

LINDA LINGLE
GOVERNOR OF HAWAII



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

*Copies to Cor
Carric, Gary
Maile & Paul*
CHIYOME L. FUKINO, M.D.
DIRECTOR OF HEALTH

In reply, please refer to:
EMD/SHWB

October 25, 2006

S10480JR

Mr. Paul Burns, Vice President/General Manager
Waste Management of Hawaii, Inc.
92-460 Farrington Highway
Kapolei, Hawaii 96707

WARNING LETTER

The Honorable Eric Takamura, Director
Department of Environmental Services
City and County of Honolulu
1000 Uluohia Street
Kapolei, Hawaii 96707

06 NOV -2 P 2:52

DEPARTMENT OF
ENVIRONMENTAL SVCS

Dear Messrs. Burns and Takamura:

SUBJECT: Inspections at Waimanalo Gulch Sanitary Landfill
Solid Waste Management Permit No. LF-0054-02
Kapolei, Oahu

On August 2, 2006 and September 29, 2006, representatives of the Hawaii Department of Health (DOH), Solid Waste Section (SWS) conducted inspections at Waimanalo Gulch Sanitary Landfill in accordance with Hawaii Revised Statutes (HRS) Section 342H-6. The purpose of the inspections were to observe the conditions of the facility during H-Power annual maintenance and diversion of MSW to the landfill and to determine compliance with HRS Chapter 342H, Hawaii Administrative Rules, Section 11-58.1-15, and the subject Solid Waste Management Permit. A copy of the inspection reports along with photographs are enclosed for your review. The reports describe the conditions at the facility at the time of the inspection, potential violations, and areas of concern.

During the inspections, Ms. Susan Pankenier, Environmental Protection Manager for Waste Management of Hawaii, Inc. (WMH), accompanied the inspectors and provided documents related to the operation of the landfill. Additional information was requested by phone based on logs provided and the information was later faxed to SWS.

The inspection identified new and continuing potential violations and concerns that identified during the recent inspections:

The following are potential violations identified during the recent inspections:

1. The facility stored wet weather construction material for MSW cells on ash monofill Cell 4, in violation of Special Condition IIIB, Item 5.

EXHIBIT K101

Mr. Paul Burns
The Honorable Eric Takamura
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2. The facility continues to violate Special conditions III, Item 9 by exceeding permit grades on the placement of ash and MSW. While WMH and the City and County of Honolulu (City) submitted an application to modify its permit grades after the fact, the application remains incomplete.
3. MSW Cell 4B sump remains inaccessible and thus leachate monitoring has not been conducted, in violation of Special Condition III, Item 6 and General Conditions I, Items 9b and 9c. We completed our review of your *Response to March 29, 2006 Letter, Municipal Solid Waste Cell 4B Leachate Sump Riser Replacement*, dated July 24, 2006 and will respond in a separate letter. We understand that the earliest drilling may occur is January 2007.
4. Portions of Ash Cell 6 requires intermediate cover. Based on the growth of vegetation in this area and visual observation, ash has not been covered within 7 days of placement, in violation of the facility's Permit Special Condition IIIB, Item 2.
5. The permitted upper stormwater pond and eastern stormwater diversion ditch has not been constructed. On July 26, 2006, WMH and its consultant held a meeting at DOH and said, "The basin originally presented to DOH would not be able to be implemented." We understand that this portion of the stormwater management system cannot be constructed because it is outside the limits of your Special Use Permit. Therefore, this constitutes a potential violation.

Since the proposed permit modification application presents the same stormwater management system, we asked you under a separate cover to resubmit a stormwater design that will meet all applicable regulations. We understand that WMH will be redesigning the stormwater management system for which a revised Special Use Permit application will also be submitted to the Land Use Commission.

The following are concerns that SWS has in reference to the operation of the landfill:

1. The recent modification of the stormwater channel, where two 48-inch corrugated metal pipes were placed in the concrete channel to pass stormwater under the recently constructed berm lacks safety devices. WMH and the City should consider constructing a fence or similar structure along the perimeter of the inlet area as a safety measure.
2. Please note that any inactive MSW cell that has reached final grades and will not receive waste within a 30-day period is required to be covered with 12 inches of intermediate soil cover. DOH believes that some cells at the landfill have exceeded the 30-day period.
3. The monthly methane gas monitoring procedure conducted at the perimeter of the landfill to measure explosive gases is not consistent with the current Operations Manual, as discussed in the August 2, 2006, inspection report. We understand from our discussions with Mr. Paul Burns that WMH intends to install permanent gas

Mr. Paul Burns
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monitoring wells along the perimeter of the landfill within the next year. In the meantime, gas monitoring within barholes will utilize slotted PVC pipes so as to avoid surrounding soils from clogging the gas meter.

Please address these concerns and notify us of your actions. In addition, please submit the following information:

1. Monthly updates of MSW and MSW ash acceptance and placement, identifying cells exceeding permitted grades.
2. Please identify which portion of the landfill cells has intermediate soil cover placement and any other cells that is planned to be covered with intermediate soil in the near future.
3. Provide a closure schedule for MSW Cells E-1, 2, and any other cells that have reached final grades.

Any deficiencies, which may be noted in this letter or the enclosed inspection reports, are not necessarily inclusive and any omissions shall not be construed as a determination of compliance with any applicable laws. Also, any omission to cite other violations is not intended to nor shall be binding upon the DOH.

We look forward to receiving your written response within thirty (30) calendar days from the receipt of this letter. Should you have any questions, please contact Mr. Jose Ruiz of the Solid and Hazardous Waste Branch at (808) 586-4226.

