



University of Hawaii at Manoa

Environmental Center
Crawford 317 • 2550 Campus Road
Honolulu, Hawaii 96822
Telephone (808) 948-7361

June 25, 1984

RP:0041

U.S. Environmental Protection Agency Region 9
Attention: Permits Administration Section (M-5-P)
215 Fremont Street (At Howard)
San Francisco, California 94105

Dear Sir/Madam:

Revised Draft Permit
Hazardous Waste Storage Facility
Honolulu Wood Treating Co.
Maui Plant - HID059475210
Puunene, Maui

In response to your request of May 11, 1984, the Environmental Center has reviewed the above cited document with the assistance of Keith Chave, Oceanography; Roy Takekawa, Facilities Management; John Hylin, Agricultural Biochemistry; Doak Cox and Antonio De Oteyza, Environmental Center.

We found that the information provided by the applicant in the revised draft permit is in general very complete and meets the requirements of the solid waste disposal act, as amended by the Resource Conservation and Recovery Act (RCRA) and Regulations promulgated there under by the U.S. Environmental Protection Agency (EPA) codified and to be codified in Title 40 of the Code of Federal Regulations (40 CFR).

However, in view of the recent (June 4, 1984) incident in which 6,000 gallons of toxic liquid was spilled at Campbell Industrial Park Plant of the Honolulu Wood Treating Company, and the recent fines levied by the EPA on the two companies handling hazardous waste on the Islands, there should be assurance that accidents like the one at the Campbell Park Plant would not occur at the Maui Plant, and that the overall set of processes of production, storage, handling and disposal of hazardous waste will not present a threat to the environment or public health of the islands, before the permit should be granted.

It is our opinion that a detailed report of the spill incident should be filed with the EPA, and that it should be evaluated in relation to the potential for a similar event taking place at the Maui plant (which, it is important to note, differs from the Oahu plant in being located within agricultural lands). Also, a clearer picture of the way that the enforcement of the permit will be carried out appears necessary. On page III of the draft permit it is stated that if a container holding hazardous waste is not in good condition (e.g. is rusted or has structural defects) the applicant should transfer the hazardous waste

June 25, 1984

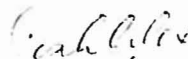
to a container in good condition or manage the situation in some other way that complies with the requirements of the conditions of the permit. The placement of the responsibilities for inspection of the facility is not stated (does it rest with EPA, Dept. of Health, or some other agency?), nor is the frequency of inspections stated. We note that no agency has inspected the hazardous waste management facilities at the University.

Also, considering the fines recently levied by the EPA on the two companies that handle hazardous waste on the islands, especially that levied on Pepper Industries, which had been prohibited from accepting any material until alleged violations of storage regulations (i.e. leaking and rusting drums, and storage of more waste than permitted) are resolved (Honolulu Advertiser, 6/22/84), we suggest that provisions be specified for handling the hazardous wastes of the Honolulu Wood Treating Company in the event that the companies that now handle the hazardous wastes are forced to or choose to close.

We suggest that there is need for more systematic monitoring of hazardous waste management activities in Hawaii than has been provided in the past, and that the needed monitoring may best be provided through cooperation between the EPA and the State Department of Health.

We appreciate the opportunity to comment on this permit petition.

Yours truly,



Doak C. Cox
Director

cc: U.S. EPA, Pacific Islands, Vicki Tsuhako
Dept. of Health
Keith Chave
Roy Takekawa
John Hylin
Dick Mayer
Jacquelin Miller
Pamela Bahnsen
Antonio De Oteyza



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July 3, 1984

(RP:0041)

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Hazardous Waste Storage Facility
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Puunene, Maui

It has come to our attention that the State of Hawaii's Department of Health has inspected the University of Hawaii's Hazardous Waste Management Facilities. The last sentence in the first paragraph on page 2 of the Center's review dated June 25, 1984 is therefore incorrect. Enclosed is the corrected page 2 for insertion.

We apologize for this error and any inconvenience that this may have caused.

Yours truly,

Doak C. Cox
Director

cc: U.S. EPA,
Pacific Island, Vicki Tsuhako
Dept. of Health
Keith Chave
Roy Takekawa
John Hylin
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June 25, 1984

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