for the Consolidation/Capping remedy are included in this Final RAR. The cap includes provision of geotextile barrier and metal warning tape between the remaining contaminated soil and the cover soils for demarcation/identification. The containment area will also be marked on the surface. Two-three feet of clean cover soils will be placed, and the area vegetated. A long-term Environmental Management Plan (EHMP) would be required for the completed containment area, ensuring the present and future landowner knows responsibilities to be maintained, including periodic inspection that cover soils and vegetation remain intact, preventing deep-rooted bushes/trees from growing on the containment area, preventing excavations into the containment area, and allowing only open space/passive use of the area. An environmental covenant will also be required for the property deed to record/document contamination and controls in place, and reference the EHMP for long-term management requirements. All details of</p>

PUBLIC COMMENT	HEER OFFICE RESPONSE
	the containment site would remain documented and mapped in the Department of Health HEER database and available to public.
6. Any odors associated with the proposed site remedy implementation need to be controlled.	No unusual odors are expected to be generated from the implementation of the selected remedy. As noted in Comment #1, specific controls/best practices were added to address potential soil/dust exposures during the limited soil consolidation and removal activities for the selected remedy.
7. One comment noted a clear and easily understood map should be included that clearly shows what lies around the site.	All attending the public meeting were familiar with the site location. A dozen maps showing the site were included in the Draft RAR, though all but one of these focused on the specific TMK parcels of the site, and the general project location map was at a broad scale. The Final RAR includes a modified Figure 1, showing the project location at a scale that provides additional detail on the surrounding 10 miles or so of the site.
8. One comment had a number of questions regarding how the HEER Office investigation at this site fit into the larger picture of pesticide investigations of former sugar plantation sites, what additional surrounding area investigations might be warranted, and background on soil sampling methods that the HEER Office utilizes for such investigations.	These questions focused on issues outside of the remedy selection for this site, and will be addressed separately in a letter to the requesting party. The questions were forwarded to HEER Office staff in the "Site Discovery" group to help address issues related to investigations of surrounding areas and sugar plantations.

10 REFERENCES

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