Sincerely,



THOMAS E. ARIZUMI, P.E., CHIEF
Environmental Management Division

Enclosures

- c: Kathleen Ho, Deputy Attorney General
Laurence Lau, Deputy Director for Environmental Health

DEPARTMENT OF HEALTH
SOLID AND HAZARDOUS WASTE BRANCH
OFFICE OF SOLID WASTE MANAGEMENT
919 ALA MOANA BOULEVARD, ROOM 212
HONOLULU, HAWAII 96814
TEL. NO. 586-4226 FAX NO. 586-7509

INSPECTION REPORT

FACILITY NAME: Waimanalo Gulch MSWLF and Ash Monofill
INSPECTION DATE: August 2, 2006
PERMIT NUMBER: LF0054-02
ISSUED DATE: May 15, 2003
EXPIRATION DATE: April 30, 2008
PERMIT MODIFICATION APPLICATION SUBMITTED: February 6, 2006 (incomplete)
MAILING ADDRESS: Mr. Paul F. Burns, General Manager
Waste Management of Hawaii, Inc.
92-460 Farrington Highway, Kapolei, Hawaii 96707
LOCATION ADDRESS: 92-460 Farrington Highway, Kapolei, Hawaii 96707
PERSONS CONTACTED: Suzan Pankenier, Environmental Compliance Officer
TELEPHONE NO.: 808-668-2985
INSPECTOR AND TITLE: Jose Ruiz, EHS & Gary Siu, Engineer
REPORT DATE: August 3, 2006

REASON FOR INSPECTION:

- ROUTINE
- COMPLIANCE SCHEDULE
- PERMIT REQUIREMENT
- VARIANCE CONDITION
- COMPLAINT EXPLAIN:
- OTHER EXPLAIN:

OBSERVATIONS / FINDINGS:

On August 2, 2006, SWS inspector Jose Ruiz and SWS engineer Gary Siu visited the site and conducted a site inspection of Waimanalo Gulch MSWLF and Ash Monofill facility in accordance with Hawaii Revised Statutes (HRS), Section 342H-6. SWS inspectors conducted the inspection at the landfill facility, which included a walk-thru and drive-thru of the landfill and ash monofill. The inspection was limited to the operation of the active work face and ash monofill area and does not include an overall compliance inspection of the facility to include closure planning documentation, groundwater monitoring, leachate analytical results, and financial assurance.

Ms. Pankenier accompanied the inspectors during the inspection and provided information on documents requested. WMH has been accepting all diverted MSW from H-Power for the past week due to H-Power annual maintenance. The H-Power facility will be down for maintenance for approximately a month and all refuse will be handled by WMH with an estimated MSW

tonnage of 3,000 tons/day. At the time of inspection, the inspectors did not observe many trucks waiting in line at the workforce area for MSW disposal. Seven traffic lanes were available for vehicles to dispose of the trash at the MSW workforce area. Weather conditions were sunny, 89°F, wind speed 8 to 12 mph from the south/southeast and hot.

Ash Monofill landfill: Based on documents provided by WMH, Environmental Compliance Officer, and an inspection of the ash monofill shows that ash is covered with intermediate soil every seven days. Ms. Pankenier said that the active ash workforce is covered every Tuesday. A few small stockpiles of ash were noted on the active workforce, now located on the northeast end along the main road to the landfill in Ash Cell 4 (see photograph 4). WMH received a total of 55 tons of ash the same day of the inspection.

Ms. Pankenier informed the inspectors that the west end of the ash monofill area continues to be overcapacity and filled with ash beyond the 2003 permit grades (see photograph 11). On the top deck of Ash Cell 1 & 8, near the recently built ash buttress berm and adjacent to the ash leachate sump, the inspectors noticed a large amount of ash placement (approx. 14,000 cubic yards) covered with intermediate soil (see photograph 3). Ms. Pankenier was asked if the ash pile is allowed to be placed on top of the ash buttress berm and she said that the stockpile is within 2003 permit grades.

The inspectors noted large stockpiles of concrete material stored on the top deck of Ash Cell 4 & 5, for the construction of wet weather deck for MSW cells (see photograph 10). Facility's permit condition does not allow for the storage of material on the ash landfill area. WMH must have the stockpiled materials removed from the ash monofill area.

Ash Monofill and MSW Cell E-1 Leachate Sumps

SWS inspectors obtained readings from the electrical control panel of the ash leachate sump (transducer), which indicate leachate level at 52 inches from the bottom of the sump to the top of the leachate level. The bubbler system indicated a reading of 55 inches of leachate in the ash sump system. The E cell sump was also checked and reading obtained from the transducer and bubbler panel showed 20 inches of leachate. Both of the leachate levels in the sumps are within regulatory limits. Copies of the leachate log were provided for both sumps and attached to the report. MSW Cell 4B sump remains inaccessible.

MSW Cell 10, Active workforce area

On August 2, 2006, SWS inspectors observed a D-9 dozer and Bomag and Caterpillar compactors working a large active workforce area, located topside of MSW Cell-10 on the northwest portion of the landfill (see photographs 5 & 13). Litter fences were observed and placed on the east and west side of MSW Cell 10. Litter fences seem to be effectively placed for flying litter. At the time of inspection, active cell geometry appears to be fairly good with narrow deep cells to limit exposed waste. Surrounding areas are covered with soil and litter and odor are controlled. From daily photos submitted by WMH to SWS, the MSW cell appears to have been covered with daily soil at the end of each day.

Litter pickers were also observed collecting litter along the cell and no excessive litter was observed. Records provided shows ten litter pickers on site.

Inspectors were told that MSW Cell E-1 & 2 are filled to final grade levels with the exception of the northern bottom end area near the liner. MSW Cells 8 and 9 have remaining capacity based on the 2005 topographic map.

The equipment maintenance yard is now located on top of MSW Cell 4-C. The top of the landfill has been covered with crushed concrete material for wet weather conditions (see photograph 6). Other types of heavy equipment utilized for the construction of the new cells are being stored on top of MSW Cell 1.

Construction of new E-cells and installation of drain pipes

Contractors were observed on the northeast ridge constructing (excavating and drilling) the upper portion of the ridge for the proposed MSW Cell E-3 and E-4. The stormwater management system for the E-Cell expansion is still under construction.

The installation of two 48-inch corrugated metal stormwater drainpipes inside the drainage channel through the northwest area berm, along the length of MSW Cell-11 to MSW Cell 7 has been completed (see photograph 12). The pipes were installed to pass stormwater under the northwest berm (see photographs 7 & 8). A fence or similar structure was not provided to provide safety along the perimeter of the inlet area (see photograph 9).

The upper gulch pond and eastside stormwater diversion ditch has not yet been constructed as part of the permit renewal dated May 15, 2003. The permittee was authorized by SWS to construct a stormwater management system and to operate an approved surface water management system in accordance with as built-drawings. As of this date, WMH has not constructed the offsite upper gulch pond and eastside stormwater diversion drainage system. On July 26, 2006, WMH and its consultant held a meeting at DOH and said, "The basin originally presented to DOH would not be able to be implemented." This is a potential violation solid waste regulations and your solid waste permit.

