From: Wendy Wiltse
To:
Subject: Comments on Monitoring plan for Lahaina 401
Date: 07/01/2014 05:25 PM

All, I did not review the AMAP for Lahaina in great detail, but I do have some significant comments that I hope we can transmit to DOH.

Wendy Wiltse, Ph.D.
EPA-PICO
300 Ala Moana Blvd. Box 50003
Room 5-152
Honolulu, HI 96850
Phone: (808) 541-2752
FAX: (808) 541-2712

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From: Wendy Wiltse/R9/USEPA/US
To: David Albright/R9/USEPA/US@EPA, Nancy Rumrill/R9/USEPA/US@EPA,
Cc: Janet Hashimoto/R9/USEPA/US@EPA, Sara Roser/R9/USEPA/US@EPA, Hudson Slay/R9/USEPA/US@EPA, Elizabeth Sablad/R9/USEPA/US@EPA
Date: 05/15/2012 08:30 PM
Subject: Monitoring plan for Lahaina 401

I gave Maui County's monitoring plan for the 401 a quick review and have a few general comments that may be worth discussing at Wednesday's meeting with DOH. I offer a couple of ideas for expediting the completed 401 application for submittal before their projected 2014 date.

1. The plan calls for installing new groundwater monitoring wells above and below the treatment plant. This could take a very long time to get approvals, permits, and installation. USGS got congressional money a few years ago to do the same at Lahaina. They gave up because they were unable to get landowner permission so they studied Kihei instead. There is a fair amount of historical and recent nutrient data from nearby wells both up and downgradient of LWRF which could suffice....or if we really need new data the County could just sample existing wells. Their plan calls for sampling just a few of the existing wells and they overlook some strategically placed existing wells. I am not sure if the new wells were required by DOH or if that's just the County's proposal. Also, the historical data show that nutrient concentrations in wells are very consistent across seasons and years so we do not need a long sampling period.

2. The plan calls for a second year of monthy samples of effluent for nutrients and contaminants. Is this second year of data necessary when they will have a full year of monthly data later in 2012?

3. The plan does not call for toxicity tests on the injected effluent or the seeps. Given the high chlorine values in seep water (exceeding both the acute and chronic criteria) and the confirmed existence of pharmaceuticals in the seep water, I think it

would be wise to conduct toxicity tests on the effluent or seep water. EPA has just approved a new sea urchin fertilization test that would be appropriate. Can we modify the requirements to get some toxicity testing? These tests assess the narrative standard about "no toxics in toxic amounts" and are more biologically relevant than single chemical concentrations. These results would give us a clearer idea of the potential for wastewater impacts to corals and other aquatic life.

Wendy

Wendy Wiltse, Ph.D.
EPA-PICO
300 Ala Moana Blvd. Box 50003
Room 5-152
Honolulu, HI 96850
Phone: (808) 541-2752
FAX: (808) 541-2712