From:	Arnold Abe
To:	Nancy Rumrill/R9/USEPA/US@EPA
Cc:	Dave Taylor
Subject:	Re: Lahaina Plant Disinfection
Date:	10/28/2008 07:28 PM
Attachments:	Microsoft Word - ATTACHMENT U.pdf EPA WWRF Process Summary.doc Lahinaflow diagram.pdf

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Hi Nancy,
As Dave had mentioned previously, please see the revised "Attachment U." I've also attached a revised "Lahaina Wastewater Reclamation Facility Description" and the revised "Process Flow Diagram." Please contact me if you have any questions or clarifications. My number is (808) 270-7428.
Thanks,
Arnold

>>> Dave Taylor 10/28/2008 2:36 PM >>>
Hi Nancy,

I've taken a look at the October 27th letter regarding disinfection at the plant. I think we have had a major mis-communication based on imprecise language in "Attachment U" of the permit renewal. The language should have indicated that all the water is treated in the same process train until disinfection. The water going to reuse is disinfected with ultraviolet disinfection and the water destined for the injection wells is disinfected with chlorine. Arnold Abe will be emailing you a draft of a proposed revision to "attachment U" clarifying this information.

I want to assure you that this has always been the system operation at the facility. The water going down the injection wells has NEVER been of R-1 quality. It has always been considered R-2 quality because of the disinfection process. There has never been adequate ultraviolet disinfection capacity for the entire plant flow. In the past 10 years that we have been operating under the EPA UIC permit, this process train has remained unchanged. DOH is fully cognizant of our system operation and we are absolutely certain that HAR 11-62-26 does not require effluent being disposed by injection wells to be R-1 quality. Thomas See of DOH can easily verify this.

As the premise of the letter appears to be based on mis-communication, we would like to proceed in the following manner:

1. Send you a draft of a proposed revised Attachment U
2. If the draft looks okay, we will formally send a request to substitute the revised Attachment U in the permit application
3. Respond to the October 27th letter by saying that "we apologize for the mis-communication and as the plant process has not changed since the issuance of the original permit and effluent is in compliance with HAR 11-62-26, the additional information is not necessary ..." or something along those lines.

I am sure that if you check with Thomas See, you will find that the effluent disinfection requirements at the Lahaina Wastewater Reclamation Facility are identical to those across the State of Hawaii. I am hoping that by proceeding in this manner we can save a lot of effort on both sides.

Please feel free to call me if you want to discuss this further. I wanted to send you email for clarity, but I would prefer to have future discussions by telephone to more quickly reach a resolution.

Thanks for your help.

Dave