

Iwilei Programmatic EHE/EHMP
HDOH Response to Comments
5/24/13

Introduction:

On May 3, 2013 HDOH held an Open House to solicit comments on the Iwilei Programmatic EHE/EHMP. Approximately 25 people attended Open House consisting of consultants, HECO, SHWB and HEER staff.

Comments made during the public meeting of May 3, 2013

Carol Mitsuyasu, IDPP:

Why was outreach for the meeting so limited? How can one be confident in being able to determine what 5000ppm is when doing a field test?

HDOH Response: The document was distributed to consultants, landowners, utilities companies but few responded or attended the Open House. 5000 ppm THP was used as it is considered the level where free product exits in soil. This section was expanded to include use of laboratories and the glove and paper towel test to determine the level of TPH in soil.

How do you determine what 5000ppm smells like?

HDOH Response: Professional judgment can be used to determine hydrocarbon odors

Melissa Shimabukuro, IDPP:

What is the definition of a small project as referred to in the EHMP?

HDOH Response: Sections 1 and 2 have been modified to clarify the projects where the EHE/EHMP applies.

Derek Yasaka, WCP:

What is the legal power of the EHMP? Why isn't it in agreement or signed by property owners/contractors/utility companies?

HDOH Response: HDOH does not have legal powers to enforce the EHE/EHMP. HDOH can refuse to accept work that does not follow the document and could require the work to be performed over again depending on the situation.

Roger Brewer:

What is the IDPP's role in regards to the development of the EHMP?

HDOH Response: HDOH plagiarized the Guidelines section and other pertinent parts from IDPP. IDPP is not responsible for enforcement or use of the document.

Julia Gray, To the Field:

Is it possible to include the one-call center with the document and have the HEER office added to the list of who is notified?

HDOH Response: HDOH is looking into the use of the One Call Center for notification purposes but we are not part of that system yet.

Comments by Linda Grey

1. Comment: Section 1.0 / 2.0: The project for which this EHMP is appropriate is inconsistent in/between these two sections. Section 1.0 indicates the document can be used for work in roadways, while Section 2.0 expands this. Recommend reconciling the information in only one section and providing the whole definition in the first mention of where/when it applies and/or incorporate additional reference to portions of Appendix A, as appropriate.
HDOH Response: Language has been added to both sections clarifying when to use the document.

2. Comment: Section 4.0 / 5.0: These sections use terminology such as “mauka” and “makai.” These terms are readily understood by local contractors and consultants, however if an “out of town” firm is performing work in this area, they may not be familiar with these terms. Consider defining them. Also suggest adding a figure which clearly shows the boundaries of where this EHMP applies in case personnel are not aware of the street layout.
HDOH Response: Mauka and Makai have been clarified and their definitions were added to the list of acronyms.

3. Comment: Section 6.2: The first two paragraphs in this section appear to be the same. Consider revising the information to provide different/more specific information in the second paragraph if that is the intent.
HDOH Response: Redundancy has been removed from text.

4. Comment: Section 9.0: The numbered list is indicated to identify “what is considered a release,” however there are numbered items which are more “who to call.” Suggest separating the two for clarity.
HDOH Response: The numbered bullets that refer to calling have been moved to Section 9.1.

5. Comment: Section 12.3, 3rd paragraph: Suggest adding a phrase indicating that only personnel familiar with cutting fuel lines should cut lines in the area.
HDOH Response: A phrase has been added to this section addressing this concern.

6. Comment: Section 13.1, Stockpile Testing: Is Multi-Incremental sampling required, or are other sampling procedures (e.g. discrete, composite, other) acceptable?
HDOH Response: There were a number of comments addressing this Section. Multi increment samples are required for stockpile testing. Clarification has been added to address the number of samples.

7. Comment: Section 15.1: The COCs listed include TPH-G and BTEX. Are the typical concentrations of these compounds high enough in the free product found onsite that if pads are used to absorb the product the pads may then contain concentrations high enough to require management as hazardous waste? Suggest incorporating language for the management of materials such as used absorbents, used PPE, used plastic sheeting, stormwater control devices, etc. Otherwise, suggest incorporating the management of these materials to the duties of the environmental professional.
HDOH Response: Language has been added on how to deal with PPE, Plastic sheeting and adsorbent booms. If they are left to dry VOCs should not be a hazardous waste issue.
8. Comment: Section 16.0: The section for free product management includes requirements for LEL monitoring; however there does not appear to be similar guidance for LEL in the Vapor Management Plan section. Is the intent to imply that LEL monitoring is only necessary when there is free-product?
HDOH Response: Language has been added that this section stating that it only applies when the soil vapors are below the LEL.
9. Comment: Appendix A, "How to Proceed": Should this information be included in Section 1.0? Provides a nice step-by-step approach that is lacking in Section 1.0 and may be missed this far in to the appendix.
HDOH Response: How to proceed is contained in Section 2.1 How to Use This document.