Perimeter gas monitoring

WMH is conducting monthly methane gas monitoring along the landfill perimeter area utilizing a bar-hole punch tool. The punch tool is rammed into the ground to approximately 2.5 to 3 feet in depth at selected locations along the landfill perimeter. Once the punch tool is removed from the ground, a gas-monitoring probe is immediately inserted into the hole at 2-6 inches in depth and a methane reading is obtained. This procedure is inconsistent with the current operations manual (July 2004), which states that reading will be taken at 3-foot depths.

Documents / Logs

The inspectors requested the following logs and copies were provided by WMH.

1. Leachate logs for MSW E-Cells and Ash monofill sumps.
2. Ash monofill intermediate weekly cover log
3. Daily litter pickers log
4. MSW daily cover log with entries on tires, propane, and batteries removed from the active face.
5. Perimeter gas monitoring log for 7/27/06
6. Daily Well field Monitoring Report for 8/1/06
7. Equipment Operator log

Potential Violations:

1. Portions of Ash and MSW cells remains overfilled; MSW Cell 1 overfilled above permit grades.
2. MSW 4B sump remains inaccessible.
3. Storage of wet weather road material on top deck of Ash cell 4.
4. Non-construction of portions of the permitted stormwater management system.

Areas of Concern:

1. Stormwater inlet area at northwest berm should be fenced for safety purposes.
2. Cell E-1, 2 and any other cell that have reached final grades require intermediate soil cover.
3. Bar-hole monitoring of perimeter gas not adequate at depths of 2-6 inches.

VIOLATIONS:

(X) HAWAII REVISED STATUTES

HAWAII ADMINISTRATIVE RULES TITLE 11 CHAPTER 58.1
 COMPLIANCE SCHEDULE

PERMIT CONDITION
 VARIANCE CONDITION
 OTHER
 NONE

FOLLOW-UP NEEDED: YES (x)
NO ()

WHEN: as needed
WHY: To ensure compliance with permit conditions

LIST OF ATTACHMENTS: Photos



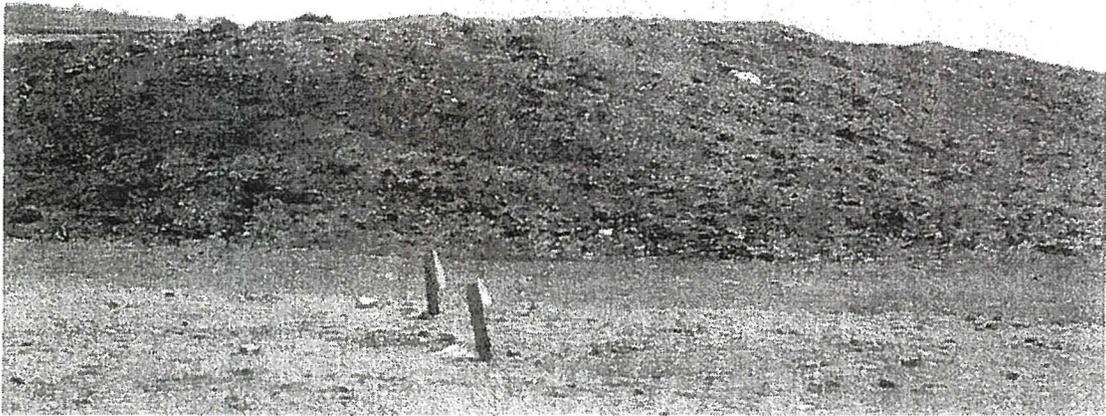
Photograph 1

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: August 2, 2006
Photographer: JRuiz
Description: View of the siltation pond from top of the ash berm buttress and located on the southeast portion of the landfill adjacent to Farrington Highway.



Photograph 2

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: August 2, 2006
Photographer: JRuiz
Description: Present height at the ash monofill ash buttress is at 162' msl.



Photograph 3

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: August 2, 2006
Photographer: JRuiz
Description: Placement of ash covered with intermediate soil near the buttress area in Ash Cell 8 with stakes indicating present height at 162 ft msl.



Photograph 4

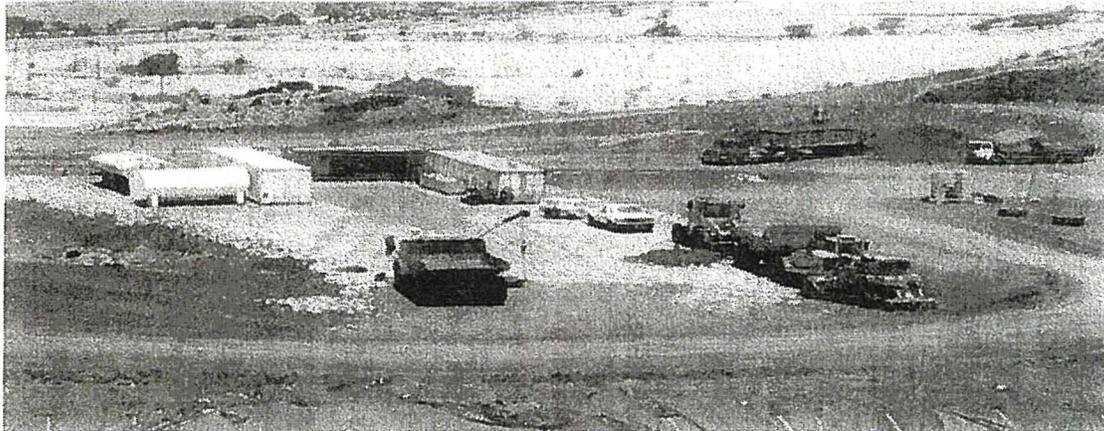
Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: August 2, 2006
Photographer: JRuiz
Description: Active ash monofill workforce area located on the north end of Ash Cell 4.



