



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Sent Via: Electronic Mail

Marissa Harman, Director  
Asset Management  
Community & 'Āina Resiliency Group  
Trustees of the Estate of Bernice Pauahi Bishop,  
d/b/a Kamehameha Schools  
567 South King Street, Suite 310  
Honolulu, HI 96813  
[maharman@ksbe.edu](mailto:maharman@ksbe.edu)

**Re: In the Matter of Kamehameha Schools  
EPA Docket No.: UIC-09-2018-0008  
Phase I (Oahu) Plan and Schedule**

Dear Director Harman:

Pursuant to Paragraph 48.a of the above referenced Consent Agreement and Final Order (CAFO), Kamehameha Schools (KS) submitted its plan and schedule for closure of the nineteen (19) Large Capacity Cesspools (LCCs) that were identified during the Phase I Audit for the U.S. Environmental Protection Agency's (EPA's) approval on May 06, 2022. Based on review of the plan and schedule, EPA determined that the information provided for the properties listed below does not fully comply with the requirements that are detailed in Paragraph 48 because KS did not include any information about the manner and timeframe in which KS or its tenants intend to close the LCCs.

TMK	Address	Plan	Schedule
153001010	53-157 Kamehameha Hwy, Hauula, HI 96717	KS notified tenant on multiple occasions of tenant's obligations under the lease and to close the LCC.  If tenant is unable to close the LCC, KS will.	KS in discussions with tenant.
139019012	968 Kamilonui Place, Honolulu, HI 96825	Tenant to discuss LCC determination with EPA. Tenant inclined to close and replace the LCC.	Tenant to discuss LCC determination with the EPA, while also interviewing prospective contractors to replace the cesspool.

As specified in Paragraph 48.a of the CAFO, KS is required to submit a plan and schedule for closure for any LCCs identified during the Phase I Audit. Additionally, Paragraph 48.b requires that all LCCs

identified during the Phase I Audit be closed as soon as possible by preparing and submitting construction plans for an individual wastewater system to the Hawai'i Department of Health for approval or applying for a sewer connection within thirty (30) days of submission of the Inspection Phase Completion Report.

Considering that the information provided about the above reference properties did not include any information about the manner and timeframe in which KS or its tenants intend to close the LCCs, EPA requests that KS submit an appropriate plan and schedule for closure by May 31, 2022.

If you have any questions regarding this letter, please feel free to contact Mr. Jelani Shareem of my staff at (415) 972-3095 or via e-mail at [shareem.jelani@epa.gov](mailto:shareem.jelani@epa.gov). Legal questions should be addressed to Ms. Kimberly Wells at (415) 972-3056 or [wells.kimberly@epa.gov](mailto:wells.kimberly@epa.gov).

Sincerely,

Sincerely,

Roberto Rodriguez  
Assistant Director  
Water Enforcement Branch  
Enforcement and Compliance Assurance Division

cc: Raina Gushiken, Kamehameha Schools ([ragushik@ksbe.edu](mailto:ragushik@ksbe.edu))  
Ian L. Sandison, Watanabe Ing LLP ([ISandison@wik.com](mailto:ISandison@wik.com))  
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