WORK PLAN
PĀHALA ELDERLY HOUSING APARTMENTS
LARGE CAPACITY CESSPOOL (LCC) REPLACEMENT PROJECT
Pāhala, District of Kaʻū, County of Hawaiʻi, Hawaiʻi
April 21, 2017

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I. Background

The County of Hawai`i Office of Housing and Community Development received the property utilized for the Pāhala Elderly Housing complex (TMK 9-6-017:038) from Brewer Support Housing, Inc. An amendment to the deed executed on July 31, 1985 specifies that the County will use its best efforts to ensure that the property is utilized in an elderly housing project, or, if that is not feasible, for low and/or moderate income housing.

On September 29, 2016 the County of Hawai`i provided a response to a Request for Information regarding the Pāhala Elderly Apartments located on TMK 3-9-017:038. In that response the County provided information regarding lease of the property to the Ka`ū Housing Corporation for the purposes of building and operating a U.S. Department of Housing and Urban Development (HUD) funded and insured elderly housing project as well as other details regarding the facility as requested by the Environmental Protection Agency (EPA). The County notes, however, that while the September 29, 2016 response indicates that the County controls the property through an Executive Order by the Governor; as indicated above, the property is owned by the County.

There are two (2) buildings on the property with each building served by its own Large Capacity Cesspool (LCC). One building has four (4) single occupancy units and one building has three (3) single occupancy units and one (1) double occupancy unit. Each of the eight (8) units has one (1) toilet, one (1) shower, and two (2) sinks. In addition to the dwelling units, one building has a meeting room which contains one (1) washing machine.

II. Location

The Pāhala Elderly Housing Apartments is located within the District of Kaʻū in the County of Hawaiʻi (Figure 1). The District of Kaʻū is situated at the southern tip of the Island and extends across the southern and southeastern flanks of Mauna Loa. With a land area of over 630,000 acres and an estimated population of over 5,000 persons, the District of Kaʻū is relatively isolated and unspoiled. The Pāhala Community is one of two major population centers in the District of Kaʻū with a population of 1,356 according to the year 2010 census. Since the closing of the Kaʻū Sugar Company in 1996, many of the residents within the community are former sugar workers and their descendants.

III. Purpose

Per Federal regulations, all existing LCCs must be closed. There are no existing County of Hawaiʻi (County) wastewater treatment plants in the Kaʻū District. The closest County wastewater treatment plant is located in the town of Hilo which is approximately 52 miles north of Pāhala. Currently, the Pāhala Elderly Housing Apartments are served by two (2) Large Capacity Cesspools. The existing LCC locations are as shown in Figures 2 and 3 herein.
IV. Objectives

The objective is to replace the existing Pāhala Elderly Housing Apartments cesspools with two (2) Septic Tanks utilizing a common leach field which is proposed to be located within the parking lot due to limited land area on the property. As Hawaiʻi Administrative Rules §11-62-31.1(b)(2) requires that each dwelling unit be connected to its own Individual Wastewater System (IWS); the County has submitted a Variance Application to the State of Hawaiʻi Department of Health, Environmental Management Division (DOH) to allow servicing each building with a single Septic Tank System. The DOH has indicated that processing of the variance would take approximately 4-8 months. A copy of the Variance Application which was submitted on March 31, 2017 is provided as Figure 4 herein.

V. Methods

To meet the objectives, the County is currently in the process of executing a consultant contract with an engineering consultant to provide designs and bid documents to allow closure of the LCC’s for the Pāhala Elderly Housing Apartments.

As indicated under Section IV, the proposed method of closing the two (2) each LCC’s currently servicing the complex is to install a Septic System for each building which utilizes a common absorption system.

The County has determined that an Environmental Assessment pursuant to HRS §343 will not be required as the work qualifies as an exempt class of work under Exemption Class 2.2, “Replacement or reconstruction of all wastewater facilities including sewer lines, pump stations and treatment plant components.” A copy of the Comprehensive Exemption List for the Department of Environmental Management, County of Hawaiʻi, revised February 10, 2005 is posted on the State of Hawaiʻi Department of Health, Office of Environmental Quality Control website and is provided as Figure 5 herein.

VI. Project Schedule/Milestones

The project consists of ten (10) major tasks as follows with additional information provided within Table 1 (Project Schedule).

Task 1: Pāhala Elderly Housing Apartments LCC Closure

Task 1.1 The County is currently in the process of executing a contract with an engineering consultant firm to provide bid documents for closure of the two (2) existing LCC’s.

Task 1.2 Obtain Variance from HAR 11-62-31.1 to allow installation of one (1) each Septic Tank to service each building on the premises with both units to be serviced by a common absorption system.
Task 1.3 Prepare Bid Documents for installation of the Septic Systems and closure of the existing LCC’s

Task 1.4 Bidding Period

Task 1.5 Bid Evaluation Period

Task 1.6 Bid Award and Contract Execution

Task 1.7 Construction Phase

Task 1.8 Closure of two (2) existing LCC’s

Task 1.9 Obtain DOH Approval to Operate

Task 1.10 Submit LCC closure reports to DOH and EPA

VII. Project Costs

It is intended that financing for this project be provided by County funds.

