

DAVID Y. IGE
GOVERNOR OF HAWAII



BRUCE S. ANDERSON, Ph.D.
DIRECTOR OF HEALTH

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

In reply, please refer to:
File: SDWB
Fronda01.docx

March 28, 2019

Mr. R. Kalani Fronda
Senior Land Assets Manager, CCIM
Kamehameha Schools
567 South King Street, Suite 200
Honolulu, Hawaii 96813
[via kafronda@ksbe.edu only]

Dear Mr. Fronda:

SUBJECT: KAMEHAMEHA SCHOOLS WAIAWA PROPERTY
CLEARWAY ENERGY GROUP LLC
LAND USE COMMISSION CONDITION DOCKET NO. A87-610
TMKS: (1) 9-4-006: 034, 035, 036, & 037; (1) 9-6-004: 024, 025, & 026;
AND (1) 9-6-005: 003
WAIAWA, WAIPIO, EWA, O'AHU, HAWAII

The Department of Health (DOH), Environmental Management Division (EMD) and Hazard Evaluation and Emergency Response (HEER) Office have reviewed the March 20, 2019 Kamehameha Schools (KS) letter which included the May 16, 2014 DOH-EMD letter commenting on the April 9, 2014 KS letter, Solar farm site plan, and technical information.

Based on the reviews by the EMD Branches and HEER Office and the understanding that Clearway will comply with all applicable regulations, the proposed solar farm should have minimal or no impact on ground water. The operation and construction of the proposed solar farm is acceptable to the DOH-EMD and HEER Office, subject to the standard conditions for each program (available online) and specific conditions as listed below and as identified for the solar farm construction and/or operation.

Safe Drinking Water Branch (SDWB)

SDWB reviewed the materials provided by Clearway and saw no increased contamination risk relative to currently zoned use. However, the proposed project is over the zone of contribution to a drinking water source that draws water from an infiltration gallery excavated along the water table. This type of drinking water source is more susceptible to contamination than traditional wells. Clearway shall install and operate the proposed solar farm within the Waiawa Shaft zone of contribution with

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sufficient mitigation measures that will prevent the introduction of contamination to the source water shaft. Clearway shall obtain approval of the proposed contamination mitigation measures from the owner of the Waiawa Shaft and continue consultation with the SDWB.

Clean Water Branch (CWB)

Clearway shall obtain the necessary National Pollutant Discharge Elimination System (NPDES) permits for potential discharges of pollutants due to construction activities and Section 401 Water Quality Certifications (WQC), as applicable, during the construction of the proposed solar farm.

Wastewater Branch (WWB)

The WWB has no objection to the construction and operation of the proposed solar farm.

Clean Air Branch (CAB)

Please see the CAB standard comments for land use reviews at:

<https://health.hawaii.gov/cab/files/2018/12/Standard-Comments-Clean-Air-Branch-2018-c.pdf>.

While the comments provide guidance, it is the responsibility of the contractor to comply with all air regulations for the duration of the construction and operation of the solar farm.

Solid and Hazardous Waste Branch (SHWB)

Clearway shall properly manage the wastes from the construction and operation of the solar farm.

Hazard Evaluation & Emergency Response (HEER) Office

The Clearway solar farm facility may be subject to Tier II reporting and therefore may need an emergency response plan. Please contact Ms. Liz Galvez of the HEER Office at 586-4249 for more information.

If there are any questions, please call Ms. Joanna L. Seto, P.E., SDWB Chief, at 586-4258.

Sincerely,



KEITH E. KAWAOKA, D.Env.
Deputy Director for Environmental Health

JS:mc

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- c: Mr. Larry Sumida, KS [via lsumida@ksbe.edu only]
- Ms. Michelle Swartman, KS [via miswartm@ksbe.edu only]
- Ms. Nicola Park, Clearway Energy Group LLC [via Nicola.Park@clearwayenergy.com only]
- Ms. Naomi Kuwaye, Esq., Ashford & Wriston [via nkuwaye@awlaw.com only]
- Ms. Jennifer A. Lim, Esq., Carlsmith Ball LLP [via jlim@carlsmith.com only]
- CAB [via Cab.General@doh.hawaii.gov only]
- CWB [via cleanwaterbranch@doh.hawaii.gov only]
- SHWB [via lene.ichinotsubo@doh.hawaii.gov only]
- WWB [via DOH.wwb@doh.hawaii.gov only]
- HEER Office [via MaeRose.Bento@doh.hawaii.gov only]