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# County of Hawai'i

## DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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March 23, 2016

Mr. Scott Glenn, Director  
Office of Environmental Quality Control  
State Department of Health  
235 South Beretania Street, Suite 702  
Honolulu, Hawai'i, 96813

**Subject: Draft Environmental Assessment and Anticipated Finding of No Significant Impact  
Former Kealakehe Metal Salvage Facility Remediation and Closure  
TMK 7-4-020:16 (portions of)  
North Kona District, Island of Hawai'i**

Dear Director Glenn,

With this letter, the County of Hawai'i Department of Environmental Management hereby transmits the Draft Environmental Assessment and Anticipated Findings of No Significant Impact (DEA-AFONSI) for the Former Kealakehe Metal Salvage Facility Remediation and Closure, situated at TMK 7-4-020:016 (portions of) in the North Kona District on the Island of Hawai'i for publication in the next available edition of the Environmental Notice.

Enclosed is a completed OEQC Publication Form, a hard copy of the DEA-AFONSI, a searchable Adobe Acrobat PDF file of the same document and an electronic copy of the publication form in MS Word. Simultaneous with this letter, we are submitting the summary of the action in a text file by electronic mail to your office.

Should you have any questions, please contact Mr. Greg Goodale, Solid Waste Division Chief, at (808) 961-8515 or Gene Quiamas, Environmental Compliance Specialist, at (808) 961-8058 or [Gene.Quiamas@hawaiicounty.gov](mailto:Gene.Quiamas@hawaiicounty.gov).

Sincerely,

BJ Leithead Todd  
DIRECTOR

enclosures

cc: Greg Goodale, SWD Chief  
Gene Quiamas, Environmental Compliance Specialist

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**AGENCY  
PUBLICATION FORM**

APR 08 2016

Project Name:	Former Kealakehe Metal Salvage Facility Remediation and Closure
Project Short Name:	Former Kealakehe Metal Salvage Facility
HRS §343-5 Trigger(s):	Use of State land, use of State and County funds, land classified as conservation district
Island(s):	Hawai'i
Judicial District(s):	North Kona
TMK(s):	7-4-020:16 (portions of)
Permit(s)/Approval(s):	NPDES, grading permit
Proposing/Determining Agency:	County of Hawai'i Department of Environmental Management
Contact Name, Email, Telephone, Address	BJ Leithead Todd, Director, <a href="mailto:cohdem@hawaiiicounty.gov">cohdem@hawaiiicounty.gov</a> 808.961.8083 345 Kekūanāo'a Street, Ste. 41, Hilo, HI 96720
Accepting Authority:	(for EIS submittals only)
Contact Name, Email, Telephone, Address	
Consultant:	Integral Consulting Inc.
Contact Name, Email, Telephone, Address	Dennis Poma, <a href="mailto:dpoma@integral-corp.com">dpoma@integral-corp.com</a> , 808-739-7055 94-515 Uke'e Street Suite 301, Waipahu, HI 96797

**Status (select one)**

DEA-AFNSI

**Submittal Requirements**

Submit 1) the proposing agency notice of determination/transmittal letter on agency letterhead, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the DEA, and 4) a searchable PDF of the DEA; a 30-day comment period follows from the date of publication in the Notice.

FEA-FONSI

Submit 1) the proposing agency notice of determination/transmittal letter on agency letterhead, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the FEA, and 4) a searchable PDF of the FEA; no comment period follows from publication in the Notice.

FEA-EISPN

Submit 1) the proposing agency notice of determination/transmittal letter on agency letterhead, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the FEA, and 4) a searchable PDF of the FEA; a 30-day comment period follows from the date of publication in the Notice.

Act 172-12 EISPN  
("Direct to EIS")

Submit 1) the proposing agency notice of determination letter on agency letterhead and 2) this completed OEQC publication form as a Word file; no EA is required and a 30-day comment period follows from the date of publication in the Notice.

DEIS

Submit 1) a transmittal letter to the OEQC and to the accepting authority, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the DEIS, 4) a searchable PDF of the DEIS, and 5) a searchable PDF of the distribution list; a 45-day comment period follows from the date of publication in the Notice.

FEIS

Submit 1) a transmittal letter to the OEQC and to the accepting authority, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the FEIS, 4) a searchable PDF of the FEIS, and 5) a searchable PDF of the distribution list; no comment period follows from publication in the Notice.

FEIS Acceptance  
Determination

The accepting authority simultaneously transmits to both the OEQC and the proposing agency a letter of its determination of acceptance or nonacceptance (pursuant to Section 11-200-23, HAR) of the FEIS; no comment period ensues upon publication in the Notice.

FEIS Statutory  
Acceptance

Timely statutory acceptance of the FEIS under Section 343-5(c), HRS, is not applicable to agency actions.

Supplemental EIS  
Determination

The accepting authority simultaneously transmits its notice to both the proposing agency and the OEQC that it has reviewed (pursuant to Section 11-200-27, HAR) the previously accepted FEIS and determines that a supplemental EIS is or is not required; no EA is required and no comment period ensues upon publication in the Notice.

- Withdrawal Identify the specific document(s) to withdraw and explain in the project summary section.
- Other Contact the OEQC if your action is not one of the above items.

**Project Summary**

Provide a description of the proposed action and purpose and need in 200 words or less.

The subject property was used as a metal salvage facility for several decades before operations ceased in 2013. During prior site investigations, lead was found in site soils. The lead-contaminated soil that remains on the subject property presents a potential hazard by direct contact and must be addressed. Closure and remediation actions are required by the solid waste permit for the former metal salvage facility, issued by the State of Hawai'i Department of Health (HDOH). The proposed action consists of offsite landfill disposal of all non-recyclable waste materials and contaminated soils. The objective of the proposed project is to remediate the subject property to HDOH standards by eliminating the existing environmental impacts. The proposed action is anticipated to adequately manage hazards associated with lead-contaminated soil, is practical to implement, and will allow for future beneficial use of the subject property.

No adverse impacts are anticipated upon project completion. Potential short-term impacts may be created by the generation of dust, noise, runoff, additional vehicular traffic, and disturbance of seabirds flying over the facility during debris/soil removal and offsite landfill disposal. Mitigation measures will be implemented to address these potential short-term impacts.

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# DRAFT ENVIRONMENTAL ASSESSMENT

## Former Kealakehe Metal Salvage Facility Remediation and Closure: TMK 7-4-020:016 (portion) North Kona, Island of Hawai'i

*Prepared for*  
**County of Hawai'i**  
**Department of Environmental Management**  
345 Kekūanāo'a St., Suite 41,  
Hilo, HI 96720

*Prepared by*  
The logo for Integral Consulting Inc. features the word "integral" in a bold, lowercase, sans-serif font. A thin, curved line starts under the letter 'i' and loops around the bottom of the word. Below "integral" is the text "consulting inc." in a smaller, lowercase, sans-serif font.

**integral**  
consulting inc.

94-515 Uke'e Street  
Suite 301  
Waipahu, HI 96797

March 29, 2016

# CONTENTS

<b>LIST OF FIGURES</b> .....	<b>v</b>
<b>LIST OF TABLES</b> .....	<b>v</b>
<b>ACRONYMS AND ABBREVIATIONS</b> .....	<b>vi</b>
<b>1 DESCRIPTION OF THE PROPOSED ACTION</b> .....	<b>1-1</b>
1.1 BACKGROUND .....	1-1
1.2 PROJECT NEED AND OBJECTIVE.....	1-1
1.3 PROJECT LOCATION, VICINITY, AND CONDITIONS .....	1-1
1.3.1 Project Location and Current Land-use .....	1-1
1.3.2 Land Ownership.....	1-2
1.3.3 Immediately Surrounding Uses, Tenants, and Structures.....	1-2
1.3.4 Existing Conditions .....	1-3
1.4 PROJECT DESCRIPTION.....	1-3
1.4.1 Proposed Action .....	1-3
1.4.2 Effectiveness.....	1-4
1.4.3 Implementability .....	1-5
1.4.4 Preliminary Cost Estimate.....	1-5
1.4.5 Funding.....	1-6
1.4.6 Project Schedule.....	1-6
1.4.7 Conclusions .....	1-7
<b>2 ALTERNATIVES TO PROPOSED PLAN</b> .....	<b>2-1</b>
2.1 NO-ACTION ALTERNATIVE .....	2-1
2.1.1 Effectiveness.....	2-1
2.1.2 Implementability .....	2-1
2.2 SOLID WASTE REMOVAL .....	2-1
2.2.1 Effectiveness.....	2-1
2.2.2 Implementability .....	2-1
2.3 SOLID WASTE REMOVAL AND ONSITE SOIL ENCAPSULATION .....	2-2
2.3.1 Effectiveness.....	2-2
2.3.2 Implementability .....	2-3
<b>3 RELATIONSHIPS TO PLANS, POLICIES, AND CONTROLS</b> .....	<b>3-1</b>
3.1 STATE OF HAWAI'I PLANS, POLICIES, AND CONTROLS.....	3-1
3.1.1 State Land Use District .....	3-1
3.1.2 Hawai'i State Plan .....	3-1

3.1.3	Coastal Zone Management .....	3-1
3.2	COUNTY OF HAWAI'I PLANS, POLICIES, AND CONTROLS .....	3-2
3.2.1	County of Hawai'i General Plan .....	3-3
3.2.2	County of Hawai'i Land Use Ordinance.....	3-3
3.2.3	Community Development Plans .....	3-3
3.2.4	Coastal Zone Management .....	3-4
<b>4</b>	<b>PERMITS AND APPROVALS.....</b>	<b>4-1</b>
4.1	STATE OF HAWAI'I.....	4-1
4.2	COUNTY OF HAWAI'I.....	4-1
<b>5</b>	<b>ENVIRONMENTAL SETTING, POTENTIAL IMPACTS, AND PROPOSED MITIGATION.....</b>	<b>5-1</b>
5.1	GEOGRAPHIC SETTINGS .....	5-1
5.1.1	Climate .....	5-1
5.1.2	Geology and Soils.....	5-1
5.1.3	Topography .....	5-2
5.1.4	Groundwater.....	5-2
5.1.5	Surface Waters .....	5-3
5.1.6	Flood, Tsunami, and Earthquake Hazard.....	5-3
5.2	BIOLOGICAL RESOURCES .....	5-3
5.3	AIR QUALITY.....	5-4
5.4	WATER QUALITY .....	5-4
5.5	NOISE.....	5-5
5.6	VISUAL RESOURCES .....	5-5
5.7	INFASTRUCTURE AND UTILITIES.....	5-5
5.7.1	Roadways and Traffic Considerations .....	5-6
5.7.2	Water Systems.....	5-6
5.7.3	Drainage Systems .....	5-6
5.7.4	Wastewater System .....	5-6
5.7.5	Electrical, Telephone, Cable, and Gas Services .....	5-6
5.8	ARCHAEOLOGICAL AND CULTURAL RESOURCES.....	5-7
5.9	PARKS AND RECREATIONAL RESOURCES.....	5-7
5.10	SOCIO-ECONOMIC CHARACTERISTICS.....	5-7
5.10.1	Existing Businesses and Surrounding Uses.....	5-8
5.10.2	Demographic Data .....	5-8
5.10.3	Community Services .....	5-8
5.11	ENVIRONMENTAL JUSTICE.....	5-8

5.12	POTENTIAL IMPLEMENTATION IMPACTS AND MITIGATION MEASURES .....	5-9
<b>6</b>	<b>CONSULTED PARTIES.....</b>	<b>6-1</b>
<b>7</b>	<b>ANTICIPATED FINDINGS OF NO SIGNIFICANT IMPACT .....</b>	<b>7-1</b>
<b>8</b>	<b>REFERENCES.....</b>	<b>8-1</b>

Appendix A. Subject Property Parcel Information

A-1. Department of Land and Natural Resources Parcel Details

A-2. Real Property Tax Office Records

A-3. Tax Map

A-4. Flood Assessment Report

A-5 EPA EJSCREEN Report

Appendix B. Archeological Inspection Report

Appendix C. Correspondence

C-1. Pre-Assessment Consultation Letter

C-2. Comment Responding to Pre-Assessment Consultation Letter

## **LIST OF FIGURES**

- Figure 1-1. Site Location  
Figure 1-2 Aerial Photograph and TMK Parcels  
Figure 1-3 Site Plan – Existing Conditions

## **LIST OF TABLES**

- Table 6-1. Pre-Assessment Consultation

## **ACRONYMS AND ABBREVIATIONS**

BISM	Big Island Scrap Metal
CZM	Coastal Zone Management
DEM SWD	County of Hawai'i, Department of Environmental Management Department of Environmental Management, Solid Waste Division
EAL	environmental action level
EPA	U.S. Environmental Protection Agency
HAR	Hawai'i Administrative Rules
HDOH	Hawai'i Department of Health
HRS	Hawai'i Revised Statutes
QLT	Queen Lili'uokalani Trust
RAR	remedial action report

# 1 DESCRIPTION OF THE PROPOSED ACTION

This Section provides background information as well as a description of the proposed action.

## 1.1 BACKGROUND

The former Kealakehe Metal Salvage Facility is located in the North Kona industrial area mauka (mountain-ward) of Queen Ka'ahumanu Highway (Figure 1-1) in North Kona, adjacent to the current Kealakehe Transfer Station (Figure 1-2). The facility also includes a small area of fill material extending onto adjacent Queen Lili'uokalani Trust (QLT) land. Residual solid waste debris is present on the facility and extends to the south onto the adjacent QLT property.

Past salvage operations have caused site soils to become contaminated with lead. Although the metal salvaging area is currently unused, stockpiles of soils and rock containing assorted small debris (metal, plastic, wood) have accumulated on the subject property. The presence of lead in stockpile soils, at concentrations above Hawai'i environmental action levels (EALs), was identified during preliminary environmental sampling performed in 2010 (Element 2010) and in 2011 (Integral 2011). Lead-contaminated soil is also present within working surfaces throughout the subject property.

## 1.2 PROJECT NEED AND OBJECTIVE

Closure and remediation actions are required by the solid waste permit for the former metal salvage facility, issued by the State of Hawai'i Department of Health (HDOH). The lead-contaminated soil that remains on the subject property presents a potential hazard by direct contact and must be addressed. The objective of the proposed action is to prevent human direct contact with lead by remediating the subject property. The remediation would eliminate the current environmental impacts by meeting HDOH Tier 1 EALs for lead under a commercial/industrial land use scenario. Therefore the proposed remediation project aims at restoring and reclaiming land for productive future beneficial use.

## 1.3 PROJECT LOCATION, VICINITY, AND CONDITIONS

A description of the project location and its vicinity is provided below.

### 1.3.1 Project Location and Current Land-use

The facility is located in the North Kona industrial area on Queen Ka'ahumanu Highway adjacent to the existing solid waste transfer station and former green waste facilities (Figure 1-

1). The limits of the former metal salvage operations are delineated on Figure 1-2 by a red outline, and include a small area of fill material extending onto adjacent QLT land, for a total of approximately eight acres. Only the limits of the former metal salvage operations, herein referred to as the subject property, are included under the present scope of work. The site plan (Figure 1-3) shows the area included under this scope of work and identifies key features such as the soil stockpiles, south plateau, QLT area, and miscellaneous debris. Debris removal will target the four soil stockpiles, the south plateau, and the area of fill material extending onto the adjacent QLT area.

The facility also contains two concrete structures, a loading dock and a former fluid-recovery concrete containment pad, which require cleaning, removal, crushing, and reuse as coarse inert fill or disposal. Some asphalt paving around the former scale house and loading dock area will require removal, crushing, and reuse as inert fill onsite. The soil stockpiles consist of a mixture of rock, soil, and solid waste debris (e.g., metal, plastic, foam, and other inert materials).

The facility was previously operated by Big Island Scrap Metal (BISM) as a scrap metal salvage facility. Salvage operations were conducted under Solid Waste Management Permit No. SV-0008-03 issued by the HDOH SHWB issued jointly to BISM (operator) and County of Hawai'i (lessee), which expired on August 5, 2008. The County was operating under an administrative extension until closure. The County of Hawai'i, Department of Environmental Management, Solid Waste Division (DEM SWD) has terminated the salvage operations in 2013 and wishes to close the permits, and perform necessary remediation work to address impacts to site soils.

### **1.3.2 Land Ownership**

The subject property is owned by the State of Hawai'i Department of Land and Natural Resources and is leased by the County of Hawai'i DEM SWD. It is part of a larger parcel of approximately 30 acres, identified by Tax Map Key (TMK) (3) 7-4-020:016, which includes the adjacent solid waste transfer station, the closed Kailua landfill, and the Humane Society. The entire Parcel 16 is leased by the County of Hawai'i (Appendix A-1). According to Real Property Tax Office records, the property class is Industrial (Appendix A-2). As previously described, some fill material from the site operations now extends onto the adjacent QLT property, with Tax Map Key (3) 7-4-020:022.

### **1.3.3 Immediately Surrounding Uses, Tenants, and Structures**

The subject property is bounded by Hale Makai Place (also known as the "Old Dump Access Road") to the north, the closed Kailua landfill immediately to the east, QLT property to the south, and the former green waste recycling operations to the west. The Humane Society and impound vehicle site are located beyond the former green operations to the west. The Kealakehe Police Station is located across the road to the north, as well as a County HI-5 Redemption Center (Figure 1-2).

### **1.3.4 Existing Conditions**

The scrap metal facility is co-located on the same parcel as the closed Kailua Landfill and the current solid waste transfer station. Figure 1-3 illustrates the site features, former operational activity areas, and general topography. The natural grade in the vicinity of the site slopes from east to west, toward the ocean, and grade elevations range from about 100 to 120 ft above mean sea level.

The entrance to the facility is on Hale Makai Place at the northeast corner of the facility. Solid waste disposal chutes and collection bins are located in the far northeast corner of the site, at an elevated and paved public convenience center. To drop off general refuse, the public drive their vehicles past the solid waste transfer station entrance up the curved ramp drive to the waste transfer chutes. Prior to the metal salvage facility closing, the public dropping off metal wastes entered the main gate of the solid waste transfer station and proceeded across the asphalt pavement to the metal salvage operations area. County office and storage buildings are also located along the northern perimeter of the site, just west of the refuse transfer facility. The majority of the site is earthen surfaces. Broken asphalt concrete pavement and concrete pads are present around the loading dock and compactor area.

## **1.4 PROJECT DESCRIPTION**

A description of the proposed action, including a preliminary cost estimate and schedule, is provided below.

### **1.4.1 Proposed Action**

The proposed action consists of excavating all non-recyclable waste materials and all lead-impacted soil/rock/debris and transporting the material to the West Hawai'i Sanitary Landfill, conducting post-excavation confirmation sampling, grading, backfilling portions of the site with clean aggregate, and vegetating. The excavated waste material and the lead-contaminated soils exceeding the commercial/industrial land use EAL (>800 mg/kg) will be disposed of at the West Hawai'i Sanitary Landfill. This is the only solid waste landfill on the Island of Hawai'i that is permitted to accept non-hazardous lead-contaminated soil. This facility is located near Waikoloa, approximately 22 miles from the subject property, and it is owned by the County of Hawai'i and operated by Waste Management, Inc. This alternative assumes that the excavated soil is not considered a hazardous waste, as indicated by toxicity characteristic leaching procedure analytical results (Element 2010). Additional waste characterization sampling and analysis will be performed to ensure the material is not a hazardous waste and is suitable for on-island landfill disposal. If waste characterization identifies any hazardous waste, that material will be either treated (e.g. stabilized) to remove hazardous waste characteristics and

landfill disposed on-island or transported to a mainland U.S. hazardous waste treatment and disposal facility.

Fill material placed on the adjacent QLT property will also be removed and disposed of in the West Hawai'i Sanitary Landfill; the QLT property will be remediated such that all residual contamination levels meet the HDOH EAL for unrestricted land use.

The above activities will be accomplished through the following main steps:

1. Waste material sampling and analysis in preparation for landfill disposal
2. Large debris removal, recycling, or disposal
3. Demolition of two concrete structures and associated asphalt pavement;
4. Excavation and landfill disposal of soil/debris stockpile material
5. Recycling of ferrous metal debris and washing of large rocks for onsite reuse
6. Excavation of the top 1 ft of soil and landfill disposal, and preliminary site restoration consisting of soil stabilization
7. Soil environmental investigation, and comparison of results to EALs, to determine whether further soil excavation is needed
8. Excavation of additional impacted soil (if identified) and landfill disposal
9. Stabilization and revegetation of bare soil areas to control dust
10. Preparation of closure and remediation reports documenting cleanup.

### **1.4.2 Effectiveness**

Excavation and offsite disposal of soils with lead exceeding the EALs will be an effective long-term remedy. This alternative will eliminate the potential for human direct contact with hazards associated with lead-contaminated soils. This alternative will remove lead to acceptable levels, and thereby reduce the toxicity, mobility, and volume of contamination at the property; however the impacted soil would still need to be disposed of at a permitted landfill facility. The final environmental investigation will analyze the soil substrate to confirm that all impacted soils above applicable EALs have been removed. The investigation will include sampling from throughout the subject property as well as sampling at the perimeter. Short-term effectiveness, during and immediately after the Response Action, is only moderate since there is potential exposure to site workers and the community during implementation of the soil excavation, transport, and disposal. Short-term effectiveness can be improved by strong engineering and management controls, such as personal protective equipment for workers and air monitoring and mitigation measures for dust suppression.

Overall, the proposed project would achieve the objective of preventing human direct contact with lead and would be consistent with HDOH guidance for managing contaminated soil (HDOH 2009). This alternative would be in full compliance with all regulatory requirements. The remedy will allow closure to be obtained from HDOH and will also allow future beneficial reuse of the subject property.

### **1.4.3 Implementability**

Integral Consulting Inc. calculated that approximately 29,600 cubic yards of soil will require removal and disposal under this alternative. The excavation and offsite disposal of soil can be implemented using traditional construction techniques. This alternative is simple in approach (i.e., "dig and haul"). Dust control and soil erosion control measures must be implemented during excavation and loading activities to ensure community and worker health and safety. Large volumes of rock/soil would have to be transported by truck over local roadways, resulting in an increase in truck traffic and potential neighborhood disturbances. The remedy is expected to take approximately eight months to implement, which could result in some disturbance to ongoing solid waste transfer station operations.

### **1.4.4 Preliminary Cost Estimate**

For cost analysis purposes, the following key assumptions have been made:

1. A total of 22,800 cubic yards of soil/debris "piles" (including QLT area) and 6,800 cubic yards (29,600 cubic yards total) of surface soils will require landfill disposal
2. Plateau surface under soil/debris piles does not contain significant residual solid waste debris (only soil and rock)
3. All soil in debris piles and upper 1 ft of plateau surface (but not deeper) is lead-contaminated above the HDOH commercial/industrial EAL.

<b>Item Description</b>	<b>Cost</b>	
<b>I. Direct Construction Costs</b>	<b>\$3,950,000</b>	
Site Preparation		
Soil/Debris Pile and QLT Area Material Removal and Landfill Disposal		
Site Restoration		
<b>II. Indirect Costs</b>	<b>\$430,000</b>	
Existing Conditions and Post-Closure (As- Built) Surveys		
Design, Work Plans, Permitting		
Project Management, Engineering Support		
Close-out Report, Obtain No Further Action Determination		
	Project Subtotal	\$4,380,000
	Contingency for Unforeseen (20%)	\$880,000
	<b>Projected Opinion of Probable Cost</b>	<b>\$5,300,000</b>

### 1.4.5 Funding

The project is being funded through the Clean Water State Revolving Fund program. The County has already secured funding for the proposed action.

### 1.4.6 Project Schedule

The following is the proposed project schedule:

- August 2016–February 2017: All debris and the top 1 ft of soil will be removed, followed by a preliminary site restoration consisting of soil stabilization.
- February–March 2017: Following debris and soil removal, the environmental soil investigation will take place.
- March–September 2017: A remedial action report (RAR) will be prepared after completion of the environmental investigation. A draft RAR will be submitted to HDOH for review and approval. After agency approval, a final RAR will be prepared. The RAR preparation, and its review and final approval by HDOH is expected to take 7 months.
- October–November 2017: If further soil excavation is needed, it will take approximately 2 months. The site will be restored at this time.

- December 2017–February 2018: The preparation of the post-closure documentation and its approval by HDOH is expected to take 3 months.

### **1.4.7 Conclusions**

The proposed action is anticipated to adequately manage hazards associated with lead-contaminated soil, is practical to implement, and will allow for future beneficial use of the subject property.

## **2 ALTERNATIVES TO PROPOSED PLAN**

The proposed action consists of excavating all non-recyclable waste materials and all lead-impacted soil/rock/debris and transporting the material to the West Hawai'i Sanitary Landfill. As described below, several other alternatives were considered but not recommended based on the balance of effectiveness, implementability, and cost.

