From: Wendy Wiltse
To: David Albright; Nancy Rumrill
Subject: Lahaina
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David and Nancy,

Thanks for including me on the call with Maui County today. There are 2 things I'd like to discuss with you in follow ;up. I understand David may be out the rest of the week so I'll outline it by email.

1. Steve Parabacoli, MC's reuse coordinator called me this afternoon. Steve wants EPA to know that the uncertainty about the permit and future requirements for Lahaina is setting back the reuse program for Lahaina. County had an agreement with a developer for a new uv disinfection unit. County called it off because the additional uv unit won't work if the plant has to be totally reconfigured to go 100% R1 water. Also, Steve lost funding for a feasibility study that would qualify MC for title 16 federal grant (DOI-BOR) for reclaimed water storage facility. So the Co has lost progress toward increased reuse in Lahaina. I told Steve we were considering a 100% disinfection requirement for Lahaina, but I wasn't sure if that meant 100% R-1 or not. Steve thinks they can pretty easily get to R-2, which is a lower level of disinfection but still may be OK for golf course use. I had the impression that Steve sees some ways ahead toward increased reuse, but is very disappointed at the present situation.

2. The more I think about a mass loading approach to the tracer study, the less I like it. I'm very familiar with Steve Dollar's mass loading work and it always shows that the human source is not such a big contributor. In this case, we have 4 confirmed seeps. We will likely never know or sample the universe of seeps or know if they carry equal or disparate loads. I think basing a load estimate on the 4 confirmed seeps would lead to erroneous assumptions about the total load.

For NPDES, we want to know the travel time, standards exceedences, and dilution rates. On the other hand, the mass loading approach would be potentially helpful for a TMDL for West Maui. We should discuss with Janet when/if we see a proposal.

Wendy

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