

Temporary Debris Storage (TDS) Site Monitoring

U.S. Army Corps of Engineers and County of Maui Department of Environmental Management

April 10, 2024

The Temporary Debris Storage (TDS) area located in West Maui was designed and is underlain by a thick (80 mil or 0.08 inches) plastic impermeable liner to protect the soil, groundwater, and ocean. The entire TDS site is being monitored closely by USACE, County of Maui, and Hawai'i Department of Health (DOH) to ensure no impacts to the surrounding area or the marine environment from the ash and debris, along with any leachate or rainwater run-off generated.

Leachate is a liquid, usually rainwater, which percolates through the ash and debris within the lined area of the TDS working boundaries. Though most of this water is either absorbed into the waste mass or evaporates into the air, some may pass through the ash and debris, and may pick up contaminants present within the ash, such as heavy metals (i.e., arsenic, lead and cobalt) as detected by Hawai'i DOH in samples of the ash taken in Lahaina. Leachate is different than rainwater or surface water run-off which is diverted around the TDS working area from the surrounding hills. Stormwater is intentionally diverted around the TDS to minimize the generation of leachate. All leachate collected within the TDS area is drained by gravity to a low spot in the TDS working area called a sump, where it is drained via a drainpipe to a leachate basin. This leachate basin is located directly below the TDS working area, and is constructed with the same thick, impermeable liner underneath it to prevent any infiltration into the underlying soils.

The leachate basin has a design capacity of 1.375 million gallons, which is much more than is ever expected to be collected, even in the most significant rain event in West Maui. For example, during a rainstorm in early January during which over 3" of rain fell in less than 24 hours, the leachate basin successfully collected all rainwater which fell directly into the TDS working area as well as its surroundings, as construction had yet to be completed on the stormwater diversion canals around the TDS working area. The leachate basin filled with approximately 500,000 gallons of rainwater, which only caused it to reach just over 1/3 of its total capacity.

The leachate generated in the TDS is utilized within the limits of the lined TDS working area where the storage of ash and debris is taking place. It is being applied via wet spray atop the debris as a means to control dust generation. During this process, most of the liquid evaporates. The water spray is applied several times throughout the workday, especially on drier days. As of early March, all of the leachate which accumulated during the January rain event had been utilized for dust control. The leachate basin has been for the most part empty for the past several weeks, and fresh water is being used for dust control. Leachate basin level monitoring results are presented in the table below:

Date	Level	Gallons (est)
1/11/2024	33%	480,000
2/15/2024	5'	100,000
2/22/2024	< 1'	2,000
3/14/2024	< 1'	2,000
3/24/2024	empty	0

A percolation basin is located below the TDS site, designed to receive rainwater run-off which is diverted around the TDS working area, which does not come into contact with any ash or debris. The purpose of the percolation basin is to allow rainwater run-off to percolate into the natural soils and not run down the roadway or drainage channels. A Stormwater Pollution Prevention Plan (SWPPP) was developed to prevent contamination of the surrounding area from site operations which complies with applicable state and federal requirements.

On January 21, 2024, the County of Maui approved Ordinance #5596, also known as “Bill #120.” Among other recordkeeping, operational and planning requirements, the ordinance required the following specific monitoring at the TDS:

- 1) Leachate quantity, quality and treatment processes
- 2) Run-off, including nearby waterways
- 3) Air quality for toxins and contaminants

The data from this monitoring must be made publicly available, which is the purpose of this section.

1) Leachate

Due to the dry conditions in West Maui, ‘baseline’ sampling of run-off water was collected directly from the leachate basin two days after a significant storm event on January 9, 2024. Approximately 3 inches of rain fell over 24 hours during this storm event, generating approximately 500,000 gallons of run-off, which was collected in the leachate basin. At the time of the storm, no ash or debris had been placed in the TDS working area, so the run-off represented typical precipitation run-off un-impacted by waste, therefore considered typical of what normally runs off the natural soils present in the area.

Since the preliminary, baseline sampling event, USACE has sampled the leachate basin periodically, and plans to continue sampling leachate monthly directly from the leachate basin if a 1” or greater storm event occurs within that month.

The following table shows the parameters analyzed by FQ Labs in Oahu or Eurofins Labs in Seattle, along with the results from samplings conducted by USACE to date. Not all parameters shown below were analyzed for by the laboratory during each event, as additional parameters were added at the request of Hawai’i DOH and the Maui County after the baseline sampling event on January 11, 2024.

