



STATE OF HAWAII
DEPARTMENT OF HEALTH
SAFE DRINKING WATER BRANCH
ULUAKUPU BLDG. 4
2385 WAIMANO HOME ROAD, SUITE 110
PEARL CITY, HI 96782-1400

In reply, please refer to:
File: SDWB
432H0818.docx

August 6, 2018

Mrs. Erna A. Kamibayashi
Kauai District Supervisor
Department of Hawaiian Homelands
3060 Eiwa Street, Room 203
Lihue, Hawaii 96766-1886
[via erna.a.kamibayashi@hawaii.gov only]

Dear Mrs. Kamibayashi:

**SUBJECT: REPORT OF SANITARY SURVEY
PUBLIC WATER SYSTEM NO. 432, ANAHOLA FARM LOTS**

Thank you for the assistance and information provided during the sanitary survey inspection of the Department of Hawaiian Homelands' (DHHL) Anahola Farm Lots water system conducted on July 25, 2018.

My staff appreciated the assistance provided by Messrs. Guy Moriguchi, Keith Taguma and Mike Crutchfield from Aqua Engineers, and Messrs. Rick Speer, Wayne Nakamura and Halealoha Ayau from DHHL.

A sanitary survey of a public water system is a periodic review of the system's facilities, operation and maintenance practices, and records to assure that proper conditions, policies, and practices are in effect for that water system. Maintaining of minimum standards of operation and maintenance is the responsibility of the operator.

As of December 1, 2009, systems must comply with the sanitary survey requirements of the Ground Water Rule (GWR). The Rule requires ground water systems with an identified "**significant deficiency**" to consult with the State on a corrective action plan and schedule of completion within 30 days of receiving written notice of the deficiency. The system must complete the corrective actions or be in compliance with an agreed upon corrective action plan and completion schedule within 120 days of receiving written notice of the deficiency. As of January 1, 2014, photo documentation of all corrected significant deficiencies is required. The Safe Drinking Water Branch (SDWB) reserves the right to conduct follow up inspections as necessary.

There were no significant deficiencies found on this survey.

The Department of Health (DOH) also requests that the system review the list of “recommendations” (non-significant deficiencies) below and provide written acknowledgement that they will address them in a timely manner, to the extent that resources and operations will allow. We strongly encourage the system to address “recommendations” as you would significant deficiencies to avoid related problems in the future. The DOH will be using the list of significant deficiencies and recommendations as a reference and benchmark for measuring system progress in future sanitary surveys.

The following are our recommendations:

1. There were no Safety Data Sheets (SDS) on site for the liquid sodium hypochlorite. Please ensure that an up-to-date copy exists at the site where the chemicals are stored.
2. The tank is severely rusted and needs replacement. This has been an ongoing comment since the 1999 survey. The Phase II WSI project is expected to resolve this, with construction starting in CY2019. Please acknowledge this as a correct statement.
3. Individual homeowner backflow preventers are not tested annually (per HAR 11-21), not well maintained and DHHL is not the responsible party. The Phase I WSI project proposes that backflow preventer testing and maintenance will be assumed by DHHL, using its contract operator.
 - a. Please acknowledge this as a correct statement.
 - b. When available, please provide the revised contract operator scope as evidence of this change.
4. A mutual aid agreement letter of 12/8/2008 between DHHL and the Kauai Department of Water for backup water and electrical generator should be updated. Provide a copy of the update to the SDWB for review to ensure completeness.
5. PWS should develop a cross connection control plan that includes the following minimum content:
 - a. inventory of devices (location or address, device make and model, installation date),
 - b. test records (annual for each device),
 - c. a list of certified testers

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- d. educational materials for consumers.
 - e. A PWS' cross connection control program's policies should ensure adequate access for inspection, testing, maintenance and replacement of assemblies through private property if necessary
 - f. Such a document should be updated at least every year
6. PWS should develop a Vulnerability Assessment/Emergency Response Plan that includes the following minimum content:
- a. Vulnerability Assessment/Emergency response to the following types of events: Heavy rains/flooding, high wind events, earthquakes, brush fires, power outages, major well or waterline disruptions, sudden unavailability of water system personnel
 - b. Emergency contact numbers for water system personnel and first responders
 - c. Communications protocols for disseminating information to the water system's users and possibly the media

Provide a copy of the plans to the SDWB for review and to maintain Statewide consistency. Here's a link to a recent Water Spot article with more detail:
http://health.hawaii.gov/sdwb/files/2018/07/Water_Spot_Volume22_Issue3.pdf

If there are any questions, please call Mr. Michael Miyahira, SDWB Engineering Section Supervisor, at (808)586-4258.

Sincerely,



JOANNA L. SETO, P.E., CHIEF
Safe Drinking Water Branch

MM:cb

c: Mr. Guy Moriguchi, Aqua Engineers [via guy@aquengineers.com only]