Photograph 5

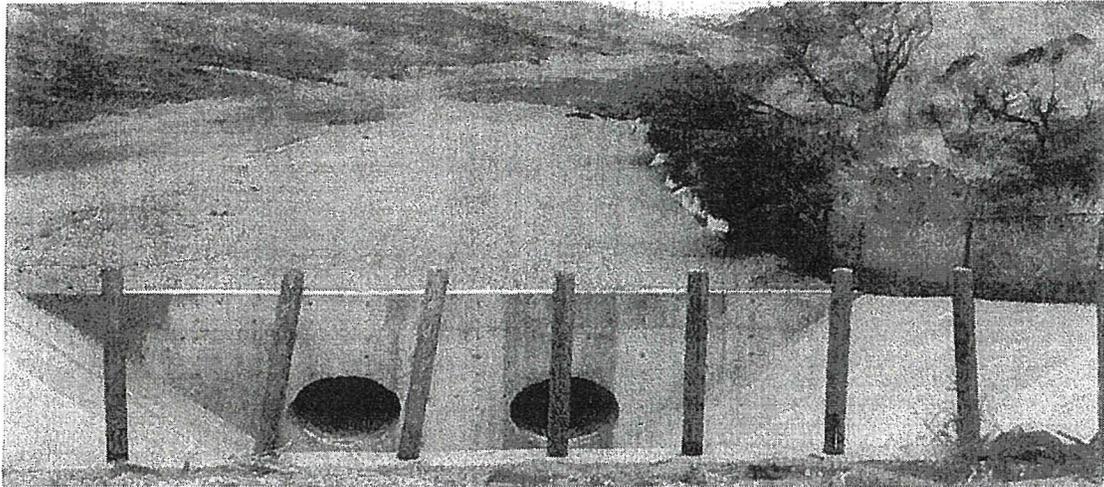
Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: August 2, 2006
Photographer: JRuiz

Description: Compactor operators are working the MSW at the active workforce area in Cell 10. Operators were running 3 to 5 passes for compaction. H-Power is down for maintenance and daily tonnage is about 3,000 tons per day.



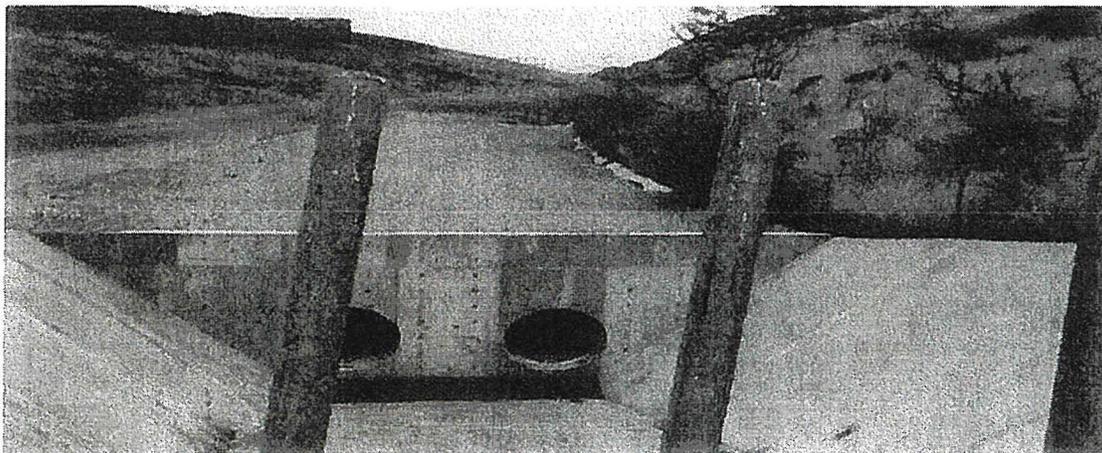
Photograph 6

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: August 2, 2006
Photographer: JRuiz
Description: Equipment maintenance yard located on top of MSW Cell 4C.



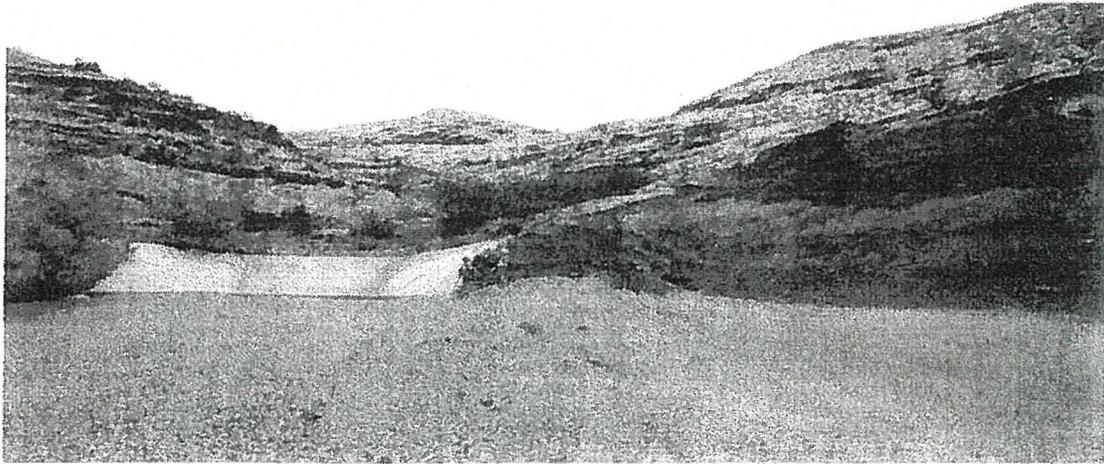
Photograph 7

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: August 2, 2006
Photographer: JRuiz
Description: Newly installed two 48 inch corrugated metal pipes to channel stormwater under the northwest berm located from the topside of MSW Cell 11 to MSW Cell 7. The pipes are located on the former concrete channel for stormwater runoff.



Photograph 8

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: August 2, 2006
Photographer: JRuiz
Description: Another view of the newly installed two 48 inch corrugated metal pipes to channel stormwater under the northwest berm located from the topside of MSW Cell 11 to MSW Cell 7.