Parameter	Method*	1/11/2024 (Baseline)	1/30/2024	2/8/2024	2/13/2024	2/20/2024	Units
TSS	SM 2450D	316	46	32	8	-	mg/L
TDS	EPA 160.1	NS	NS	289	315	-	mg/l
TOC	EPA 415.3	NS	NS	7.96	9.16	-	mg/l
COD	EPA 410.4	NS	NS	15.5	12		mg/l
Turbidity	EPA 180.1	650	103	NS	NS	-	NTU
Total Alkalinity	EPA 310.2	NS	NS	69.9	74.1	-	
Nitrogen-Total	EPA 351.2	NS	NS	15.9	16.5	-	mg/l
Nitrates	EPA 353.2	NS	10.1	14.4	15		mg/l
Nitrites	EPA 353.2	NS	0.369	0.74	0.59	-	mg/l
Oil & Grease	EPA 1664A	< 5.0	3.9	< 5.0	9	-	mg/L
TPH	EPA 1664A	< 5.0	NS	NS	NS	-	mg/L

Parameter	Method*	1/11/2024 (Baseline)	1/30/2024	2/8/2024	2/13/2024	2/20/2024	Units
Chlorine	EPA 9250	NS	< 0.01	0.317	0.283	-	mg/l
Hex Chromium	EPA 218.6	NS	0.185	NS	NS	-	mg/l
Carbonate		NS	NS	1.2	5	-	mg/l
Sulfide	EPA 9034	NS	NS	0.057	0.058	-	mg/l
Sulfate	EPA 9038	NS	NS	107	121	-	mg/l
Dioxins and Furans (2,3,7,8-TCDD)	8290A	NS	-	-	< 1.9	< 2.0	
PCBs (total)	8082A	NS	NS	ND	ND	ND	mg/l
Herbicides	8151A	NS	NS	NS	ND	ND	
Pesticides	8081B	NS	-	-	NS	ND	ug/l
VOCs	8260D	NS	ND	-	ND	ND	ug/l
SVOCs	8270D/E	NS	-	-	NS	ND	ug/l
Dissolved Oxygen		NS	NS	9.53	9.91		mg/l
pH		NS	NS	8.21	8.88	-	
Total Metals	6010D						
Barium						2.6	mg/l
Beryllium		< 0.010	0.00048	-	< 0.0015	0.030	mg/L
Boron		0.107	-	-	-	-	mg/L
Sodium		70.3	-	-	-	-	mg/L
Magnesium		13.1	-	-	-	-	mg/L
Aluminum		61.4	-	-	-	-	mg/L
Potassium		< 5.00	-	-	-	-	mg/L
Calcium		13.7	-	-	-	-	mg/L
Vanadium		0.13	0.019	-	0.013	0.92	mg/L
Chromium		0.136	0.013	-	0.0075	0.56	mg/L
Manganese		0.991	-	-	-	-	mg/L
Iron		63.9	-	-	-	-	mg/L
Cobalt		0.026	0.0033	-	0.0019	0.4	mg/L
Nickel		0.078	0.011	-	0.0063	0.38	mg/L
Copper		0.042	0.007	-	0.0047	0.23	mg/L
Zinc		< 0.100	0.017	-	0.0052	0.49	mg/L
Arsenic		< 0.010	0.0027	-	0.0027	<0.16	mg/L
Selenium		< 0.010	< 0.005	-	< 0.025	<0.16	mg/L
Strontium		0.226	-	--	-	-	mg/L
Molybdenum		< 0.010	0.0021	-	0.0024	<0.02	mg/L
Silver		< 0.010	NS	-	< 0.008	<0.04	mg/L
Cadmium		< 0.010	NS	-	< 0.0035	<0.01	mg/L
Antimony		< 0.010		-	< 0.0011	<0.16	mg/L
Barium		0.251	0.04	-	0.025	2.6	mg/L
Mercury	7470A	< 0.0002	< 0.0002	< 0.0002	< 0.0002	0.085	mg/L
Thallium		< 0.010	NS	-	NS	<0.12	mg/L
Lead		< 0.010	0.00096	-	0.0042	<0.071	mg/L