It is currently estimated that closure of the two (2) LCC’s at the Pāhala Elderly Housing Apartments will cost approximately $300,000, including consultant fees, with work to include installation of two (2) each Septic Tanks, installation of an absorption system under the parking lot, closure of two (2) each existing LCC’s, and restoration of the site to include repaving of the existing parking lot.

VIII. Performance Evaluation

The following will be used to evaluate the success of the project:

1. Timely completion of the project in accordance with the plans and specifications.

2. Elimination of the large capacity cesspools currently serving the Pāhala Elderly Housing Apartments.

3. Compliance with the EPA regulations, 40 CFR 144 & 145.

IX. Reporting Schedule to EPA

The County will participate in quarterly meetings with the USEPA in order to provide updates to the project and will provide semi-annual reports regarding project status.
X. Project benefits to the Public

The expected output and outcome is a design and construction project that will allow closure of two (2) existing LCC’s currently serving the Pāhala Elderly Housing Apartments in compliance with EPA requirements.
XI. Attachments
Table 1
Pahala Elderly Housing
LCC Closure Schedule
(04/20/2017 Revision 3 \ FINAL)

<table>
<thead>
<tr>
<th>ID</th>
<th>Task Name</th>
<th>Duration</th>
<th>Start</th>
<th>Finish</th>
<th>Predecessors</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>Pahala Elderly Housing</td>
<td>579 days</td>
<td>Mon 2/27/17</td>
<td>Fri 9/28/18</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>1.1 Consultant Contract</td>
<td>579 days</td>
<td>Mon 2/27/17</td>
<td>Fri 9/28/18</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>1.1 Consultant Contract</td>
<td>90 days</td>
<td>Mon 2/27/17</td>
<td>Sat 5/27/17</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>1.1.1 Execute Consultant Contract</td>
<td>90 days</td>
<td>Mon 2/27/17</td>
<td>Sat 5/27/17</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>1.3 Bid Documents for Septic Systems &amp; Closure of LCC's</td>
<td>120 days</td>
<td>Sun 5/28/17</td>
<td>Sun 9/28/17</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>1.4 Bidding Period</td>
<td>90 days</td>
<td>Fri 11/24/17</td>
<td>Mon 1/22/18</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>1.5 Bid Evaluation</td>
<td>90 days</td>
<td>Tue 2/27/18</td>
<td>Mon 2/27/18</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>1.6 Bid Award &amp; Contract Execution</td>
<td>90 days</td>
<td>Tue 2/27/18</td>
<td>Fri 4/6/18</td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>1.7 Construction (Installation of Septic Systems &amp; Leach Field)</td>
<td>150 days</td>
<td>Sat 6/7/18</td>
<td>Mon 9/3/18</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>1.8 Close two (2) each LCC's</td>
<td>30 days</td>
<td>Tue 9/4/18</td>
<td>Thu 9/21/18</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>1.9 Obtain DOH Approval to Operate</td>
<td>14 days</td>
<td>Tue 9/4/18</td>
<td>Mon 9/17/18</td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>1.10 Submit LCC Closure Report to DOH and EPA</td>
<td>15 days</td>
<td>Fri 9/14/18</td>
<td>Fri 9/28/18</td>
<td></td>
</tr>
</tbody>
</table>

Legend:
- Task
- Milestone
- Rolled Up Task
- Rolled Up Milestone
- External Tasks
- Project Summary
- Deadline

Project: Pahala Elderly Housing
Date: Thu 4/20/17
FIGURE 3
LCC LOCATION MAP
FIGURE 4

VARIANCE APPLICATION

State of Hawaii
Department of Health
Environmental Management Division

Wastewater Branch
Application No. WW _____
Docket No. ______ - VWW - ______
Permit ID ______

APPLICATION FOR VARIANCE
Primarily Concerning Large Capacity Cesspools
Wastewater Systems
In accordance with Chapter 342 D Hawaii Revised Statutes

Complete check box for New or Renewal Application

✓ New Variance Application

Submit one (1) original and filing fee of $300.00 payable to State of Hawaii.

[ ] Renewal Variance Application

Submit one (1) original and filing fee of $150.00 payable to State of Hawaii.

Submit Variance Application Documents to:

Hawaii State Department of Health
Wastewater Branch
919 Ala Moana Blvd. Room 309
Honolulu, Hawaii 96814-4920
Ph (808) 586-4294  Fax (808) 586-4300

Attachments are allowed. For copying purposes, 8 2" x 11" format is preferred.