### **2.1 NO-ACTION ALTERNATIVE**

The No-Action alternative consists of no response actions. This alternative would leave the subject property in its current condition.

#### **2.1.1 Effectiveness**

Under this alternative, no engineering features or institutional controls will be used to prevent potential human or ecological risks from exposure to lead-impacted soil. The No-Action alternative would not achieve the objective of preventing human direct contact with lead and is not consistent with HDOH guidance for managing contaminated soil (HDOH 2009).

#### **2.1.2 Implementability**

No action would be needed under this alternative.

### **2.2 SOLID WASTE REMOVAL**

This alternative consists of removal and disposal of the solid waste debris and soils accumulating in four large piles onsite as a result of the former metal salvage operations. This alternative would not address the underlying soils.

#### **2.2.1 Effectiveness**

Given that impacted soils will be still present onsite, this alternative would not achieve the RAO of preventing human direct contact with lead and would not be consistent with HDOH guidance for managing contaminated soil (HDOH 2009). After removal of solid waste debris, the County of Hawai'i will need to address lead-impacted soils underlying the debris/soil piles.

#### **2.2.2 Implementability**

The excavation and offsite disposal of waste can be implemented using traditional construction techniques. This alternative is simple in approach (i.e., "dig and haul"). Dust control and soil

erosion control measures must be implemented during excavation and loading activities to ensure community and worker health and safety. Large volumes of rock/soil would have to be transported by truck over local roadways, resulting in an increase in truck traffic and potential neighborhood disturbances. The remedy is expected to take approximately 7 months to implement, which could result in some disturbance to ongoing solid waste transfer station operations.

## **2.3 SOLID WASTE REMOVAL AND ONSITE SOIL ENCAPSULATION**

This alternative consists of removing and disposing of the solid waste debris accumulating onsite, and consolidating the existing lead-impacted soil piles over the South Plateau; grading to optimize future use; and capping with an engineered cover system to prevent direct contact exposure to the lead-impacted soil. The cover system is expected to consist of a geotextile barrier placed over lead-contaminated soil, with placement of a grid of warning tape over the geotextile, and covered by 6 in. of aggregate base and 4 in. of asphalt pavement. Alternatively, a 2-ft-thick vegetated clean soil cover could be used in lieu of aggregate/asphalt in areas with no intended future operational use. The cost differential between soil and aggregate/asphalt cover systems is not expected to be significant, so for costing this preliminary alternative, we have assumed all aggregate/asphalt cover. Since the lead in site soils has been shown not to leach at appreciable levels, no impermeable barrier is required in the cover design.

### **2.3.1 Effectiveness**

This alternative would achieve the RAO of preventing human direct contact with lead and would be consistent with HDOH guidance for managing contaminated soil (HDOH 2009). Excavation and onsite encapsulation of soils with lead exceeding the EAL would eliminate the potential for human direct contact hazards associated with lead-contaminated soils, and it represents an effective long-term remedy. However the impacted soil would still be present onsite. Institutional controls would be required for this remedy, to include a deed notice and an Environmental Hazard Management Plan requiring long-term cap maintenance. Additionally, the impacted soil would need to be disposed of at a permitted landfill facility at some point in the future, should the property owner decide to redevelop the subject property for other beneficial reuse. Short-term effectiveness, during and immediately after the Response Action, is only moderate since there is potential exposure to site workers and the community during implementation of the soil excavation, transport, and disposal. Short-term effectiveness can be improved by strong engineering and management controls, such as personal protective equipment for workers and air monitoring and mitigation measures for dust suppression. This alternative would be in full compliance with regulatory requirements.

### **2.3.2 Implementability**

The excavation and offsite disposal of soil can be implemented using traditional construction techniques. This alternative is simple in approach (i.e., “dig and haul”). Dust control and soil erosion control measures must be implemented during excavation and loading activities to ensure community and worker health and safety. Large volumes of rock/soil would have to be transported by truck over local roadways, resulting in an increase in truck traffic and potential neighborhood disturbances. The remedy is expected to take approximately 8 months to implement, which could result in some disturbance to ongoing solid waste transfer station operations.

### **3 RELATIONSHIPS TO PLANS, POLICIES, AND CONTROLS**

This section describes how the proposed action relates to existing plans, policies, and controls.

#### **3.1 STATE OF HAWAII PLANS, POLICIES, AND CONTROLS**

The proposed action is consistent with the State of Hawai'i's plans, policies, and controls as discussed herein.

##### **3.1.1 State Land Use District**

The State of Hawai'i Land Use Commission regulates land use through classification of state lands into four districts: Urban, Agriculture, Conservation, and Rural. According to the County of Hawai'i Planning Department, the State Land Use of parcel 16 (the subject property is a portion of this parcel) is designated as Conservation (Appendix A-1). The land in the vicinity of the subject property and parcel 16, including the neighboring QLT parcel, is designated as Urban; a residential subdivision is planned for development on this parcel, as visible on the tax map plat (Appendix A-3, Tax Map, identified as Keahuolu Subdivision, File Plan 2041).

##### **3.1.2 Hawai'i State Plan**

The Hawai'i State Plan, Chapter 226 of the Hawai'i Revised Statutes (HRS), outlines a set of goals, themes, objectives, and policies to serve as guidelines for future growth and development in the state. The Hawai'i State Plan promotes the growth and diversification of the state's economy, the protection of the physical environment, the provision of public facilities, and the promotion of and assistance to socio-cultural advancement.

The proposed action would support the goals and objectives of the Hawai'i State Plan dealing with economic, physical, and natural environment objectives and policies. The proposed action would be protective of the environment as it would remediate and reclaim currently impacted land. The proposed action would facilitate commerce by reclaiming currently unused land and allowing for future beneficial use by the State of Hawai'i (the land owner). As described in this environmental assessment (Section 5), the proposed action will not have any adverse impacts. Potential short-term impacts associated with the implementation of the proposed action (excavation, transport, and offsite disposal of soils and debris) will be mitigated as described in Section 5.12.

##### **3.1.3 Coastal Zone Management**

The entire state of Hawai'i is included in the Coastal Zone Management (CZM) area, per the definition of CZM provided in HRS 205-1. Federally funded activities within Hawai'i's CZM

area must be consistent with CZM objectives and policies. The proposed action is consistent with the objectives and policies of the State CZM:

- **Recreational Resources:** The proposed action will not affect existing recreational resources located in the area, as further discussed in Section 5.9 of this report.
- **Historical Resources:** The proposed action will not affect historical resources, as further discussed in Section 5.8 of this report.
- **Scenic and Open Space Resources:** The proposed action will not affect scenic and open space resources, as further discussed in Section 5.6 of this report.
- **Coastal Ecosystems:** The subject property is located approximately 1.7 miles from the coastline. Therefore coastal habitats would not be affected by the project. Potential water runoff during the proposed action's implementation is addressed in Section 5.12 of this report.
- **Economic Uses:** The proposed action would reclaim public land for future beneficial uses of the subject property. The subject property would allow for future development, such as public facilities, on a parcel that has been already developed and used for the past decades, without the need for disturbing undeveloped land.
- **Coastal Hazards:** The subject property is not located in a hazard-prone area, as further discussed in Section 5.1.6 of this report. Also refer to Coastal Ecosystem above.
- **Managing Development:** The proposed action is consistent with the objective of improving the development review process, communication, and public participation by undertaking the ongoing Environmental Assessment process.
- **Public Participation:** Consultation with federal, state, and county agencies is ongoing. Also local representatives, community associations, and cultural and historical groups have been involved in the consultation. For a complete list of entities included in the consultation process, please refer to Section 6 of this report.
- **Beach Protection:** The proposed action would not affect coastal erosion given its distance from the shoreline.
- **Marine Resources:** The proposed action would not affect coastal erosion given its distance (1.7 miles) from the shoreline. Potential water runoff during implementation of the proposed action is addressed in Section 5.12 of this report.

### 3.2 COUNTY OF HAWAI'I PLANS, POLICIES, AND CONTROLS

The proposed action is consistent with the County of Hawai'i's plans, policies, and controls as discussed herein.

### **3.2.1 County of Hawai'i General Plan**

The County of Hawai'i General Plan Land Use Pattern Allocation Guide Map designates the subject property as "urban expansion," which allows for a mix of high density, medium density, low density, industrial, industrial-commercial, and/or open designations in areas where new settlements may be desirable, but where the specific settlement pattern and mix of uses have not yet been determined.

### **3.2.2 County of Hawai'i Land Use Ordinance**

According to the County of Hawai'i Planning Commission Zoning Ordinance, North Kona Zone Map Section 25-8-3, the zoning at the subject property is Open (Appendix A-1). According to Real Property Tax Office records, the property class is Industrial (Appendix A-2).

### **3.2.3 Community Development Plans**

The Kona Community Development Plan was adopted by the County of Hawai'i as Ordinance No. 08-131 in September 2008 (County of Hawai'i 2008). The proposed action is in line with the eight guiding principles of the Kona Community Development Plan. Specifically, the proposed action would:

1. Protect Kona's natural resources and culture by remediating existing environmental impacts and reclaiming the land for beneficial reuse
2. Provide connectivity and transportation choices (NA)
3. Provide housing choices by allowing for potential future uses such as residential
4. Provide recreational opportunities by allowing for potential future uses such as recreational
5. Direct future growth patterns toward compact villages by allowing for the future redevelopment of the previously used subject property
6. Provide infrastructure and essential facilities concurrent with growth, by allowing for potential future uses of the subject property that may include infrastructure and essential facilities, given that the land is owned by the State of Hawai'i
7. Encourage a diverse and vibrant economy by reclaiming usable land for future beneficial uses
8. Promote effective governance by reclaiming public land and giving it back to beneficial uses for the community.

### **3.2.4 Coastal Zone Management**

The subject property is not located within the County's Special Management Area (Appendix B-2, County of Hawai'i Planning Department letter).

## **4 PERMITS AND APPROVALS**

The proposed action will require two permits as described below.

### **4.1 STATE OF HAWAI‘I**

One permit will be needed and obtained from the appropriate state agency—National Pollutant Discharge Elimination System (NPDES) Form C, Discharges of Storm Water Associated with Construction Activities, HDOH, Clean Water Branch.

### **4.2 COUNTY OF HAWAI‘I**

One permit will be needed and obtained from the appropriate county agency—Grading Permit, Department of Public Works, Engineering Division.

## **5 ENVIRONMENTAL SETTING, POTENTIAL IMPACTS, AND PROPOSED MITIGATION**

This section describes the existing conditions at and around the subject property, and addresses any potential impacts of the proposed action. There are no expected long-term impacts associated with the proposed action, given that it consists of the remediation of impacted land, and does not include any development of the reclaimed land. However there are potential short-term impacts associated with the implementation of the proposed action (i.e., associated with the excavation, transport, and offsite disposal of the soils and debris). These potential short-term impacts are addressed in Section 5.12.

### **5.1 GEOGRAPHIC SETTINGS**

A brief description of the geographic settings is provided below.

#### **5.1.1 Climate**

The mean annual rainfall in the Kealakehe area is between 8 and 30 in., and the mean annual temperature is 74°F (Giambelluca et al. 2013). Over the course of a year, the temperature typically varies from 68°F to 86°F and is rarely below 65°F or above 88°F. The relative humidity typically ranges from 65 percent (mildly humid) to 85 percent (very humid) over the course of the year, rarely dropping below 43 percent and reaching as high as 100 percent (WeatherSpark 2016). Kona is the only region in the islands where summer rainfall exceeds winter rainfall. There is a marked diurnal wind regime, with well-developed and reliable land and sea breezes, especially in the summer. The Kona coast is sheltered from the predominant regional tradewinds by Mauna Loa, and a light sea-breeze pattern prevails, with onshore winds during the day when the land heats up and offshore winds at night when the land cools off. The seabreezes converge with tradewinds that have passed through the upper slopes of Mauna Loa producing frequent afternoon showers on the mountain slopes. Summer is also the season with a high frequency of these late afternoon or early evening showers. These conditions are somewhat warmer and decidedly drier than in windward locations (WRRC 2016).

#### **5.1.2 Geology and Soils**

The following is a summary of the geology and soil characteristics at the subject property:

Landform: Pahoehoe lava flows

Landform position (two-dimensional): Summit, backslope, shoulder, footslope

Landform position (three-dimensional): Mountainflank

Down-slope shape: Linear

Across-slope shape: Linear, convex

Parent material: Organic material over pahoehoe lava

### Typical Profile

Oa - 0 to 6 in.: highly decomposed plant material

2R - 6 to 16 in.: bedrock

### Properties and Qualities

Slope: 2 to 20 percent

Depth to restrictive feature: 2 to 10 in. to lithic bedrock

Natural drainage class: Well drained

Runoff class: High

Capacity of the most limiting layer to transmit water (Ksat): Low to moderately low (0.00 to 0.06 in./hour)

Depth to water table: Approximately 100 ft

Frequency of flooding: Very rare

Frequency of ponding: None

Calcium carbonate, maximum in profile: 5 percent

Salinity, maximum in profile: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)

Available water storage in profile: Very low (about 1.3 in.) (Soil Survey)

## 5.1.3 Topography

According to the U.S. Geological Survey topographic map for Kailua-Kona, the overall topography throughout the site ranges in elevation from approximately 100 to 120 ft above mean sea level (MSL), though the majority of the site was graded for its construction. The topography in the vicinity of the site slopes moderately to the west, towards the ocean.

## 5.1.4 Groundwater

According to the Aquifer Identification and Classification for the Island of Hawai'i (University of Hawaii 1993), the groundwater beneath the site is located in the Hawi Aquifer system, which extends from Pu'u Pili, peaking at 4,676 ft, northeast along the crest of the mountain range to the extremity of the island between Puakea Point and Upolu Point. The east boundary is the western divide of Pololu Valley.

### **5.1.5 Surface Waters**

According to the Atlas of Hawaiian Watersheds & Their Aquatic Resources (DLNR 2008) the site is located within the Kohanaiki watershed region. The Hawaiian meaning of the name is “small barrenness.” The area of the watershed is 12.1 square miles with maximum elevations of 5,154 ft. The percent of watershed in the different land use districts is as follows: 23.6 percent Agricultural, 26 percent Conservation, and 50.4 percent Urban.

There are no freshwater streams, rivers, ponds, or open surface water bodies located on or immediately adjacent to the site. The site is located approximately 2 miles east and mauka of the Pacific Ocean.

### **5.1.6 Flood, Tsunami, and Earthquake Hazard**

According to the Federal Emergency Management Agency Flood Insurance Rate Map, Community Panel Number 155166 0692 C, the site was identified within Zone X. Zone X designates areas determined to be outside the 500-year flood plain (Appendix A-4). According to the Tsunami Evacuation map of Kailua-Kona, the site is not located within a tsunami evacuation zone.

The subject property is located in a Lava Flow Hazard Zone 4 on a scale of ascending risk 9 to 1 (Wright 1992). The Zone 4 area consists of all Hualalai, a dormant volcano with a lower frequency of eruption than Kilauea and Mauna Loa. Less than 15 percent of the hazard zone area has been covered in the past 750 years.

A seismic zone is a region in which the rate of seismic activity remains fairly consistent. Seismic zones are numbered from 0 to 4, with 4 having the highest risk and 0 having the lowest risk of earthquakes. According to the Uniform Building Code Zone Map of the United States, the entire Island of Hawai‘i is rated a Zone 4 Seismic Hazard. Zone 4 areas are at risk from major earthquake damage.

## **5.2 BIOLOGICAL RESOURCES**

The subject property is located within a commercial/industrial area of Kona. Lands altered by a high degree of development are characterized by floral communities dominated by introduced species. Based on the review of the Hawai‘i Biodiversity and Mapping Project, there is no designated critical habitat within the proposed project footprint; however, the endangered Hawaiian petrel and the threatened Newell’s shearwater may fly over the area (see letter from U.S. Fish and Wildlife Service included in Appendix B-2).

The proposed action will not have any adverse impacts on biological resources.

### 5.3 AIR QUALITY

The National Ambient Air Quality Standards have been established for seven major air pollutants: carbon monoxide, nitrogen oxides, ozone, particulate matter smaller than 10 microns, particulate matter smaller than 2.5 microns, sulfur oxides, and lead. Air pollutant levels are monitored by HDOH.

The air quality in West Hawai'i is primarily affected by naturally-occurring volcanic emissions of sulfur dioxide. Sulfur dioxide, sulfuric acid, and other sulfate compounds are finely sized particulate matter. The mixtures of sulfurous gases and particulates appear as fog called "vog." Pacific trade winds carry the vog from the eruption vents of Kilauea towards the Dona Coast.

According to the Hawai'i Clean Air Branch Ambient Air Quality Data, the average sulfur dioxide concentration for October 3, 2015, through February 3, 2016, was 0.0025 ppm. National Ambient Air Quality Standards list the standard limit for sulfur dioxide as 0.075 ppm. The air quality in Kona is considered moderate.

The proposed action will not have any adverse impacts on the current air quality.

### 5.4 WATER QUALITY

Water runoff from the site that does not infiltrate into site soils generally travels as sheet flow from the center of the site to either the north or south property perimeters. The north perimeter storm runoff appears to flow into a public conveyance system that presumably discharges to the Pacific Ocean. Storm runoff discharging from the south perimeter appears to infiltrate into the open undeveloped ground. The site is situated on the slopes above the Pacific Ocean, and storm runoff generally flows from east to west down the slope to the Pacific Ocean. Stormwater presumably may collect site sediments with lead and could potentially migrate offsite.

With regard to risks to underlying groundwater, a leaching study was performed in 2011 (Integral 2011), in accordance with HDOH guidance, to evaluate the potential for lead in site soils to affect underlying groundwater. The leaching study allowed determination of a partitioning coefficient ( $K_d$ ) for lead, which is defined as the ratio of the concentration of the subject compound in the solid phase divided by the concentration in the aqueous phase. Compounds are not considered highly leachable if the  $K_d$  values are greater than 20. Results from the 2011 study showed the  $K_d$  values ranged from 95 to 200 (much greater than 20), and therefore, the lead is not considered leachable in these soils.

The proposed action will not have any adverse impacts on the current water quality. To the contrary, future stormwater quality from the site after the remediation is completed will improve as a result of the source of lead being removed from site soils. The four stockpiles that contain the concentration of lead-impacted soils and other debris will be removed and disposed

of in the West Hawai'i Sanitary Landfill, thereby eliminating the main source of lead. Also, site surface soils will be tested, and any soils above applicable HDOH EALs will be removed and disposed of in a landfill, eliminating the sources of lead and the potential for offsite migration with stormwater runoff.

Other pollutants, such as metals from exposed scrap debris, will also be eliminated from the stormwater runoff as a result of these materials being removed from the site. The final graded site will consist of clean surface soils, eliminating any potential polluted runoff from solid waste or scrap sources.

## 5.5 NOISE

The subject property is located in a commercial/industrial area. Noise levels in the vicinity are relatively moderate with peaks of higher level noise mostly associated with the following:

- The activities at the solid waste transfer station: These entail vehicular traffic of private individuals dumping their refuse, as well as commercial trucks transporting the refuse from the solid waste transfer station to the landfill.
- County HI-5 redemption center: The redemption center generates noise when emptying bottle/can-filled containers for recycling.
- The Humane Society: Animals living at the shelter, particularly dogs, have been noted to bark for extended periods of time.

The proposed action will not have any adverse impacts on the current noise levels.

## 5.6 VISUAL RESOURCES

Viewplanes or vistas are described as all surface areas visible from an observer's viewpoint. At the subject property, the only available open and scenic viewplane is to the south, overlooking the QLT parcel that is currently undeveloped. Mauka of the subject property, there is the solid waste transfer station, and the closed Kailua landfill further mauka. Makai of the subject property there is the Humane Society, and further makai the commercial/industrial buildings along the highway. North of the subject property, there is the Kealakehe Police Station and the County HI-5 redemption center. The proposed action will not have any adverse impacts on current viewplanes and vistas.

## 5.7 INFRASTRUCTURE AND UTILITIES

The infrastructure and utilities at and around the subject property are described below.

### **5.7.1 Roadways and Traffic Considerations**

Hale Makai Place Road starts at Queen Ka'ahumanu Highway and stretches to the east, dead-ending at the closed Kailua Landfill. Therefore, the road serves only the commercial and industrial businesses located along Hale Makai Place. The overall distance from the highway to the road's endpoint is approximately 0.3 mile. Traffic is generally light on this road. Most of the vehicular traffic is directed to the solid waste transfer station at the end of the road. The intersection of Hale Makai Place and the highway is served by a traffic light.

The proposed action will not have any adverse impacts on roadways and traffic conditions.

### **5.7.2 Water Systems**

The subject property is served by the County of Hawai'i Department of Water, which has a water line located along Hale Makai Place. The line serves tenants located on this road (tenants identified in Section 1.3.3). There is a fire hydrant located on Hale Makai Place, near the Kealakehe Police Station. The proposed action will not have any adverse impacts on the current water systems.

### **5.7.3 Drainage Systems**

Surface water and groundwater quality have been discussed in detail in Section 5.4 of this report. The north perimeter storm runoff appears to flow into a public conveyance system that presumably discharges to the Pacific Ocean, while runoff discharging from the south perimeter appears to infiltrate into the open undeveloped ground. The proposed action will not have any adverse impacts on current drainage systems, but it would rather constitute an improvement to current conditions.

### **5.7.4 Wastewater System**

There is no wastewater system currently in place at the subject property. The nearest restroom is located on the adjacent site, the solid waste transfer station. The proposed action consists of environmental remediation and does not include any site development; therefore, it will not have any impacts on the generation of wastewater.

### **5.7.5 Electrical, Telephone, Cable, and Gas Services**

The subject property is not served by utility services such as electrical, telephone, cable, or gas. The proposed action will not have any impacts on the current utility services.

## **5.8 ARCHAEOLOGICAL AND CULTURAL RESOURCES**

In order to assess the presence of potential archeological and cultural resource, historic maps and previous publicly available archeological studies conducted in the area were reviewed. Additionally an archeological field inspection was conducted in March 23, 2016, by ASM Affiliates. Results of the historical records review and the field inspection are provided in the archeological inspection report (Appendix B).

There are no known archeological or cultural sites present on the surface of the subject property. The subject property has been under light industrial uses for several decades. Given that extent of land disturbance that has occurred in the past, no historical properties are likely to be encountered during the proposed remedial action.

The only historical site that has been recorded in close proximity to the subject property is a wall, identified as Site 5011. Several studies have documented this feature as a core-filled wall on the adjacent QLT parcel to the south, near the southern edge of the subject property, and further mauka on the same QLT parcel. Based on its core-filled construction, Site 5011 has been interpreted as having been built during the Historic Period for boundary marking purposes. The remnant section of this wall located near the edge of the subject property is in poor condition, covered in debris and collapsed along much of its length. Given that adequate documentation of Site 5011 was provided in past studies, the site was approved for “no further work” by the DLNR State Historic Preservation Division. Therefore ASM Affiliates has requested that DLNR State Historic Preservation Division issue a written determination of “no historical properties affected” with regards to the proposed remediation of the subject property.

Therefore the proposed action will not have any adverse impacts on archeological and cultural resources.

## **5.9 PARKS AND RECREATIONAL RESOURCES**

There are no existing parks or recreational resources located adjacent to or near the subject property. Therefore, the proposed action will not have any adverse impacts on parks or other recreational resources.

## **5.10 SOCIO-ECONOMIC CHARACTERISTICS**

The socio-economic characteristics of the area are described in the following sections.

### **5.10.1 Existing Businesses and Surrounding Uses**

The surrounding uses are industrial and commercial. The subject property is bounded by Hale Makai Place Road to the north, the closed Kailua landfill immediately to the east, open sparsely vegetated lava terrain to the south, and the Humane Society and impound vehicle site to the west (Figure 1-2). The Kealakehe Police Station is located across the road to the north, as well as a new County HI-5 redemption center. Two commercial buildings are located further to the west along the highway, past the Humane Society. Several small businesses are located within these two commercial buildings.

The proposed action will not have any adverse impacts on the current business and other surrounding land uses. To the contrary it would benefit the neighborhood by providing land for beneficial uses.

### **5.10.2 Demographic Data**

According to U.S. Environmental Protection Agency (EPA) demographic data, the total population living within a 1-mile radius of the subject property is 295 (Appendix A-5). The proposed action will not have any adverse impacts on the current demographic.

### **5.10.3 Community Services**

The Kealakehe Police Station is located across the street from the subject property to the north on Hale Makai Place. A Kailua-Kona Fire Station is located approximately 2 miles south of the subject property, at 74-5537 Palani Road in Kailua-Kona. The proposed action will not have any adverse impacts on the community services in the area.