Comments Submitted by IDPP 5/14/13

IDPP Comment 1: Suggest deleting the reference to an IAP in Section 11 as it appears to be carryover from previous example documents.

HDOH response: Reference to remain as it also applies to IDM.

IDPP Comment 2: Suggest reference to Section 15 Free Product Management Plan in Sections 13 Soil Management Plan and Section 14 Groundwater Management Plan.

HDOH Response: Reference provided.

IDPP Comment 3: Suggest we delete the language where HEER can help identify environmental companies that can provide support services.

HDOH Response: Language is to remain. HEER will provide a range of companies that we feel are qualified. Unfortunately HEER is aware of companies that cannot provide adequate support services.

IDPP Comment 4: The last question on page A-18 implies that all construction workers that may encounter contaminated soil or groundwater have 40 hour HAZWOPER

training. Suggest revising the question to ask the user if they have access to personnel with 24 or 40-hour HAZWOPER training.

HDOH Response: Language to remain. Originally in IDPP Guideline. Contractor will to decide level of training required for the job.

IDPP Comment 5: Area of Applicability: As the Programmatic EHE/EHMP is intended to apply to the Iwilei District mauka of Nimitz Highway, we suggest that HDOH replace Figure 1 in Appendix A with their own figure that also includes the following two changes:

- 1) Clearly show and define the area where this document applies (i.e. highlight parcels mauka of Nimitz Highway with a clear boundary)
- 2) Remove references to IDPP-specific operable unit terms (e.g. Operable Units 2 and 3)

HDOH Response: Figure to be changed as per suggestions.

IDPP Comment 6: Cost Reimbursement: IDPP recommends that any references to cost reimbursement or HDOH's role in assisting with cost reimbursement should not be contained in the Programmatic EHMP. We feel that raising such an issue is inappropriate in a document such as the Programmatic EHMP, and such language may be misinterpreted by the users. Suggest deleting all references to incremental environmental costs (e.g., pages A-14 and A-19).

HDOH Response: Language to remain as the HDOH's next step is to attempt to get responsible parties to reimburse for incremental cost when dealing with contamination in the IDM.

IDPP Comment 7: Roles and Responsibilities: On page A-20, suggest moving reference to "Utility Company responsibilities from the "Landowner" section and adding to the "Construction Contractor" section.

In addition, suggest additional language on page A-20 under the "Landowner" section to address the following:

- 1) To provide proper protection of human health and the environment, evaluate and identify if the historical activities at the site resulted in possible non-petroleum COCs
- 2) If non-petroleum COCs are identified, modify the existing text in the plan templates provided in the document.

HDOH Response: Utilities Companies responsibilities have been included with the Construction Contractor section. The utilities companies and construction contractors are responsible for the protection of human health through their site-specific Health and Safety Plan. Language has been added requiring Landowners to evaluate and identify if the historical activities at the site resulted in possible petroleum and/or non-petroleum COCs. If non petroleum COCs other than debris are identified then an individual EHMP may be required.

IDPP Comment 8: Inactive Pipeline Management:

1. In the area mauka of Nimitz Highway, individual past owners and operators of the pipelines, not only IDPP members, may be more appropriate parties to contacts. Suggest deleting the reference to IDPP for providing assistance (e.g., last bullet in B.4-1).
2. Suggest adding language to step 5 of the form that a vacuum truck should be on stand-by during tapping/draining and cutting. The vacuum truck would be used to collect product in the pipelines.

HDOH response: 1. Reference to IDPP has been deleted.

A bullet has been added requiring the consideration for a vacuum truck to be on standby.

IDPP Comment 9: Soil Management: Suggest adding a statement to Form B.5 step 2, that soil stockpiles must be stored in the project area prior to reuse or disposal.

HDOH response: Agreed- language has been added to that section.

IDPP Comment 10 General Comment on Appendix B reporting Forms: The level of detail in the Appendix B Reporting Forms does not match the text in the corresponding management plans of the main document. Suggest reviewing and revising the main document and/or Appendix B forms as necessary. For example in Section 15.1, Free Product Management recommends use of absorbent materials while the Appendix B form includes use of a vacuum truck, as applicable.

HDOH Response: Reporting forms have been modified to be more inline the appropriate sections of the document.

IDPP Comment 11: Page A-4 includes a disclaimer for the users of the document. Suggest adding disclaimer language to the main text (such as Section 2.1) and each form in Appendix B, as they are intended to be stand alone documents.

HDOH Response: Disclaimer has been added to Section 2.1 but not to each form in Appendix B.

HECO Comments

HECO through David Martin sent extensive editorial and structural comments. The comments were in the form of a track changes style to a PDF and are too numerous to mention. All of HECO's comments were incorporated into the document except for the discussions of chlordane and dioxins. These two contaminants have not been COCs in Iwilei District Mauka other than on the BEI property.