TSS = Total Suspended Solids

NTU = Nephelometric Turbidity Unit

TPH = Total Petroleum Hydrocarbons – Oil

COD = Chemical Oxygen Demand

TOC = Total Organic Carbon

ND = Non-Detect

NS = Not Sampled

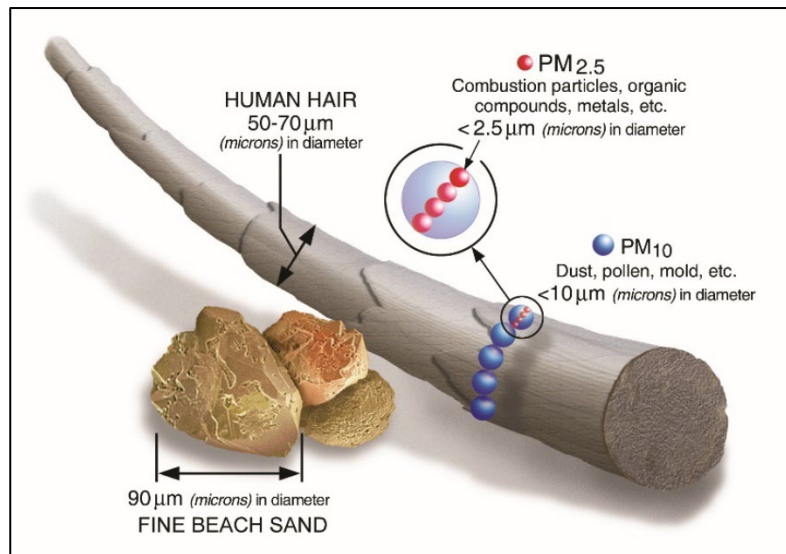
Note* = laboratory methods may vary

2) Nearby Waterways

Hawai'i DOH has reviewed coastal water quality data collected by the University of Hawai'i and the Surfrider Foundation Maui and confirms that these data show that there are no ash or fire-related chemicals present at levels of human health concern. Hawai'i DOH's water quality monitoring program will cover nearshore monitoring to include about 8 locations from Olowalu to Kaanapali is expected to begin within the month of April. Results from this sampling and analysis will be made available on the Hawai'i DOH web site at <https://health.hawaii.gov/mauiwildfires/environmental-hazard-concerns/> as well as on the mauirecovers.org website.

3) Air Quality

There are several air monitoring stations (a.k.a. 'PurpleAir Sensors' and 'Dustrak' monitors) in the vicinity of the TDS, which are operated, maintained, and monitored by either Hawai'i DOH and a contractor to USACE. The air monitoring equipment provides data for both Particulate Matter (PM) 2.5 and 10, which correspond to the size of the particulate matter in micrometers (or microns), which represent one millionth of a meter. The chart below helps put this unit of measurement into perspective.

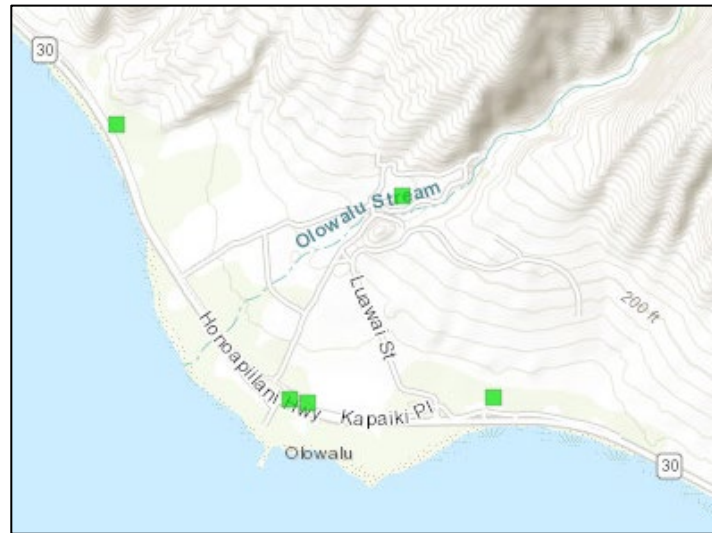


Source: US

Source: US EPA

The measurement units for PM are expressed in micrograms/cubic meter, or $\mu\text{g}/\text{m}^3$, which is basically the weight of the total dust particles (in micrograms) in a defined area of space (one cubic meter). The smaller the particle (i.e., 2.5 microns), the deeper into the respiratory tract and lungs the particles can penetrate and either cause or exacerbate existing respiratory health problems. More information on the health effects of particulate matter pollution can be found at: <https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulate-matter-pm>.

The locations of the PurpleAir monitors operated by DOH are found in the figure below. Monitoring data from the PurpleAir monitors can be viewed at <https://fire.airnow.gov> and <https://map.purpleair.com/>.



Locations of air monitors located around the TDS site in Olowalu.