## **5.11 ENVIRONMENTAL JUSTICE**

Executive Order 12898 regarding environmental justice requires federal agencies to take appropriate and necessary steps to identify and address disproportionately high and adverse effects of federal projects on minority and low-income populations' health or environment. Because of expected federal funding supporting the proposed action, the project must comply with Executive Order 12898. It should be noted that because Hawai'i is unique in having a majority of traditionally defined "minority" residents, who are otherwise not marginalized, the ethnicity criterion under Executive Order 12898 is often meaningless when applied to Hawai'i. The income criterion may be more useful in evaluating Hawai'i projects. According to EPA data, the low-income population within a 1-mile radius of the subject property is 20 percent, below the state average of 25 percent, below the EPA region average of 35 percent, and below the country average of 34 percent (Appendix A-5). Overall, there are not residents living at or adjacent to the subject property. The nearest residential area is located approximately 2,500 ft

east of the subject property, where Kealakehe High School is also located. Therefore, the proposed action will not have any adverse impacts on minorities or low-income populations in the area.

## 5.12 POTENTIAL IMPLEMENTATION IMPACTS AND MITIGATION MEASURES

Once completed, no adverse impacts are anticipated from the proposed project as described above (Sections 5.1 through 5.11). The selected remedy consists of eliminating the current environmental impacts that are present at the subject property, and reclaiming the land for future beneficial use. The subject property will be restored to its previous conditions, thus allowing the HDOH to use or lease the subject property for various beneficial uses.

However some short-term adverse effects have the potential to occur during the implementation of the selected remedy. These are listed below, along with the planned mitigation measures:

- **The generation of dust:** Project activities such as excavation and transport may stir up unwanted dust. The Kealakehe area is dry with moderate winds. Wind direction is typically onshore during the day, as discussed in Section 5.1.1. Therefore potential dust will tend to migrate east toward the closed Kailua Landfill. Dust mitigation measures that comply with HDOH rules (Hawai'i Administrative Rules [HAR] 11-60.1-33 relating to "Fugitive Dust") will be used during any activity that may disrupt surface soil. Care will be taken to mitigate fugitive dust during excavation and removal activities by spraying water and erecting a perimeter silt fabric dust control fence.
- **The generation of additional vehicular traffic:** Offsite disposal of soil and debris at the landfill will entail trucks traveling to and from the subject property. However, given the volumes of soil and debris estimated in Section 1.4, the implementation of the proposed action is not expected to significantly impact the state highway (State of Hawaii Department of Transportation letter, Appendix B-2). It is not anticipated that any oversized and/or overweight materials and equipment will be transported. A permit will be obtained from the State of Hawai'i Department of Transportation in the event any oversized and/or overweight materials and equipment will need to be transported to and from the subject property.
- **The generation of noise:** Both excavation activities and vehicular traffic for offsite disposal of soils and debris may generate more noise than typically observed in this area. The project activities will comply with the HDOH Administrative Rules Chapter 11-46 addressing community noise control. The surrounding land use is industrial/commercial; therefore, any implementation-related noise will not impact residential areas.

- **The generation of runoff in the event of heavy rain:** The Kealakehe area on average does not receive high levels of rainfall (Section 5.1); therefore, runoff from the subject property is not expected to be a significant issue. However, measures to contain potential runoff will be applied during the implementation of the proposed remediation action. Erosion control measures will be implemented in order to contain runoff onsite, allowing lead-contaminated soil or sediment to be captured and disposed of in the landfill. Waters will be allowed to percolate into soils. Stormwater control measures will be consistent with best management practices described in *Low Impact Development, A Practitioner's Guide* (State of Hawai'i 2006), and the *Stormwater Impact Assessments* guidance (State of Hawai'i 2013). During the remediation stage, a perimeter silt fabric dust control fence will be erected and erosion control berms will be put in place. After remediation, the site will be graded, stabilized with clean aggregate, and vegetated, as a permanent measure to prevent runoff.
- **The potential to disturb seabirds flying over the subject property:** Hawaiian petrels and Newell's shearwaters may transit over the subject property during the implementation of the proposed action, if it occurs during their breeding season running from March to November. During this time, the seabirds fly between the ocean and nesting sites in the mountains. Artificial lighting can adversely impact seabirds, causing disorientation. Night work is not anticipated to occur during the implementation of the proposed project. In the event that any outdoor artificial lighting may be needed, lights will be shielded so that light is directed downwards and not upwards.

## **6 CONSULTED PARTIES**

A list of agencies and organizations that were consulted in the pre-assessment phase of the draft environmental assessment is presented in Table 6-1. A two-page informational flyer and a cover letter were sent to the entities listed in Table 6-1 requesting written comments on the project, if any, and asking whether they wanted to participate in the review of the draft environmental assessment. The cover letter and informational flyer are provided in Appendix C-1. Copies of the written responses that were received are compiled in Appendix C-2. The column “Other Consultation Conducted” in Table 6-1 notes any further consultation that was conducted beyond sending the pre-consultation letter with parties who did not respond. Further consultation may have entailed either phone call, electronic mail, or in-person meeting, as noted on Table 6-1.

## 7 ANTICIPATED FINDINGS OF NO SIGNIFICANT IMPACT

As the proposing agency, the County of Hawai'i DEM SDW anticipates rendering a Finding of No Significant Impact for the proposed project in accordance with Chapter 343 HRS and HAR Sections 11-200-9 and 11-200-11.2. This assessment is based on an evaluation of project impacts in relation to the Significance Criteria that are specified in HAR 11-200-12(b). The 13 Significance Criteria are listed below, followed by a brief discussion of the project in relation to the specific criterion. The nature of the project's potential impacts is discussed in Section 5.12.

1. **Involves an irrevocable commitment to loss or destruction of any natural or cultural resource:** The proposed project does not entail the loss or destruction of any natural or cultural resource, since the subject property is already developed and used by the County of Hawai'i for various uses.
2. **Curtails the beneficial uses of the environment:** The proposed project will not curtail the beneficial uses of the environment, since the subject property is already developed and used by the County of Hawai'i for various uses. The proposed project aims at allowing future beneficial uses of the subject property.
3. **Conflicts with the State's long-term environmental policies or goals and guidelines expressed in Chapter 344, HRS, and any revisions thereof and amendments thereto, court decisions, or executive orders:** The proposed project is not in conflict with any policies, goals or guidelines expressed in Chapter 344, HRS.
4. **Substantially affects the economic or social welfare of the community or State:** The proposed project will not affect in a negative the economic or social welfare of the community or the State. To the contrary, it aims at providing benefits to the community and State, allowing the State of Hawai'i to redevelop or lease the subject property for beneficial uses.
5. **Substantially affects public health:** The proposed project will not affect public health in a negative way. To the contrary, the proposed project aims to ameliorate public health by eliminating direct exposure to lead in soils.
6. **Involves substantial secondary impacts:** The proposed project does not involve substantial secondary impacts.
7. **Involves substantial degradation of environmental quality:** The proposed project does not involve substantial degradation of environmental quality. To the contrary, the proposed project involves an improvement of the environmental quality by remediating lead-impacted soils.
8. **Is individually limited but cumulatively has considerable effect upon the environment or involves a commitment for larger actions:** The proposed project does not have considerable effect upon the environment and does not involve commitment for larger actions. Once implemented, the remedy will be the final action and the site will receive proper closure from regulators.

9. **Substantially affects a rare, threatened or endangered species, or its habitat:** The proposed project does not affect rare, threatened, or endangered species, or their habitat.
10. **Detrimentially affects air or water quality or ambient noise levels:** The proposed project will not affect detrimentally air, water quality, or ambient noise level once implemented. During implementation, some short-term disturbances may occur, as detailed in Section 5.12.
11. **Affects or is likely to suffer damage by being located in an environmentally sensitive area such as a floodplain, tsunami zone, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters:** The proposed project is not likely to suffer any damage by being located in an environmentally sensitive area, as it does not entail any development.
12. **Substantially affects scenic vistas and viewplanes identified in county or state plans or studies:** The proposed project will not affect scenic vistas and viewplanes as it does not entail any development.
13. **Requires substantial energy consumption:** The proposed project will not require substantial energy consumption as it does not entail any development.

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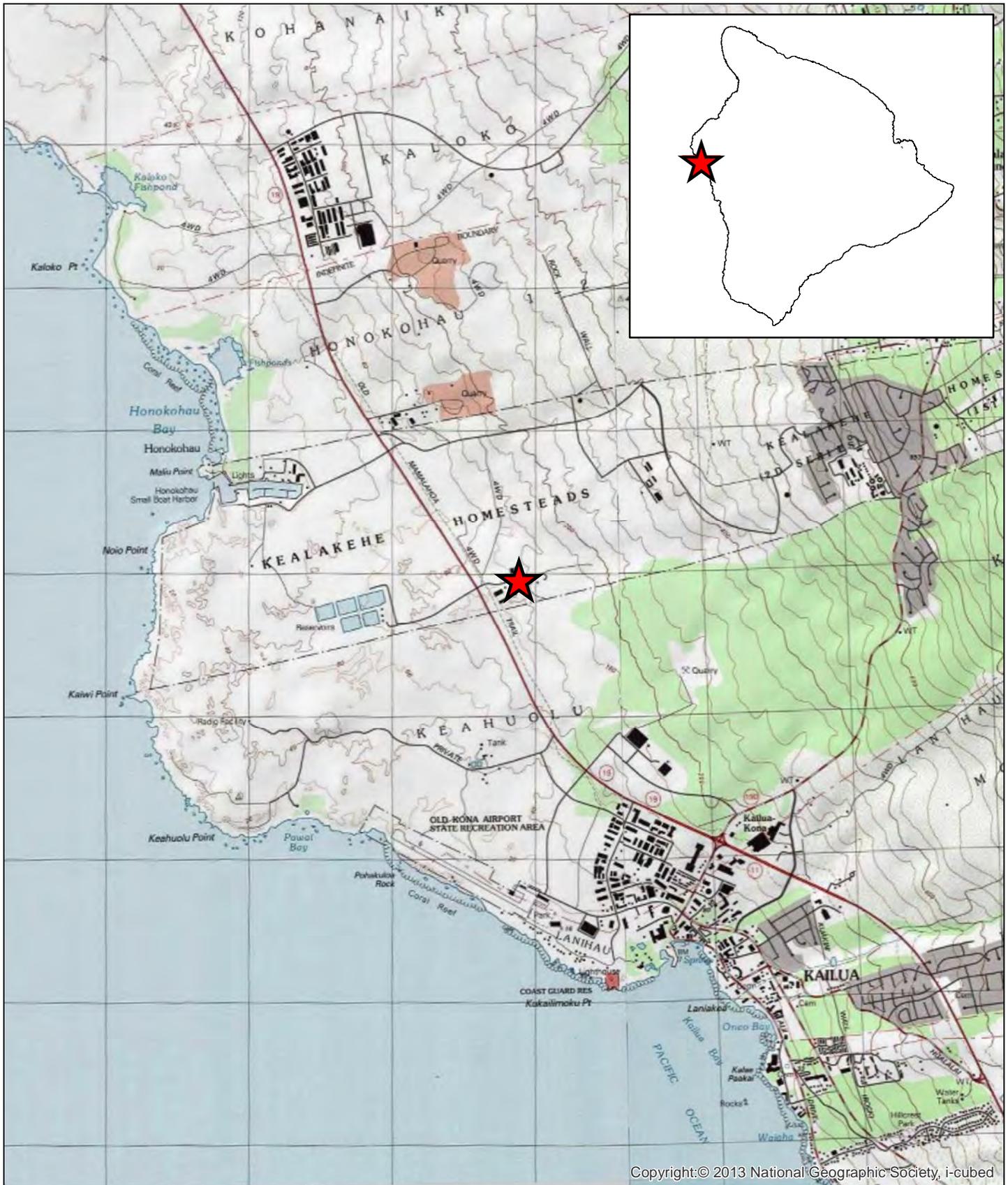
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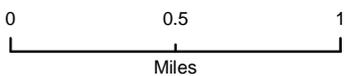
## FIGURES

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integral  
consulting inc



Data Source: ESRI Prime USGS Topographic Map

**Figure 1-1.**  
Site Location  
Kealahou Former Metal Salvage Facility  
Kailua-Kona, Hawaii

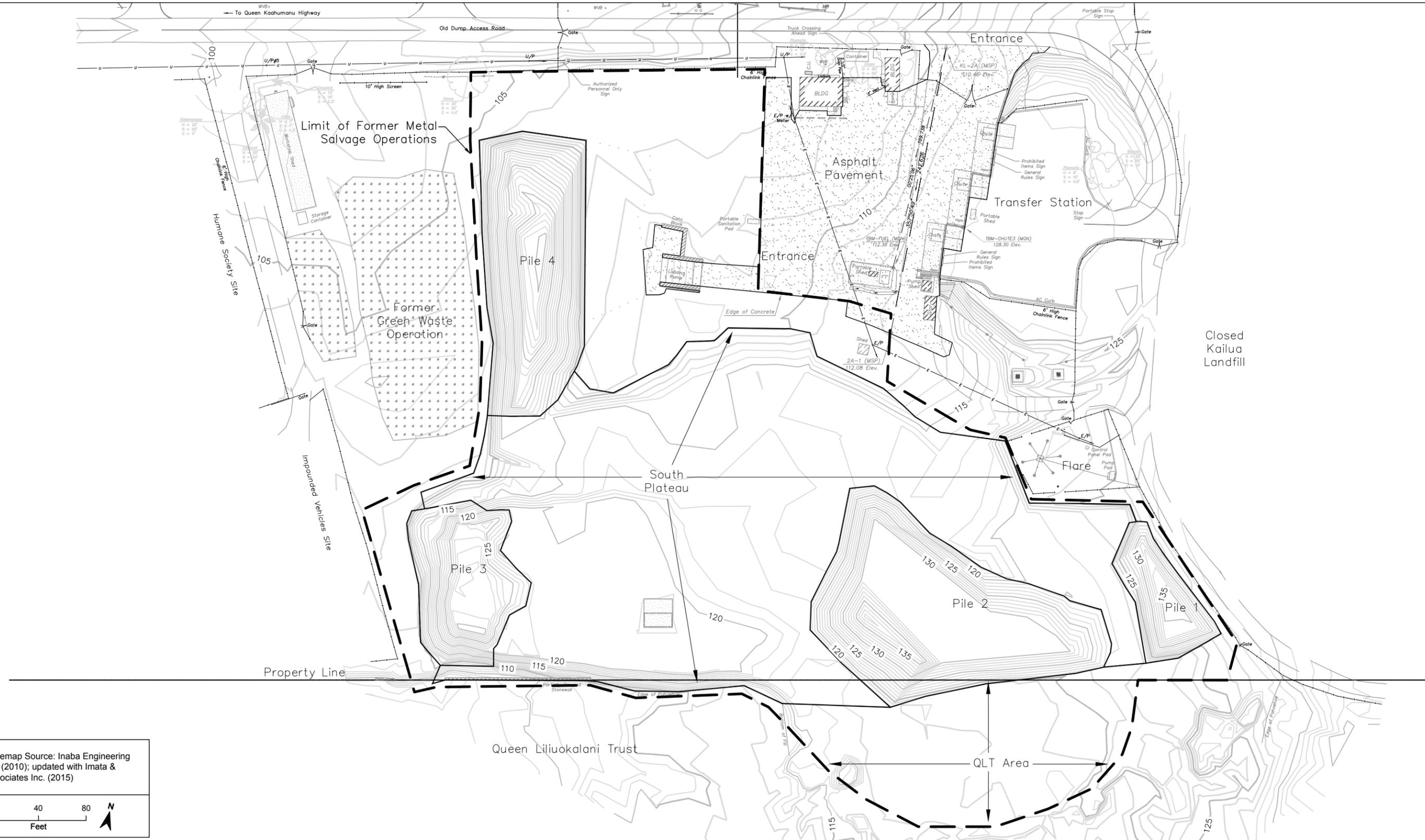
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- Limit of Kealakehe Transfer Station
- Limits of Former Metal Salvage Operations
- Parcel Boundaries

**Figure 1-2.**  
 Aerial Photograph and TMK Parcels  
 Kealakehe Former Metal Salvage Facility  
 Kailua-Kona, Hawaii

P:\Projects\1128\_HKTS\_Cnty\HICAD\Production Drawings\Draft\_EA\Figure\_1\_3\_Site\_Plan.dwg 3/23/2016 2:23:23 PM



Basemap Source: Inaba Engineering Inc. (2010); updated with Imata & Associates Inc. (2015)

0 40 80 Feet

N

--- Limit of Former Metal Salvage Operations

QLT = Queen Liliuokalani Trust

**Figure 1-3.**  
Site Plan - Existing Conditions  
Kealakehe Former Metal Salvage Facility  
Kailua-Kona, Hawaii



## **TABLES**

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Table 6-1. Pre-Assessment Consultation

Organization	Department	Office or Division	Date of Response	Other Consultation Conducted
<b>State of Hawaii</b>				
	Department of Accounting and General Services		2/10/2016	
		Office of Planning	2/4/2016	
	Department of Defense	Office of the Adjutant General	1/21/2016	
	Department of Hawaiian Home Lands			3/1/2016 (phone)
	Department of Health	Environmental Health Administration		
	Department of Health	Environmental Planning Office	2/1/2016	
	Department of Health	Environmental Management Division, Clean Air Branch		
	Department of Health	Environmental Management Division, Clean Water Branch	2/12/2016	
	Department of Health	Environmental Management Division, Safe Drinking Water Branch		
	Department of Health	Hazard Evaluation and Emergency Response Office	2/12/2016	
	Department of Health	Environmental Management Division, Solid and Hazardous Waste Branch		
	Department of Health	Environmental Management Division, Wastewater Branch	1/21/2016	
	Department of Health	Environmental Health Service Division, Indoor and Radiological Health Branch	1/20/2016	
	Department of Health	Office of Environmental Quality Control		3/21/2016 (meeting)
	Department of Land And Natural Resources	Land Division	2/11/2016	
	Department of Land and Natural Resources	State Historic Preservation Division		2/18/2016 (phone)
	Department of Transportation		2/3/2016	
	Office of Hawaiian Affairs		2/8/2016	
<b>County of Hawaii</b>				
	Fire Department		1/25/2016	
	Department of Parks and Recreation			
	Planning Department		2/10/2016	
	Police Department		2/2/2016	
	Department of Public Works		1/28/2016	
	Department of Research and Development			
	Department of Water Supply			
<b>United States Federal Agencies</b>				
	Department of the Interior	Geological Survey, Pacific Island Water Science Center	2/1/2016	
	Department of the Interior	Fish and Wildlife Service	2/11/2016	
	Department of Agriculture	National Resources and Conservation Service, Pacific Islands Area Office		2/25/2016 (phone)
	Environmental Protection Agency	Region IX, Pacific Islands Contact Office		2/18/2016 (phone and email)
<b>Elected Officials</b>				
	Ms. Lorraine Inouye	Senate District 4		
	Ms. Nicole Lowen	House District 6		
	Ms. Karen Eoff	Hawaii County Council		
<b>Other Consulted Parties</b>				
	Queen Liliuokalani Trust		2/11/2016	
	Kaniohale Community Homestead Association			
	Sierra Club Hawaii Chapter			
	Historic Hawaii Foundation			
	Humane Society			

## **APPENDIX A**

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### **SUBJECT PROPERTY PARCEL INFORMATION**

- APPENDIX A-1. DEPARTMENT OF LAND AND  
NATURAL RESOURCES PARCEL DETAILS
- APPENDIX A-2. REAL PROPERTY TAX  
OFFICE RECORDS
- APPENDIX A-3. TAX MAP
- APPENDIX A-4. FLOOD ASSESSMENT  
REPORT
- APPENDIX A-5. EPA EJSCREEN  
REPORT

## **APPENDIX A-1**

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DEPARTMENT OF LAND AND  
NATURAL RESOURCES PARCEL  
DETAILS



**APPENDIX A-2**

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REAL PROPERTY TAX OFFICE

RECORDS



<a href="#">Recent Sales in Area</a>	<a href="#">Previous Parcel</a>	<a href="#">Next Parcel</a>	<a href="#">Return to Main Search Page</a>	<a href="#">Hawaii Home</a>	<a href="#">Real Property Home</a>
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Owner and Parcel Information			
Owner Name	STATE OF HAWAII Fee Owner	Today's Date	February 17, 2016
Mailing Address		Parcel Number	740200160000
Location Address	74-598 HALE MAKAI PLACE	Project Name	
Property Class	INDUSTRIAL	Parcel Map	<a href="#">Show Parcel Map</a> <a href="#">Plat (TMK) Maps</a>
Neighborhood Code	7321A-4	Land Area (acres)	30.139
Legal Information		Land Area (approximate sq ft)	1,312,854

Assessment Information <a href="#">Show Historical Assessments</a>										
Year	Property Class	Market Land Value	Dedicated Use Value	Land Exemption	Net Taxable Land Value	Market Building Value	Assessed Building Value	Building Exemption	Net Taxable Building Value	Total Taxable Value
2015	INDUSTRIAL	\$ 5,464,800	\$ 0	\$ 5,464,800	\$ 0	\$ 51,100	\$ 51,100	\$ 51,100	\$ 0	\$ 0

Appeal Information	
No appeal information on parcel.	

Land Information			
Property Class	Square Footage	Acreage	Agricultural Usage
INDUSTRIAL	1,312,855	30.139	

Commercial Improvement Information											
Property Class	Building Card	Building Number	Improvement Name	Identical Units	Units	Structure Type	Year Built	Effective Year Built	Gross Building Value	Gross Building Description	Sketch
	1	0001	WEST HI HUMANE SOC.	1	1	COMMERCIAL C-1 (WD)	1975	1975	0		NA

Commercial Building Sections											
Card	Section	Level From	Level To	Area	Perimeter	Usage	Wall Height	Exterior Wall	Frame Type		
1	1	01	01	1,025	138	OFFICES	8	WOOD	WOOD FRAME		
1	2	01	01	290	52	WAREHOUSE	8	WOOD	WOOD FRAME		

Commercial Building Other Features		
Description	Measurements	Identical Units

CP - PAVED FL	48 x 18	1	
CP - PAVED FL	16 x 12	1	
PRCH - CEIL; SHED ROOF	4 x 9	1	

Property Class	Building Card	Building Number	Improvement Name	Identical Units	Units	Structure Type	Year Built	Effective Year Built	Gross Building Value	Gross Building Description	Sketch
	2	0002	WEST HI HUMANE SOC.	1	1	COMMERCIAL C-1 (WD)	1989	1989	0		NA

**Commercial Building Sections**

Card	Section	Level From	Level To	Area	Perimeter	Usage	Wall Height	Exterior Wall	Frame Type
2	1	01	01	400	88	WAREHOUSE	8	WOOD	WOOD FRAME

**Commercial Building Other Features**

Description	Measurements	Identical Units
CP - PAVED FL	20 x 5	1
CP - PAVED FL	9 x 6	1

**Other Building and Yard Improvements**

Description	Quantity	Year Built	Area	Gross Building Value
CARPORT OPEN GRAVEL FLOOR	1	1970	336	\$ 1,600
FRAME UTILITY SHED	1	1970	96	\$ 1,300
FRAME UTILITY SHED	1	1970	336	\$ 4,500

**Permit Information**

Date	Permit Number	Reason	Permit Amount
04/18/2002	020449	OB&Y	\$ 22,000
03/25/2002	025374	MISC	\$ 10,000
03/25/2002	025373	MISC	\$ 10,000
10/20/2000	001411	WATERTANK	\$ 666,271
06/05/1998	985596		\$ 300
02/26/1998	985183		\$ 5,000
01/19/1983	830083		\$ 1,200
05/13/1974	59494		\$ 63,500

**Dept of Public Works Bldg Division Permit and Inspections Information**

Permit Date	Permit Type	Permit Number	Permit Reason	Permit Description	Estimated Cost	Inspection Date	Inspection Status
10/15/2012	Plumbing	<a href="#">MH2012-00647</a>	Plumbing Only	PLUMBING ONLY TO INSTALL EXTERIOR HOSE BIBB	\$10,213	12/21/2012	COMPLETED

03/11/2004	Electrical	<a href="#">E2004-0398K</a>	New	SERVICE FOR PRE-WIRED MODULAR OFFICE BLDG.	\$1,000	03/12/2004	REJECTED
03/11/2004	Electrical	<a href="#">E2004-0398K</a>	New	SERVICE FOR PRE-WIRED MODULAR OFFICE BLDG.	\$1,000	03/29/2004	COMPLETED
04/18/2002	Building	<a href="#">020449*</a>	New		\$22,000		
03/25/2002	Building	<a href="#">025373*</a>	New		\$10,000		
03/25/2002	Building	<a href="#">025374*</a>	New		\$10,000		
06/05/1998	Building	<a href="#">985596*</a>	Repair		\$300	06/10/1998	COMPLETED
02/26/1998	Building	<a href="#">985183*</a>	Repair		\$5,000	03/20/1998	COMPLETED

**As a courtesy to the public, we provide building permit data as supplied by the Department of Public Works. As such, no warranties, expressed or implied, are provided for the data herein, its use or its interpretation, and accuracy.**

**Sales Information**

Sale Date	Sale Amount	Instrument #	Instrument Type	Instrument Description	Date of Recording	Land Court Document Number	Cert #	Book/Page	Conveyance Tax	Document Type
03/05/2002	\$ 0	02-042527	OTHER	Grant of easement	03/12/2002					Grant of easement
05/04/1995	\$ 0	0000000000								

**Current Tax Bill Information**    [2015 Tax Payments](#)    [Show Historical Taxes](#)

Tax Period	Description	Original Due Date	Taxes Assessment	Tax Credits	Net Tax	Penalty	Interest	Other	Amount Due
									<b>\$ 0.00</b>
No Tax Information available on this parcel.									

