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REQUEST TO ENVIRONMENTAL PROTECTION AGENCY OFFICE OF THE
INSPECTOR GENERAL FOR AN INVESTIGATION OF STATE OF HAWAII
DEPARTMENT OF HEALTH USE OF CLEAN WATER STATE REVOLVING
FUND (CWSRF)

Your Office found problems with the Hawaii DOH DWSRF funding utilization in your June, 2016, audit report (Report No.16-P-0218). However, the utilization of similar CWSRF funds was never considered.

As evidence that the CWSRF has exactly the same problems with long-delayed projects, I submit to you Project FY No. 2021001 DEM- Naalehu Wastewater System re-appropriation of \$6,500,00 in **State Revolving Fund Loans** which I believe are in violation of SRF requirements, based on the finding that SRF project delays limit SRF spending and contribute to a problematic “unspent funds issue.” (Report No. 16-P-0218, June 28, 2016).

I believe both the Naalehu and Pahala Wastewater System (formerly LCC Closure project) have similarly tied up CWSRF funds since receiving \$5,715,000 CWSRF in 2008 (County of Hawaii 2008-09 CIP Page 11) as funding for two open CWSRF projects that have never proceeded beyond the stage of environmental review and preliminary design for 14 years. Thus, the Naalehu and Pahala wastewater projects are open grants that have tied up CWSRF for 14 years – and, lacking environmental review, still have no construction planned.

Further, since environmental review and design are costs that are not supposed to have received \$6,500,000 (per the current CIP Budget “State Revolving Loan Fund” on page 4), this use of CWSRF funds should place the Clean Water Branch of the Department of Health, headed by Sina Pruder, P.E., under EPA audit scrutiny- like the 2016 DWSRF audit.

Thank you for acting upon this petition.

April 12, 2021 at Naalehu HI



Sandra L. Demoruelle

Petitioner