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Denise Mulligan H3. ✓

RECEIVED MAY 10 1995



BENJAMIN J. CAYETANO
GOVERNOR OF HAWAII

LAWRENCE MIKE
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
ENVIRONMENTAL MANAGEMENT DIVISION
SOLID AND HAZARDOUS WASTE BRANCH
919 ALA MOANA BLVD., #212
HONOLULU, HAWAII 96814

In reply, please refer to:
EMD / SHW

May 4, 1995.

H0503GMS

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Mr. Ted Baldau
Reid & Associates
P.O. Box 1686
Kailua-Kona, Hawaii 96745

Post-It™ brand fax transmittal memo 7671		# of pages	2.
To	S. Hardash	From	J. Libby
Co.	Gemini	Co.	Gemini
Dept.		Phone #	
Fax #	808 969 7365	Fax #	520 318 8590

Dear Mr. Baldau:

Subject: Comments to Proposed Industrial Pre-Treatment Study for the Gemini 8 Meter Telescopes Project, Mauna Kea Science Reserve

We have reviewed the proposed industrial pre-treatment study for the above mentioned project and concur with your plan of action for the management of potentially generated hazardous waste. We also offer the following comments:

1. Based on the projected quantity of waste to be generated, the observatory may be an episodic large quantity generator (LQG) subject to full federal and state hazardous waste regulations under 40 CFR 262 and Hawaii Administrative Rules 11-262. As a LQG, the facility must obtain an EPA ID Number and follow all reporting, storage, and handling requirements. Enclosed is a booklet and notification form to apply for an EPA ID number which should be sent to EPA Region 9.
2. As a generator, the facility is allowed to treat its hazardous waste onsite. The plan to neutralize the washwater generated from the stripping of the aluminum and silver coatings is allowed under the hazardous waste regulations so long as it is done in a tank.
3. Recovery of the silver from the washwater through an ion exchange method is highly recommended and should help to decrease the concentration of silver to within the 5 ppm hazardous waste regulatory level.
4. Careful monitoring of the washwater prior to discharge into the seepage pit is required. The washwater would have to be tested per the EPA approved test methods for hazardous waste characteristics; namely for pH and heavy metal

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content (silver) prior to discharge. The enclosed booklet also specifies the test methods required and regulatory limits for these two hazardous waste characteristics.

Should you have any questions, please contact Ms. Grace Simmons at (808) 586-4226.

Sincerely,


STEVEN Y.K. CHANG, P.E., MANAGER
Solid & Hazardous Waste Branch

enclosure

c: Jerry Nunogawa, Hawaii District Health Office

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