I. GENERAL INFORMATION (please print or type):

A. Applicant Name: County of Hawaii Office of Housing and Community Development

(Corporation, company, agency, firm, etc. seeking variance)

Contact person: [ ] Mr.  [ ] Ms.  Neil Gyotoku

Title: Housing Administrator

Mailing address: 50 Wailuku Drive

Hilo  Hawaii  96720-2456

(City)  (State)  (Zip Code)

Phone No.: 808-961-8379  Fax No.: 808-961-8685

Email Address: ohcd@hawaiicounty.gov

FIGURE 4
VARIANCE APPLICATION
APPLICATION FOR VARIANCE
Primarily Concerning Large Capacity Cesspools

Variance to allow installation of two (2) each septic tanks with one (1) combined disposal system to service seven (7) signal occupancy residential units and one (1) double occupancy unit at the Pahala Elderly Housing Complex.

Nature of Business: Check applicable category. EPA makes the final determination of a Large Capacity Cesspool (LCC).

[ ] Non-Residential LCC
[ ] Church
[ ] School
[ ] Retail Business
[ ] Other: ________________________________

[✓] Residential LCC
[✓] Multiple dwelling
[ ] Regional system
[ ] Other: ________________________________

Provide location of existing cesspool(s):

Tax Map Key No. ( ) 9 - 017 - 038
1=Oahu 2=Maui 3=Big Island 4=Kauai
96-1183 Holei Street

(Number)                    (Street)
Pahala                      Hawaii

(City)                    (Island)               (Zip Code)

(B.) Individual authorized to act for applicant:

Agent Name: [✓] Mr.  [ ] Ms. William Kurcharski

Title: Director, Department of Environmental Management

Company/Firm: County of Hawaii

Address: 345 Kekuanaoa Place, Suite 41

(City)                    (State)               (Zip Code)
Hilo                      Hawaii                 96720

Phone No.: 808-961-8083     Fax No.: 808-961-8086

Email Address: cohdem@hawaiicounty.gov
C. Identify the specific section(s) of Hawaii Administrative Rules (HAR) Chapter 11-62 for which the variance is requested. Check applicable sections: If additional space is required, please include information on a separate attachment and label "Attachment A". (HAR Chapter 11-62 may be downloaded from our website at http://health.hawaii.gov/wastewater/home/forms/)

Section 11-62-31.1(a)(1)(A) "Developments involving dwellings: There shall be 10,000 square feet of land area for each individual wastewater system."

Section 11-62-31.1(a)(1)(C) "Developments involving dwellings: Area of the lot shall not be less than 10,000 square feet except for lots created and recorded before August 30, 1991. For lots less than 10,000 square feet which were created and recorded before August 30, 1991, only one individual wastewater system shall be allowed."

Section 11-62-31.1(a)(1)(D) "Developments involving dwellings: The total wastewater flow into each individual wastewater system shall not exceed one thousand gallons per day."

Section 11-62-31.1(a)(2)(A) "Developments involving buildings other than dwellings: There shall be 10,000 square feet of usable land area for each individual wastewater system. Usable land area shall not include the area under the buildings."

Section 11-62-31.1(a)(2)(C) "Developments involving buildings other than dwellings: Area of the lot shall not be less than 10,000 square feet except for lots created and recorded before August 30, 1991. For lots less than 10,000 square feet which were created and recorded before August 30, 1991, only one individual wastewater system shall be allowed."

Section 11-62-31.1(a)(2)(D) "Developments involving buildings other than dwellings. The total wastewater flow into each individual wastewater system shall not exceed one thousand gallons per day."

Section 11-62-31.1(b)(2) "A building may use more than one individual wastewater system where each individual wastewater system shall connect to a single dwelling unit.

II. SPECIFIC INFORMATION:

A. Describe existing facility conditions in detail, in relation to the requested variance. (Example: Requested Variance for HAR section 11-62-31.1 (a)(2)(C). The total area of the subject lot is 8,500 square feet. The lot has 2 buildings on it consisting of a restaurant and a physical therapy office which are served by a cesspool. The estimated wastewater flow is 2,000 gpd.) If additional space is required, include the information on a separate attachment and label "Attachment B".
APPLICATION FOR VARIANCE
Primarily Concerning Large Capacity Cesspools

Requested Variance for HAR Section 11-61-31.1(b)(2): The Pahala Elderly Housing Complex consists of two (2) separate buildings with one (1) building containing four (4) single occupancy dwelling units and the other building containing three (3) single occupancy dwelling units and one (1) double-occupancy unit. Each of the eight (8) units has one (1) toilet and two (2) sinks. In addition to the dwelling units one building has a meeting room which contains one (1) washing machine. The Lot is 26,806 square feet in size. Based on water consumption data obtained from the Department of Water Supply, average water use is 920 gallons/day for the entire property.

B. Describe how the present or proposed conditions fail to conform to the environmental rules of the State. Check applicable category and provide missing information.

☒ The area of the lot is ______26,806____ square feet. This is insufficient to meet the minimum land area requirement for Individual Wastewater System (IWS) utilization which is one IWS per 10,000 square feet of lot area.

☐ The large capacity septic system proposed to serve the facility would not comply with HAR section 11-62-31.1(a)(1)(D) or 11-62-31.1(a)(2)(D) because the IWS would receive more than 1,000 gallons per day of wastewater. The estimated flow into the system would be ______ gallons per day.

