October 31, 1988
RG:0084

Mr. Donald A. Clegg
Department of General Planning
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Clegg:

88/E-1027 (IC)
Development Plan Public Facilities Map Amendment
Barbers Point Cogeneration Plant
Campbell Industrial Park, Oahu

I would like to respond briefly, albeit late, to your request for comments on the above cited plan to develop a coal fired energy generating facility at Campbell Industrial Park.

In the past, the Environmental Center has provided reference materials to state agencies, city departments, the Mayor and City Council with regard to environmental issues pertinent to developments at Campbell Industrial Park. Most specifically, we have discussed environmental issues related to the construction of the Barbers Point Harbor and the HPOWER plant. It would appear that several of the issues identified in our earlier reviews may be applicable in the case of the proposed cogeneration plant. The following examples reflect concerns that should be addressed in the development plans for this project.

Air Emissions

Air emissions from a coal fired plant will use up some percentage of the EPA allowed Prevention of Significant Deterioration increment for Campbell Industrial Park. Thus, future development at the industrial park will benefit substantially from installation of efficient scrubbers at the cogeneration plant. Furthermore, the proposed new housing projects in areas adjacent to Campbell Park also mandate implementation of maximum air emission controls to protect public health.

Air Quality Monitoring

The present air quality monitoring stations for Campbell Industrial Park are inadequate to establish accurate baseline data on which to assess the impacts of pollution sources. Immediate steps should be taken to
establish long term air quality monitoring stations appropriate to accurately monitor the pollution sources and the residential areas that will be affected.

Residual Ash

It is our understanding that one of the primary environmental problems associated with coal fired generators is the handling and disposal of the large quantities of residual ash produced. The presence of toxic metals in the residue may limit or restrict ash disposal in land fills.

Plant Design and the Conveyor System

The project description states that, "A covered conveyor will operate between Barbers Point Deep Draft Harbor and [the] plant site to convey coal unloaded at the Harbor". We find this proposal to be of great interest and would like to suggest that a reconsideration be given to a suggestion put forth in 1979 and again in 1982 by the Environmental Center. At that time we suggested that the development of a conveyor system from Barbers Point Harbor to Campbell Industrial Park would allow for both off and on loading of multiple products such as coal, refuse, cement, sand, gravel, or coral. Multiple product transfer would permit cost sharing of the conveyor system and should improve the overall economics of the systems served. For example, with such a system it may be economically feasible to barge refuse from Honolulu Harbor to the Barbers Point Harbor with subsequent transmission of the refuse to the HPower plant by conveyor system. The conveyor system now being proposed should surely be designed to serve more than one product and we urge that full consideration of multiple product transfer be given in the development plans for this project.

In summary, there are obviously many issues of significant environmental concern associated with the construction and operation of a large scale cogeneration plant. These can best be addressed through the preparation of an Environmental Impact Statement which we assume will be forthcoming. We appreciate the opportunity to comment on this facility and hope you will find our comments helpful in developing your assessment of the plant.

Yours truly,

Jacquelin N. Miller
Associate Environmental Coordinator

cc: OEQC
L. Stephen Lau