

Attachment A

Key matters identified in the Pāhala EID that the County of Hawai'i should consider while it develops its Pāhala Implementation Plan.

Identification of Preferred Project and Funding Status

While the EID provides sufficient reasoning for the selection of the preferred alternative when evaluated for Regulatory Compliance, Community Factors, and Environmental Risks, the EID did not provide a comprehensive summary for project Costs. During EPA's review of the funding status section, EPA noticed that the County did not include any additional information on how it plans to account for the operation and maintenance costs that are not typically covered by the Clean Water State Revolving Fund. The County will need a plan to fund operation and maintenance in order to successfully implement the Pāhala Large Capacity Cesspool Closure Project.

To properly plan for operation and maintenance, the County should conduct a more thorough staffing assessment to ensure that they are able to retain qualified operators.

Additionally, when developing its plan to fund operation and maintenance, the County should consider whether its customer base will be able to pay a full sewer service fee and develop an appropriate service rate structure.

Analysis Comparing the Feasible Project Options and the No Action Alternative

While the EID adequately addresses many of the environmental impact categories that were examined, EPA noticed that a few categories were missing relevant information for potential impacts that are associated with operating and maintaining the package plant and new collection system. The following provides additional information that that County should consider for potential environmental impacts.

- **5.10 Energy and Natural Resources:** The County should estimate power usage, the reliability of the local grid for primary power, and if the current grid will be able to accommodate the additional electricity demand for the package plant. If the County will need to store oil on-site for additional power or for back-up power, the County must develop and implement a Spill Prevention, Control, and Countermeasure Plan to avoid adverse impacts to the local environment.
- **5.12 Roadways and Traffic:** The County should plan for the sustained increase in heavy vehicle traffic due to hauling waste solids from the package plant and vacuum trucks for pumping the collection system.
- **5.13 Hazardous Materials:** The County should consider the types, quantity, and availability of hazardous chemicals likely needed for proper operation of the package

plant, including polymers, hypochlorite, acid for cleaning, and fuel storage. The County will need to implement measures to prevent the accidental release of hazardous materials to the environment. The County should also plan for sourcing, transportation, and proper disposal of materials, including materials that cannot be landfilled locally.