☐ Other, please specify: ____________________________________________________________

D. Describe in detail why the present or proposed equipment and/or operating conditions cannot be altered to bring such facility into compliance with the environmental rules of the State within a reasonable amount of time. Check all applicable reasons.

☒ The existing large capacity cesspool(s) must be closed and replaced with a new treatment individual wastewater system by April 5, 2005 in order to comply with federal requirements.

☐ The current State requirement of a wastewater treatment plant would significantly add to the construction and ongoing maintenance costs.

☒ The facility has been in operation for ______32____ years in this location using the existing cesspool. The installation of a wastewater treatment plant in lieu of a septic system will not be possible due to space restrictions and may force the owner to abandon the business operation.

☒ Other, please specify: As indicated under C above installation of separate IWS's and/or installation of individual IWS's to service the eight (8) dwelling units is not practical due to space restrictions.

Application for Varience
Primarily Concerning Large Capacity Cesspools
Revised 8/01/2014

Page 4 of 6
E. Check applicable reasons listed below and/or supply supporting information and include as Attachment C.1, C.2 and C.3 to clearly show that:

1. The granting of the variance is in the public interest as defined in the Hawaii Revised Statutes, section 342.D-6(c).
   - [✓] The applicant believes this variance request is in the public interest because the LCC will be upgraded to a treatment IWS (e.g., septic system). The IWS plans will be designed by an engineer and will be submitted to DOH for review and approval. The new IWS will provide a better wastewater treatment system compared to the existing LCC. Therefore, impact to the environment will be minimized.

   - [ ] Prevent loss of jobs. The LCC serving my facility has been in operation for ________ years. The current State requirements of a wastewater treatment plant would significantly add to the construction and ongoing maintenance costs. I (owner) may be forced to close my existing business and lay off my employees.

   - [✓] The variance is in the public interest as the facility is being used for public housing to serve the elderly and there are limited such facilities in the area. If the number of dwelling units were required to be reduced, this would be a disservice to the community.

2. The granting of the variance will not substantially endanger human health or safety.
   - [✓] The existing LCC will be upgraded to a treatment IWS (e.g., septic system). The IWS will provide a better treatment system prior to effluent disposal. The IWS will be designed and constructed to meet the Department of Health standards. The impact to the environment will be minimized compared to the current wastewater disposal system.

   - [✓] The proposed treatment IWS(s) will provide greater protection than the large capacity cesspools. The proposed IWS is an improvement over the existing cesspool in terms of wastewater treatment. The septic tank will provide pretreatment and sludge removal prior to effluent disposal.

   - [ ] Other, please specify: __________________________________________

   __________________________________________

   __________________________________________
APPLICATION FOR VARIANCE
Primarily Concerning Large Capacity Cesspools

3. Compliance with the rules or standards from which the variance is sought would produce serious hardship without equal or greater benefit to the public.

☑ The residents of Pahala, Hawaii are economically depressed.

☑ The owner of the facility cannot afford to build and operate wastewater systems (such as small aerobic wastewater treatment plants) to meet all the requirements of HAR Chapter 11-62.

☑ The existing location of the facility is severely restrictive and there is insufficient space to construct a wastewater treatment plant.

E. Specify the amount of time requested for the variance and the reasons for such a time period. Note that the Director cannot issue a variance for a period exceeding five years. Check applicable amount of time requested.

☑ 5 years [ ] 4 years [ ] 3 years [ ] 2 years [ ] 1 year

F. Submit any additional information which will support this application for a variance (i.e., statements, plans, area maps, histories, etc.) Label "Attachment D."

III. CERTIFICATION:

I, Neil S. Gyotoku, Housing Administrator, certify that I have knowledge of the facts herein set forth and that the same are true and correct to the best of my knowledge and belief.

Signature: _____________________________ Date: ___________________________

DO NOT WRITE BELOW - FOR AGENCY USE ONLY

IV. Date Application received: _____________________________

V. Application No.: _____________________________ VI: Docket No.: _____________________________

VII. OneStop Database Permit ID: _____________________________ VIII. Received by: _____________________________

IX. Filing fee ($300.00) check date: _____________________________ Check #: _____________________________

($150.00 for renewals) check date: _____________________________ Check #: _____________________________

X. Department of Health Receipt #: _____________________________ Batch #: _____________________________

XI. Decision on Application: _____________________________ Date: _____________________________

XII. Date of Public Hearing: _____________________________

Application for Variance
Primarily Concerning Large Capacity Cesspools
Revised 8/01/2014

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INFORMATION FOR VARIANCE EVALUATION BY UIC PROGRAM
Underground Injection Control (UIC) Program, Safe Drinking Water Branch
Department of Health, State of Hawaii
919 Ala Moana Blvd., #308, Honolulu, HI 96814
Tel. No. 808-586-4258, Fax: 808-586-4351

Attention: This information will be used to determine your project's applicability to UIC requirements and the authorization to abandon or operate the effluent disposal system. Answer all parts accurately and completely. Inaccurate or incomplete answers may result in processing delays.

