

DAVID Y. IGE  
GOVERNOR OF HAWAII



ELIZABETH A. CHAR, M.D.  
DIRECTOR OF HEALTH

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

In reply, please refer  
to:

LUD – 2 4 9 002 061 etc Pulama Lanai  
Island of Lanai ID 5806

September 29, 2021

Ms. Mary Alice Evans, Director  
Office of Planning and Sustainable Development  
235 South Beretania Street 6<sup>th</sup> Floor  
Honolulu, Hawaii 96813

Attention: Mr. Aaron H. Setogawa  
Email: [aaron.h.setogawa@hawaii.gov](mailto:aaron.h.setogawa@hawaii.gov)



Dear Ms. Evans:

Subject: A21-810 State Land Use DBA, Approximately 56 Acres at Lanai City  
Island of Lanai, County of Maui (Hokuao 201H Housing Project)  
TMK (2) 4-9-002: 061 (portion), (2) 4-9-014: 001 (portion), (2) 4-9-014:009 (portion)

Thank you for allowing the Department of Health, Wastewater Branch (DOH-WWB) the opportunity to provide comments for the subject land use project.

The Lanai Wastewater Reclamation Facility (WWRF) which is planned to serve the proposed project is presently under an Informal Notice of Violation (INOV) from our office for effluent exceedances at the facility. Our operation and maintenance (O&M) inspection in 2018 found that Lanai WWRF exceeded the effluent limits for biochemical oxygen demand and suspended solids on numerous occasions. In addition, our review of the submitted effluent lab reports showed that the exceedance violations have not been corrected since 2018. The County of Maui (County) has developed and is implementing a corrective action plan with short-term and long-term solutions toward mitigating the effluent violations. However, the schedule provided by the County to design, construct, and complete their long-term solution for the effluent exceedances is expected to be completed at the end of 2023. Please note that the DOH-WWB will not be able to offer our concurrence with the subject project until the effluent violations at the Lanai WWRF are satisfactorily addressed.

Furthermore, it should be noted that our records indicate that the existing Lanai WWRF design capacity is 0.54 million gallons per day (mgd). The proposed project assessment indicated that the present influent flow to the Lanai WWRF is 0.315 mgd and the proposed anticipated additional flows associated with the project would result with a total influent average daily flow of 0.465 mgd at the Lanai WWRF. Therefore, pursuant to Hawaii Administrative Rules (HAR), Section 11-62-23.1(i) a facility plan would need to be initiated when the actual wastewater flow reaches 75% of the design capacity, and the plan would need to be implemented when the actual wastewater flow reaches 90% of the design capacity of the wastewater facility.

Please be informed that the proposed wastewater systems for the development may have to include design considerations to address any effects associated with the construction of and/or discharges

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from the wastewater systems to any public trust, Native Hawaiian resources or the exercise of traditional cultural practices. In addition, all wastewater plans must conform to applicable provisions of the HAR, Chapter 11-62, "Wastewater Systems" and the Department of Health's "Reuse Guidelines" Volumes 1 and 2, 2016.

Should you have any questions, please call Mr. Mark Tomomitsu of my staff at (808) 586-4294.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sina Pruder".

SINA PRUDER, P.E., CHIEF  
Wastewater Branch

LM/MST:lmj

c: Mr. Roland Tejano, DOH-WWB, Maui  
Ms. Sue Liu, DOH-WWB