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Hawaii Congressional Delegation:

Senator Daniel Inouye
Senator Akaka
Congressman Neil Abercrombie
Congresswoman Mazie Hirono

RE: Intentional Contamination of Residential Sites at Kaneohe Military Base

To the Hawaii Congressional Delegation;

I am writing today because of the on-going concerns we have with the contamination and cleanup of our islands. The contamination of our land includes the exposure of infants, toddlers and young children of enlisted Marines to Group 2B carcinogens. This carcinogen is chlordane, heptachlor and heptachlor epoxide from a termite treatment used prior to 1988. EPA banned the use of chlordane in 1988 because of the toxicity. The International Agency for Research on Cancer (IARC) classifies chlordane and heptachlor as Group 2B carcinogens.¹

The Resident Officer in Charge of Construction (ROICC) issued directives in 2005 and 2006 to a contractor constructing 212 residential units at Kaneohe Military Base (KMB) to spread contaminated topsoil throughout the residential project, about 48 acres, and plant the landscaping. As of March 2007 this work has been completed and enlisted Marine families are living in the residential units. The contaminated topsoil remained in place and the grass and landscaping was installed. The ROICC could have followed the State of Hawaii Dept of Health protocol to excavate and cover the contaminated areas with at least 18" of clean soils to seal in the contaminant, but chose not to do so. In similar construction projects the Navy removed the contaminant and covered the area with clean topsoil.

The Navy alleges that they conducted a risk assessment and determined that the exposure is minimal due to the length of time the enlisted marine families reside in these units. The risk assessment is seriously deficient, and at the very least does not address exposure of Group 2B carcinogens to infants and toddlers. The conscious disregard of their duty to provide safe housing for the marine families and to prevent the contamination of our environment is inexcusable.

¹ Volume 53; Occupational Exposure in Insecticide Application, and Some Pesticides; International Agency for Research on Cancer (IARC); last updated November 1997.


A complaint was filed in April 2006 with the EPA hotline and the Navy Inspector General hotline because it was unclear as to who had jurisdiction. Neither agency took any action.

Chlordane, heptachlor and heptachlor epoxide is not new to Hawaii. In the 1980's we saw the contaminant in our milk on our grocery shelves when contaminated pineapple toppings were fed to the cows. Testing revealed the contaminant in breast milk. This incident clearly proved the path from the ground to human exposure.

The two primary issues are the intentional spreading of contaminated topsoil that will result in exposures to infants, toddlers and young children; and the contamination of our lands. The contaminated topsoil will ultimately work its way to the ocean and we will find the contamination in our ocean floors and marine life. The attached complaint also provides a map that shows the extent of the exposed contaminated areas throughout the project. There is no excuse for the intentional contamination of the residential area and subsequent exposure of a Group 2B carcinogen to infants, toddlers and young children.

Finally, we continue to find contaminants in our ocean, land and air from the military operations in Hawaii. It is irresponsible and intolerable to accept the intentional contamination of any of the precious lands in our islands. We note that there are several other housing projects being developed by the military or through the privatization process and wonder if the spreading of contaminants are continuing throughout the island. Please help to investigate and take actions to correct this travesty.

Please let me know if I can provide any other information or if I can provide any other assistance.

Thank You,


Walter Chun, PhD, CSP, CHST

Attachment A Map of Contaminated Residential Project at Kaneohe Military Base

CC: Marine Commandant Kaneohe Military Base
ROICC, Kaneohe Military Base

ATTACHMENT A

MAP OF CONTAMINATED RESIDENTIAL PROJECT AT KANEOHE MILITARY BASE