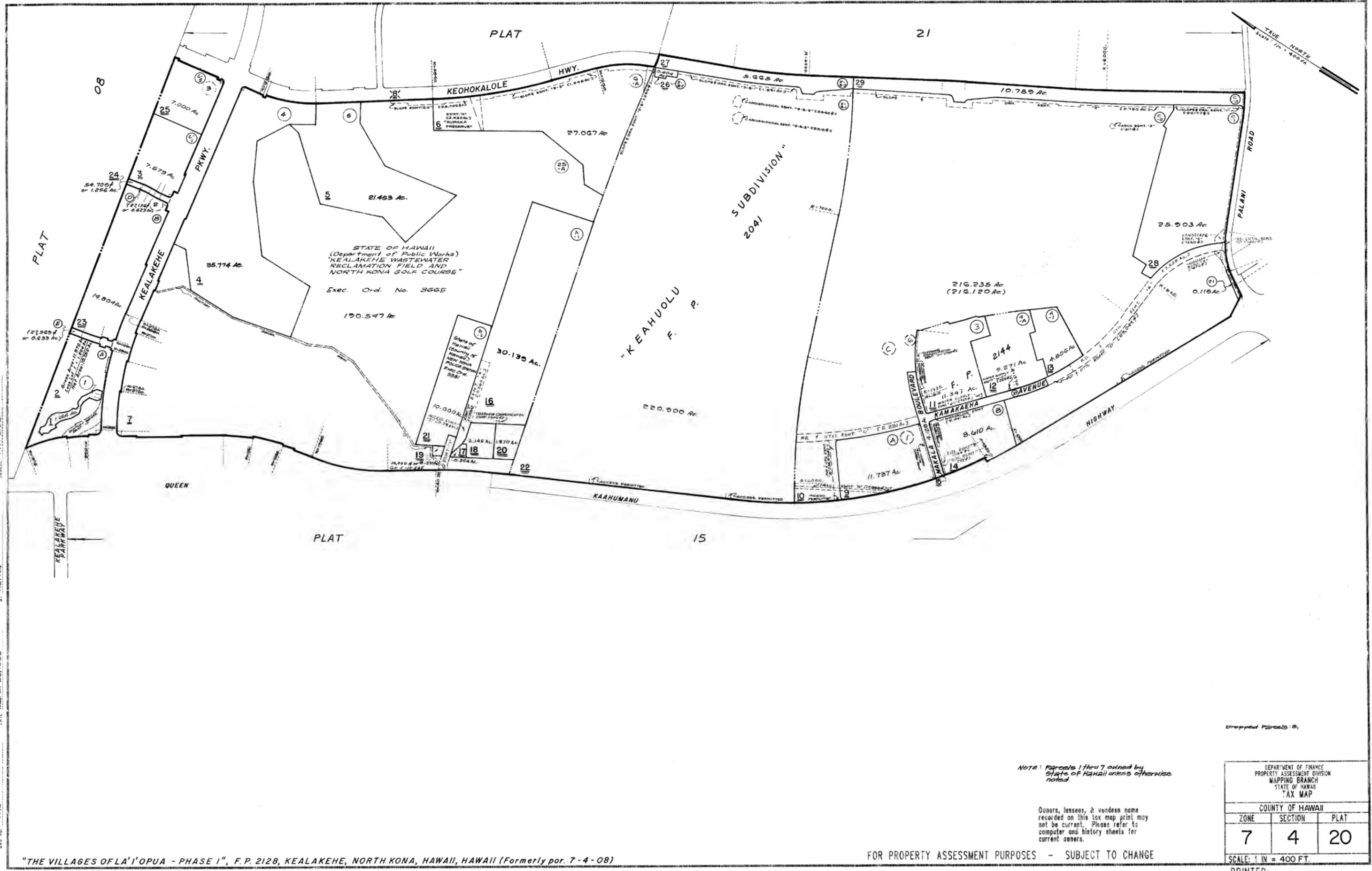
[Recent Sales in Area](#)   
 [Previous Parcel](#)   
 [Next Parcel](#)   
 [Return to Main Search Page](#)   
 [Hawaii Home](#)   
 [Real Property Home](#)

The Hawaii County Tax Assessor's Office makes every effort to produce the most accurate information possible. No warranties, expressed or implied, are provided for the data herein, its use or interpretation. Website Updated: February 12, 2016

## **APPENDIX A-3**

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### TAX MAP



DWG. NO. 7419 DATE March 25, 1995 BY AB/RG SOURCE F.P. 2128

"THE VILLAGES OF LA'I'OPUA - PHASE 1", F.P. 2128, KEALAKEHE, NORTH KONA, HAWAII, HAWAII (Formerly por. 7-4-08)

Note: Parcels 1 thru 7 owned by State of Hawaii unless otherwise noted.

Owners, lessees, & vendees name recorded on this tax map print may not be current. Please refer to computer and history sheets for current owners.

FOR PROPERTY ASSESSMENT PURPOSES - SUBJECT TO CHANGE

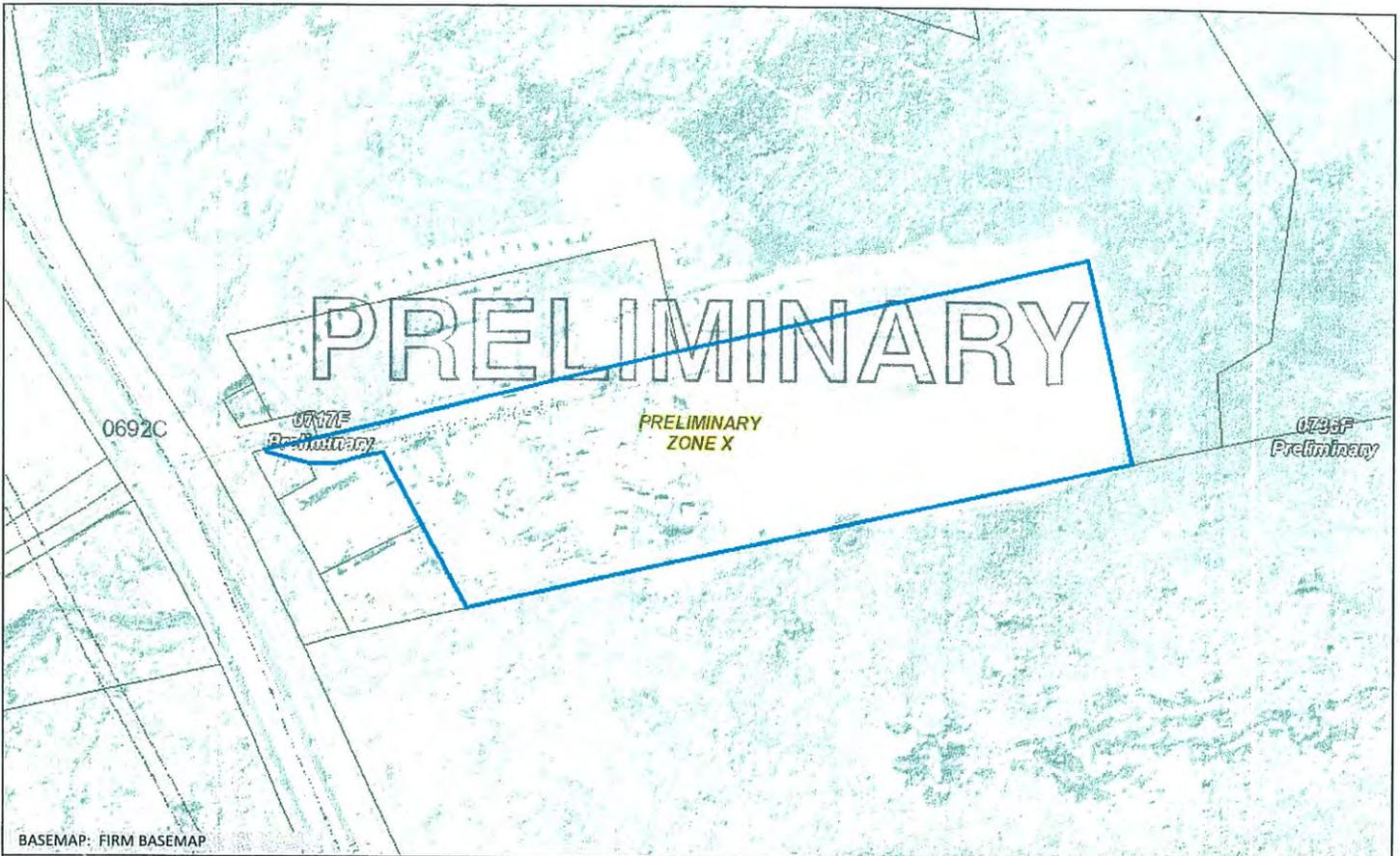
Dropped Parcels: 8,

DEPARTMENT OF FINANCE PROPERTY ASSESSMENT DIVISION MAPPING BRANCH STATE OF HAWAII TAX MAP		
COUNTY OF HAWAII		
ZONE	SECTION	PLAT
7	4	20
SCALE: 1 IN = 400 FT.		
PRINTED: _____		

## **APPENDIX A-4**

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### **FLOOD ASSESSMENT REPORT**



# Flood Hazard Assessment Report

www.hawaiiifip.org

## Remediation Kealakehe MSF

### Property Information

COUNTY: HAWAII  
 TMK NO: (3) 7-4-020:016  
 WATERSHED: HONOKOHAU; WAIAHA  
 PARCEL ADDRESS: 598 HALE MAKAI PLACE  
 KAILUA KONA, HI 96740

### Notes:

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### Flood Hazard Information

FIRM INDEX DATE: APRIL 02, 2004  
 LETTER OF MAP CHANGE(S): NONE  
 FEMA FIRM PANEL: 1551660692C  
 PANEL EFFECTIVE DATE: SEPTEMBER 16, 1988

THIS PROPERTY IS WITHIN A TSUNAMI EVACUATION ZONE: NO  
 FOR MORE INFO, VISIT: <http://www.scd.hawaii.gov/>

THIS PROPERTY IS WITHIN A DAM EVACUATION ZONE: NO  
 FOR MORE INFO, VISIT: <http://dlnreng.hawaii.gov/dam/>



*Disclaimer: The Hawaii Department of Land and Natural Resources (DLNR) assumes no responsibility arising from the use, accuracy, completeness, and timeliness of any information contained in this report. Viewers/Users are responsible for verifying the accuracy of the information and agree to indemnify the DLNR, its officers, and employees from any liability which may arise from its use of its data or information.*

*If this map has been identified as 'PRELIMINARY', please note that it is being provided for informational purposes and is not to be used for flood insurance rating. Contact your county floodplain manager for flood zone determinations to be used for compliance with local floodplain management regulations.*

### FLOOD HAZARD ASSESSMENT TOOL LAYER LEGEND

(Note: legend does not correspond with NFHL)

**SPECIAL FLOOD HAZARD AREAS (SFHAs) SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD** - The 1% annual chance flood (100-year), also known as the base flood, is the flood that has a 1% chance of being equaled or exceeded in any given year. SFHAs include Zone A, AE, AH, AO, V, and VE. The Base Flood Elevation (BFE) is the water surface elevation of the 1% annual chance flood. Mandatory flood insurance purchase applies in these zones:

	<b>Zone A:</b> No BFE determined.
	<b>Zone AE:</b> BFE determined.
	<b>Zone AH:</b> Flood depths of 1 to 3 feet (usually areas of ponding); BFE determined.
	<b>Zone AO:</b> Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined.
	<b>Zone V:</b> Coastal flood zone with velocity hazard (wave action); no BFE determined.
	<b>Zone VE:</b> Coastal flood zone with velocity hazard (wave action); BFE determined.
	<b>Zone AEF:</b> Floodway areas in Zone AE. The floodway is the channel of stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without increasing the BFE.

**NON-SPECIAL FLOOD HAZARD AREA** - An area in a low-to-moderate risk flood zone. No mandatory flood insurance purchase requirements apply, but coverage is available in participating communities.

	<b>Zone XS (X shaded):</b> Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.
	<b>Zone X:</b> Areas determined to be outside the 0.2% annual chance floodplain.

### OTHER FLOOD AREAS

	<b>Zone D:</b> Unstudied areas where flood hazards are undetermined, but flooding is possible. No mandatory flood insurance purchase apply, but coverage is available in participating communities.
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## **APPENDIX A-5**

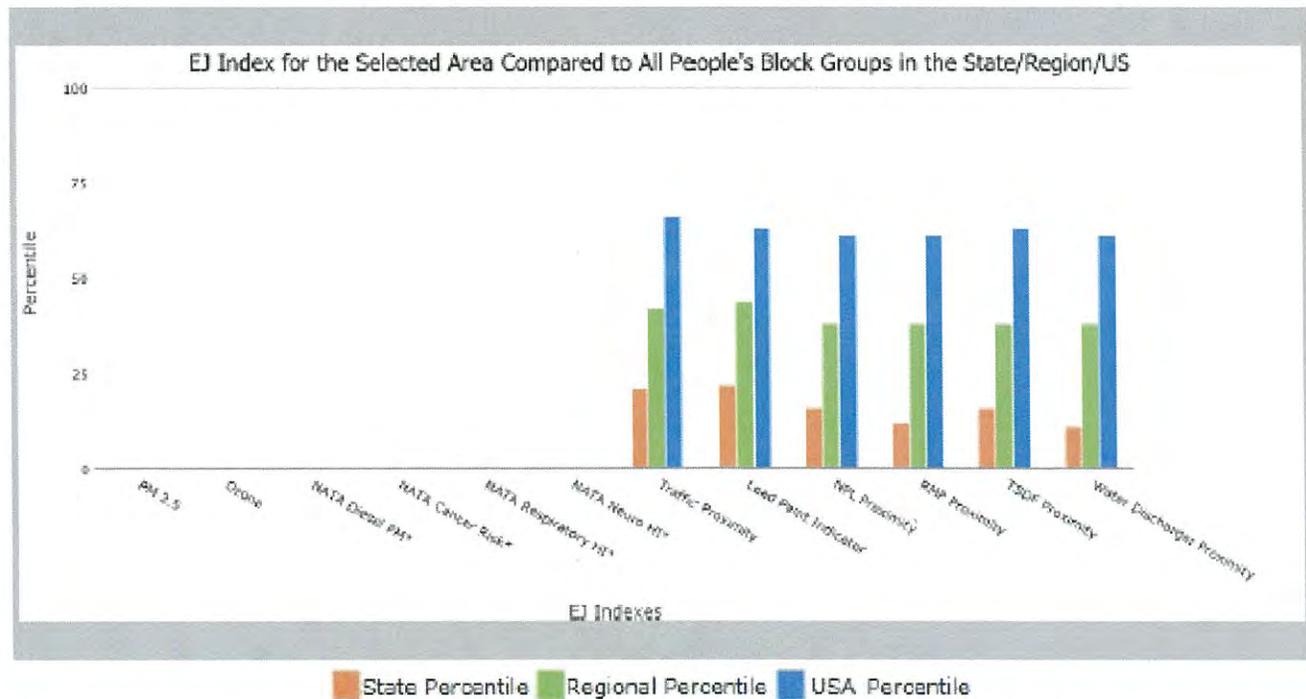
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### **EPA EJSCREEN REPORT**

for 1 mile Ring around the Corridor, HAWAII, EPA Region 9

Approximate Population: 295

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
<b>EJ Indexes</b>			
EJ Index for PM2.5	N/A	N/A	N/A
EJ Index for Ozone	N/A	N/A	N/A
EJ Index for NATA Diesel PM*	N/A	N/A	N/A
EJ Index for NATA Air Toxics Cancer Risk*	N/A	N/A	N/A
EJ Index for NATA Respiratory Hazard Index*	N/A	N/A	N/A
EJ Index for NATA Neurological Hazard Index*	N/A	N/A	N/A
EJ Index for Traffic Proximity and Volume	21	42	68
EJ Index for Lead Paint Indicator	22	44	63
EJ Index for Proximity to NPL sites	18	38	61
EJ Index for Proximity to RMP sites	12	38	61
EJ Index for Proximity to TSDFs	18	38	63
EJ Index for Proximity to Major Direct Dischargers	11	38	61



This report shows environmental, demographic, and EJ indicator values. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

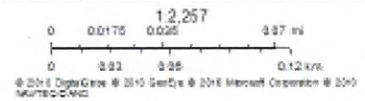
for 1 mile Ring around the Corridor, HAWAII, EPA Region 9

Approximate Population: 295



February 2, 2016

— Digitized Line



Selected Variables	Raw Data	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
<b>Environmental Indicators</b>							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$ )	N/A	N/A	N/A	9.95	N/A	9.78	N/A
Ozone (ppb)	N/A	N/A	N/A	49.7	N/A	46.1	N/A
NATA Diesel PM ( $\mu\text{g}/\text{m}^3$ ) <sup>*</sup>	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Cancer Risk (lifetime risk per million) <sup>*</sup>	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Respiratory Hazard Index <sup>*</sup>	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Neurological Hazard Index <sup>*</sup>	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Traffic Proximity and Volume (daily traffic count/distance to road)	11	280	14	190	12	110	23
Lead Paint Indicator (% Pre-1960 Housing)	0.0018	0.17	14	0.25	17	0.3	10
NPL Proximity (site count/km distance)	0.0033	0.092	11	0.11	0	0.096	0
RMP Proximity (facility count/km distance)	0.013	0.18	3	0.41	1	0.31	0
TSDF Proximity (facility count/km distance)	0.0035	0.092	11	0.12	0	0.054	4
Water Discharger Proximity (facility count/km distance)	0.0097	0.33	0	0.19	0	0.25	0
<b>Demographic Indicators</b>							
Demographic Index	40%	51%	44	46%	56	35%	74
Minority Population	79%	77%	42	57%	69	36%	84
Low Income Population	20%	25%	44	35%	31	34%	31
Linguistically Isolated Population	4%	6%	54	9%	39	5%	67
Population With Less Than High School Education	17%	10%	83	18%	57	14%	68
Population Under 5 years of age	13%	6%	92	7%	91	7%	92
Population over 64 years of age	11%	14%	37	12%	58	13%	48

<sup>\*</sup> The National-scale Air Toxics Assessment (NATA) environmental indicators and EJ indexes, which include cancer risk, respiratory hazard, neurodevelopment hazard, and diesel particulate matter will be added into EJSCREEN during the first full public update after the soon-to-be-released 2011 dataset is made available. The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <http://www.epa.gov/ttn/atw/natamain/index.html>.

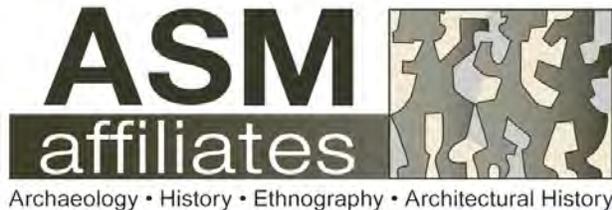
For additional information, see: [www.epa.gov/environmentaljustice](http://www.epa.gov/environmentaljustice)

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

## **APPENDIX B**

---

### ARCHAEOLOGICAL INSPECTION REPORT



March 28, 2016

Susan Lebo  
Archaeology Branch Chief  
State Historic Preservation Division  
601 Kamokila Blvd., Rm. 555  
Kapolei, HI 96707  
Email: Susan.A.Lebo@hawaii.gov

Subject: Archaeological Field Inspection of the Former Kealakehe Metal Salvage Facility, Keahuolū and Kealakehe *ahupua`a*, North Kona District, Island of Hawai`i (portions of TMKs: (3) 7-4-020:016 and 022)

Dear Susan:

At the request of Integral Consulting, on behalf of the County of Hawai`i, Department of Environmental Management, Solid Waste Division, ASM Affiliates (ASM) conducted an archaeological field inspection of a roughly 8-acre study area (portions of TMKs: (3) 7-4-020:016 and 022) in Keahuolū and Kealakehe *ahupua`a*, North Kona District, Island of Hawai`i (Figures 1 and 2). The study area, which is adjacent to the current Kealakehe Transfer Station and the closed Kona landfill (Figure 3), was used as the site of the Kealakehe Metal Salvage Facility for several decades before operations ceased in 2013. During environmental sampling of the salvage facility conducted in 2010, lead was found in the soils. The County of Hawai`i, Department of Environmental Management, Solid Waste Division is currently seeking closure and remediation of the area on which the metal salvage facility operated, to satisfy permit requirements and to improve the land for future productive use. Most of the area (TMK: (3) 7-4-020:016) is owned by the State of Hawai`i and leased to the County of Hawai`i for waste management purposes, but residual solid waste debris extends to the south onto an adjacent property owned by the Queen Lili`uokalani Trust (TMK: (3) 7-4-020:022; see Figure 3). The proposed action for the remediation of the site includes the removal and offsite disposal of all non-recyclable waste materials and contaminated soils at the West Hawai`i Sanitary Landfill in Pu`uanahulu. The current archaeological inspection was conducted to determine if any undocumented historic properties are present within the proposed remediation area.

The study area is located at an elevation of approximately 120 feet above sea level on the western flank of Hualālai Volcano within the Kekaha region of North Kona. The principle environmental features of the Kekaha region are a hot, dry climate, and extensive lava fields with sparse vegetation and very little soil accumulation. Sato et al. (1973) classify the lands in the general vicinity of the current study area as consisting primarily of *pāhoehoe* lava flows (rLW). The lava flows on which the former metal salvage facility is situated originated from Hualālai Volcano roughly 1,500 to 3,000 years before present (Wolfe and Morris 1996). The 8 acres that are the subject of this field inspection, however, consist of a completely anthropogenic, modern landscape. Most of the operating surface within the former facility is raised several meters above the natural

ground surface to the south (Figure 4). Over time, stockpiles of soils and rock containing assorted small debris (metal, plastic, wood) have accumulated on this surface (Figures 5 and 6), and the remaining areas have been bulldozed flat (Figure 7). Although the former metal salvaging facility is currently unused, some metal debris and other inert waste such as plastic, glass, rubber, and foam remain scattered about the site (Figures 8 and 9). Vegetation is limited to a sparse cover of fountain grass on the older stockpiles.

Records on file at DLNR-SHPD indicate that the study area was not surveyed for archaeological sites prior to the construction of the Kealakehe Metal Salvage Facility and Landfill. The lands surrounding the State-owned landfill, transfer station, and salvage facility parcel, however, were the subject of archaeological studies conducted by Paul H. Rosendahl, Ph.D., Inc. (PHRI) in 1989-1990 (Donham 1990a and 1990b; Figure 10). In 1989 PHRI conducted an archaeological inventory survey of 950-acre area for the proposed Kealakehe Planned Community in Kealakehe and Keahuolū *ahupua‘a* (Donham 1990a). As a result of that survey eighty-two sites and 840 individual features were recorded, including 350 rock mounds, 258 *pāhoehoe* excavations, 73 terraces, 46 modified outcrops, 26 cairns, 22 enclosures, 18 walls, 16 platforms, 11 stepping stone trails, 5 pavements, 5 kerbstone trails, 3 caves, 2 hearths, 2 other trails, a c-shape, a midden scatter, and a roadbed. The sites were assigned to eight different functional categories including agricultural, habitation, transportation, possible ceremonial, agricultural/habitation, indeterminate marker, land division/ranching, and possible burial. Within these site categories, the identified features were primarily indicative of Precontact use of the area with some Historic Period additions. Of the eighty-two sites, fifty-three were located within Kealakehe Ahupua‘a, twenty-eight were located within Keahuolū Ahupua‘a, and one wall (Site 5011) extended along the boundary between the two *ahupua‘a*. That wall was the only site recorded in close proximity to the current study area.