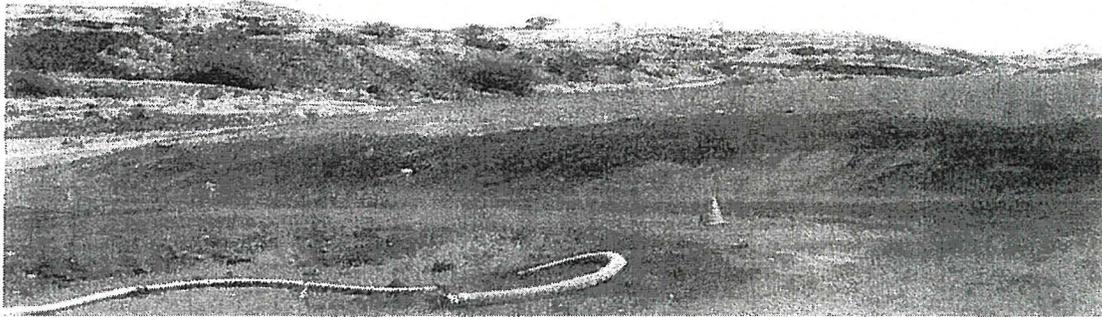
Photograph 9

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: August 2, 2006
Photographer: JRuiz
Description: Wide view of the stormwater channel located at the topside of MSW Cell 11 to divert run on water during inclement weather.



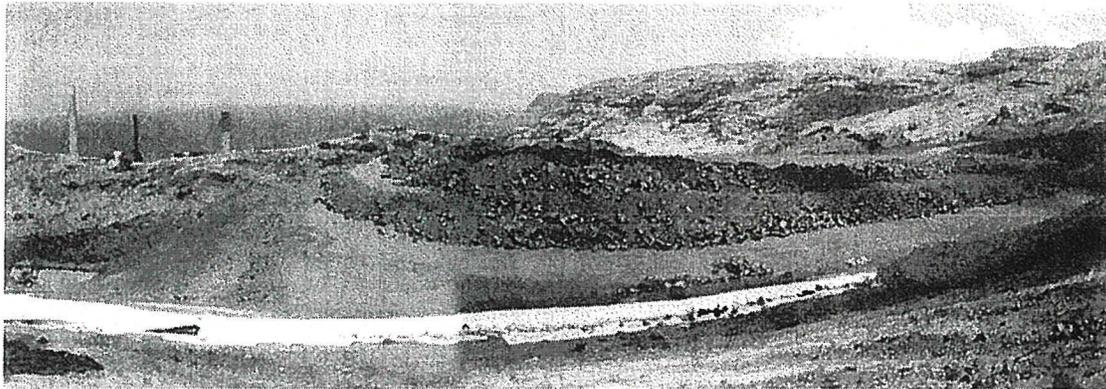
Photograph 10

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: August 2, 2006
Photographer: JRuiz
Description: View of the ash monofill from top of E-Cell berm. To the right of the photo, WMH is stockpiling concrete material for construction of wet weather deck for MSW Cell 10.



Photograph 11

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: August 2, 2006
Photographer: JRuiz
Description: View of the overfilled ash monofill Cells 5 through 8 located on the west portion of the landfill.



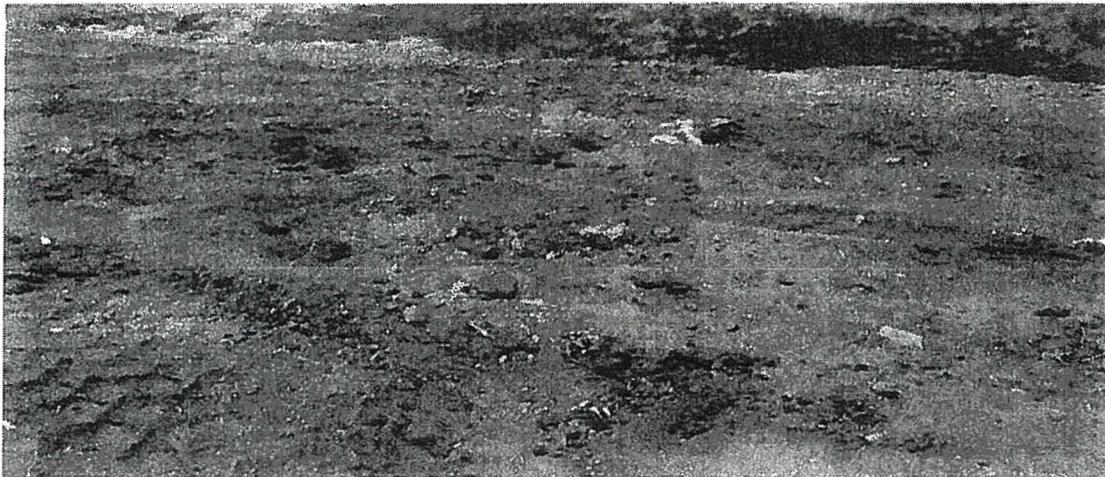
Photograph 12

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: August 2, 2006
Photographer: JRuiz
Description: Panoramic view of the northwest berm under construction on top of MSW Cells 7 thru 11 and inside the concrete stormwater channel. The contractor installed two 48 inch corrugated metal pipes through the berm (former concrete channel) to pass stormwater.



Photograph 13

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: August 2, 2006
Photographer: JRuiz
Description: Panoramic view of MSW Cell-10 workface area during H-Power shutdown.



Photograph 14

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: August 2, 2006
Photographer: JRuiz
Description: View of trash lift out caused by a track equipment driving on MSW Cell 11.

DEPARTMENT OF HEALTH
SOLID AND HAZARDOUS WASTE BRANCH
OFFICE OF SOLID WASTE MANAGEMENT
919 ALA MOANA BOULEVARD, ROOM 212
HONOLULU, HAWAII 96814
TEL. NO. 586-4226 FAX NO. 586-7509

INSPECTION REPORT

FACILITY NAME: Waimanalo Gulch MSWLF and Ash Monofill
INSPECTION DATE: September 29, 2006
PERMIT NUMBER: LF0054-02
ISSUED DATE: May 15, 2003
EXPIRATION DATE: April 30, 2008
PERMIT MODIFICATION APPLICATION SUBMITTED: February 6, 2006 (incomplete)
MAILING ADDRESS: Mr. Paul F. Burns, General Manager
Waste Management of Hawaii, Inc.
92-460 Farrington Highway, Kapolei, Hawaii 96707
LOCATION ADDRESS: 92-460 Farrington Highway, Kapolei, Hawaii 96707
PERSONS CONTACTED: Suzan Pankenier, Environmental Compliance Officer
TELEPHONE NO.: 808-668-2985
INSPECTOR AND TITLE: Jose Ruiz, EHS & Gary Siu, Engineer
REPORT DATE: October 2, 2006

REASON FOR INSPECTION:

- ROUTINE
- COMPLIANCE SCHEDULE() PERMIT REQUIREMENT
- VARIANCE CONDITION
- COMPLAINT EXPLAIN:
- OTHER EXPLAIN:

OBSERVATIONS / FINDINGS:

On September 29, 2006, SWS inspector Jose Ruiz and SWS engineer Gary Siu visited the site and conducted a site inspection of Waimanalo Gulch MSWLF and Ash Monofill facility in accordance with Hawaii Revised Statutes (HRS), Section 342H-6. SWS inspectors conducted the inspection at the landfill facility, which included a walk-thru and drive-thru of the landfill and ash monofill. The inspection was limited to the operation of the active work face and ash monofill area and does not include an overall compliance inspection of the facility to include closure planning documentation, groundwater monitoring, leachate analytical results, and financial assurance.

