

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843



September 8, 2015

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Deputy Manager and Chief Engineer *EWL*

TO: LORI M.K. KAHIKINA, P.E., DIRECTOR
DEPARTMENT OF ENVIRONMENTAL SERVICES

ATTN: MANUEL S. LANUEVO, P.E. AP LEED

FROM: ERNEST Y.W. LAU, P.E., MANAGER AND CHIEF ENGINEER *EWL*

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT ON BUILDING FOR
SUPPLEMENTAL ENVIRONMENTAL PROJECT AT H-POWER
TAX MAP KEY: 9-1-026: 033, 034, 035

Thank you for the opportunity to review and comment on the Draft Environmental Assessment for the H-Power environmental project. We have the following comments:

1. The existing water system cannot provide adequate fire protection to accommodate the proposed development. The Board of Water Supply (BWS) Water System Standards require a fire hydrant to be located within 125 linear feet of the property and provide a fire flow of 4,000 gallons per minute (gpm) for industrial developments. The nearest fire hydrant, fire hydrant L-4256, is located approximately 10 feet from the property; however, it can only supply a flow of 3,400 gpm. Therefore, the developer will be required to install the necessary water system improvements to provide adequate fire protection in accordance with our Water System Standards.
2. In response to Council Resolution 06-329, supporting the use of recycled water for industrial uses at the City's H-POWER facility and in accordance with BWS Rules and Regulations Section 1-112, Nonpotable Water, recycled water should be utilized in lieu of potable water for nonpotable purposes. The BWS Recycled Water System is located within an easement between the proposed H-Power environmental project site and the H-Power facility.
3. We remind Environmental Services that Covanta, the H-Power contractor, has not fulfilled a previous BWS requirement to utilize RO demineralized recycled water associated with the H-Power 3rd boiler project to replace the use of potable water for boiler feed. Since Covanta has been non-responsive to our attempts at a resolution to our recycled water requirement, it will be difficult for BWS to approve any further building permits for water services to these facilities.

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4. The availability of potable water will be confirmed when the building permit application is submitted for approval. However, please be advised that this information is based upon current data, and therefore, the BWS reserves the right to change any position or information stated herein up until the final approval of the building permit application. The availability of recycled water for the H-POWER development will be confirmed when a recycled water service agreement is executed.
5. When water is made available, the applicant will be required to pay our Water System Facilities Charges for resource development, transmission and daily storage. Construction drawings should be submitted for our review and the construction schedule should be coordinated to minimize impact to the water system.
6. The on-site fire protection requirements should be coordinated with the Fire Prevention Bureau of the Honolulu Fire Department. The proposed project is subject to BWS Cross-Connection Control and Backflow Prevention requirements prior to the issuance of the Building Permit Applications.

If you have any questions, please contact Robert Chun, Project Review Branch of our Water Resources Division at 748-5443.