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THE LIHUE PLANTATION CO., LTD.
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Amfac

July 15, 1999

CERTIFIED MAIL NO. Z 357 930 477
RETURN RECEIPT REQUESTED

Mr. Steven Y.K. Chang, P.E., Chief
Solid and Hazardous Waste Branch
Department of Health
919 Ala Moana Blvd., Room 212
Honolulu, HI 96814

Dear Mr. Chang:

SUBJECT: DOH Request for Information

The following information is provided per your letter to us dated May 17, 1999, which we received on Friday, May 21, 1999.

- A. 2940 Haleko Road Facility**
- 1.a. Types of oil and lubricants used: GST 32; GST 100; NL Gear Compound 680; EP Industrial Oil 220X; EP Industrial Oil 150X; Tribol 968; Tribol 936; Tribol 922; Anderal 750; Chevron EP 0 Grease; Chevron EP 1 Grease; Chevron Ultra-Duty Grease 1; Chevron Ultra-Duty Grease 2
 - 1.b. Estimated 1.75 barrels used per month.
 - 1.c. The used oil is collected and stored in the tank located outside of the Welding Shop. This used oil is used to lubricate chains and sprockets located throughout the plant.
 2. As observed on April 8, 1999, a total of 38 55-gallon drums were in the yard. Used oil collected from the 38 drums estimated at 8.5 barrels (drums). Drums started accumulating from early 1998.
 3. An estimated 5 containers were observed to have possibly leaked. Undetermined as to how long any containers, or when any of the containers started leaking.
 4. Clean up of the storage yard began on April 14, 1999. The used oil collected is stored in the oil storage tank outside of the Welding Shop. The soil is set out on plastic under B-Mill and in an area back of the Motor Pool, and will be remediated.
 5. No records of disposal are available, as all used oil from the factory is collected at the storage tank outside of the Welding Shop. This used oil is then drawn from the tank and used to lubricate sprockets and chains throughout the plant.
 6. No records of transportation to Hanamaulu garage are available, as used oil was not transported to Hanamaulu garage.
 - 7.a. Within the past 3 years, the only used oil accepted from off-site generators was in 1997, records of which are attached. (Attachment I - 18 pages)
 - 7.b. April 3, 9, 15, and 16, 1997.
 - 7.c. The used oil was burned as fuel on-site in the Lihue Power Plant. The oil was burnt within a week or so after receipt.

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B. Hanamaulu Garage

1.a. Types of oils and lubricants used are: Delo 400 Motor Oil SAE 30; AW Hydraulic Oil 68; Tractor Hydraulic Fluid; Universal Gear Lubricant SAE 80W90; Automatic Transmission Fluid (Dexron II); Heavy Duty Grease 2; Ultra Duty Grease 2; Ultra Grease Light; Anderal 750

1.b. Used oil generated varies between 1000 to 1500 gallons a month.

1.c. Used oil is collected and stored in a 6000 gallon tank located at the shop. Every 3 months or 4,500 gallons, whichever comes first, sampling is performed, after which the used oil is either transported to Kekaha Sugar or stored at the Motor Pool where we have 2-12,000 gallon tanks.

1.d. Used oil is stored no more than 3 months at the Hanamaulu Shop.

2. The Hanamaulu Garage does not accept used oil from other off-site used oil generators.

3.a. Used oil is stored in the 6,000-gallon tank at Hanamaulu Garage and 2-12,000 gallon tanks at the Motor Pool.

3.b. Secondary containment systems for both storages are tile walls and concrete floors.

4. The Lihue Plantation Co., Ltd. is in the process of obtaining a used oil transportation permit from the State and has already obtained a U. S. Department of Transportation Hazardous Materials Certificate of Registration. (Attachment II – 1 page)

5. Records of transportation of used oil from Hanamaulu Garage to Kekaha Sugar are attached. The Lihue Plantation Co. transported this used oil to Kekaha Sugar. (Attachment III – 5 pages)

C. Kekaha Sugar Mill

1. Kekaha Sugar EPA No. is HID 000875203

2. Kekaha Sugar does not blend used oil with virgin petroleum products or blend used oil to meet the fuel specifications, filtration, simple distillation, chemical or physical separation and re-refining.

3. A copy of Kekaha Sugar's updated contingency plan is attached. (Attachment IV – 1 page)

4. Kekaha Sugar's waste analysis plan is attached. (Attachment V – 3 pages)

5.a. All used oil is collected and initially stored in a 200 gallon tank at the garage. When the tank is full, the used oil is transferred to a 4000 gallon mobile tanker located in the millyard. When 5000 gallons of used oil has accumulated or when 3 months has passed, whichever comes first, samples are taken. If the analysis passes for specification oil, the Used oil is transferred to the 49,000 gallon used oil tank, where the used oil is used for boiler fuel.

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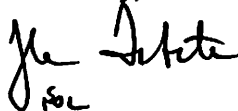
- 5.b. The 49,000 gallon used oil tank has a tile retaining wall and earthen floor.
- 6. All records are attached. (Attachment VI – 191 pages: 1996 – 67 pages; 1997 - 63 pages; 1998 – 61 pages)
- 7. All analysis is attached. (Attachment VI – Note: Same as C.6.
- 8. Kekaha Sugar's Boiler incorporates a mechanical dust collector and multi-jet scrubber to control particulate emissions. These residues are included in the factory wastewater, which is pumped to our settling ponds and reused for irrigation.

D. Other Information

- 1. The Lihue Plantation Co., Ltd. is in the process of drafting Spill Prevention, Control and Countermeasures (SPCC) plans for 2940 Haleko Road, Hanamaulu Garage and Kekaha Sugar Mill
- 2. Lihue Plantation's EPA ID No. is HID 009145632.

Please contact Malcolm Fernandez at (808) 337-1474 if there are any questions regarding our response.

Sincerely,



Richard Edsall
Chief Operating Officer

Xc: Lisa Munger, Esq.

