



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

May 13, 2020

Ian Sandison  
Partner  
Watanabe Ing LLP  
First Hawaiian Center  
999 Bishop Street, Suite 1250  
Honolulu, Hawaii 96813

**Re: In the Matter of Kamehameha Schools  
EPA Docket No.: UIC-09-2018-0008  
Approval of Extension for Compliance Audit Inspections of Big Island Target Properties**

Dear Mr. Sandison:

On May 07, 2020, you informed the Environmental Protection Agency (EPA) that Kamehameha Schools requests an extension in relation to the compliance audit of its Target Properties on the Big Island. You explained that an extension of 45-days is needed to meet the terms of Paragraph 46.c.iv.B of the above referenced Consent Agreement and Final Order because Governor Ige's Sixth Supplementary Proclamation in connection with implementing Hawaii's Emergency Rules Relating to COVID-19 has prohibited Kamehameha Schools employees and contractors (including the Auditor) from engaging in the travel that is necessary to continue conducting compliance inspections of the Big Island Target Properties. You also noted that the proclamation was issued on April 25, 2020 and continues in effect through May 31, 2020.

Paragraph 46.c.iv.B of the Consent Agreement and Final Order provides that if the number of Target Properties on the Big Island is greater than 60, then Kamehameha Schools may submit a proposed project schedule for EPA's approval. Kamehameha Schools identified 500 Target Properties in the list submitted to EPA on March 27, 2019. Therefore, EPA has discretion to approve an appropriate schedule for conducting compliance inspections at the Target Properties.

EPA approved an Inspection Completion Schedule with a final Deadline of December 01, 2020 by letter on April 3, 2019. Given the impact that Governor Ige's shelter in place order has on Kamehameha Schools ability to conduct compliance inspections on the remaining Big Island Target Properties, EPA hereby agrees to and grants Kamehameha Schools request of a 45-day extension. Inspection of the target properties on the Big Island must be completed by January 14, 2021.

If you have any questions about this approval 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.kimbeiy@epa.gov](mailto:wells.kimbeiy@epa.gov).

Sincerely,

Thanne Berg “/s/” May 13, 2020

Thanne Berg

Acting Assistant Director

Water Enforcement Branch

Enforcement and Compliance Assurance Division