Facility address: 96-1183 Holei Street
Owner: County of Hawaii
Island: Hawaii TMK No.: (3) 9-6-017:038 Lot size: 26,807 sq. ft.
Action related to disposal (check all applicable): ☑ abandon cesspool ☑ reuse cesspool ☑ build new cesspool
☐ reuse cesspool as seepage pit ☐ build new seepage pit ☑ reuse leachfield ☑ build new leachfield ☐ reuse injection well
☐ build new injection well ☐ other: ____________________________________________________________________________

Describe the disposal structure: ☑ leachfield ______ ft. x ______ ft. x ______ ft. deep
Percolation Testing will be performed to determine leachfield sizes based on 125 gpd/resident.

<table>
<thead>
<tr>
<th>g</th>
<th>2</th>
<th>☑</th>
</tr>
</thead>
<tbody>
<tr>
<td>d</td>
<td>927 ft., (+/-)</td>
<td></td>
</tr>
<tr>
<td>h</td>
<td>8 ft.</td>
<td></td>
</tr>
<tr>
<td>depth (h) ft.</td>
<td>15 ft.</td>
<td></td>
</tr>
<tr>
<td>depth to standing water from surface if present:</td>
<td>1 ft.</td>
<td></td>
</tr>
</tbody>
</table>

Wastewater type (check all applicable): ☑ domestic ☑ residential ☐ non-residential ☑ runoff ☐ industrial
☐ aquaculture ☐ commercial products processing ☐ food processing ☑ animal-related ☐ swimming pool/hubs
☐ condensate ☐ aesthetics ☐ healthcare-related ☐ floor drains ☐ other: ____________________________________________________________________________

Facility's wastewater flow in gallons per day:
Existing design: 800 gpd Minimum per Septic Tank (2) Future design: ☑ 800 gpd Average Maximum 920 gpd 1,420 gpd

Actual (measured or metered): __________________________________________________________

Person providing this information: ☑ is representing the owner.

Printed name: William Kurcharski Signed: ____________________________________________________________________________
Title: Director, Department of Environmental Management Company: County of Hawaii
Address: 345 Kekuanoo Place, Suite 41 Hilo, Hawaii 96720

Date: ____________________________ Phone: 808-961-8083 Fax: 808-961-3808

As of 04-07-08
September 29, 2016

Mr. Jelani Shareem
USEPA, Region IX
Enforcement Division
SDWA/FIFRA Enforcement Office (ENF 3-3)
75 Hawthorne Street
San Francisco, CA 94105

Re: Request for Information: Subsurface Wastewater Disposal Systems Serving the Pahala Elderly Apartments Tax Map Key (TMK) 3-9-6-017-038.

Aloha Mr. Shareem,

Enclosed, please find attached the information that was requested with regards to the Subsurface Wastewater Disposal Systems Serving the Pahala Elderly Apartments Tax Map Key (TMK) 3-9-6-017-038.

If you have any further questions or comments, please do not hesitate to contact Craig Kawaguchi at (808)-961-8019 or by email at craig.kawaguchi@hawaiicounty.gov.

Mahalo,

[Signature]

Randall M. Kurohara
Managing Director

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Attachment C.1
Re: Request for Information: Subsurface Wastewater Disposal Systems Serving the Pahala Elderly Apartments Tax Map Key (TMK) 3-9-6-017-038.

Dear Mr. Jelani Shareem,

On August 2, 2016 we received a letter from your office requesting information on a facility owned by the County of Hawaii (County) known as the Pahala Elderly Apartments (hereinafter the "Facility") located on Tax Map Key 3-9-6-017-038 (hereinafter the "Property"). The County inadvertently overlooked this Facility in its March 18, 2016 response to Request #1 in the EPA's January 26, 2016 request for information letter.

Therefore, we provide the following responses after each of the EPA's requests in the order as they appear in the August 2, 2016 letter:

1. Copies of the following existing documents pertaining to the cesspools servicing the Subject Property:

   A copy of the Site Plan showing the cesspool location is attached as Exhibit A. A copy of the Cesspool Detail plan is attached as Exhibit B and copies of the State of Hawaii Department of Health Cesspool Surveys are attached as Exhibit C.

2. A description of the ownership and operational control of the Subject Property, including, but not limited to, the percentage ownership of each owner, the nature of operational control for each operator, and the contact information for all owners and operators or managers of the Subject Property. Provide copies of any/all documents which support the ownership and/or operational control of the Subject Property, including, but not limited to, leases, sales agreement, management agreements, operator agreements, etc.

   The County of Hawaii controls the Property through an Executive Order by the governor and leases it to Kau Housing Corporation for the purpose of building and operating a U.S. Department of Housing and Urban Development (HUD) funded and insured elderly housing project. The lease which was effective September 27, 1985 has a term of 55 years at $1.00 per annum provided that project continues as a HUD-funded, HUD-insured or other government subsidized elderly housing project. See lease attached as Exhibit D. Kau Housing Corporation is a Hawaii Non-profit Corporation. Kau Housing Corporation has contracted with Bob Tanaka Inc. as its property manager. See Property Management Agreement attached as Exhibit E. Below is the contact information for Lessee and Manager.