Between 1989 and 1990, subsequent to the Donham (1990a) study, PHRI conducted an archaeological inventory survey of 1,100-acres of Queen Lili‘uokalani Trust land within Keahuolū Ahupua‘a (Donham 1990b). This survey included the Keahuolū portion of the current study area (see Figure 10), which at that time had already been developed as part of the metal salvage facility. Donham (1990b) recorded 239 sites that included more than 1,810 individual features. The identified feature types included 892 *pāhoehoe* excavations, 205 mounds, 183 modified outcrops, 83 terraces, 63 modified blisters, 50 caves, 44 platforms, 43 enclosures, 41 walls, 40 cairns, 31 alignments, 18 linear mounds, 18 petroglyphs, 17 rock concentrations, 16 pavements, 13 faced mounds, 13 trails, 10 overhangs, 8 bifaced walls, 5 c-shapes, 5 filled crevices, 3 midden scatters, 2 roadbed sections, 2 modified pools, 2 uprights, a cupboard, and a loading ramp. Functional categories assigned to the formal feature types included agriculture, temporary habitation, permanent habitation, transportation, rock art/recreation, possible aquaculture, marker, burial, and ceremonial. Approximately 90% of all of the features recorded were interpreted as having been utilized for agricultural purposes. Radiocarbon dates obtained from two cave shelters indicate that initial settlement of the area occurred between A.D. 1430 and 1650. There was also ample evidence to indicate that use of the area continued into the early Historic Period (Donham 1990b). None of the identified sites were situated in close proximity to the current study area.

The findings of the inventory surveys reported above have been updated over the years as a result of more recent archaeological studies that have examined smaller portions of the Donham (1990a and 1990b) survey areas (see Figure 10). In 1990 PHRI produced an addendum to their previous

archaeological inventory survey done for the proposed Kealakehe Planned Community in Kealakehe and Keahuolū *ahupua'a* (Donham 1990a). The addendum report (Donham 1990c) re-investigated 53 acres in Keahuolū *Ahupua'a* that were originally surveyed by Donham (1990b). Twenty-four sites containing 279 features were reported on in Donham (1990c), and their numbers were incorporated into the findings of Kealakehe Planned Community project area. Between 1990 and 1991 PHRI conducted more additional archaeological inventory survey within the proposed Kealakehe Planned Community project area (Burgett and Rosendahl 1992). The purpose of the survey was to identify and locate any archaeological sites within or adjacent to six proposed 300-foot wide roadway corridors on the property and within a roughly 45 acre proposed Kealakehe High School site. As a result of the additional survey Burgett and Rosendahl (1992) recorded 44 new sites containing a total of 225 features, and added 103 new features to sites previously recorded by Donham (1990a). The 328 newly identified features included 103 rock mounds, 74 terraces, 44 modified outcrops, 30 'a 'ā excavations, 17 walls, 9 enclosures, 8 cairns, 6 platforms, 6 pavements, 5 caves, 4 alignments, 4 modified blisters, 4 trails, 3 steppingstone trails, 3 modified sinks, 2 paved depressions, 2 filled crevices, a kerbstone trail, a causeway, a cupboard, and a *pāhoehoe* excavation. These features were classified under eight functional categories; 279 were interpreted as agricultural features, 5 contained human burials, 19 were interpreted as habitation features, 3 had an indeterminate function, 8 were markers, 1 was a storage feature, 9 were trails used for transportation purposes, and 3 could have been used for either habitation or agriculture. Based on the results of radiocarbon age determination Burgett and Rosendahl (1992) determined that initial occupation of the area may have occurred as early as A.D. 1410, but that use of some of the features continued into the early Historic Period. The Historic Period wall along the boundary between Kealakehe and Keahuolū *ahupua'a* (Site 5011) was also documented by Burgett and Rosendahl (1992).

More recently, in 2008, Rechtman Consulting, LLC conducted an inventory survey (Ketner and Rechtman 2008) of a proposed reservoir site and associated service road within Keahuolū and Kealakehe *ahupua'a*, at elevations ranging from 500 to 640 feet above sea level (see Figure 10). As a result of the survey two sites originally documented by Donham (1990a), an agricultural complex and the Site 5011 boundary wall, were relocated and three cairns and a multi-feature site containing a linear rock mound and a *pāhoehoe* excavation were newly recorded. With the exception of Site 5011, all of the recorded sites appeared to have been constructed and utilized during the Precontact Period for agricultural and marker purposes. Based on its core-filled construction style and location, Site 5011 was interpreted as having been built during the Historic Period for boundary marking purposes.

In 2009, Cultural Surveys Hawai'i (Tulchin and Hammatt 2009) conducted an archeological inventory survey of a 2.3 kilometer long section of the Ane Keohokālole Highway corridor across Kealakehe and Keahuolū *ahupua'a* at an elevation of roughly 280 feet above sea level (see Figure 10). As a result of the survey twelve archaeological sites were identified. Nine of the twelve sites recorded by Tulchin and Hammatt (2009) were newly identified, while the remaining three had been previously documented during the earlier PHRI archaeological studies. The recorded sites included caves and lava tubes, terraces, a trail, modified blisters, a *pāhoehoe* excavation, and a wall. All of the identified sites were interpreted as being of likely Precontact origins, with the exception of Site 5011, the aforementioned Historic boundary wall. The Precontact sites were interpreted as having been used for agricultural, habitation, transportation, and burial purposes. Also noted by Tulchin and Hammatt (2009) was the presence of two burial caves located just outside (*makai* of) the roadway survey corridor in Keahuolū *Ahupua'a*.

In 2010, Rechtman Consulting, LLC (Clark et al. 2010) conducted an archaeological inventory survey of 52 acres (TMKs: (3) 7-4-021:003 and 023) located within the Kealakehe Planned Community in Keahuolū and Kealakehe *ahupua'a* at elevations ranging from 280 to 400 feet above sea level (see Figure 10). As a result of that study nine sites were recorded. Three of the sites were previously identified (Burgett and Rosendahl 1992; Donham 1990a), the other six sites were newly documented during the Clark et al. (2010) survey. The previously identified sites included a section of the Historic wall along the boundary between the two *ahupua'a* (Site 5011), a Precontact habitation/agricultural complex, and a Historic core-filled wall segment, while a lava blister with a nearby cairn that appeared to have been utilized as a resting/water storage place during Precontact and Historic times, a modified outcrop that may have been utilized for Precontact agricultural purposes, two Precontact stepping-stone trail segments, a Historic/Modern rock wall and fence line utilized for Historic ranching purposes, and a Historic/Modern cairn that appeared to mark the boundary of one of the study parcels were newly recorded.

While the current study area was never surveyed for archaeological sites, the results of archaeological surveys previously conducted in the vicinity of the former Kealakehe Metal Salvage Facility indicate that sites within this transitional area, between the coastal habitation zone and the upland agricultural zone of the Kekaha region of North Kona, are likely to include habitation shelters or temporary use habitations (C-shaped enclosures, enclosures and platforms of small size), inland-heading trails and associated cairns, *pāhoehoe* excavations, rock mounds, and various other Historic Period sites related to habitation, ranching, and agriculture. Although these feature types have been well documented in both Kealakehe and Keahuolū *ahupua'a* in the general vicinity of the study area, they are unlikely to be present within the 8-acre former metal salvage facility, as the area has been completely transformed by mechanical disturbance and decades of use. Only one site recorded during the earlier studies, Site 5011, a core-filled wall documented along the boundary between Kealakehe and Keahuolū *ahupua'a* by Burgett and Rosendahl (1992), Clark et al. (2010), Donham (1990a, 1990c), Ketner and Rechtman (2008), and Tulchin and Hammatt (2009), has the potential to still be extant along the southern edge of the study area at the *ahupua'a* boundary.

On March 23, 2016, ASM archaeologists, Matthew R. Clark, B.A., and Julie E. Kramer, B.S., under the direction of Robert B. Rechtman, Ph.D., conducted an archaeological field inspection of the current study area in accordance with HAR 13§13-275. The pedestrian survey included a visual inspection of the entire surface of the 8-acre study area, which as previously discussed has been significantly altered by its decades of use as a metal salvage facility. No historic properties are present on the surface of the study area, and given the extent of land disturbance that has occurred here in the past, none are likely to be encountered in a subsurface context during removal of the lead contaminated soils. Along the southern edge of the study area, however, a twenty-three meter long, remnant section of the Kealakehe/Keahuolū boundary wall (Site 50-10-28-5011; Figure 11) was identified at the base of a roughly 5 meter tall, debris strewn, rubble slope that defines the edge of the former salvage area (Figure 12). This remnant section of wall is in poor condition, covered in debris and boulder rubble, and collapsed along much of its length (Figure 13). Only the southern edge of the wall, and portions of its top surface are still visible, demonstrating the (Historic) core-filled construction style and stacked cobble edges. The most intact portion of the wall (Figure 14) occurs near the eastern extent of its length where it stands 1.1 meters tall by 0.6 meters wide.

March 28, 2016

Archaeological Field Inspection portions of TMKs: (3) 7-4-020:016 and 022

Page 5 of 14

Site 5011 was previously documented near the current study area by Donham (1990a:A-52), who described it as follows:

This wall follows the ahupuaa boundary between Kealakehe and Keahuolu. It consists of aa and pahoehoe, small to medium boulders and small to large cobbles. The wall is bifaced and core-filled. The wall is oriented an average of c. 220/40 degrees Az. And has a few bends in the eastern section. The east and west ends are currently defined by the boundaries of developed areas, and do not represent the original ends of the wall.

As a result of the Donham (1990a) study, Site 5011 was determined significant under state Criterion d for information it yielded regarding Historic land tenure practices within the Kekaha region; as adequate documentation of the wall was provided in that study, the site was approved for “no further work” by the Department of Land and Natural Resources State Historic Preservation Division (DLNR-SHPD). Since the Donham (1990a) study, portions of Site 5011 located *mauka* of the current study area have been further documented by Burgett and Rosendahl (1992), Clark et al. (2010), Donham (1990c), Ketner and Rechtman (2008), and Tulchin and Hammatt (2009). All of these studies have also recommended no further work for Site 5011, a treatment that in each case has been approved by DLNR-SHPD. Given that Site 5011 has been previously documented and approved for no further work, on behalf of Integral Consulting and the County of Hawai‘i, we are requesting that DLNR-SHPD issue a written determination of “no historic properties affected” in accordance with HAR 13§13-284-5(b)1, with regards to the proposed remediation of the former Kealakehe Metal Salvage Facility. It is argued that that the additional documentation of Site 5011 presented here serves to mitigate any potential impacts to this remnant section of wall that lacks integrity of design and setting, which may occur during the remediation process.

In the unlikely event that additional archaeological resources are encountered within the study area during the removal of the lead contaminated soils, work in the immediate area of the discovery will be halted and DLNR-SHPD contacted as outlined in Hawai‘i Administrative Rules 13§13-275-12.

Should you require further information, or wish to visit the lot, please contact me directly.

Sincerely,

A handwritten signature in black ink, appearing to read "Bob Rechtman", with a long horizontal flourish extending to the right.

Bob Rechtman, Ph.D.  
Principal Archaeologist

## Reference Cited

Burgett, B., and P. Rosendahl

- 1992 Addendum Report: Archaeological Inventory Survey Kealakehe Planned Community Project Area, Lands of Kealakehe and Keahuolu, North Kona District, Island of Hawaii (TMK:7-04-08:17, Por.12). PHRI Addendum Report 927-021192. Prepared for Housing Finance and Development Corporation.

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- 2010 An Archaeological Survey of TMKs:3-7-4-21:003 and 023 in Compliance with Section 106 of the National Historic Preservation Act, Keahuolū and Kealakehe *ahupua‘a*, North Kona District, Island of Hawai‘i. Rechtman Consulting, LLC Report RC-0656. Prepared for Bo Kahui, La‘i‘ōpua 2020, Kailua-Kona, Hawai‘i.

Donham, T.

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- 1990b Archaeological Inventory Survey, Queen Liliuokalani Trust Property, Land of Keahuolu, North Kona District, Island of Hawaii (TMK:3-7-4-8:Por.2, 12). PHRI Report 596-021290. Prepared for Belt, Collins and Associates.
- 1990c Addendum Report: Archaeological Inventory Survey Kealakehe Planned Community Project Area, Lands of Kealakehe and Keahuolu, North Kona District, Island of Hawaii (TMK:7-04-08:17, Por.12). PHRI Addendum Report 652-051090. Prepared for Housing Finance and Development Corporation—State of Hawaii.

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- 2008 An Archaeological Inventory Survey for the Proposed Development of a Water Reservoir and Service Road (TMK:3-7-4-21:por. 014, 020, and 021. Keahuolu and Kealakehe *ahupua‘a*, North Kona District, Island of Hawai‘i. Prepared for Belt Collins Ltd. Honolulu, HI 96819.

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- 1973 *Soil Survey of the Island of Hawaii, State of Hawaii*. U.S. Department of Agriculture, Soil Conservation Service and University of Hawaii Agricultural Experiment Station. Washington, D.C.: Government Printing Office.

Tulchin, J., and H. Hammatt

- 2009 Archaeological Inventory Survey of an Approximately 2.3-km Long Portion of the Proposed Ane Keohokalole Highway Project, Kealakehe and Keahuolu Ahupua‘a, North Kona District, Island of Hawai‘i (TMK:[3] 7-4-020:006 por. & 007 por. & 010 por. & 022 por.; [3] 7-4-021: 03 por. & 004 por. & 020 por. Prepared for Belt Collins Hawaii Ltd.

Wolfe, E., and J. Morris

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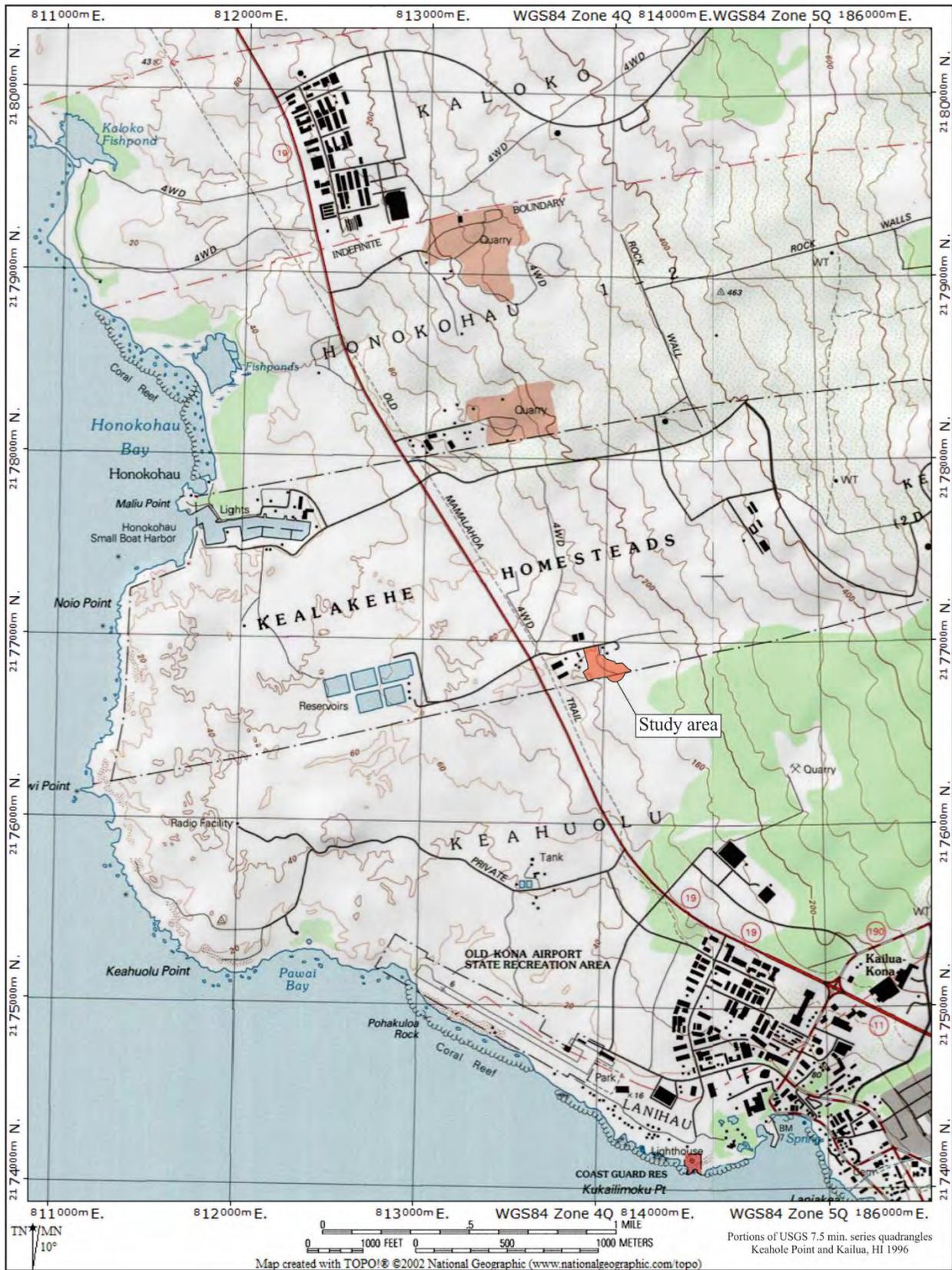


Figure 1. Study area location.

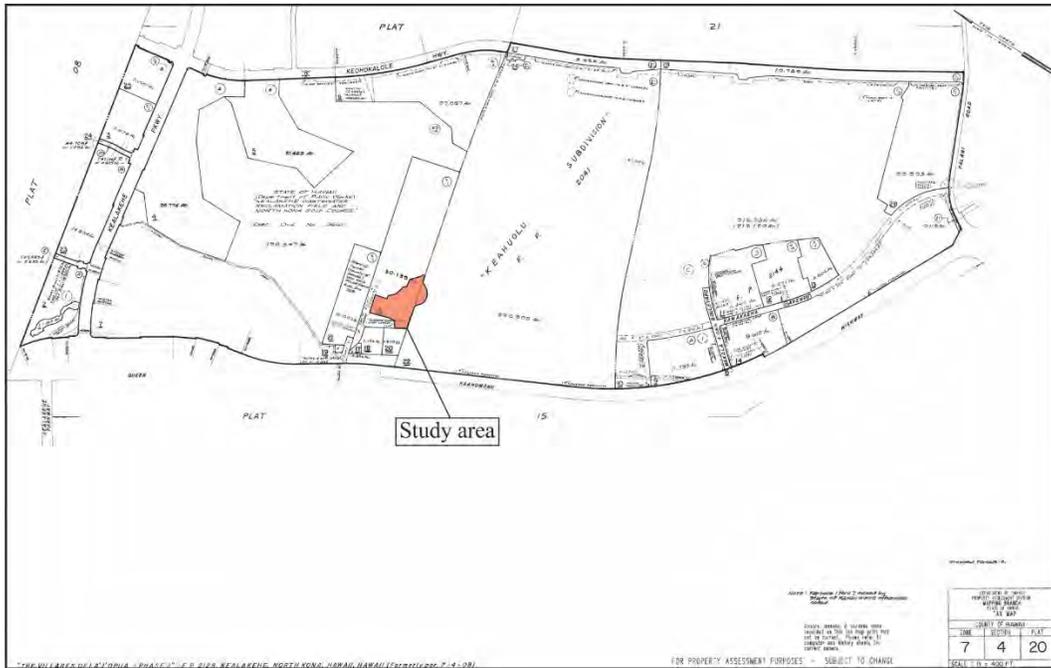


Figure 2. Tax Map Key: (3) 7-4-020 showing the current study area (portions of Parcels 016 and 022) in red.

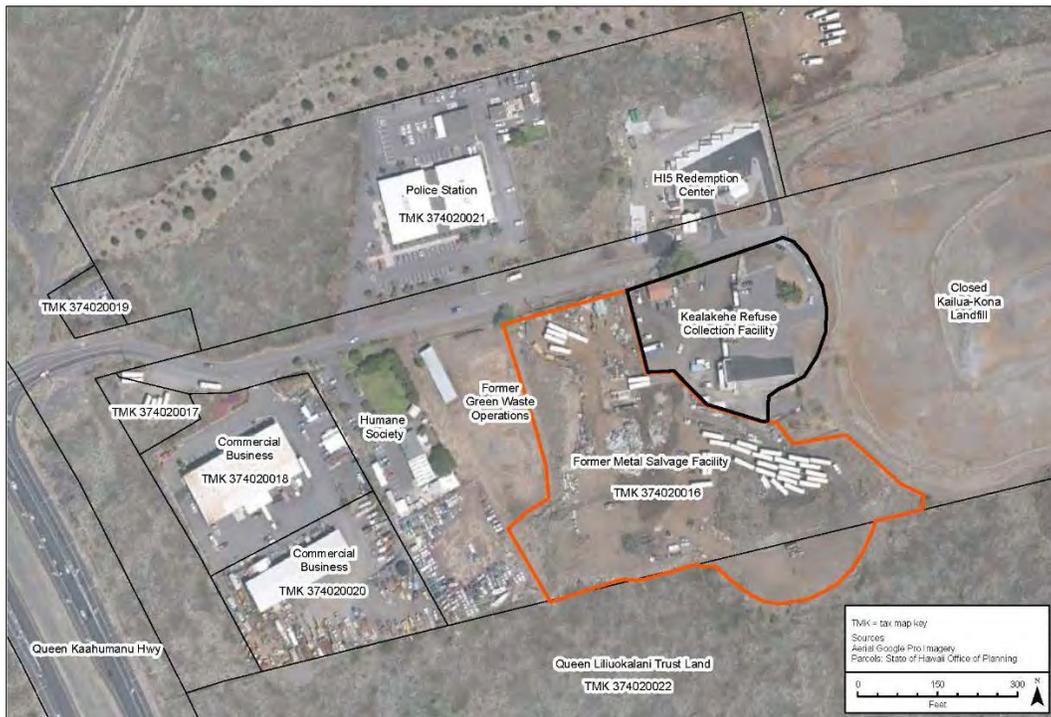


Figure 3. Aerial view of the current study area showing the former Kealakehe Metal Facility outlined in red.

March 28, 2016

Archaeological Field Inspection portions of TMKs: (3) 7-4-020:016 and 022

Page 9 of 14



Figure 4. Built southern edge of the study area with the natural ground surface beyond, view to the east.



Figure 5. General study area, view to the northeast.



Figure 6. Typical stockpile of soils and rock containing assorted small debris, view to the north.



Figure 7. Portion of the former metal salvage facility that has been graded flat, view to the south.



Figure 8. Collection of appliances within the study area, view to the east.



Figure 9. Pile of metal debris, view to the north.

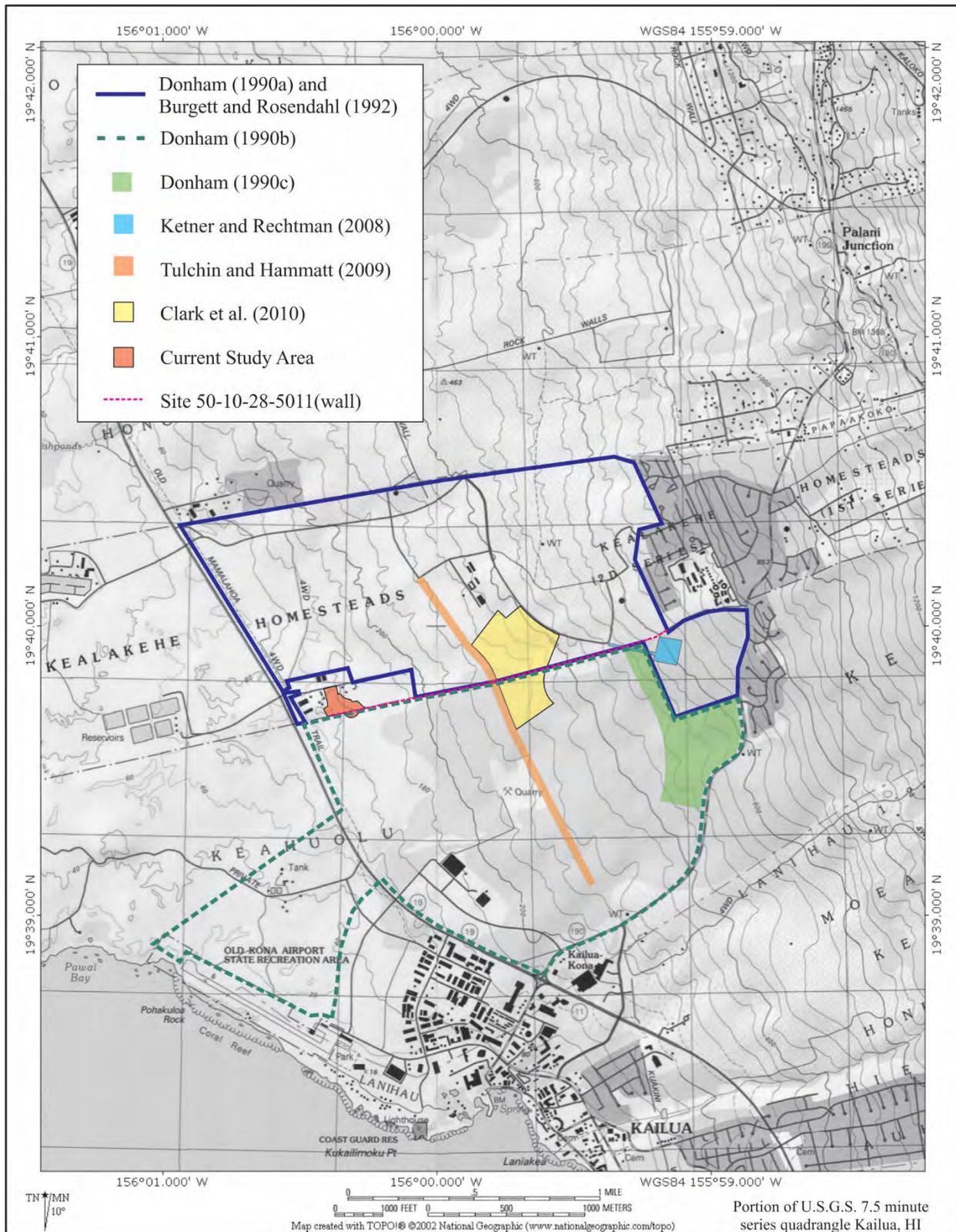


Figure 10. Previous archaeological surveys conducted in the vicinity of the current study area.

