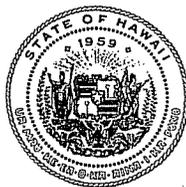


NEIL ABERCROMBIE
GOVERNOR OF HAWAII



LINDA ROSEN, M.D., M.P.H.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. Box 3378
HONOLULU, HAWAII 96801-3378

In reply, please refer to:
File: EHA / HEER Office
2014-189-ES

May 22, 2014

Walter Chun, Ph.D.
1045 Lolena Place
Honolulu, Hawaii 96817

Facility/Site: Military family housing neighborhoods at Marine Corps Base Hawaii

Subject: HDOH response to your 4/16/2014 letter "RE: Dept of Health Approval of Construction on Contaminated Land for the Military Families"

Dear Dr. Chun:

This letter responds to your 4/16/2014 letter regarding the management of pesticide-impacted soils in military family housing neighborhoods at Marine Corps Base Hawaii (MCBH) and other Hawaii military bases.

We understand and share your concern about protecting human health and the environment from pesticide residues in soils treated for termiticidal purposes with organochlorine pesticides such as aldrin, chlordane, and DDT. The continuing presence of organochlorine pesticide residues in residential soils due to historic termiticide use is a long-standing and widespread potential environmental hazard statewide that warrants our attention. Houses built before 1988 throughout our islands are all potentially affected. The primary human health concern posed by these pesticide-impacted soils (PI soils) arises when old buildings are demolished and PI soils which were previously beneath or adjacent to foundations are exposed by excavation or grading activities. PI soils pose health risks to families and children when they end up in play areas, yards, and gardens, where children may inadvertently swallow soil particles.

We agree that the use of proper soil management procedures before, during, and after construction activities that could disturb buried PI soils is a critical element in controlling potential public exposure to these contaminated soils. To this end, Ohana Military Communities (OMC), the DoD privatized housing provider for Navy and Marine Corps military family housing in Hawaii, prepared a *Pesticide Soils Management Plan* for use in OMC housing neighborhoods. This *Plan* describes OMC's programmatic approaches for identifying PI soils prior to demolition or excavation activities on a neighborhood-by-neighborhood basis and then taking appropriate

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steps to remove and isolate these PI soils to ensure that future residents could safely enjoy their homes and yards. On 3/23/2007, we approved OMC's *Pesticide Soils Management Plan* for implementation (see attached letter). However, until April of this year, we had not received any follow-up information or data regarding OMC's implementation of their *Plan*.

In other parts of the State, we have worked with other DoD privatized housing providers to develop procedures for the proper management of PI soils in their housing neighborhoods, to ensure that their procedures are properly implemented, and to identify and correct instances where improper PI soil management has occurred such as the case you referred to involving Hickam Communities. Prompted in part by health concerns raised by you and others at MCBH, on 3/21/2014 we issued Requests for Information to OMC, the Navy, and the Marine Corps, requesting all available existing data regarding PI soil management activities at MCBH.

On 4/21/2014 we received OMC's response, dated 4/17/2014. OMC's response consisted of approximately 88 documents, 30 of which are related to OMC MCBH neighborhoods and the rest of which are related to other OMC Navy or Marine Corps neighborhoods (see attached list of MCBH-related documents). We are currently in the process of reviewing these reports as part of our overall evaluation of the effectiveness of OMC's implementation of its *Pesticide Soils Management Plan*.

You continue to express great concern about the safety of the site-specific alternative environmental action levels (EALs) that HDOH has approved for organochlorine pesticides in PI soils in military family housing neighborhoods at MCBH and other Hawai'i military bases. As we have stated in our responses to your previous letters, these site-specific alternative EALs are protective of human health and the environment. In fact, OMC's site-specific alternative EALs, which we approved in 2007 as part of OMC's *Pesticide Soils Management Plan*, are lower (more stringent) than the current default statewide Tier 1 EALs which we established in 2011. We strongly disagree with your claim that the site-specific alternative EALs for military family housing neighborhoods are inadequate and not protective of human health and the environment. This basic disagreement appears to be the core issue from which most of the other concerns listed in your letter flow.

Our Human Health toxicologist has also received a number of phone calls and health complaints from concerned MCBH residents. Multiple complaints are related to mold and mildew issues and a few raise concerns about potential pesticide exposures. To date, we have no evidence that residual pesticides are present in surface soils at unacceptable levels anywhere in MCBH housing neighborhoods. However, we are carefully reviewing the multiple reports recently submitted by OMC to understand which MCBH neighborhoods have had historic use of

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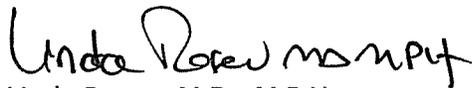
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termiticides; where demolition and construction activities have taken place; and what measures OMC has implemented to ensure compliance with its *Pesticide Soils Management Plan* and ensure that PI soils that have been interred and capped remain safely isolated and protective. As a part of our review, we will identify any questions we have and determine whether more information is needed to establish whether there are any current exposures to PI soils at MCBH, and we will follow up accordingly.

Thank you for your concern. Should you have further questions about site-specific issues at Marine Corps Base Hawai'i, please contact Mr. Eric Sadoyama of HDOH's Office of Hazard Evaluation and Emergency Response at eric.sadoyama@doh.hawaii.gov or (808) 586-0955.

Sincerely,



Linda Rosen, M.D., M.P.H.

Director of Health

Attachments:

1. 3/5/2014 letter from Walter Chun to HDOH
2. 3/28/2014 letter from HDOH to Walter Chun
3. 3/23/2007 letter from HDOH to Parsons (consultant for Ohana Military Communities), approving *Pesticide Soils Management Plan* (February 2007)
4. List of MCBH documents received 4/21/2014 from Ohana Military Communities