Kau Housing Corporation
Attn: Gilbert DeMottia
451 Atkinson Drive
Honolulu, HI 96814
808-936-2299

Bob Tanaka Realty
Attn: Kevin Tanaka
1055 Kalo Place, STE 103
Honolulu, HI 96826
808-949-4111
3. A description of the ownership and operational control of the wastewater disposal unit(s) identified in response to Request #1 (e.g., ownership by a homeowners association). If the wastewater disposal unit is located on the Subject Property (e.g., located on an easement located on an adjacent property), provide information regarding this arrangement.

The Kau Housing Corporation (Lessee) will during the whole of said term make, build, maintain and repair all fences, sewers, drains, roads, curbs, sidewalks, parking areas, and any other improvements which may be required by law to be made, built, maintained and repaired upon or adjoining or in connection with or for the use of the project.

4. For each wastewater disposal unit identified in response to Request #1, an identification and/or description of the following:

a. the type of business or activity operated on the Subject Property that contributes wastewater to that unit, along with a description of the nature of the wastewater (e.g., sewage, rinse water, etc.);

Kau Housing Corporation operates Pahala Elderly Housing which consists of 8 residential units and 1 meeting room. Each residential unit consists of (1) bedroom, kitchen, bathroom, and living room. The meeting room is for the residents to congregate and socialize. It contains (1) washing machine and (1) clothes dryer. The property manager estimates that the residents do one load of laundry every 2 weeks per unit.

b. the maximum daily number of persons that have worked in, used or visited each dwelling(s), building(s) or facility(ies) in the past 5 years that contribute wastewater to each wastewater disposal unit (broken down by dwelling, building and facility), along with a description of the source of the data.

Average number of daily users for the last 5 years is 11 (9 residents and 2 guests). There are two buildings each with its own cesspool. One building has 4 single occupancy units and one building has 3 single occupancy units and 1 double occupancy. Each of the 8 units has 1 toilet, 1 shower and 2 sinks. In addition to the dwelling units one building has a meeting room which contains 1 washing machine. The source of this information is the property manager.

5. Identification of the number of employees currently employed at the Subject Property and/or the number of residents currently living on the Subject Property, with a breakdown of numbers based upon dwelling, building and/or facility.

There are no employees at Pahala Elderly Housing. There is a yard service person that visits the property once per month. There are two buildings, each with its own cesspool. One building has 4 single occupancy units and one building has 3 single occupancy units and 1 double occupancy. Each of the 8 units has 1 toilet, 1 shower and 2 sinks. In addition to the dwelling units one building has a meeting room which contains 1 washing machine.
6. A description of the County's plans for closing the cesspools servicing the Subject Property.

   The County of Hawai'i has plans to install a sewer system within the next 2-5 years.

7. Confirmation that the County of Hawai'i does not own and/or operate any additional cesspools in the communities of Pahala and Naalehu.

   The County of Hawai'i does not own and/or operate any additional cesspools in the communities of Pahala and Naalehu that have not already been disclosed to the EPA.
Exhibit C

STATE OF HAWAII
DEPARTMENT OF HEALTH

SANITATION BRANCH
ENVIRONMENTAL PROTECTION AND HEALTH
SERVICES DIVISION

CESSPOOL SURVEY

Property Owner: Kau Housing Corporation
Address: Kau St

Tax Map Key: 9-6-17-38
Lot No.: B

Island: Hawaii
City: Pahala
District: Kau

Builder or Contractor: L. Aze
Intended For: Sewage Wastes

Primary: Yes
Secondary: No

Distance From Building: 12'
Boundary: 15'
Stream, Well, Body of Water, Etc.: None

Diameter (Clear) Ft.: 8'
Depth-Ft.: 15'
Capacity (Gal.): 5640

No. Ft. Down to Water Table: None
Ground Slope: Level

Soil Profile (Starting from Surface): 15' Layered Rock

Type of Wall or Curb: None
Reinforced Concrete Cover: Yes

Distance from Finished Ground to Top of Cover (Ft.): 1 ft.

Date Certificate Issued:
Date Approved: 6/5/86 19

Sanitarian: 0
STATE OF HAWAII
DEPARTMENT OF HEALTH

Building #2

CESSPOOL SURVEY

Property Owner: Kau Housing Corporation
Address: Kou St.

Tax Map Key: 9-6-17-38 Lot No. B

Island: Hawaii City: Pahala District: Kau

Builder or Contractor: L. Azevedo
Intended For: Sewage Wastes

Primary [ ] Secondary [ ] Other

Distance From Building: 15' Boundary: 15' Stream, Well, Body of Water, Etc. None

Diameter (Clear) Ft: 8' Depth-Ft: 15' Capacity (Gal): 5640

No. Ft. Down to Water Table: None
Ground Slope: Level

Soil Profile (Starting from Surface): 15' Lava Bed Rock

Type of Wall or Curb: None
Reinforced Concrete Cover: Yes

Distance from Finished Ground to Top of Cover (Ft): 0

Date Certificate Issued:

Date Approved: 6/5/86
Sanitarian:
SCOPE OF WORK AND SCHEDULE

The schedule is based on that received from COH, see attached.