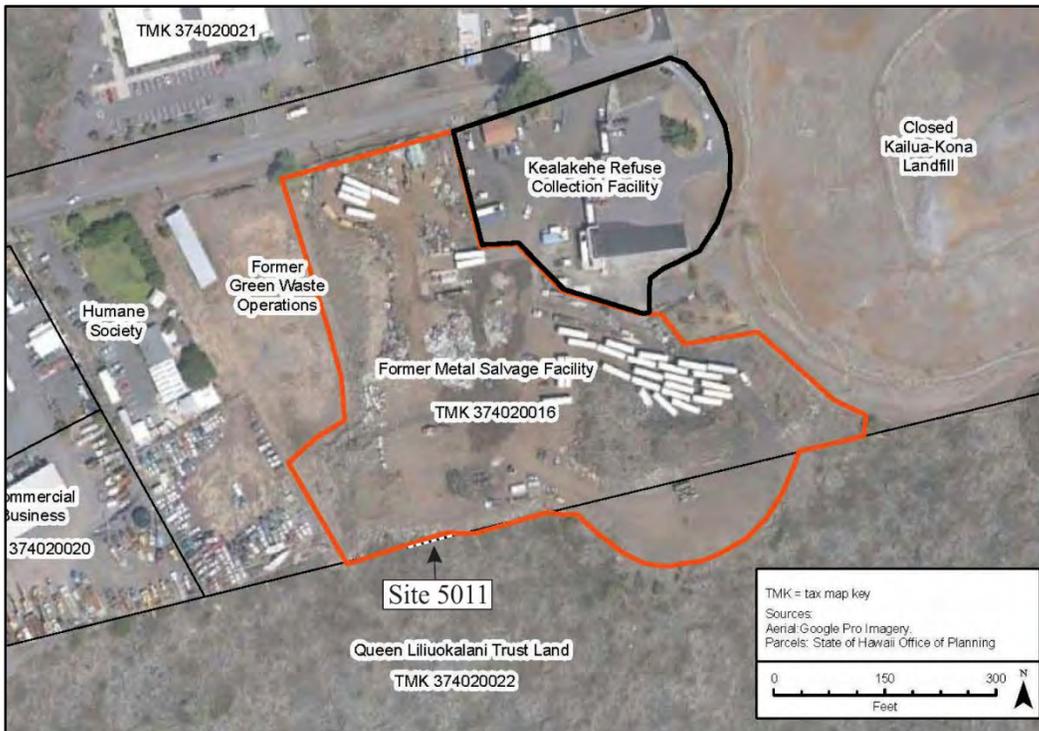


Figure 11. Aerial view of the current study area showing the location of the remnant section of Site 5011.



Figure 12. Site 5011, remnant boundary wall, view to the west.



Figure 13. Site 5011, typical condition of wall, view to the south.



Figure 14. Site 5011, intact section of wall, view to the south.

## APPENDIX C

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### CORRESPONDENCE

- APPENDIX C-1. PRE-ASSESSMENT  
CONSULTATION LETTER
- APPENDIX C-2. COMMENT  
RESPONDING TO PRE-ASSESSMENT  
CONSULTATION LETTER

## **APPENDIX C-1**

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### **PRE-ASSESSMENT CONSULTATION LETTER**



Integral Consulting Inc.  
94-515 Ukee Street  
Suite 301  
Waipahu, HI 96797

telephone: 808.739.7055  
www.integral-corp.com

January 11, 2016

Project No. C1128

Director  
Organization  
Office or Department  
Address  
City, State, Zip

Subject: **Pre-Assessment Consultation  
Remediation of the Former Kealakehe Metal Salvage Facility  
Kailua-Kona, Island of Hawai'i**

Dear [Name]:

On behalf of the County of Hawaii, Department of Environmental Management, Integral Consulting Inc. (Integral) is preparing a Draft Environmental Assessment (EA) of the former Kealakehe Metal Salvage Facility in Kailua-Kona, Island of Hawai'i, Hawai'i. Pursuant to Chapter 343, Hawai'i Revised Statutes and Title 11, Chapter 200, Hawai'i Administrative Rules of the Department of Health, we are soliciting comments for the pre-assessment consultation phase of the Draft EA.

A summary of the proposed project is attached for your review. Based on your area of expertise, we would appreciate any input and information you may have related to the project's potential impacts on the environment during the remediation activities. We would appreciate the submission of any comments by February 12, 2016.

Additionally, if you are interested in receiving a copy of the Draft Environmental Assessment, please respond below:

[YES]

[NO]

**Please send your responses and comments to:**

County of Hawai'i, Department of Environmental Management, Solid Waste Division

Pre-Assessment Consultation  
Remediation of the Former Kealakehe Metal Salvage Facility  
Kailua-Kona, Island of Hawai'i  
Page 2

C/O Integral Consulting Inc.  
94-515 Uke'e Street, Suite 301  
Waipahū, HI 96797

Thank you for your participation in the environmental review process. Should you have any questions, please contact me at 808-739-7055.

Sincerely,

[signature]

Dennis Poma, PE

Enclosure



### The Applicant:

County of Hawai'i,  
Department of  
Environmental Management,  
Solid Waste Division

Contact: Greg Goodale

Tel: 808.961.8515

### The Accepting Authority:

County of Hawai'i,  
Department of  
Environmental Management

Director:

BJ Leithead Todd

Tel: 808.961.8083

### Prepared by:

Integral Consulting Inc.

Contact: Dennis Poma

Tel: 808.739.7055



*Residual debris to be recycled or disposed*

## Remediation of the Former Kealakehe Metal Salvage Facility Kailua-Kona, Island of Hawai'i

The former Kealakehe Metal Salvage Facility (site) is located in Kailua-Kona adjacent to the current Kealakehe Transfer Station. The site was used as a metal salvage facility for several decades before operations ceased in 2013. The former metal salvage operation is co-located on the same parcel as the current transfer station, just makai of the closed Kona Landfill. The County of Hawai'i, Department of Environmental Management, Solid Waste Division is seeking closure and remediation of the area on which the metal salvage facility operated, to satisfy permit requirements and to improve the land for future productive use. During prior site investigations, lead was found in site soils. The source of lead contamination has not been definitively identified, but it is speculated that a past fire may have played a role.

### Site Description and History

The site comprises 8 acres and is identified by TMK (3)-7-04-020:016. The transfer station land is owned by the State of Hawai'i and has been leased to the County of Hawai'i for waste management activities. Residual solid waste debris is present on the transfer station property and extends to the south onto an adjacent property.

Although the metal salvaging area is currently unused, some metal debris and other inert waste such as plastic, glass, rubber, and foam remain scattered about the site. Over time, stockpiles of soils and rock containing assorted small debris (metal, plastic, wood) have accumulated on the site. The presence of lead in stockpile soils, at concentrations above Hawai'i environmental action levels, was identified during preliminary environmental sampling performed in 2010. Lead-contaminated soil is also present within working surfaces throughout the site. Further investigation will be conducted as part of the proposed action to define the extent of lead-impacted soil and to identify any other potential contaminants of concern that may be present.

### Why Is the Proposed Action Necessary?

Closure and remediation actions are required by the solid waste permit for the former metal salvage facility, issued by the Hawai'i Department of Health. Furthermore, the County has an interest in improving the environmental condition of the land to allow for beneficial future use. The lead-contaminated soil that remains on site presents a potential hazard by direct contact and must be addressed.

# Remediation of the Former Kealakehe Metal Salvage Facility

## Proposed Action

The proposed action for the site consists of offsite disposal of all nonrecyclable waste materials and contaminated soils at the West Hawai'i Sanitary Landfill. The proposed action must be formally approved by the Hawai'i Department of Health. This remedy is anticipated to adequately manage hazards associated with lead-contaminated soil, is practical to implement, and will allow for various future uses of the site.

The proposed action will consist of the following basic steps:

1. Waste material sampling and analysis in preparation for landfill disposal
2. Large debris and equipment removal, recycling, or disposal
3. Demolition of two concrete structures and associated asphalt pavement
4. Excavation and landfill disposal of soil/debris stockpile material, with dust control measures and monitoring
5. Recycling of ferrous metal debris and washing of large rocks for onsite reuse
6. Environmental investigation of site after soil/debris removal to determine whether further soil remediation is needed
7. Excavation of additional impacted soil (if identified) and disposal at a landfill
8. Stabilization and revegetation of bare soil areas to control dust
9. Preparation of closure and remediation reports documenting cleanup.



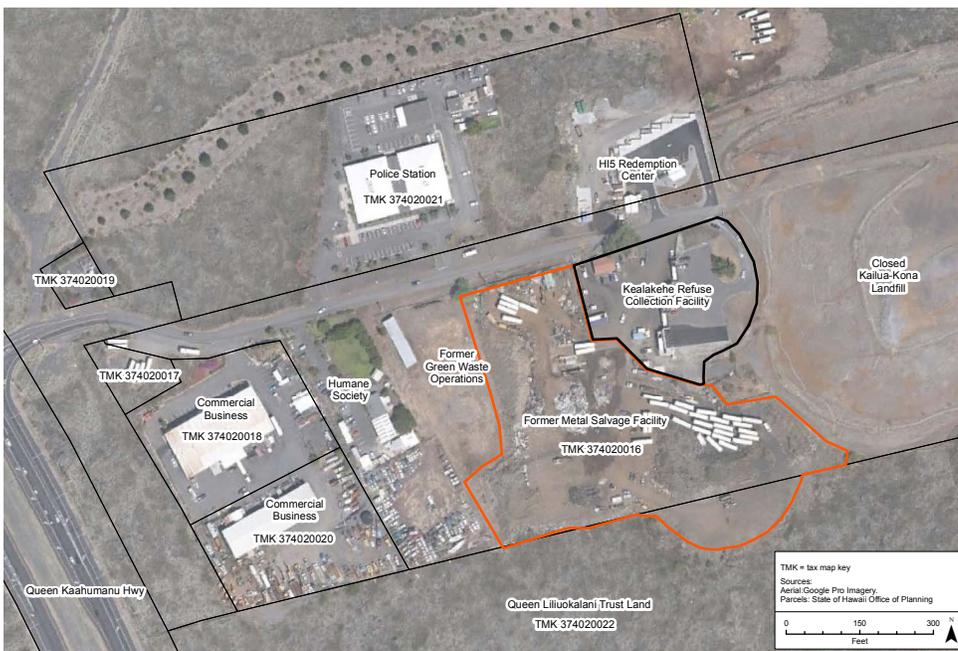
*Inert debris accumulated at the site*

*Lead-impacted soil will be removed and disposed of in a landfill to eliminate potential human health and environmental hazards.*



*Soil and debris stockpiles*

*The proposed action will mitigate hazardous conditions and allow for beneficial site reuse.*



## **APPENDIX C-2**

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### COMMENT RESPONDING TO PRE-ASSESSMENT CONSULTATION LETTER



Queen  
Lili'uokalani  
Trust

ʻE ʻONIPAʻA KAKOU  
*Let us all be steadfast.*

February 11, 2016

County of Hawaiʻi  
Department of Environmental Management  
Solid Waste Division

C/O Integral Consulting Inc.  
94-515 Uke`e Street, Suite 301  
Waipahu, Hawaiʻi 96797  
Attn: Mr. Dennis Poma

Dear Mr. Poma:

**Subject: Pre-Assessment Consultation  
Remediation of the Former Kealakehe Metal Salvage Facility  
North Kona, Island of Hawaiʻi**

Thank you for your letter dated January 11, 2016 soliciting comments as part of the pre-assessment consultation phase for the Draft Environmental Assessment (EA) being prepared for the former Kealakehe Metal Salvage Facility. Your letter included a flyer that provided a summary of the proposed project which seeks closure and remediation of the area on which the Kealakehe Metal Salvage Facility operated, to satisfy permit requirements, and to improve the land for future productive use.

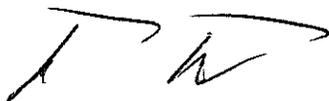
The Queen Lili'uokalani Trust (QLT) is the landowner to the south and immediately adjacent to the former Kealakehe Metal Salvage Facility. It appears that large debris and waste materials from the Kealakehe Metal Salvage Facility has encroached onto QLT property. Due to the potential impacts to QLT property, we offer the following comments to your letter to mitigate hazardous conditions and allow for beneficial reuse of the site.

1. Since the proposed project includes affected QLT property, we would like to continue to be included as part of the overall remediation process, including receiving a copy of the Draft EA.
2. The flyer describes previous site investigations that have identified lead contamination in the soils. Please provide copies for review of all previous site investigations at the subject property.
3. Please describe how fire may have contributed to the lead contamination in the soil and whether there is a potential for airborne lead dust or other contaminants from the fire(s) to have been deposited on the adjacent QLT property.

4. The flyer states that the proposed project comprises 8-acres of TMK (3) 7-4-020: 016. According to the County of Hawai'i Real Property Tax Office, TMK (3) 7-4-020: 016 is a total of 30.139 acres. Are there plans to remediate or investigate soil contaminants on the remaining portion of the parcel? More specifically, are there plans to investigate potential soil contaminants on the portion of the parcel located mauka (east) of the former Kealakehe Metal Salvage Facility, which borders the QLT property and, in several areas, encroaches onto QLT property?
5. The flyer states that further investigation will be conducted to identify any other contaminants of potential concern (COPCs) that may be present. What other COPCs will be analyzed for in the soil? Specifically, we request that the County analyze soil samples for total petroleum hydrocarbons (TPH), polychlorinated biphenyls (PCBs), volatile organic compounds (VOCs), polynuclear aromatic hydrocarbons (PAHs), semi-volatile organic compounds (SVOCs), organochlorine (OC) pesticides, dioxins/furans, RCRA 13 heavy metals, and asbestos.
6. The flyer does not mention groundwater sampling. We request that the County conduct sampling of the groundwater along the entire perimeter of the property shared with QLT. Should COPCs be discovered at concentrations greater than State of Hawai'i Department of Health (DOH) Tier 1 Environmental Action Levels (EALs) in the water, we request that the County conduct additional groundwater sampling to completely delineate the extent of the contamination beneath QLT property.
7. The flyer identifies residual solid waste debris on the Kealakehe Transfer Station property, and extending to the south onto the adjacent QLT property. The proposed action consists of off-site disposal of all non-recyclable waste materials. How will the removal of solid waste material from the QLT property be confirmed?

If you have any questions or comments, please feel free to contact Ms. LeeAnn Crabbe or myself at (808) 203-6150.

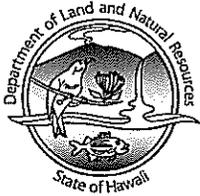
Sincerely,



Justin Murata  
Real Estate Manager

Cc: Ms. BJ Leithead Todd, County of Hawai'i, Department of Environmental Management

DAVID Y. IGE  
GOVERNOR OF HAWAII



SUZANNE D. CASE  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT

**STATE OF HAWAII**  
**DEPARTMENT OF LAND AND NATURAL RESOURCES**  
**LAND DIVISION**

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

February 8, 2016

Integral Consulting, Inc.  
Attention: Mr. Dennis Poma, P.E.  
94-515 Ukee Street, Suite 301  
Waipahu, Hawaii 96797

Dear Mr. Poma:

**SUBJECT:** Pre-Assessment Consultation for the Remediation of the Former Kealakehe Metal Salvage Facility

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR) Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comments.

At this time, enclosed are comments from the (a) Engineering Division and (b) Land Division – Hawaii District on the subject matter. Should you have any questions, please feel free to call Lydia Morikawa at 587-0410. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Russell Y. Tsuji".

Russell Y. Tsuji  
Land Administrator

Enclosure(s)  
cc: Central Files

DAVID Y. IGE  
GOVERNOR OF HAWAII



SUZANNE D. CASE  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

January 20, 2016

MEMORANDUM

TO: FR

**DLNR Agencies:**

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division**
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – Hawaii District
- Historic Preservation

RECEIVED  
LAND DIVISION  
2016 JAN 29 PM 3:01  
DEPT. OF LAND &  
NATURAL RESOURCES  
STATE OF HAWAII

16 JAN 22 AM 11:00 ENGINEERING

FROM: P  
SUBJECT:

Russell Y. Tsuji, Land Administrator  
Pre-Assessment Consultation for the Remediation of the Former Kealakehe  
Metal Salvage Facility

LOCATION: Kealakehe, N. Kona, Island of Hawaii; TMK: (3) 7-04-020:016

APPLICANT: County of Hawaii, Department of Environmental Management, Solid Waste  
Division

Transmitted for your review and comment is information on the above-referenced project. We would appreciate your comments on this project. Please submit any comments by **February 10, 2016**.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

Attachments

- We have no objections.
- We have no comments.
- Comments are attached.

Signed: \_\_\_\_\_

Print Name: Cary S. Chang, Chief Engineer

Date: 1/20/16

cc: Central Files

DEPARTMENT OF LAND AND NATURAL RESOURCES  
ENGINEERING DIVISION

LD/ Russell Y. Tsuji

REF: Pre-Assessment Consultation for the Remediation of the Former Kealakehe Metal Salvage Facility  
Hawaii.010

COMMENTS

- ( ) We confirm that the parcel/project site, according to the Flood Insurance Rate Map (FIRM), is located in Zones X. The National Flood Insurance Program does not regulate developments within Zones X.
- (X) **Please take note that the project site, according to the Preliminary data in the Flood Insurance Rate Map (FIRM), is also located in Zone X.** The National Flood Insurance Program does not regulate developments within Zones X.
- ( ) Please note that the correct Flood Zone Designation for the project site according to the Flood Insurance Rate Map (FIRM) is \_\_\_\_.
- ( ) Please note that the project site must comply with the rules and regulations of the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR), whenever development within a Special Flood Hazard Area is undertaken. If there are any questions, please contact the State NFIP Coordinator, Ms. Carol Tyau-Beam, of the Department of Land and Natural Resources, Engineering Division at (808) 587-0267.

Please be advised that 44CFR indicates the minimum standards set forth by the NFIP. Your Community's local flood ordinance may prove to be more restrictive and thus take precedence over the minimum NFIP standards. If there are questions regarding the local flood ordinances, please contact the applicable County NFIP Coordinators below:

- ( ) Mr. Mario Siu Li at (808) 768-8098 of the City and County of Honolulu, Department of Planning and Permitting.
- ( ) Mr. Carter Romero (Acting) at (808) 961-8943 of the County of Hawaii, Department of Public Works.
- ( ) Ms. Carolyn Cortez at (808) 270-7253 of the County of Maui, Department of Planning.
- ( ) Mr. Stanford Iwamoto at (808) 241-4896 of the County of Kauai, Department of Public Works.
  
- ( ) The applicant should include project water demands and infrastructure required to meet water demands. Please note that the implementation of State-sponsored projects requiring water service from the Honolulu Board of Water Supply system must first obtain water allocation credits from the Engineering Division before it can receive a building permit and/or water meter.
- ( ) The applicant should provide the water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update.
- ( ) Additional Comments: \_\_\_\_\_  
\_\_\_\_\_
- ( ) Other: \_\_\_\_\_  
\_\_\_\_\_

Should you have any questions, please call Mr. Rodney Shiraishi of the Planning Branch at 587-0258.

Signed:   
CARY S. CHANG, CHIEF ENGINEER  
Date: 1/25/14



# Flood Hazard Assessment Report

www.hawaiiinfip.org

## Remediation Kealakehe MSF

### Property Information

COUNTY: HAWAII  
 TMK NO: (3) 7-4-020:016  
 WATERSHED: HONOKOHAU; WAIAHA  
 PARCEL ADDRESS: 598 HALE MAKAI PLACE  
 KAILUA KONA, HI 96740

### Notes:

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### Flood Hazard Information

FIRM INDEX DATE: APRIL 02, 2004  
 LETTER OF MAP CHANGE(S): NONE  
 FEMA FIRM PANEL: 1551660692C  
 PANEL EFFECTIVE DATE: SEPTEMBER 16, 1988

THIS PROPERTY IS WITHIN A TSUNAMI EVACUATION ZONE: NO  
 FOR MORE INFO, VISIT: <http://www.scd.hawaii.gov/>

THIS PROPERTY IS WITHIN A DAM EVACUATION ZONE: NO  
 FOR MORE INFO, VISIT: <http://dlnreng.hawaii.gov/dam/>



*Disclaimer: The Hawaii Department of Land and Natural Resources (DLNR) assumes no responsibility arising from the use, accuracy, completeness, and timeliness of any information contained in this report. Viewers/Users are responsible for verifying the accuracy of the information and agree to indemnify the DLNR, its officers, and employees from any liability which may arise from its use of its data or information.*

*If this map has been identified as 'PRELIMINARY', please note that it is being provided for informational purposes and is not to be used for flood insurance rating. Contact your county floodplain manager for flood zone determinations to be used for compliance with local floodplain management regulations.*

### FLOOD HAZARD ASSESSMENT TOOL LAYER LEGEND

(Note: legend does not correspond with NFHL)

**SPECIAL FLOOD HAZARD AREAS (SFHAs) SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD** - The 1% annual chance flood (100-year), also known as the base flood, is the flood that has a 1% chance of being equaled or exceeded in any given year. SFHAs include Zone A, AE, AH, AO, V, and VE. The Base Flood Elevation (BFE) is the water surface elevation of the 1% annual chance flood. Mandatory flood insurance purchase applies in these zones:

	<b>Zone A:</b> No BFE determined.
	<b>Zone AE:</b> BFE determined.
	<b>Zone AH:</b> Flood depths of 1 to 3 feet (usually areas of ponding); BFE determined.
	<b>Zone AO:</b> Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined.
	<b>Zone V:</b> Coastal flood zone with velocity hazard (wave action); no BFE determined.
	<b>Zone VE:</b> Coastal flood zone with velocity hazard (wave action); BFE determined.
	<b>Zone AEF:</b> Floodway areas in Zone AE. The floodway is the channel of stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without increasing the BFE.

**NON-SPECIAL FLOOD HAZARD AREA** - An area in a low-to-moderate risk flood zone. No mandatory flood insurance purchase requirements apply, but coverage is available in participating communities.

	<b>Zone XS (X shaded):</b> Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.
	<b>Zone X:</b> Areas determined to be outside the 0.2% annual chance floodplain.

### OTHER FLOOD AREAS

	<b>Zone D:</b> Unstudied areas where flood hazards are undetermined, but flooding is possible. No mandatory flood insurance purchase applies, but coverage is available in participating communities.
--	---

DAVID Y. IGE  
GOVERNOR OF HAWAII

RECEIVED  
LAND DIVISION

2016 FEB -1 AM 11:12

SUZANNE D. CASE  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT



DEPT. OF LAND &  
NATURAL RESOURCES  
STATE OF HAWAII

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

January 20, 2016

MEMORANDUM

RECEIVED  
LAND DIVISION  
HILLO, HAWAII  
2016 JAN 25 AM 11:12

TO:

**DLNR Agencies:**

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – Hawaii District
- Historic Preservation

FROM:

Russell Y. Tsuji, Land Administrator

SUBJECT:

Pre-Assessment Consultation for the Remediation of the Former Kealakehe Metal Salvage Facility

LOCATION:

Kealakehe, N. Kona, Island of Hawaii; TMK: (3) 7-04-020:016

APPLICANT:

County of Hawaii, Department of Environmental Management, Solid Waste Division

Transmitted for your review and comment is information on the above-referenced project. We would appreciate your comments on this project. Please submit any **comments by February 10, 2016.**

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

Attachments

- We have no objections.
- We have no comments.
- Comments are attached.