Ms. Pankenier accompanied the inspectors during the inspection and provided information on documents requested. The total MSW tonnage for the previous day was 365 tons. The ash tonnage received from H-Power facility was not available at the time of inspection. Weather

conditions at 10:30 were partly cloudy, 86°F, and wind speed variable at 7 mph.

Ash Monofill landfill: Based on documents provided by WMH, Environmental Compliance Officer, and an inspection of the active ash workface area in cell-8 (see photograph 1), ash is graded daily and covered with intermediate soil every seven days. Other cells of the monofill were covered with intermediate soil except for a large part of ash cell 6 (see photographs 6, 7, & 8) which was estimated to be a little less than ½ acre. Ms. Pankenier said that the ash would be covered during the coming weekend.

The inspectors continue to note large stockpiles of rock material stored on the top deck of ash cell 4, for the construction of the road perimeter swale and buttress in MSW cell-9. A large stockpile of gravel material was also observed in the same cell described above. The material observed at the time of inspection is not the same material observed a month ago in the same cell. The facility's permit does not allow for the storage of material on the ash landfill area. WMH must have the stockpiled materials removed from the ash monofill area.

Ash Monofill and MSW Cell E-1 Leachate Sumps

Readings obtained from the electrical panel of the ash leachate sump (transducer) indicate leachate level of 52 inches from the bottom of the sump to the top of the leachate level. The bubbler system indicated the reading of 55 inches of leachate in the ash sump system. The E cell sump was also checked and reading obtained from the transducer and bubbler panel showed 15 and 14.5 inches of leachate, respectively. Based on these readings, both of the leachate levels in the sumps are within regulatory limits. Copies of the leachate log were provided for both sumps and attached to the report. MSW Cell 4B sump remains inaccessible.

MSW Cell 10, Active workface area

WMH continues to fill MSW Cell-10 while constructing the new MSW Cell E-3. On September 29, 2006, SWS inspectors observed a D-9 dozer and Bomag compactor working the active MSW Cell-10 workface, located on the northwest portion of the landfill (see photograph 11). Litter fences were observed and placed on the west and south side of MSW Cell 10. Litter fences seem to be effectively placed for flying litter. At the time of inspection, active cell geometry appears to be fairly good with narrow deep cells to limit exposed waste. Surrounding areas are covered with soil and litter and odor are controlled. From daily photos submitted by WMH to SWS, the MSW cell appears to have been covered with daily soil at the end of each day. The water log run for the facility shows that WMH is using on an average of 50,000 gallons of water daily as dust control.

Construction of new MSW cell E-3, installation of swales, construction of buttress on MSW Cells 8 & 9 and renovation of siltation pond and risers.

The new MSW Cell E-3 is almost ready to be lined (see photograph 9) and plans are to lined the cell by mid October 2006. Contractor was observed at the bottom edge of MSW Cell E-2 with a backhoe (see photograph 10) uncovering the edge of the existing liner and exposing the waste of MSW Cell E-2 for connection to the new cell liner. The stormwater management system for the E-Cell expansion is still under construction. WMH is constructing swales along the perimeter of the road adjacent to the MSW landfill area to divert storm water. The swales should be completed by the first week of October 2006. Contractor continues to build the buttress on the west side of MSW Cells 8 & 9. Prior to the placement of the rock wall/partition in the pond, the contractor had excavated 2500 cubic yards of dirt. The contractor was observed isolating the pond by placing a layer of rocks on the upper portion of the pond to separate the fines before it gets into the second phase of the pond. New risers were also observed in place on the second portion of the pond area (see photograph 2).

Documents / Logs

The inspectors requested the following logs and copies were provided by WMH.

8. Leachate logs for MSW E-Cells and Ash monofill sumps.
9. Ash monofill intermediate weekly cover log
10. MSW daily cover log with entries on tires, propane, and batteries removed from

- 11. the active face.
- 12. Water run log
- 13. Isopach drawing, Master Plan final Grade, sheet 6
- 14. Isopach drawing, Topo, sheet 5

Potential Violations:

- 5. Portions of Ash and MSW cells remains overfilled above permit grades.
- 6. Failure to place intermediate soil cover on ash monofill cell 6
- 7. MSW 4B sump remains inaccessible.
- 8. Storage of rocks and gravel material on top deck of Ash cell 4.

Areas of Concern:

- 4. MSW Cell E-1, 2 and any other cell that have reached final grades require intermediate soil cover.

VIOLATIONS:

- HAWAII REVISED STATUTES
- HAWAII ADMINISTRATIVE RULES TITLE 11 CHAPTER 58.1
- COMPLIANCE SCHEDULE
- PERMIT CONDITION
- VARIANCE CONDITION
- OTHER
- NONE

FOLLOW-UP NEEDED: YES (x)
NO ()

WHEN: as needed
WHY: To ensure compliance with permit conditions

LIST OF ATTACHMENTS: Photos
Logs



Photograph 1

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: September 29, 2006
Photographer: JRuiz
Description: Active ash workface located in cell 8



