



## EPA Public Hearing on Lahaina Wastewater Injection Well Permit

August 20, 2009

U.S. Environmental Protection Agency, Ground Water Office (WTR-9)  
75 Hawthorne Street  
San Francisco, CA 94105  
Attn: Nancy Rumrill

Aloha EPA Hearing Officers,

Thank you for returning to Maui to hold this meeting. Maui Tomorrow Foundation is a member of the DIRE Coalition, an organization representing the interests of many members of our community concerned with the state of our County's reefs, public health, and economy.

We strongly support Mayor Tavares's publicly stated goal of 100% wastewater reuse and zero injection and ask the County's Wastewater Management to work with the community and DIRE Coalition to achieve the goal of 100% wastewater reuse and zero injection as soon as possible.

We ask that EPA not grant the requested application as written, but instead issue a permit for no longer than five years, conditioned on a number of requirements, including:

- More stringent waste treatment for nitrogen removal and effective disinfection of pathogens
- Effective ground and ocean water quality and bio-impact monitoring and public reporting
- Development, within one year, of a detailed plan for design, financing, and construction of necessary treatment upgrade and wastewater reuse facilities

EPA should decline to approve a 10-year renewal permit for Maui County to continue to discharge inadequately treated wastewater effluent into the injection wells because this effluent flows into the ocean, stimulates algal growth, harms

coral reefs, and releases pathogens that threaten the health of those who swim, snorkel, dive, and work in the near shore waters as shown in recent studies conducted by University of Hawaii's Botany Department.

Maui Tomorrow believes it is feasible to end all reuse within five years. We ask that EPA not grant a UIC permit which allows behavior prohibited by the Clean Water Act.

A five year term is warranted to ensure that progress is made and to also ensure that this situation is revisited more than once a decade. We ask for reductions in nitrogen loading and injectate rates during the five years as Maui County moves towards an ultimate goal of eliminating underground injection as a disposal option. With the 2030 Maui Island Plan projecting growth of more than 5000 units in West Maui it is imperative that we move towards more water reuse and away from detrimental practices.

Maui Tomorrow Foundations asks that EPA not approve the permit renewal application as the current wastewater injection practice at Lahaina violates the policies of the federal Pollution Prevention Act, Hawaii state water pollution control regulations and policies, and the Hawaii constitutional requirement that the counties as well as the state treat all waters of Hawaii as a "public trust."

We ask the County of Maui to phase out wastewater injection wells and reclaim and re-use properly treated wastewaters on land for a variety of beneficial uses as soon as possible and no later than January 1, 2015 and again ask EPA to issue a permit for Lahaina Wastewater Treatment facility for five years only.

Thank you,

A handwritten signature in dark ink, appearing to read "Irene Bowie". The signature is written in a cursive, flowing style.

Irene Bowie  
Executive Director  
Maui Tomorrow Foundation, Inc.