Signed:

Print Name:

GORDON C. HEIT

Date:

1/28/16

cc: Central Files



**STATE OF HAWAII**  
**DEPARTMENT OF LAND AND NATURAL RESOURCES**  
**LAND DIVISION**

75 Aupuni Street, Room 204  
Hilo, Hawaii 96720  
PHONE: (808) 961-9590  
FAX: (808) 961-9599

January 28, 2016

MEMORANDUM

TO: Russell Y. Tsuji, Administrator

FROM: Gordon C. Heit, Hawaii District Land Agent 

SUBJECT: Pre-Assessment Consultation for the Remediation of the Former Kealakehe Metal Salvage Facility

LOCATION: Kealakehe, North Kona, Island of Hawaii, TMK: (3) 7-4-020:016

APPLICANT: County of Hawaii, Department of Environmental Management

Pursuant to your request for comments on the above matter, we offer the following:

The property identified above is encumbered under General Lease No. S-4029 to the County of Hawaii for rubbish dump site purposes. The Land Division will provide further comments when the Draft Environmental Assessment is available for review.

Please contact me should you have any questions.





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

In reply, please refer to:  
File:

EPO 16-029

February 1, 2016

Mr. Dennis Poma, P.E.  
Integral Consulting, Inc.  
94-515 Ukee Street, Suite 301  
Waipahu, Hawaii 96797

Dear Mr. Poma:

**SUBJECT: Pre-Assessment Consultation (PAC) for Remediation of the Former Kealakehe Metal Salvage Facility, Kailua-Kona, Hawaii**

The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges receipt of your PAC to our office on January 25, 2016. Thank you for allowing us to review and comment on the proposed project. The PAC was routed to the District Health Office on Hawaii, and the Clean Air, Clean Water, Indoor and Radiological Health, Solid Hazard Waste branches, and the Hazard Evaluation and Emergency Response office. They will provide specific comments to you if necessary. EPO recommends that you review the standard comments and available strategies to support sustainable and healthy design provided at: <http://health.hawaii.gov/epo/landuse>. Projects are required to adhere to all applicable standard comments.

EPO also encourages you to examine and utilize the Hawaii Environmental Health Portal. The portal provides links to our e-Permitting Portal, Environmental Health Warehouse, Groundwater Contamination Viewer, Hawaii Emergency Response Exchange, Hawaii State and Local Emission Inventory System, Water Pollution Control Viewer, Water Quality Data, Warnings, Advisories and Postings. The Portal is continually updated. Please visit it regularly at: <https://eha-cloud.doh.hawaii.gov>

We request that you utilize all of this information on your proposed project to increase sustainable, innovative, inspirational, transparent and healthy design.

Mahalo nui loa,

A handwritten signature in blue ink, appearing to read "Laura Phillips", written over a horizontal line.

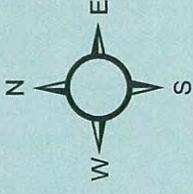
Laura Leialoha Phillips McIntyre, AICP  
Program Manager, Environmental Planning Office

LM:nn

Attachments: EPO Draft Environmental Health Management Map - <http://health.hawaii.gov/epo/eqjs>  
OEQC viewer - <http://eha-web.doh.hawaii.gov/oegc-viewer>  
U.S. EPA EJSCREEN Map 3 page report - <http://www2.epa.gov/ejscreen>

c: Applicant: Greg Goodale, County of Hawaii, Environmental Management, Solid Waste Division  
BJ Leithead Todd, County of Hawaii, Department of Environmental Management  
DOH: DHO Hawaii, CAB, CWB, IRHB, SHWB, & HEER {via email only}

# HAWAII COUNTY



## LEGEND

- AIR QUALITY MONITORING SITES
- ▲ ACTIVE LANDFILLS
- ★ WATER QUALITY MONITORING SITES
- PERENNIAL STREAMS
- NON-PERENNIAL STREAMS
- 3-MILE NAUTICAL BOUNDARY
- A CLASS WATER QUALITY
- AA CLASS WATER QUALITY
- HOUSE DISTRICTS
- SENATE DISTRICTS
- AGRICULTURAL
- CONSERVATION
- RURAL
- URBAN



HAWAII STATE  
DEPARTMENT  
of HEALTH  
ENVIRONMENTAL GEOGRAPHIC  
INFORMATION SYSTEM 2015  
THE ENVIRONMENTAL PLANNING OFFICE



# ENVIRONMENTAL HEALTH MANAGEMENT ON HAWAII

MAP INTENDED FOR ILLUSTRATIVE PURPOSES ONLY. SITE LOCATIONS ARE APPROXIMATE.

kealahou transfer station

3 sites found

Results Filter

Waimalu Wastewater Pump Station (FEA-FONS) Environmental Assessment (Agency)

Waimalu Wastewater Pump Station (DEA-FONS) Environmental Assessment (Agency)

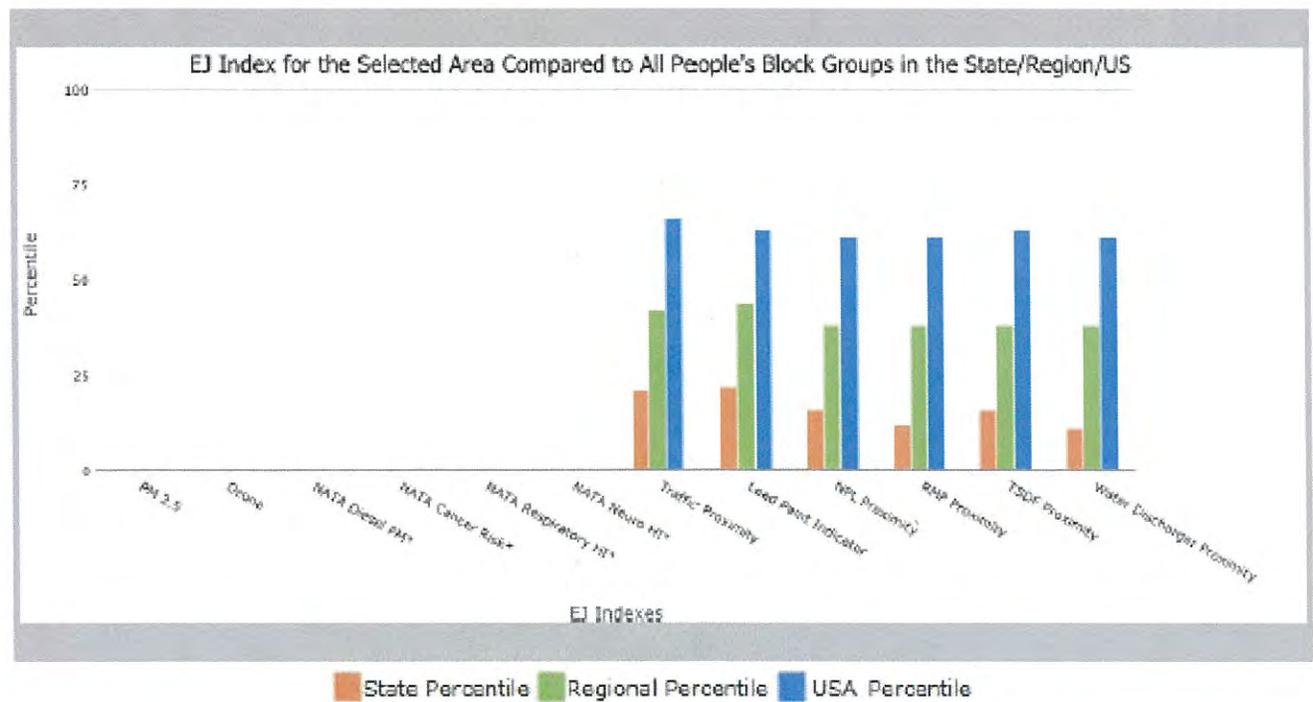
LAHAINA WASTEWATER PUMP STATION 5,6 (FEA-FONS) Environmental Assessment (Agency)



Map data ©2016 Google Imagery ©2016 OpenStreetMap

Report a map error

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
<b>EJ Indexes</b>			
EJ Index for PM2.5	N/A	N/A	N/A
EJ Index for Ozone	N/A	N/A	N/A
EJ Index for NATA Diesel PM*	N/A	N/A	N/A
EJ index for NATA Air Toxics Cancer Risk*	N/A	N/A	N/A
EJ Index for NATA Respiratory Hazard Index*	N/A	N/A	N/A
EJ Index for NATA Neurological Hazard Index*	N/A	N/A	N/A
EJ Index for Traffic Proximity and Volume	21	42	66
EJ Index for Lead Paint Indicator	22	44	63
EJ Index for Proximity to NPL sites	16	38	61
EJ Index for Proximity to RMP sites	12	38	61
EJ Index for Proximity to TSDFs	16	38	63
EJ Index for Proximity to Major Direct Dischargers	11	38	61



This report shows environmental, demographic, and EJ indicator values. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

for 1 mile Ring around the Corridor, HAWAII, EPA Region 9

Approximate Population: 295



February 2, 2016

— Digitized Line



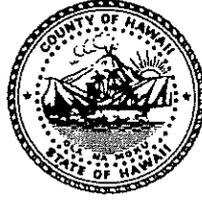
Selected Variables	Raw Data	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
<b>Environmental Indicators</b>							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$ )	N/A	N/A	N/A	9.95	N/A	9.78	N/A
Ozone (ppb)	N/A	N/A	N/A	49.7	N/A	46.1	N/A
NATA Diesel PM ( $\mu\text{g}/\text{m}^3$ ) <sup>*</sup>	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Cancer Risk (lifetime risk per million) <sup>*</sup>	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Respiratory Hazard Index <sup>*</sup>	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Neurological Hazard Index <sup>*</sup>	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Traffic Proximity and Volume (daily traffic count/distance to road)	11	280	14	190	12	110	23
Lead Paint Indicator (% Pre-1960 Housing)	0.0018	0.17	14	0.25	17	0.3	10
NPL Proximity (site count/km distance)	0.0033	0.092	11	0.11	0	0.096	0
RMP Proximity (facility count/km distance)	0.013	0.18	3	0.41	1	0.31	0
TSDF Proximity (facility count/km distance)	0.0035	0.092	11	0.12	0	0.054	4
Water Discharger Proximity (facility count/km distance)	0.0097	0.33	0	0.19	0	0.25	0
<b>Demographic Indicators</b>							
Demographic Index	49%	51%	44	46%	58	35%	74
Minority Population	79%	77%	42	57%	69	36%	84
Low Income Population	20%	25%	44	35%	31	34%	31
Linguistically Isolated Population	4%	6%	54	9%	39	5%	67
Population With Less Than High School Education	17%	10%	83	18%	57	14%	68
Population Under 5 years of age	13%	6%	92	7%	91	7%	92
Population over 64 years of age	11%	14%	37	12%	58	13%	48

<sup>\*</sup> The National-scale Air Toxics Assessment (NATA) environmental indicators and EJ indexes, which include cancer risk, respiratory hazard, neurodevelopment hazard, and diesel particulate matter will be added into EJSCREEN during the first full public update after the soon-to-be-released 2011 dataset is made available. The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <http://www.epa.gov/ttn/atw/natamain/index.html>.

For additional information, see: [www.epa.gov/environmentaljustice](http://www.epa.gov/environmentaljustice)

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

**William P. Kenoi**  
*Mayor*



**Harry S. Kubojiri**  
*Police Chief*

**Paul K. Ferreira**  
*Deputy Police Chief*

## **County of Hawai'i**

### **POLICE DEPARTMENT**

349 Kapi'olani Street • Hilo, Hawai'i 96720-3998  
(808) 935-3311 • Fax (808) 961-2389

February 2, 2016

Mr. Dennis Poma, PE  
Integral Consulting, Inc.  
94-515 Ukee Street, Suite 301  
Waipahu, HI 96797

**SUBJECT: PRE-ASSESSMENT CONSULTATION  
REMEDICATION OF THE FORMER KEALAKEHE METAL SALVAGE FACILITY  
KAILUA-KONA, ISLAND OF HAWAII**

Dear Mr. Poma:

This is in response to your letter dated January 11, 2016, requesting for information and comments regarding the pre-assessment consultation for the remediation of the former Kealakehe Metal Salvage Facility in Kealakehe, North Kona, Hawai'i.

Thank you for allowing the Hawai'i Police Department to make comments regarding this project. At this time, the Hawai'i Police Department has no comments.

Should you have any questions or concerns, please contact Captain Randal M. Ishii, Commander of our Kona District, at 326-4646, extension 299.

Sincerely,

HARRY S. KUBOJIRI  
POLICE CHIEF

PAUL H. KEALOHA JR.  
ASSISTANT POLICE CHIEF  
AREA II OPERATIONS

RMI/jaj  
RS160039



# United States Department of the Interior

U.S. GEOLOGICAL SURVEY  
Pacific Islands Water Science Center  
1845 Wasp Boulevard, Building 176  
Honolulu, Hawaii 96818

Phone: (808) 690-9600/Fax: (808) 690-9599

February 1, 2016

Mr. Dennis Poma, PE  
Integral Consulting Inc.  
94-515 Ukee Street, Suite 301  
Waipahu, Hawai'i 96797

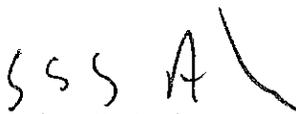
Dear Mr. Poma:

Subject: Pre-Assessment Consultation  
Remediation of the Former Kealakehe Metal Salvage Facility  
Kailua-Kona, Island of Hawai'i

Thank you for forwarding the subject Pre-Assessment Consultation for review and comment by staff of the U.S. Geological Survey Pacific Islands Water Science Center. We regret however, that due to prior commitments and lack of available staff, we are unable to review this document.

We appreciate the opportunity to participate in the review process.

Sincerely,

  
Stephen S. Anthony  
Center Director



Integral Consulting Inc.  
94-515 Ukee Street  
Suite 301  
Waipahu, HI 96797

telephone: 808.739.7055  
www.integral-corp.com

January 11, 2016

Project No. C1128

Director  
US Geological Survey  
Pacific Island Water Science  
1845 Wasp Blvd B 176  
Honolulu, HI 96818

U.S. GEOLOGICAL SURVEY  
PIWSC  
HONOLULU, HAWAII

JAN 29 2016

RECEIVED

**Subject: Pre-Assessment Consultation  
Remediation of the Former Kealakehe Metal Salvage Facility  
Kailua-Kona, Island of Hawai'i**

Dear Director:

On behalf of the County of Hawaii, Department of Environmental Management, Integral Consulting Inc. (Integral) is preparing a Draft Environmental Assessment (EA) of the former Kealakehe Metal Salvage Facility in Kailua-Kona, Island of Hawai'i, Hawai'i. Pursuant to Chapter 343, Hawai'i Revised Statutes and Title 11, Chapter 200, Hawai'i Administrative Rules of the Department of Health, we are soliciting comments for the pre-assessment consultation phase of the Draft EA.

A summary of the proposed project is attached for your review. Based on your area of expertise, we would appreciate any input and information you may have related to the project's potential impacts on the environment during the remediation activities. We would appreciate the submission of any comments by February 12, 2016.

Additionally, if you are interested in receiving a copy of the Draft Environmental Assessment, please respond below:

[YES]

[NO]

**Please send your responses and comments to:**  
County of Hawai'i, Department of Environmental Management, Solid Waste Division

DAVID Y. IGE  
GOVERNOR



ARTHUR J. LOGAN  
MAJOR GENERAL  
ADJUTANT GENERAL

KENNETH S. HARA  
BRIGADIER GENERAL  
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII  
**DEPARTMENT OF DEFENSE**  
OFFICE OF THE ADJUTANT GENERAL  
3949 DIAMOND HEAD ROAD  
HONOLULU, HAWAII 96816-4495

January 21, 2016

Integral Consulting, Inc.  
94-515 Uke'e Street, Suite 301  
Waipahu, Hawai'i 96797

Attn.: Mr. Dennis Poma, P.E.

Subject: Pre-Assessment Consultation, Remediation of the Former Kealakehe Metal  
Salvage Facility, Kailua-Kona, Island of Hawai'i

Dear Mr. Poma:

Thank you for the opportunity to comment on the above project. The State of Hawaii Department of Defense has no comments to offer relative to the project and does not require a copy of the Draft Environmental Assessment.

Should you have any questions, please contact Mr. Lloyd Maki, Assistant Chief Engineering Officer at (808) 733-4250.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Logan", with a long horizontal line extending to the right.

ARTHUR J. LOGAN  
Major General  
Hawaii National Guard  
Adjutant General

DAVID Y. IGE  
GOVERNOR OF HAWAII



VIRGINIA PRESSLER, M.D.  
DIRECTOR OF HEALTH

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

In reply, please refer to:  
File:

January 20, 2016

Mr. George Goodale  
County of Hawaii  
Department of Environmental Management  
Solid Waste Division  
c/o Integral Consulting Inc.  
94-515 Uke'e Street, Suite 301  
Waipahu, HI 96797

Dear Mr. Goodale:

Thank you for your submittal requesting comments to the Pre-Assessment Consultation for Remediation of the Former Kealakehe Metal Salvage Facility located in Kailua-Kona, Island of Hawaii.

Project activities shall comply with the following Administrative Rules of the Department of Health:

- Chapter 11-41           Lead-based Paint Activities
- Chapter 11-46           Community Noise Control

Should you have any questions, please contact me at (808) 586-4700.

Sincerely,

Jeffrey M. Eckerd  
Program Manager  
Indoor and Radiological Health Branch

**William P. Kenoi**  
Mayor



**Darren J. Rosario**  
Fire Chief

**Renwick J. Victorino**  
Deputy Fire Chief

**County of Hawai'i**  
**HAWAI'I FIRE DEPARTMENT**  
25 Aupuni Street • Suite 2501 • Hilo, Hawai'i 96720  
(808) 932-2900 • Fax (808) 932-2928

January 25, 2016

Dennis Poma, PE  
Intergral Consulting Inc.  
94-515 Uke'e Street, Suite 301  
Waipahu, Hawai'i 96797

Dear Mr. Dennis Poma:

SUBJECT: Pre-Assessment Consultation  
Remediation of the Former Kealakehe Metal Salvage Facility  
Kailua-Kona, Island of Hawai'i

We are in receipt of your letter dated January 11, 2016 in regards to a Pre-Assessment consultation on Environmental Assessment and Anticipated finding of no significant Impact for the above listed subject.

The Hawai'i Fire Department has no issues or comments with regards to the request for a Pre-Assessment consultation on Environmental Assessment and Anticipated finding of no significant Impact as noted above.

If you should have any questions, please feel free to contact my office at (808)323-4761.

Mahalo,

Handwritten signature of Darren J. Rosario.

DARREN J. ROSARIO  
Fire Chief

KV/ds



DAVID Y. IGE  
GOVERNOR OF HAWAII



VIRGINIA PRESSLER, M.D.  
DIRECTOR OF HEALTH

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

In reply, please  
refer to:

LUD - 3 7 4 020 016 Pre Asmnt  
Kealakehe Metal Salv Fac-ID2590

January 21, 2016

Mr. Dennis Poma, PE  
Integral Consulting, Inc.  
94-515 Ukee Street Suite 301  
Waipahu, Hawaii 96797

Dear Mr. Poma:

Subject: Pre-Assessment Consultation for Remediation of the Former  
Kealakehe Metal Salvage Facility  
74-598 Hale Makai Place, Kailua-Kona, Hawaii 96740  
TMK (3) 7-4-020: 016

Thank you for allowing us the opportunity to provide comments on the above subject project.

We have the following information to offer.

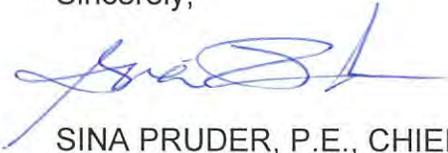
Domestic wastewater treatment and disposal have not been addressed in the document. For any domestic wastewater generation and treatment & disposal, we would highly recommend the connection to the Kealakehe Wastewater Treatment Plant (WWTP), if the anticipated increase is within the design and operating capacity of the WWTP.

Please be informed that the proposed wastewater systems for the development may have to include design considerations to address any effects associated with the construction of and/or discharges from the wastewater systems to any public trust, Native Hawaiian resources or the exercise of traditional cultural practices. In addition, all wastewater plans must conform to applicable provisions of the Hawaii Administrative Rules, Chapter 11-62, "Wastewater Systems."

Mr. Dennis Poma  
January 21, 2016  
Page 2

Should you have any questions, please contact Mark Tomomitsu of our office at 586-4294.

Sincerely,



SINA PRUDER, P.E., CHIEF  
Wastewater Branch

LM:lmj

c: Ms. Laura McIntyre, DOH-Environmental Planning Office, via email  
Mr. Dane Hiromasa, DOH-WWB's Kona Staff, via email

DAVID Y. IGE  
GOVERNOR



FORD N. FUCHIGAMI  
DIRECTOR

Deputy Directors  
JADE T. BUTAY  
ROSS M. HIGASHI  
EDWIN H. SNIFFEN  
DARRELL T. YOUNG

STATE OF HAWAII  
DEPARTMENT OF TRANSPORTATION  
869 PUNCHBOWL STREET  
HONOLULU, HAWAII 96813-5097

IN REPLY REFER TO:  
STP 8.1931

February 3, 2016

Mr. Greg Goodale  
Division Chief  
County of Hawaii  
Department of Environmental Management  
Solid Waste Division  
345 Kekuanaoa Street, Suite 41  
Hilo, Hawaii 96720

Dear Mr. Goodale:

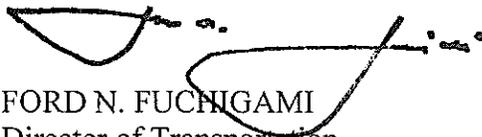
Subject: Remediation of the Former Kealakehe Metal Salvage Facility  
Pre-Assessment Consultation  
Kailua-Kona, Hawaii  
TMK: (3) 7-4-020:016

The subject project is not expected to significantly impact the State highway facility. However, a permit from DOT Highways Division, Hawaii District Office is required for the transport of oversized and/or overweight materials and equipment on State highway facilities.

We are also interested in receiving a copy of the Draft Environmental Assessment.

If there are any questions, please contact Mr. Norren Kato of the DOT Statewide Transportation Planning Office at telephone number (808) 831-7976.

Sincerely,



FORD N. FUCHIGAMI  
Director of Transportation

c: ✓ Dennis Poma, Integral Consulting, Inc.

DAVID Y. IGE  
GOVERNOR OF HAWAII



VIRGINIA PRESSLER, M.D.,  
DIRECTOR OF HEALTH

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

In reply, please refer to:  
File: EHA/HEER Office  
16-051-DA

February 12, 2016

Mr. Dennis Poma, P.E.  
Integral Consulting, Inc.  
94-515 Ukee Street, Suite 301  
Waipahu, Hawaii 96797

**Facility/Site:**

**Subject: Pre-Assessment Consultation (PAC) for Remediation of the Former  
Kealakehe Metal Salvage Facility, Kailua-Kona, Hawaii**

Dear Mr. Poma,

The Department of Health (DOH), Hazard Evaluation and Emergency Response Office (HEER), acknowledges receipt of your PAC to our office as of February 3, 2016. We appreciate the opportunity you have provided HEER to examine and respond to this proposed project.

HEER defers to the Solid and Hazardous Waste Branch (SHWB) on the issues presented in the Proposed Action.

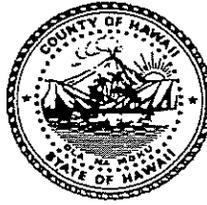
Sincerely,

Dylan P. Armstrong  
Environmental Health Specialist IV  
Hazard Evaluation and Emergency Response Office

c: SHWB (via e-mail only)

William P. Kenoi  
Mayor

Walter K. M. Lau  
Managing Director



Warren H. W. Lee  
Director

Brandon A. K. Gonzalez  
Deputy Director

County of Hawai'i  
DEPARTMENT OF PUBLIC WORKS  
Aupuni Center  
101 Pauahi Street, Suite 7 · Hilo, Hawai'i 96720-4224  
(808) 961-8321 · Fax (808) 961-8630  
www.co.hawaii.hi.us

January 28, 2016

County of Hawaii,  
Department of Environmental Management  
Solid Waste Division  
C/O Integral Consulting, Inc.  
94-515 Uke'e Street, Suite 301  
Waipahu, HI 96797

Subject: **Pre-Assessment Consultation**  
Remediation of the Former Kealakehe Metal Salvage Facility  
Kailua-Kona, Island of Hawaii  
TMK: 7-4-002:016

We reviewed the subject and have the following comments:

Buildings shall conform to all requirements of code and statutes pertaining to building construction, a demolition permit may be required for the concrete structures.

