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Nancy Rumrill
U.S. Environmental Protection Agency
Ground Water Office (WTR-9)

Submitted via email: rumrill.nancy@epa.gov

**Subject: Revised draft permit for the Lahaina Wastewater Reclamation Facility (LWRF):
REQUEST FOR A PUBLIC HEARING ON INTERIM PERMIT OPTION AND
PHASE OUT OF THE LWRF INJECTION WELL.**

Dear Ms. Rumrill:

In our letter to you of 6 November 2008, we described the threat from waste water injection wells to Maui's coral reef ecosystems. We emphasized the importance of curtailing injection well pollution and abating other threats to coral reefs, given the increased vulnerability of these ecosystems due to global warming. National and international environmental agencies and organizations call for bold efforts to save coral reefs by curtailing land-based stressors.

The revised draft permit for the Lahaina Wastewater Reclamation Facility (LWRF) would require reductions in total nitrogen pollution from injected wastewater of 25% and 50% by the end of 2011 and 2015, respectively. This would still allow injection of up to 15,000 pounds of total nitrogen per calendar quarter more than 6 years from now. A stated goal of these limits is to "[minimize] the environmental impact that the injection plume may have on the coastal water" (p. 5, Statement of Basis).

We support EPA's efforts to reduce pollution from LWRF. However, the Statement of Basis for the revised permit does not assure that the proposed pollution limits will be adequate to protect nearby coral reefs, and that, years from now, our community will not bemoan their destruction, regretting that pollution controls were "too little and too late." This is both an environmental and public safety issue, as corals reefs help ensure both.

Prudence demands that land-based pollution of coral reef ecosystems soon be curtailed. The only sure way to avoid continuing coastal pollution from nearby waste water injection wells is to phase them out.

EPA's job is to safeguard the biological integrity of the Nation's waters, in this case the coastal waters of Maui, Hawaii. Issuing a permit for reduced but continued groundwater pollution is unsatisfactory.

We ask that EPA:

- Set a target date for requiring full replacement of LWRF and other waste water injection wells on Maui (e.g., January 2014) with new waste water treatment systems that do not pollute our environment.
- Begin immediate planning with other federal authorities, state agencies, Maui County, and the private sector for the design, funding, and timely construction and operation of new wastewater treatment infrastructure.
- Provide only an "interim permit" for operation of LWRF (and other injection wells on Maui), with rigorous requirements for yearly reductions in pollution (e.g., 15% per year for nitrogen).
- Become more competitive and creative in helping secure the necessary funding to clean up Maui's waste water system. It is astounding that some \$23 million in federal funds have been spent on design and planning for a new telescope on Maui, with another \$146 million in federal stimulus on the way, while there are no earmarks (that we know of) for helping finance a state-of-the-art wastewater treatment system to end pollution of Maui's coastal waters.

We ask that EPA hold a public hearing on the issues raised in this letter, mainly, on the need, options, and planning for LWRF facility phase out and replacement with a non-polluting wastewater treatment system.

Sincerely,

Tony Povilitis

Tony Povilitis, Ph.D.

Cc:

Mayor Charmaine Tavares
Council Members, Maui County