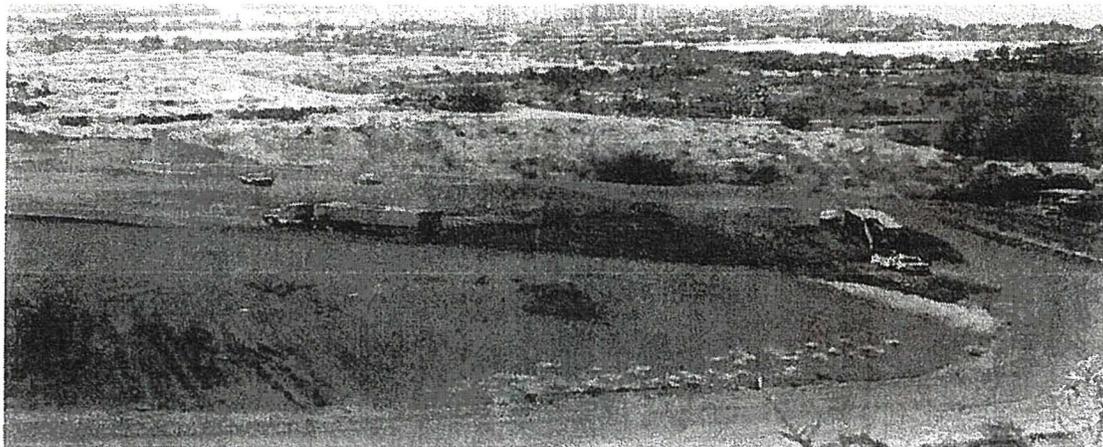
Photograph 2

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: September 29, 2006
Photographer: JRuiz
Description: Contractor placing rocks to separate the siltation pond area and on the background (red arrows) shows two new risers for installation.



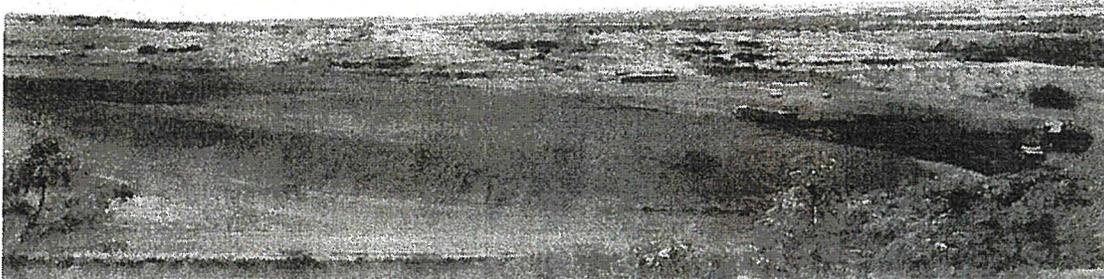
Photograph 3

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: September 29, 2006
Photographer: JRuiz
Description: Monitoring well #3 (red arrow) located on west side of the siltation pond.



Photograph 4

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: September 29, 2006
Photographer: JRuiz
Description: View of the active ash workspace area located in cell 8.



Photograph 5

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: September 29, 2006
Photographer: JRuiz
Description: View of ash monofill cells 1-4 and 5-8 from the top of the southwest hill of the landfill.



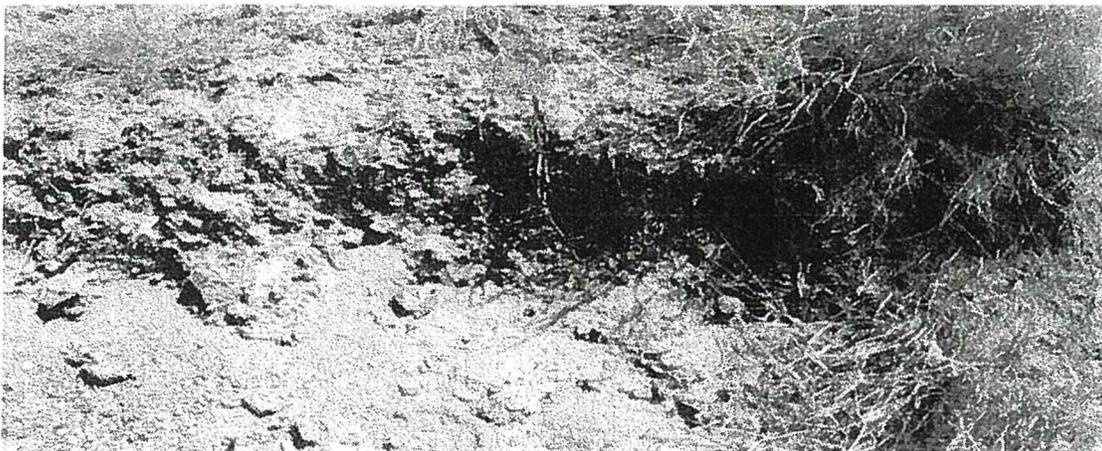
Photograph 6

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: September 29, 2006
Photographer: JRuiz
Description: Part of the monofill area (red arrows) located on the west of cell 6 was noted without intermediate soil cover.



Photograph 7

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: September 29, 2006
Photographer: JRuiz
Description: Close-up look of ash cell 6 without intermediate soil cover.



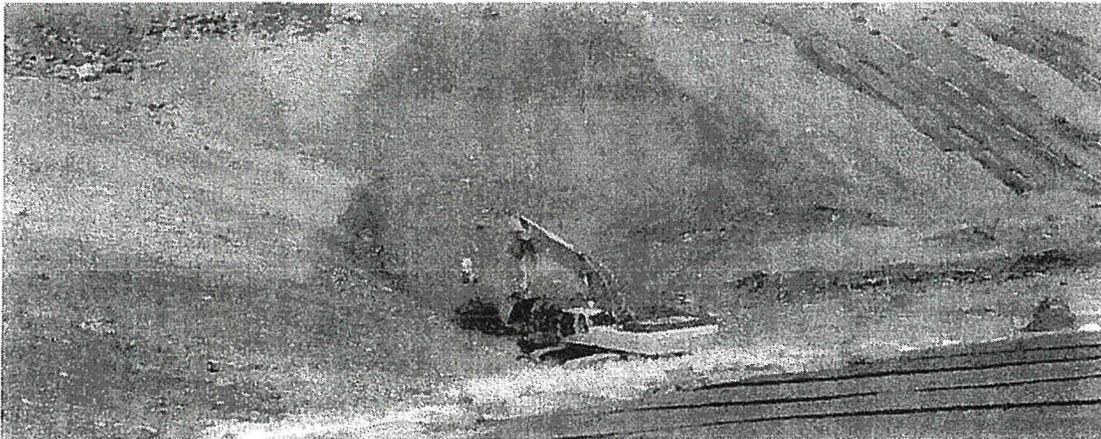
Photograph 8

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: September 29, 2006
Photographer: JRuiz
Description: Another view of ash cell 6 without intermediate soil cover.



