



REGION 9

SAN FRANCISCO, CA 94105

September 27, 2024

Sent Via Electronic Mail

Brenda D. Iokepa-Moses, Deputy Director
County of Hawai'i
Department of Environmental Management
345 Kekūanāo'a Street, Suite 41
Hilo, HI 96720
Brenda.Iokepa-Moses@hawaiiicounty.gov

**Re: Revised Administrative Order on Consent
EPA Docket No. SDWA-UIC-AOC-09-2017-0002
Pāhala and Nā'ālehu Large Capacity Cesspool Closure Projects
Approval of Pāhala Environmental Information Document**

Dear Deputy Director Iokepa-Moses:

On June 19, 2024, in accordance with Paragraph 32.c of the above-referenced Administrative Order on Consent (Consent Order), the County of Hawai'i (the County) submitted its Pāhala Environmental Information Document (the EID) for the United States Environmental Protection Agency's (EPA) review and approval. The EID, which was prepared for the County by Wilson Okamoto, details the environmental review of the feasible options identified in the County's Feasibility Evaluation Report.¹

To fulfill the conditions of Paragraph 32.c of the Consent Order, the County was required to conduct its environmental review in a manner that was consistent with the requirements of the National Environmental Policy Act, 42 U.S.C. § 4321 et seq., and document the review in an EID that addresses the following nine components: i) a description of the purpose and need for the project; ii) identification of the preferred project and funding status; iii) description of the affected environment, including baseline conditions that may be impacted by the proposed project; iv) analysis comparing the feasible project options and the no action alternative; v) assess and describe the environmental impacts and mitigation measures for each feasible project option; vi) a description of consultation activities and coordination with state and federal agencies; vii) a description of public engagement in preparation of the EID; viii) a list of preparers; and ix) a list of references.

¹ EPA approved the County's Feasibility Evaluation Report on November 07, 2022.

Based on EPA's review of the document, EPA has determined that the EID fulfills the requirements of Paragraph 32.c. EPA therefore approves the County to use the information presented in the EID to develop and implement its plan for the Pāhala Community Cesspool Closure Project.

Pursuant to Paragraph 33.a of the Consent Order, the County's Implementation Plan must be prepared by a licensed professional engineer and include a schedule and completion dates for each step required to implement the County's selected alternative of a package plant with new collection system, provide wastewater services for 174 properties, and close the Pāhala Community Cesspools by no later than January 22, 2027. The Pāhala Implementation Plan is due within **30-days** of receipt of this letter.

Please note that as the County moves forward with developing its implementation plan for the Pāhala Community Cesspool Closure Project, EPA identified a few sections in the EID that the County should further evaluate in order to successfully implement its plan. A list of key factors for the County to consider while it develops the Pāhala Implementation Plan is included in Attachment A.

EPA appreciates the effort the County is putting forth to address its unique challenges concerning wastewater management and looks forward to continuing working together to ensure the successful implementation of the Pāhala Community Cesspool Closure Project. If you have any questions about this letter, please feel free to have your staff contact Jelani Shareem at (415) 972-3095 or via email at shareem.jelani@epa.gov. Legal questions should be addressed to Kimberly Wells at (415) 972-3056 or wells.kimberly@epa.gov.

Sincerely,

Roberto Rodriguez, Assistant Director
Enforcement and Compliance Assurance Division

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