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cc: "whamada@honolulu.gov"; "JWhelan1@wm.com"; Kurano, Matthew;
Tsuji, Michael; Wong, Alec Y; Gill, Gary L.; Ichinotsubo, Lene K; Chang, Steven Y;
Yamada, Stuart H;
Subject: Contingency Plan for Discharge from Waimanalo Gulch Sanitary Landfill (HIR50A533)
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**Subject: Contingency Plan for Discharge of Contaminated Storm Water
from Waimanalo Gulch Sanitary Landfill, Kapolei, Island of Oahu, Hawaii
NGPC File No. HI R50A533**

Dear Mr. Steinberger,

Thank you for speaking with the Department of Health (DOH), Environmental Management Division (EMD), Solid and Hazardous Waste Branch (SHWB) and Clean Water Branch (CWB) on January 10 and 11, 2011. We'd like to take this opportunity to reiterate the main points of the conversations.

1. Regarding the potential need to discharge contaminated storm water from the E6 cell and/or the sedimentation basin in the event of another rain event which inundates the cell with contaminated storm water:

If the CCH and Waste Management makes the decision that contaminated storm water MUST be discharged from the E6 cell, the decision will be considered a "business decision" by the responsible persons. In preparation for the potential discharge of contaminated storm water, please submit a Contingency Plan which, at a minimum, includes the following elements:

- a. Notification to Michael (Mike) Tsuji of DOH-CWB at 586-4309 (during work hours) or [REDACTED] (after work hours) or via email to michael.tsuji@doh.hawaii.gov before any unpermitted discharge so a coordinated effort can be made to manage the event by CCH and Waste Management.
- b. Notification to the public of the discharge of potentially contaminated storm water via a press release.
- c. Posting of "contaminated water" signs in the vicinity of the discharge to State waters.
- d. As the facility will still be subject to Hawaii and Federal Water Pollution rules and regulations and should make every good faith effort to mitigate any potential human or environmental harm potentially associated with the unpermitted discharge.

Efforts should be made to monitor discharge and receiving water to insure human

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and environmental health. The monitoring plan should take into consideration the standard leachate sampling parameters as detailed in the facility's quarterly monitoring report, as well as the Waianae WWTP's Effluent Limitations and Monitoring Requirements in Part A, including whole effluent toxicity tests (NPDES Permit No. HI 0020109, issued March 19, 2004 - attached).

Please be aware that under typical conditions, the contaminated storm water can only be treated for disposal at a secondary wastewater treatment plant (i.e., Waianae WWTP or Kailua Regional WWTP).

2. Regarding the landfill's need to continue receiving solid waste.

The DOH-SHWB will acknowledge Waste Management's informal request to start operating in the upper E6 cell area. That opening of the upper E6 area should allow for an additional six (6) weeks of operational capacity. During the next 4-6 weeks, it is expected that the landfill will continue to reduce the contaminated storm water currently impounded on the E6 cell through its leachate handling protocols. The following points are for your consideration:

- a. The CCH and Waste Management estimate that approximately 240,000 gallons of the impounded storm water can be hauled from the landfill to the Waianae and/or Kailua Regional WWTPs per day.
- b. DOH-SHWB understands that you have completed an engineering assessment on a portion of Cell E-6 in response to the flooding and plan to utilize this portion of E-6 as soon as tomorrow.
- c. Barring an unforeseen event, the landfill should have adequate space to continue operating while addressing the impounded water in the E6 cell.
- d. The landfill needs to take actions to prevent run-on from filling the E6 cell. That means keeping the 36" storm drain line located above the E6 cell open and free from becoming impacted. The DOH recognizes that the current design on the 36" storm drain line has become unviable during the previous two (2) rain events and has serious concerns that it will plug again exacerbating the problem.
- e. The western drainage system will take about two (2) more weeks of construction to prevent hillside runoff into the E6 cell.
- f. The landfill is prohibited from bulk liquid disposal by State and federal regulations.

3. The Deputy Director has requested that the DOH-CWB, CCH, and Waste Management coordinate a response to any potential event which may jeopardize human/environmental health associated with the current landfill situation. DOH offers its assistance for any public safety type responses (e.g., posting signs, notifying the public), or coordination efforts.

We are anxious to see your contingency plans for rerouting storm water run-on from the mauka lands away or around the landfill to avoid interfering with landfill operation and introducing contaminants into the storm water.

Please call or email if you have any questions.

Thank you,
Joanna

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