Photograph 9

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: September 29, 2006
Photographer: JRuiz
Description: The lined cell area (blue arrow) is part of MSW Cell E-2 and on the background (red arrow) is the newly constructed MSW Cell E-3 not yet lined.



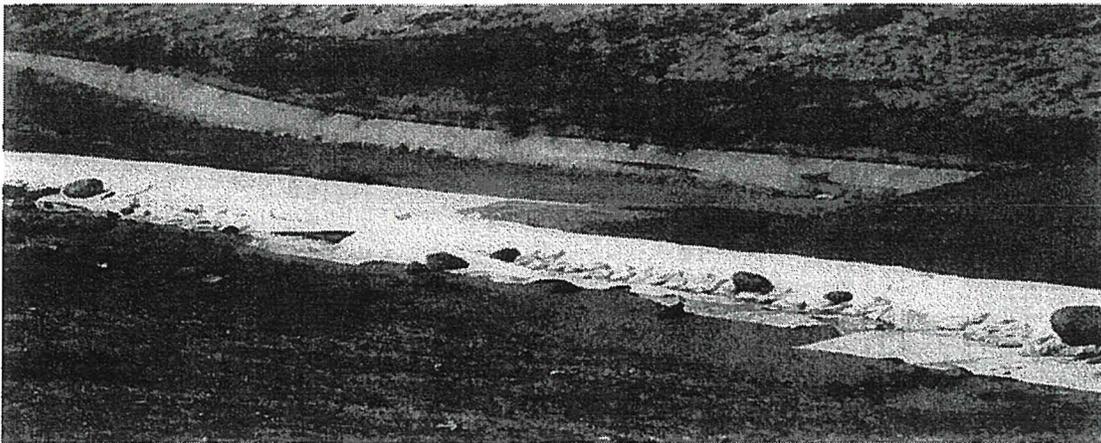
Photograph 10

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: September 29, 2006
Photographer: JRuiz
Description: Goodfellow Company is using a backhoe to expose the liner from MSW Cell E-2 for future addition of MSW Cell E-3 liner.



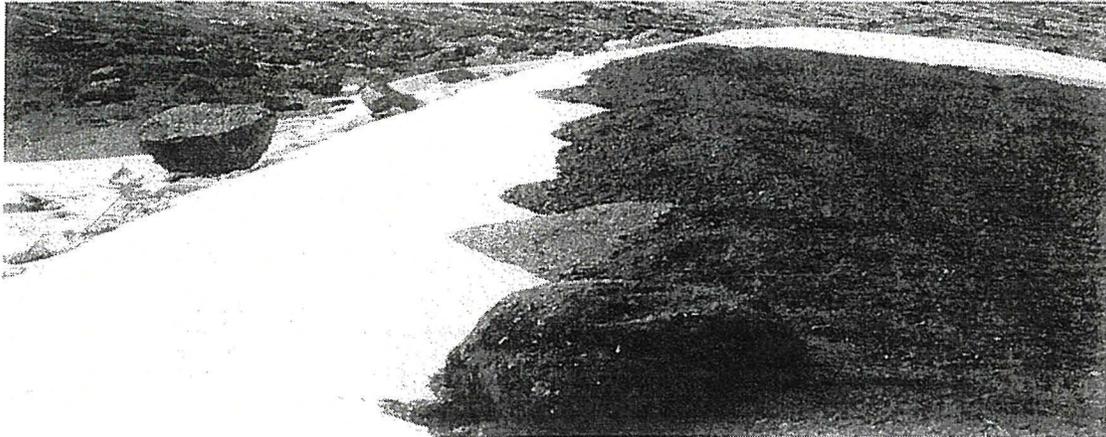
Photograph 11

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: September 29, 2006
Photographer: JRuiz
Description: Active workspace area is located in MSW Cell 10 with a bomag compactor making passes on the trash for compaction.



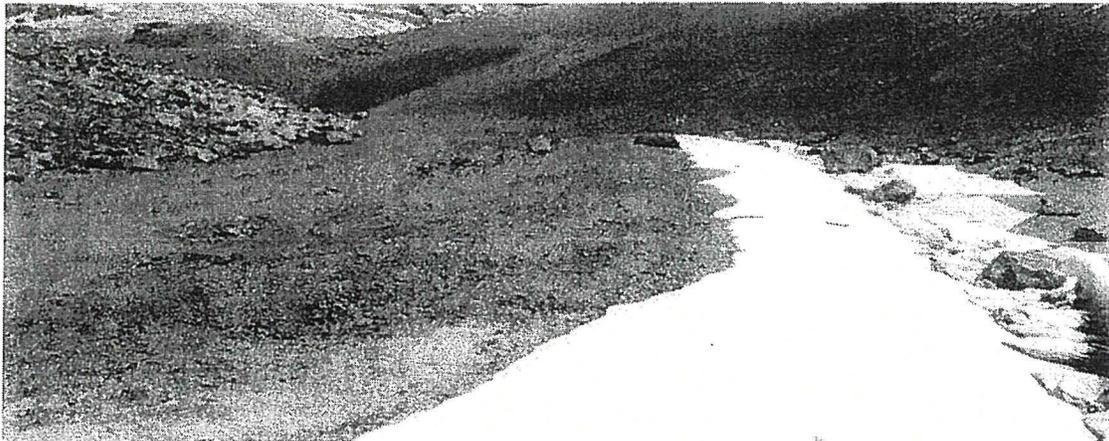
Photograph 12

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: September 29, 2006
Photographer: GSiu
Description: Composite liner system under northwest berm on cells 8 & 9 interface. White liner is flexible member liner (FML).



Photograph 13

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: September 29, 2006
Photographer: GSiu
Description: Another view of the composite liner under northwest berm. Note boulder on top of liner (red arrow).



Photograph 14

Site Name: Waimanalo Gulch MSWLF and Ash Monofill
Location: 92-460 Farrington Highway, Kapolei, Hawaii 96707
Date Taken: September 29, 2006
Photographer: GSiu
Description: Composite liner under northwest berm.