The scope of work includes the following items:

1. Perform Topographic Survey of the project area.
2. Perform preliminary site investigation.
3. Perform Percolation testing.
4. Prepare and submit UIC permit application, including permit fees ($100 per application), for DOH cesspool closure (2 cesspools only).
5. Prepare and submit IWS permit application, including permit fees ($100 per application), for DOH cesspool closure (2 cesspools only) and septic system.
6. Prepare prefinal construction plans, specifications and estimate for the cesspool closure (2 cesspools only) and septic system to be reviewed by client.
7. Prepare final construction plans, specifications and estimate for the cesspool closure (2 cesspools only) and septic system to be reviewed by COH agencies for approval.
8. Coordinate with the applicable reviewing agencies for design approval.
9. Follow County of Hawaii and DOH standards, rules and regulations.
10. Final Inspection of UIC cesspool closure and IWS system.

ASSUMPTIONS

1. Topographic survey will locate surface utilities, inverts of manholes and inverts of cesspools. Topographic surveying services do not include toning for underground utilities. Topographic survey will use assumed coordinates and elevations. Topographic survey limits are only within TMK 9-6-017:003 and 0038.
2. All work will remain within the County property.
3. All construction work will be done during normal working hours. Noise variance for night work will not be required.
4. The COH will provide AECOM with all pertinent record drawings and historical information available in the COH files.
5. The proposal is based on total contract time as stated in the COH scope of work. Additional costs may be incurred if the performance time exceeds the total contract time.
6. The septic system will be sized based on the water usage information initially provided by COH to AECOM. Changes to water usage may result in a design change order.
7. The design will be based on the existing cesspool record information provided by the client, site investigation and information collected by the topographic survey.
8. While the Brewer 1964 Map shows five (5) houses going to a cesspool in the vicinity of the Phala Elderly Complex, it does not appear that the cesspool exists.
9. The LCC closer to Holei St. has a tendency to clog and requires periodic pumping.
10. Unless percolation was inadequate, we would likely have to dig up the parking lot.
11. Utilize the EA Exemption list from DEM and/or DPW.
12. Variance and Conversion to Seepage Pit is not required.

Attachment C.2
EXCLUSIONS

1. Design of sewer connection to the county wastewater system.
2. Design of driveways, parking lot, landscaping, buildings or other utilities not related to the cesspool closure and septic system.
3. Cesspool pumping.
4. CCTV inspection of the existing sewer lines connecting to the cesspools.
5. Construction or utility easement and subdivision mapping; and, final grade certification.
6. Off-site improvements; and, handling of off-site drainage.
7. Clean Water Act Section 404 Permit and Section 401 Water Quality Certification.
8. Environmental assessment and/or environmental impact statement.
9. Historic/Archaeological assessments.
10. Noise / floral / faunal / air quality / utility / natural hazard / shoreline / visual resources / socio-economic environment / demographics surveys, studies, monitoring plans or assessment reports.
11. Professional services not described in the Project Scope of Work document or listed above, including but not limited to:
   a. Landscape Architecture
   b. Electrical Engineering
   c. Mechanical/Plumbing
   d. Structural Engineering
   e. Geotechnical Engineering
12. Title company fees, legal descriptions and exhibits.
13. Environmental / hazardous material sampling and analysis. It is assumed that the project site does not contain any hazardous material or related environmental concerns.
14. Preparing or obtaining any applicable construction or any other permits not specifically described in the Project Scope of Work or listed above.
15. Attendance at warranty period site visit(s).
16. Construction management and contractor supervision.
17. Preparation of as-built drawings.
18. Adjustment of electrical and telecommunication facilities.
19. Travel from Oahu to Hawaii (off-site work to be done by Hilo staff).

Any change or addition to the scope of services described above will be considered extra work and would need to be covered by a change order to our contract.

This proposal is conditioned upon the negotiation of mutually acceptable contract terms.
**Census 2000 Summary File 1 (SF 1) 100-Percent Data**

**Pahala CDP, Hawaii:**
- Population: 1,376
- Median Age: 40.5 years
- Male Median Income: $22,206
- Female Median Income: $27,401
- Total Housing Units: 570
- Median Household Income: $50,125
- Median House Value: $50,125
- Persons in poverty, percent: 18.1%
- Persons without health insurance, percent: 8.8%
- Male Median Income: $27,401
- Female Median Income: $22,206
- Total Housing Units: 502
- Median Household Income: $50,125
- Median House Value: $50,125
- Persons in poverty, percent: 18.1%
- Persons without health insurance, percent: 8.8%

**State of Hawaii Censuses:**
- Data as of January 1, 2000, 2010, 2015
- MTFCC OID GEOID...
- Source: 2011-2015 American Community Survey 5-Year Estimates

