



June 20, 2014

Ms. Fenix Grange
State of Hawaii Department of Health
Hazard Evaluation and Emergency Response Office
Site Discovery, Assessment, and Remediation
919 Ala Moana Boulevard, Suite 206
Honolulu, Hawaii 96814

Project No. 17014-014052.00

Subject: Transmittal of Reports for the 92-Acre Kihei Residential Development Located at Tax Map Key (TMK) Numbers [2] 3-8-004: Parcel 030, Parcel 002 [Portion], and Parcel 022 [Portion], Kihei, Maui, Hawaii

Dear Ms. Grange:

On behalf of our client, A&B Properties, Inc., we are enclosing copies of each of the following documents:

- "Phase I Environmental Site Assessment, Approximately 92-Acre Undeveloped Property, (TMK Numbers: [2] 3-8-004: Parcel 030, Parcel 002 [Portion], and Parcel 022 [Portion]), Kihei, Maui, Hawaii," May 14, 2014
- "Phase II Site Investigation Approximately 92-Acre Undeveloped Property, (TMK Numbers: [2] 3-8-004: Parcel 030, Parcel 002 [Portion], and Parcel 022 [Portion]), Kihei, Maui, Hawaii," dated June 20, 2014

We have also enclosed a Compact Disk (CD), which contains a PDF-formatted copy of each of the reports.

The reports concern an approximately 92-acre property, which was formerly used for agricultural cultivation (primarily for sugarcane and seed corn) and is planned for redevelopment as residential and commercial property. For this project, a "neighborhood scale" investigation was deemed appropriate due to the relatively small size of the planned development and the anticipated low heterogeneity of contaminants, if present. Fifteen Decision Units (DUs) that ranged from 3 to 9 acres in size were established at the site and 15 multi-increment soil samples (plus four replicates) were collected for analytical testing.

Analytical testing reported that no detectable concentrations of contaminants were present or that concentrations were well below the State of Hawaii Department of Health (HDOH) Tier 1 Environmental Action Levels (EALs).

All metals were either not detected or were below natural background levels in every sample. Organophosphate pesticides were not detected in any sample. With the exception of 4,4'-DDE, chlordane, and heptachlor epoxide, organochlorine pesticides were not detected in any sample. Consistent with HDOH guidance, each of these contaminants that was either not detected or, for metals, that was not detected above known or assumed natural background levels, can be eliminated as a contaminant of potential concern (COPC) and no further investigation for these chemicals is warranted.



Ms. Fenix Grange
State of Hawaii Department of Health
Hazard Evaluation and Emergency Response Office
June 20, 2014

Page 2
Project No. 17014-014052.00

For chlordane, the Tier 1 EAL is 1,000 times the highest concentration detected in any MIS sample, and for 4,4'-DDE the Tier 1 EAL is 400 times the highest concentration detected in any sample, meaning that for each decision unit neither compound could be present in any one of the 100 sample increments at a concentration approaching the Tier 1 EAL. On this basis, further investigation for either of these contaminants is also unwarranted.

The lone remaining COPC at this property, heptachlor epoxide, was detected in samples from seven of the 15 decision units, at levels ranging from two to eleven percent of the Tier 1 EAL. While it is therefore theoretically possible that further investigation on the scale of individual lots could result in detections of this contaminant at levels in excess of the Tier 1 EAL, Bureau Veritas believes this to be highly unlikely. Since all of the decision units in which heptachlor epoxide was detected were formerly planted in sugarcane (including at least four decision units where no other crops are known to have been grown), this contaminant is most likely related to past sugarcane cultivation on the property. Heptachlor use on sugarcane in Hawaii was limited to the control of ants in irrigation drip tubing, and applications were made directly to the drip tubing via the irrigation water. This would have contributed to extremely uniform applications across the treated areas, resulting in very limited potential for localized non-heterogeneities. Additionally, the use of heptachlor by the sugar industry ended in 1985, and the former sugarcane fields within the project area were first converted to drip irrigation in approximately 1979 (prior to that, furrow irrigation was used and ant control would not have been an issue). Therefore, the use of heptachlor in these fields would have been limited to a period of no more than five to six years. Based on these factors, the low concentrations of heptachlor epoxide detected, and the relative consistency of measured concentrations across all decision units where it was detected (ranging from an estimated concentration of 0.0011 mg/kg – below the reporting limit of 0.0025 mg/kg – to 0.0059 mg/kg), additional testing of individual lots for this contaminant appears unwarranted.

Bureau Veritas believes that the results of this investigation strongly support a conclusion that the surface soils of the site have not been significantly impacted by historical agricultural land uses and that the site is suitable for unrestricted land use. Once the Hazard Evaluation and Emergency Response Office has reviewed the enclosed documents, we request your concurrence that no action is necessary to address pesticide residues present in the project area prior to converting it to residential use.

Thank you for your attention to this request. If you have any questions or need additional information, please call our office at (808) 531-6708.

Sincerely,

John P. Rau, P.G.
Senior Geologist/Manager
Health, Safety, and Environmental Services

Enclosures

cc: Sean O'Keefe, Director, Environmental Affairs, Alexander and Baldwin, Inc.