In addition, a contractor to USACE is collecting air monitoring samples following a Hawai'i DOH-approved plan that includes all debris removal work zones as well as the TDS. A summary of data collected to date can be found in the table below:

DATE	Average PM10 (ug/m ³)	Average PM2.5 (ug/m ³)	Monitor ID #
23-Jan	10.62	8.42	4,5,11
28-Jan	16.55	13.49	9,10,11
2-Feb	9.74	7.6	1,10,11
3-Feb	7.46	5.52	9
8-Feb	7.53	2.64	6,11,13
28-Feb	9.46	7.36	3,4
6-Mar	4.33	6.06	3,8
13-Mar	14.24	11.78	1,4
14-Mar	5.75	3.24	1,11
20-Mar	8.54	6.62	4,10
27-Mar	10.24	8.35	5,10
3-Apr	4.42	3.23	8,14

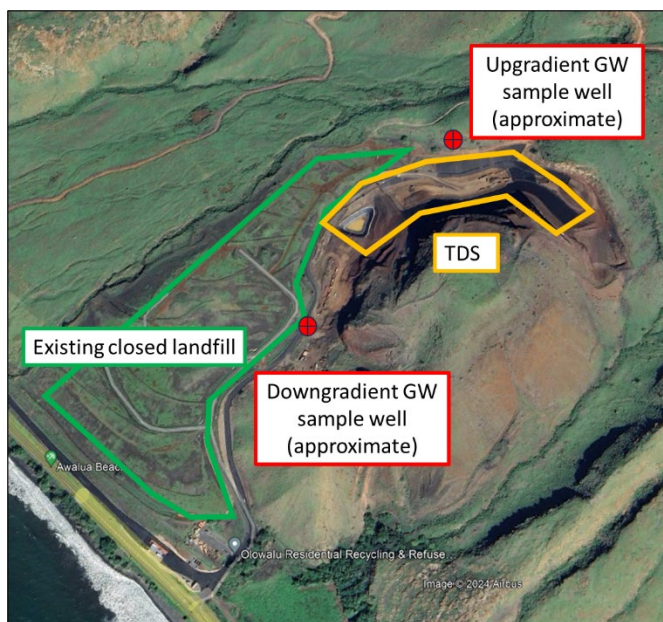
USACE has established an 'Action Level' of 35 for Particulate Matter, which means that engineering and/or operating controls such as water sprays and limiting truck speed are implemented in the event of an exceedance of an Action Level.

Finally, USACE conducts personnel air monitoring according to an Air Monitoring Sampling Plan (AMSP) using personal air cartridges directly on-site workers. The results are evaluated against criteria based on the Occupational Safety and Health Administration (OSHA) Permissible Exposure Levels (PELs) and/or the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values (TLVs). All sampling results collected from excavator operators and laborers to date have not found any exceedances of these health-based criteria.

4) Groundwater

USACE will be installing groundwater monitoring wells around the TDS site, one upgradient (uphill) and one downgradient (downhill) from the TDS site (see figure below for proposed locations).

It is expected that once the monitoring wells are installed, which is expected in mid-April, that samples will be collected quarterly (i.e., every 3 months) for laboratory analysis, which is a typical frequency around waste storage and disposal facilities. As soon as groundwater monitoring data is being generated, it will be shared in this section.



Approximate locations of groundwater monitoring wells.

5) Background Soils

Prior to the initiation of construction activities, a background soil characterization sampling was conducted on January 28-29, 2024 across the footprint of the TDS in five 'Decision Units,' or set areas within the TDS footprint, to document pre-existing soil conditions. This data will be used at the end of the project when the TDS is removed, as the soils will be sampled in similar locations for the exact same constituents. Both the pre-construction and post-construction data will be reviewed and evaluated by the County of Maui and Hawai'i DOH to determine if any action is necessary prior to finish grading of the area around the TDS.

Constituent (mg/kg)	DU-1 (mg/kg)	DU-2 (mg/kg)	DU-3 (mg/kg)	DU-4 (mg/kg)	DU-5 (mg/kg)
Antimony	0.18	0.19	0.19	0.19	0.19
Arsenic	1.4	1.5	0.73	0.584	0.94
Barium	15	15	32	40	39
Beryllium	0.56	0.66	0.6	0.75	0.66
Cadmium	0.093	0.13	0.094	0.099	0.1
Chromium	0.81	1	0.84	0.53	7
Cobalt	1.1	1.4	1.2	1.2	3
Copper	1.6	4.9	1.6	0.86	4.9
Lead	2.1	1	1.1	0.97	2.2
Molybdenum	0.51	0.54	0.5	0.67	0.9
Nickel	0.79	1	0.92	0.53	9
Selenium	4.9	5.4	3.6	3.2	3.7
Silver	0.046	0.021	0.047	0.048	0.047
Thallium	0.14	0.15	0.14	0.14	0.14
Vanadium	1.2	1.4	1.2	1.0	8.5
Zinc	48	51	44	49	52
Mercury	0.010	0.011	0.0096	0.010	0.011
Oil Range Organics	18	26	30	29	30
Gasoline Range Organics	2.9	1.1	1.6	1.7	1.5
Diesel Range Organics	32	33	28	30	16

DU = Decision Unit