**Current/BAS17:**
- Data as of January 1, 2015
- MTFCC OID...
- Source: 2011-2015 American Community Survey 5-Year Estimates

**Source:**
- 2011-2015 American Community Survey 5-Year Estimates

**Educational Attainment:**
- Source: 2011-2015 American Community Survey 5-Year Profiles

**Hawaii Censuses:**
- Population, Housing Units, Area, and Density: 2010
- Source: 2011-2015 American Community Survey 5-Year Estimates

**Persons in poverty, percent:**
- Source: 2011-2015 American Community Survey 5-Year Estimates

**Persons without health insurance, percent:**
- Source: 2011-2015 American Community Survey 5-Year Estimates

**Total Housing Units:**
- Source: 2011-2015 American Community Survey 5-Year Estimates

**Male Median Income:**
- Source: 2011-2015 American Community Survey 5-Year Estimates

**Female Median Income:**
- Source: 2011-2015 American Community Survey 5-Year Estimates

**Veterans:**
- 90
According to Section 11-200-8, Hawaii Administrative Rules, the Department of Environmental Management, County of Hawaii may declare exempt the following types of actions from the requirement to prepare an environmental assessment. The Department of Environmental Management, County of Hawaii shall not make exemption declarations when the cumulative impact of planned successive actions in the same place, over time, is significant, or when an action that is normally insignificant in its impact on the environment may be significant in a particularly sensitive environment. Sensitive areas include, but are not limited to, historical, archaeological, and cultural sites, flood plains, wetlands, beaches, coastal areas erosion-prone areas, geologically hazardous land, critical habitats, and estuaries.

EXEMPTION CLASS 1: Operations, repairs or maintenance of existing structures, facilities, equipment or topographical features, involving negligible or no expansion or change of use beyond that previously existing.

1. Repair and maintenance of existing structures.
2. Acquisition of land or easements on which existing facilities are situated.
3. Operate, repair and maintain all County automotive and construction equipment assigned to the department.
4. Operate, repair and maintain all wastewater facilities including sewer lines, pump stations and treatment plant components.
5. Operate, repair and maintain all solid waste facilities including transfer stations and disposal facility components.

EXEMPTION CLASS 2: Replacement or reconstruction of existing structures and facilities where the new structure will be located generally on the same site and will have substantially the same purpose, capacity, density, height and dimensions as the structure replaced.

1. Replacement or reconstruction of existing asphaltic concrete paved roads or of existing gravel roads by resurfacing with asphaltic concrete pavement. The completed road will be located within the existing right-of-way and will have substantially the same purpose, capacity and dimensions as the road prior to construction.
2. Replacement or reconstruction of all wastewater facilities including sewer lines, pump stations and treatment plant components.
3. Replacement or reconstruction of all solid waste facilities including transfer stations and disposal facility components.
4. Replacement or reconstruction of water, sewage, or other essential public utility services within the County road rights-of-way.

EXEMPTION CLASS 3: Construction and location of single, new, small facilities or structures and the alteration and modification of same and installation of new, small equipment and facilities and the alteration and modification of same including but not limited to: (a) single family residences not in conjunction with the building of two (2) or more such units; (b) multi-unit structures designed for not more than four (4) dwelling units, if not in conjunction with the building of two (2) or more such structures; (c) stores, offices and restaurants designed for total occupant load of twenty (20) persons or less, if not in conjunction with the
building of two (2) or more such structures; (d) water, sewage, electrical, gas, telephone, and other essential public utility service extensions to serve such structures and facilities; and (e) accessory or appurtenant structures including garages, carports, patios, swimming pools and fences.

1. Fencing when constructed in accordance with all applicable County regulations.

2. Installation of new sewer lines, pump stations and components auxiliary to existing wastewater treatment plants.

3. Modification and alteration of existing solid waste convenience centers for the collection/diversion of recyclables, reuse items and redemption of beverage containers.

**EXEMPTION CLASS 4:** Minor alteration in the condition of land, water, or vegetation.

1. Maintenance and removal of all vegetation from within existing sewer line and drainage easements as provided for under Hawaii County Code, Section 10-3.

2. Maintenance and removal of vegetation in order to conduct survey work.

**EXEMPTION CLASS 5:** Basic data collection, research, experimental management, and resource evaluation activities which do not result in a serious or major disturbance to an environmental resource.

1. Perform preliminary surveys (e.g. reconnaissance, location work, level circuits, topographic and hydrographic work).

**EXEMPTION CLASS 6:** Construction or placement of minor structures accessory to existing facilities.

1. Interior alterations involving such things as partitions, plumbing, and electrical conveyances.

2. Installation of dry well sumps within the County right-of-way.

3. Modification of existing wastewater facilities to include sewer lines, pump stations and treatment plant components.

4. Modification of existing solid waste facilities including transfer stations and disposal facility components.

5. Install wastewater facilities including sewer lines, pump stations and treatment plant components.

6. Install solid waste facilities including transfer stations and disposal facility components.