

BENJAMIN J. CAYETANO
GOVERNOR OF HAWAII



BRUCE S. ANDERSON, Ph.D., M.P.H.
DIRECTOR OF HEALTH

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

In reply, please refer to:
File:

August 16, 2000

92-346I/epo

Mr. Charles Honma
Project Manager
Halekua Development Corp.
2024 N. King Street
Honolulu, Hawaii 96813

Dear Mr. Honma:

Subject: Halekua Development Corporation; Royal Kunia Phase II
Project; Sixth Annual Progress Report to State Land
Use Commission; Docket No. A92-683

Thank you for allowing the Department of Health (DOH) to review
and comment on the subject report. We have the following
comments to offer:

Condition No. 5: Petitioner shall cooperate with the DOH and
the City and County of Honolulu Department of Public Works to
conform to the program goals and objectives of the Integrated
Solid Waste Management Act, Chapter 342G, Hawaii Revised
Statutes, in accordance with a schedule satisfactory to the DOH
and the City and County of Honolulu.

The Petitioner will comply with this condition as development
progresses.

DOH Comment

No representative of the Petitioner has yet contacted our
Office of Solid Waste Management, and this should be done
as soon as possible.

Condition No. 11: Petitioner shall coordinate with the DOH and
the City and County of Honolulu to establish appropriate
systems to contain spills and prevent materials, such as
petroleum products, chemicals, solvents or other pollutants
from leaching into the storm drainage system and adversely
affecting the groundwater and coastal waters.

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LAND USE COMMISSION
STATE OF HAWAII

The Petitioner will comply with this condition as development progresses.

DOH Comment

No representative of the Petitioner has yet contacted our Hazard Evaluation and Emergency Response (HEER) Office or our Clean Water Branch regarding this condition.

Condition No. 12: Petitioner shall participate in the funding and construction of adequate wastewater treatment, transmission and disposal facilities, on a pro-rata basis, as determined by the DOH and the City and County Department of Public Works.

The Petitioner will comply with this condition as development progresses.

DOH Comment

No representative of the Petitioner has yet contacted our Wastewater Branch regarding this condition.

We would also like to review a timetable and financial commitment to construct the necessary wastewater treatment and disposal system, if possible.

Should you have any questions, please contact the Planning/Design Section of the Wastewater Branch at telephone (808) 586-4294.

Condition No. 13: Petitioner shall implement effective soil erosion and dust control measures both during and after construction to the satisfaction of the DOH.

The Petitioner will comply with this condition as development progresses.

DOH Comments

1. So far, no soil erosion problems have come to the attention of the DOH.
2. Control of Fugitive Dust:

The Clean Air Branch has continued to receive dust complaints stemming from the project since the submittal of comments for the Fifth Annual Progress Report. Due to the nature of the project, there is a significant potential for fugitive dust to be generated during the removal of debris and during the grading, trenching, and

construction activities that would impact nearby residential, business, and thoroughfares. It is suggested that a dust control management plan be developed and modified, if necessary, which identifies and addresses activities that have a significant potential for fugitive dust to be generated. Implementation of adequate dust control measures during all phases of the project is warranted.

Construction activities must comply with provisions of Chapter 11-60.1, Hawaii Administrative Rules, "Air Pollution Control," section 11-60.1-33 on Fugitive Dust. The contractor should provide adequate measures to control dust from road areas and during the various phases of construction activities. These measures include, but are not limited to:

- a. planning the different phases of construction, focusing on minimizing the amount of dust-generating materials and activities, centralizing material transfer points and on-site vehicular traffic routes, and locating potentially dusty equipment in areas of the least impact;
- b. providing an adequate water source at the site prior to start-up of construction activities;
- c. landscaping and rapid covering of bare areas, including slopes, starting from the initial grading phase;
- d. controlling of dust from shoulders, project entrances, and access roads; and
- e. providing adequate dust control measures during weekends, after hours, and prior to daily start-up of construction activities.

If there are any questions on the control of fugitive dust, please contact Mr. Ronald Ho of the Clean Air Branch at 586-4200.

Condition No. 14: Petitioner shall participate in an air quality monitoring program as specified by the DOH.

The Petitioner will comply with this condition as development progresses.

DOH comment

The DOH does not routinely require air quality monitoring unless the proposed action or development has the potential of resulting in significant emissions from a stationary source, from construction activity, or indirectly from the entire development.

In this case, because of the air quality impact, an air quality analysis should be performed on the proposed land use activities to assess the impact that the direct and indirect air emissions may have on the ambient air. Before proceeding with the air quality impact analysis, the Petitioner should submit to the DOH a protocol on the methodology, the area of study, the modeling approach, the assumptions, and the emissions data to be used in the analysis.

As of this date the Petitioner has not contacted our Clean Air Branch in regards to this condition.

If there are any questions on air quality matters, please contact Ms. Lisa Young of the Clean Air Branch at 586-4200.

If you should have any general questions regarding this response, please call Mr. Arthur Bauckham of the Environmental Planning Office at 586-4337.

Sincerely,



GARY GILL
Deputy Director
Environmental Health Administration

- c: Clean Air Branch
Clean Water Branch
Hazardous Waste Branch
Hazard Evaluation & Emergency
Response Branch
Office of Solid Waste Management
Safe Drinking Water Branch
Wastewater Branch
State Land Use Commission