All earthwork and grading shall conform to Chapter 10, Erosion and Sediment Control, of the Hawaii County Code unless it falls under Section 10-3(4) which excludes "sanitary filling and operation of rubbish dumps". As this is a remediation project with the intent to restore/reclaim land for productive beneficial use (we presume other than for sanitary landfilling) the proposed fill would not be so excluded unless it also involves less than the excluded earthwork in Section 10-3 (6) and (7).

We do not wish to receive a copy of the Draft EA but would appreciate notice of public release on the OEQC web site.

If you have any questions, please contact Kiran Emler of our Kona office at 323-4851.

A handwritten signature in black ink, appearing to read "Ben Ishii".

Ben Ishii, Division Chief  
Engineering Division

KE  
c: ENG-HILO/KONA  
Planning Director

DAVID Y. IGE  
GOVERNOR



DOUGLAS MURDOCK  
Comptroller

AUDREY HIDANO  
Deputy Comptroller

**STATE OF HAWAII**  
**DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES**

P.O. BOX 119, HONOLULU, HAWAII 96810-0119

FEB 10 2016

(P)1027.6

Mr. Dennis Poma, PE  
Integral Consulting Inc.  
94-515 Uke'e Street, Suite 301  
Waipahu, HI 96797

Dear Mr. Poma:

Subject: Pre-Assessment Consultation  
Remediation of the Former Kealakehe Metal Salvage Facility  
Kailua-Kona, Island of Hawaii  
TMK (3) 7-4-020:016

This is in response to your letter dated January 11, 2016 regarding the subject project. The Department of Accounting and General Services does not have any comments or concerns at this time. We do however, request to receive a copy of the Draft Environmental Assessment when it is ready for review.

If you have any questions, your staff may call Mr. David DePonte of the Public Works Division at 586-0492.

Sincerely,

  
for DOUGLAS MURDOCK  
Comptroller

c: Mr. Jerry Watanabe, DAGS Hawaii District Office

William P. Kenoi  
Mayor



Duane Kanuha  
Director

Bobby Command  
Deputy Director

West Hawai'i Office  
74-5044 Ane Keohokalole Hwy  
Kailua-Kona, Hawai'i 96740  
Phone (808) 323-4770  
Fax (808) 327-3563

**County of Hawai'i**  
PLANNING DEPARTMENT

East Hawai'i Office  
101 Pauahi Street, Suite 3  
Hilo, Hawai'i 96720  
Phone (808) 961-8288  
Fax (808) 961-8742

February 10, 2016

Dennis Poma, PE  
C/O Integral Consulting Inc.  
94-515 Uke'e Street, Suite 301  
Waipahu, HI 96797

Dear Mr. Poma:

**Subject: Early Consultation on Environmental Assessment**  
**Land Owner: State of Hawaii**  
**Project: Remediation of Former Kealekehe Metal Salvage Facility**  
**TMK: (3) 7-4-020:016 (COR-16-103118)**

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On behalf of the County of Hawaii, Department of Environmental Management, Integral Consulting Inc. is preparing a Draft Environmental Assessment (EA) of the remediation of the former Kealekehe Metal Salvage Facility in Kailua Kona and is soliciting comments for the pre-assessment phase of the Draft EA.

We have the following comments to offer:

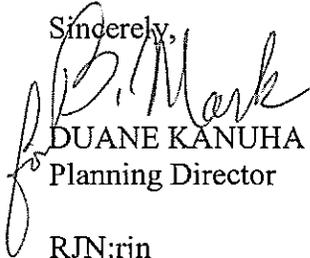
1. This 30.139 acre parcel is designated Conservation by the State Land Use Commission.
2. For the subject parcel, the General Plan Land Use Pattern Allocation Guide Map designates the following category:
  - a. Urban Expansion: *Allows for a mix of high density, medium density, low density, industrial, industrial-commercial and/or open designations in areas where new settlements may be desirable, but where the specific settlement pattern and mix of uses have not yet been determined.*
3. The County zoning is Open (O).
4. The Kona Community Development Plan was adopted by the County of Hawaii as Ordinance No. 08-151, effective November 5, 2008. A discussion of the proposed remediation as it relates to this plan should be included in the EA.
5. This parcel is not located within the County's Special Management Area.

Please provide us with a copy of the Environmental Assessment for our review and file.

Dennis Poma, PE  
C/O Integral Consulting Inc.  
February 10, 2016  
Page 2

Should you have any questions, please contact Rosalind Newlon of our West Hawaii Office at 323-4770.

Sincerely,



DUANE KANUHA  
Planning Director

RJN:rjn

C:\Users\rnewlon\Desktop\Newlon\Letters\COR-16-103118 Integral Consulting 7-4-020-016.doc

cc: West Hawaii Office



# United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Pacific Islands Fish and Wildlife Office  
300 Ala Moana Boulevard, Room 3-122  
Honolulu, Hawaii 96850

In Reply Refer To:  
01EPIF00-2016-TA-0160

FEB 11 2016

Mr. Dennis Poma  
Integral Consulting Inc.  
94-515 Ukee Street  
Suite 301  
Waipahu, Hawaii 96797

Subject: Technical Assistance for Remediation of the Former Kealakehe Metal Salvage Facility Kailua-Kona, Hawaii

Dear Mr. Poma:

The U.S. Fish and Wildlife Service (Service) received your correspondence on January 15, 2016, requesting comments regarding the proposed remediation of the former Kealakehe Metal Salvage Facility adjacent to the current Kealakehe Transfer Station, Kailua-Kona, Hawaii. The County of Hawaii, Department of Environmental Management, Solid Waste Division is seeking closure and remediation of the area on which the metal salvage facility operated, to satisfy permit requirements and to improve the land for future productive use. During prior site investigations, lead was found in site soils. The source of lead contamination has not been definitively identified, but it is thought that a past fire may have played a role. The site comprises 8 acres and is identified by TMK (3)-7-04-020:016. The transfer station land is owned by the State of Hawaii and has been leased to the County of Hawaii for waste management activities. Residual solid waste debris is present on the transfer station property and extends to the south onto the adjacent property.

Although the metal salvaging area is currently unused, some metal debris and other inert waste such as plastic, glass, rubber, and foam remain scattered about the site. Over time, stockpiles of soils and rock containing assorted small debris (metal, plastic, wood) have accumulated on the site. The presence of lead in stockpile soils, at concentrations above Hawaii environmental action levels, was identified during preliminary environmental sampling performed in 2010. Lead-contaminated soil is also present within working surfaces throughout the site. Further investigation will be conducted as part of the proposed action to define the extent of lead-impacted soil and to identify any other potential contaminants of concern that may be present. Closure and remediation actions are required by the solid waste permit for the former metal salvage facility, issued by the Hawaii Department of Health. The lead-contaminated soil that remains on site presents a potential hazard by direct contact and will be removed and disposed of in a landfill to eliminate potential human health and environmental hazards. The proposed action will mitigate hazardous conditions and allow for beneficial site reuse.

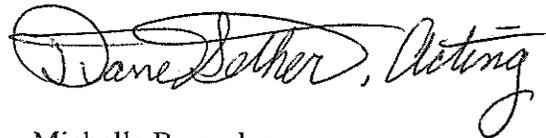
Based on information you provided and pertinent information in our files, including data compiled by the Hawaii Biodiversity and Mapping Project, we have determined that there is no designated critical habitat within the proposed project footprint. The endangered Hawaiian petrel (*Pterodroma phaeopygia sandwichensis*) and threatened Newell's shearwater (*Puffinus auricularis newelli*) collectively referred to as "seabirds" may fly over the area. The Service recommends the following measures to avoid and minimize project impacts to these listed species:

Seabirds

Hawaiian petrels and Newell's shearwaters may transit over the proposed project area while flying between the ocean and nesting sites in the mountains during their breeding season (March through November). Seabird fatalities resulting from collisions with artificial structures that extend above the surrounding vegetation have been documented in Hawaii where high densities of transiting seabirds occur. Additionally, artificial lighting can adversely impact seabirds by causing disorientation which may result in collision with utility lines, buildings, fences, and vehicles. Fledging seabirds are especially affected by artificial lighting and have a tendency to exhaust themselves while circling the light sources and become grounded. Too weak to fly, these birds become vulnerable to depredation by feral mammals such as small Indian mongoose (*Herpestes auropunctatus*), cats (*Felis catus*), and dogs (*Canis familiaris*). Therefore the Service recommends that night work requiring artificial illumination be avoided during the seabird fledging seasons (approximately September 1 through December 15). To minimize impacts to seabirds in Hawaii, we recommend shielding outdoor lights so that light is directed downwards and avoiding upward directed accent lighting.

Thank you for your efforts to conserve listed species and native habitats. Please contact Fish and Wildlife Biologist Jay Nelson (808-792-9441) if you have any questions or for further guidance.

Sincerely,

A handwritten signature in black ink that reads "Michelle Bogardus, Acting". The signature is fluid and cursive, with the last name being particularly prominent.

Michelle Bogardus  
Island Team Leader  
Maui Nui and Hawaii Island



**STATE OF HAWAII**  
**OFFICE OF HAWAIIAN AFFAIRS**  
560 N. NIMITZ HWY., SUITE 200  
HONOLULU, HAWAII 96817

HRD 16-7743

February 8, 2016

Mr. Dennis Poma, PE  
County of Hawai'i  
Department of Environmental Management, Solid Waste Division  
C/O Integral Consulting Inc.  
94-515 Uke'e Street, Suite 301  
Waipahu, HI 96797

Re: Pre-Assessment Consultation  
Remediation of the Former Kealakehe Metal Salvage Facility  
Kailua-Kona, Island of Hawai'i

Aloha Mr. Poma:

The Office of Hawaiian Affairs (OHA) received your letter dated January 11, 2016, on the above-titled project. OHA has no further comments at this time; however, our agency would like to request a copy of the DEA when it becomes available. Should you have any questions, please contact Everett Ohta at 594-0231 or everetto@oha.org.

'O wau iho nō me ka 'oia 'i'o,

A handwritten signature in black ink, appearing to read "Kamano M. Crabbe".

Kamana'opono M. Crabbe, Ph.D.  
Ka Pouhana, Chief Executive Officer

KC: acm

*\*Please address replies and similar, future correspondence to our agency:*

*Dr. Kamana'opono Crabbe  
Attn: OHA Compliance Enforcement  
560 N. Nimitz Hwy., Ste. 200  
Honolulu, Hawai'i 96817*



RECEIVED

2016 JAN 22 AM 11:09

PARKS & RECREATION  
COUNTY OF HAWAII

Integral Consulting Inc.  
94-515 Ukee Street  
Suite 301  
Waipahu, HI 96797

telephone: 808.739.7055  
www.integral-corp.com

January 11, 2016

Project No. C1128

Director – County of Hawaii  
Dept of Parks and Recreation  
101 Pauahi Street Suite 6  
Hilo, HI 96720

Director	OH
Dep Dir	
Planner	
Accounting	
Personnel	

*Stamped/annexed*

Subject: **Pre-Assessment Consultation  
Remediation of the Former Kealakehe Metal Salvage Facility  
Kailua-Kona, Island of Hawai'i**

Dear Director:

On behalf of the County of Hawaii, Department of Environmental Management, Integral Consulting Inc. (Integral) is preparing a Draft Environmental Assessment (EA) of the former Kealakehe Metal Salvage Facility in Kailua-Kona, Island of Hawai'i, Hawai'i. Pursuant to Chapter 343, Hawai'i Revised Statutes and Title 11, Chapter 200, Hawai'i Administrative Rules of the Department of Health, we are soliciting comments for the pre-assessment consultation phase of the Draft EA.

A summary of the proposed project is attached for your review. Based on your area of expertise, we would appreciate any input and information you may have related to the project's potential impacts on the environment during the remediation activities. We would appreciate the submission of any comments by February 12, 2016.

Additionally, if you are interested in receiving a copy of the Draft Environmental Assessment, please respond below:

[YES]

[NO]

Please send your responses and comments to:

County of Hawai'i, Department of Environmental Management, Solid Waste Division



## OFFICE OF PLANNING STATE OF HAWAII

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813  
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

Telephone: (808) 587-2846  
Fax: (808) 587-2824  
Web: <http://planning.hawaii.gov/>

DAVID Y. IGE  
GOVERNOR

LEO R. ASUNCION  
DIRECTOR  
OFFICE OF PLANNING

Ref. No. P-15037

February 4, 2016

Mr. Dennis Poma, PE  
Integral Consulting, Inc.  
94-515 Ukee Street, Suite 301  
Waipahu, Hawaii 96797

Dear Mr. Poma:

**Subject:** Pre-Assessment Consultation Remediation of the Former Kealakehe Metal Salvage Facility, Kailua-Kona, Island of Hawaii; TMK: (3) 7-4-020:016

Thank you for the opportunity to provide comments on the pre-assessment consultation request for the closure and remediation of the former Kealakehe Metal Salvage Facility. The pre-consultation review material was transmitted to our office by letter dated January 11, 2016.

It is our understanding that the former Kealakehe Metal Salvage Facility was used as a metal salvage operational center for decades and closed in 2013. The County of Hawaii, Department of Environmental Management, is seeking closure and remediation of the site to satisfy the permit requirements of the State Department of Health and to improve the land for future use.

The proposed action for the site calls for waste material sampling and analysis in preparation for landfill disposal; large debris and equipment removal; demolition of concrete structures and associated asphalt pavement; excavation and disposal of soil debris; recycling of ferrous metal debris; investigation of the site after soil removal to determine whether further remediation is needed; excavation of additional impacted soil (if identified); stabilization and revegetation of bare soil; and preparation of closure and remediation documents.

Per the instructions listed on the transmittal letter, the Office of Planning (OP) would like to receive a copy of the Draft Environmental Assessment (Draft EA) for this project. OP has reviewed the transmitted material and has the following comments to offer:

1. Pursuant to Hawaii Administrative Rules (HAR) § 11-200-10(4) – general description of the action's technical, economic, social, and environmental characteristics; this project must demonstrate that it is consistent with a number of State environmental, social policies, economic goals, and policies for land use. OP provides technical assistance to State and county agencies in administering the statewide planning system in Hawaii Revised Statutes (HRS) Chapter 226, the Hawaii State Plan. The

Hawaii State Plan provides goals, objectives, policies, and priority guidelines for growth, development, and the allocation of resources throughout the State in areas of state interest including but not limited to the economy, agriculture, the visitor industry, federal expenditure, the physical environment, facility systems, socio-cultural advancement, climate change adaptation, and sustainability.

The Draft EA should include an analysis that addresses whether the proposed project conforms to or is in conflict with the goals, objectives, policies, and priority guidelines listed in the Hawaii State Plan.

2. The coastal zone management (CZM) area is defined as “all lands of the State and the area extending seaward from the shoreline to the limit of the State’s police power and management authority, including the U.S. territorial sea” see HRS § 205A-1 (definition of “coastal zone management area”).

HRS § 205A-5(b) requires all State and county agencies to enforce the CZM objectives and policies. The Draft EA should include an assessment as to how the proposed project conforms to the CZM objectives and its supporting policies set forth in HRS § 205A-2. The assessment on compliance with HRS § 205A-2 is an important component for satisfying the requirements of HRS Chapter 343. These objectives and policies include recreational resources, historic resources, scenic and open space resources, coastal ecosystems, economic uses, coastal hazards, managing development, public participation, beach protection, and marine resources.

3. Pursuant to HAR § 11-200-10(6) – identification and summary of impacts and alternatives considered; in order to ensure that the coastline and water resources along West Hawaii County remain protected, the negative effects of stormwater inundation ensuing from this land remediation activity should be evaluated in the Draft EA. The project area is a dry landscape that is relatively flat in topography. It appears that the proposed project site is situated upon land that is open and not in active use. During heavy storm events, water runoff may either pond in place, or the natural contours of the land and drainage infrastructure may transport sediment, land-based pollutants, and toxicant-load contributions into nearshore waters of Honokohau Bay.

The Draft EA should examine potential benefits and/or negative impacts resulting from this project on coastal and marine resources. Issues that may be examined in the Draft EA include, but are not limited to, project site characteristics in relation to erosion controls on flood prone areas, undeveloped open spaces, and the absorption characteristics of the soil. Furthermore, it should differentiate between the existing permeable surfaces versus hardened surfaces in the area. These items, as well as the

marine water quality classification, should be considered when developing mitigation measures to protect the coastal ecosystem.

The enclosed map of this project, as well as resources available to us, indicate that this project is located approximately 1.5 miles from the coastline of Honokohau Bay. The project site is located within an area classified as State Land Use Conservation District, General Subzone. The site itself shows signs of light industrial use. In this case, the soil may have toxic substances such as ferrous metals that could cause damage to the nearshore environment downslope of this property if not properly safeguarded.

The Draft EA should examine the cumulative impact on coastal resources from land-based polluted runoff and sediment loss. It should take into account any of the natural features in the area, undeveloped open spaces, down-sloping topography, hardened non-permeable surfaces that have a cumulative effect on the volume and speed of storm runoff, and soil absorption rates.

In this closure and remediation project, the proposed actions that may impact the marine environment downslope of the project site include: debris and equipment removal activity; the demolition of concrete structures and related paved asphalt; excavation and disposal of debris stockpile material; the washing of large rocks for onsite reuse; and the stabilization and revegetation of bare soil to control dust. Erosion control best management practices, enhanced landscaping, and methods to retain and treat stormwater in place, rather than allow it to flow offsite, would benefit the nearshore environment.

OP has a number of resources available to assist in the development of projects which ensure sediment and stormwater control on land, thus protecting the nearshore environment. OP recommends consulting these guidance documents and stormwater evaluative tools when developing strategies to address polluted runoff. They offer useful techniques to keep land-based pollutants and sediment in place and prevent contaminating nearshore waters, while considering the practices best suited for this project. These three evaluative tools that should be used during the design process include:

- [Hawaii Watershed Guidance](http://files.hawaii.gov/dbedt/op/czm/initiative/nonpoint/HI%20Watershed%20Guidance%20Final.pdf) provides direction on mitigation strategies in urban areas that will safeguard Hawaii's watersheds and implement watershed plans <http://files.hawaii.gov/dbedt/op/czm/initiative/nonpoint/HI Watershed Guidance Final.pdf>

Mr. Dennis Poma, PE  
February 4, 2016  
Page 4

- Stormwater Impact Assessments can be used to identify and evaluate information on hydrology, stressors, sensitivity of aquatic and riparian resources, and management measures to control runoff, as well as consider secondary and cumulative impacts to the area  
[http://files.hawaii.gov/dbedt/op/czm/initiative/stomwater\\_impact/final\\_storm\\_water\\_impact\\_assessments\\_guidance.pdf](http://files.hawaii.gov/dbedt/op/czm/initiative/stomwater_impact/final_storm_water_impact_assessments_guidance.pdf)
- Low Impact Development (LID), A Practitioners Guide covers a range of structural best management practices (BMP's) for stormwater control management that minimizes negative environmental impacts  
[http://files.hawaii.gov/dbedt/op/czm/initiative/lid/lid\\_guide\\_2006.pdf](http://files.hawaii.gov/dbedt/op/czm/initiative/lid/lid_guide_2006.pdf)

If you have any questions regarding this comment letter, please contact Josh Hekekoa of our office at (808) 587-2845.

Sincerely,



Leo R. Asuncion  
Director



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

In reply, please refer to:  
EMD/CWB

02022PCTM.16

February 12, 2016

Mr. Dennis Poma, P.E.  
Integral Consulting Inc.  
94-515 Ukee Street, Suite 301  
Waipahu, Hawaii 96797

Dear Mr. Poma:

**SUBJECT: Comments on the Pre-Assessment Consultation (PAC) for the Remediation of the Former Kealakehe Metal Salvage Facility Project Kailua-Kona, Island of Hawaii, Hawaii**

The Department of Health (DOH), Clean Water Branch (CWB), acknowledges receipt of your letter, dated January 11, 2016, requesting comments on your project. The DOH-CWB has reviewed the subject document and offers these comments. Please note that our review is based solely on the information provided in the subject document and its compliance with the Hawaii Administrative Rules (HAR), Chapters 11-54 and 11-55. You may be responsible for fulfilling additional requirements related to our program. We recommend that you also read our standard comments on our website at: <http://health.hawaii.gov/epo/files/2013/05/Clean-Water-Branch-Std-Comments.pdf>

1. Any project and its potential impacts to State waters must meet the following criteria:
  - a. Antidegradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.
  - b. Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.
  - c. Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).
2. You may be required to obtain National Pollutant Discharge Elimination System (NPDES) permit coverage for discharges of wastewater, including storm water runoff, into State surface waters (HAR, Chapter 11-55).

For NPDES general permit coverage, a Notice of Intent (NOI) form must be submitted at least 30 calendar days before the commencement of the discharge. An application for a NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. To request NPDES permit coverage, you must submit the applicable form ("CWB Individual NPDES Form")

or "CWB NOI Form") through the e-Permitting Portal and the hard copy certification statement with the respective filing fee (\$1,000 for an individual NPDES permit or \$500 for a Notice of General Permit Coverage). Please open the e-Permitting Portal website located at: <https://eha-cloud.doh.hawaii.gov/epermit/>. You will be asked to do a one-time registration to obtain your login and password. After you register, click on the Application Finder tool and locate the appropriate form. Follow the instructions to complete and submit the form.

3. If your project involves work in, over, or under waters of the United States, it is highly recommended that you contact the Army Corp of Engineers, Regulatory Branch (Tel: 835-4303) regarding their permitting requirements.

Pursuant to Federal Water Pollution Control Act [commonly known as the "Clean Water Act" (CWA)], Paragraph 401(a)(1), a Section 401 Water Quality Certification (WQC) is required for "[a]ny applicant for Federal license or permit to conduct any activity including, but not limited to, the construction or operation of facilities, which may **result** in any discharge into the navigable waters..." (emphasis added). The term "discharge" is defined in CWA, Subsections 502(16), 502(12), and 502(6); Title 40 of the Code of Federal Regulations, Section 122.2; and Hawaii Administrative Rules (HAR), Chapter 11-54.

4. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 WQC are required, must comply with the State's Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of \$25,000 per day per violation.
5. It is the State's position that all projects must reduce, reuse, and recycle to protect, restore, and sustain water quality and beneficial uses of State waters. Project planning should:
  - a. Treat storm water as a resource to be protected by integrating it into project planning and permitting. Storm water has long been recognized as a source of irrigation that will not deplete potable water resources. What is often overlooked is that storm water recharges ground water supplies and feeds streams and estuaries; to ensure that these water cycles are not disrupted, storm water cannot be relegated as a waste product of impervious surfaces. Any project planning must recognize storm water as an asset that sustains and protects natural ecosystems and traditional beneficial uses of State waters, like community beautification, beach going, swimming, and fishing. The approaches necessary to do so, including low impact development methods or ecological

bio-engineering of drainage ways must be identified in the planning stages to allow designers opportunity to include those approaches up front, prior to seeking zoning, construction, or building permits.

- b. Clearly articulate the State's position on water quality and the beneficial uses of State waters. The plan should include statements regarding the implementation of methods to conserve natural resources (e.g. minimizing potable water for irrigation, gray water re-use options, energy conservation through smart design) and improve water quality.
- c. Consider storm water Best Management Practice (BMP) approaches that minimize the use of potable water for irrigation through storm water storage and reuse, percolate storm water to recharge groundwater to revitalize natural hydrology, and treat storm water which is to be discharged.
- d. Consider the use of green building practices, such as pervious pavement and landscaping with native vegetation, to improve water quality by reducing excessive runoff and the need for excessive fertilization, respectively.
- e. Identify opportunities for retrofitting or bio-engineering existing storm water infrastructure to restore ecological function while maintaining, or even enhancing, hydraulic capacity. Particular consideration should be given to areas prone to flooding, or where the infrastructure is aged and will need to be rehabilitated.

If you have any questions, please visit our website at:<http://health.hawaii.gov/cwb/>, or contact the Engineering Section, CWB, at (808) 586-4309.

Sincerely,



ALEC WONG, P.E., CHIEF  
Clean Water Branch

CTM:bk

c: EPO #16-029 [via e-mail only]