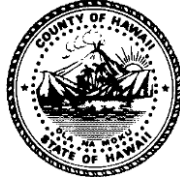


Dr. C. Kimo Alameda
Mayor

Wesley R. Segawa
*Director, Department of
Environmental Management*



Erica Perez
Chair

Dorothy Norris
Vice Chair

County of Hawai'i

ENVIRONMENTAL MANAGEMENT COMMISSION

345 Kekūanāo'a St. Suite 41 • Hilo, Hawai'i 96720 • Ph: (808) 961-8083 • Fax: (808) 961-8086

February 4, 2025

Honorable Holeka Inaba, Chair
and Members of the Hawai'i County Council
25 Aupuni Street
Hilo, Hawai'i 96720

Wesley R. Segawa, Director
Department of Environmental Management
County of Hawai'i
345 Kekūanāo'a Street, Suite 41
Hilo, Hawai'i 96720

Subject: Plastic Recycling Plants

Dear Environmental Management Director Segawa, Honorable Council Chair Inaba and Esteemed Members of the Hawai'i County Council,

In accordance with its mandate to advise the Department of Environmental Management ("DEM") and the Hawai'i County Council ("Council") regarding environmental management matters, the Environmental Management Commission ("EMC") respectfully advises the recipients of this communication to take the position that all considerations relating to the construction and operation of any plastic recycling facility be paused until the Hawai'i State Department of Health ("DOH") promulgates rules regulating the discharge of microplastic and nanoplastic pollution and establishes legally binding procedures through which plastic recycling facilities will be permitted.

It is the EMC's understanding that the DOH is currently reviewing plastic recycling business operation plans to determine which permits a company will need to commence operation. Given the potential long-term impacts of microplastics and nanoplastics on human health and ecosystems, it is imperative that all parties proceed with caution during the approval process. Even if a company has stated its intention to take certain steps to mitigate the pollution a proposed facility will generate, it is not clear that those steps will be sufficient to protect the public and prevent damage to the environment. Further concerns arise due to the voluntary nature of these proposed actions, which would be unenforceable. Without an enforceable regulatory framework in place, the risks posed by a recycling facility operation are too great. The EMC recommends that DEM and Council take actions to forestall the operation of any proposed facility until such a framework exists.

Furthermore, we urge DEM and Council to thoroughly review and consider the questions and concerns posed by community members regarding the establishment of a plastic recycling plant in the County of Hawai'i. These community perspectives should be given due diligence and weight in the approval process, ensuring that any future action is informed by robust public engagement, environmental, and regulatory considerations. An initial list of some of the pertinent questions are attached to this communication.

EMC stands ready to assist in facilitating discussions and providing further input as necessary. EMC appreciates your attention to this matter and looks forward to continued collaboration in promoting responsible environmental stewardship in the County of Hawai'i.

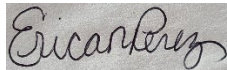
Questions gathered from Environmental Management Commissioners and Public Testimony

- What permitting process is required for a plastic recycling facility of different scales?
- How is the facility regulated and who oversees it?
- Is it legal to import plastic from other islands? Can Hawai'i Island manage importing so much plastic? What regulations need to be in place for this to happen?
- What type of water-use permits are required?
- When is the comment period from the community, and does this type of project require community input?
- What size microplastic particles will the proposed system capture? How will they be handled? What provisions will be made to capture smaller-sized particles from the process water? What provisions will be made to capture airborne microplastic particles?
- How will PVC labels be removed from the discarded plastic feedstock collected to ensure that toxic byproducts formed when processing PVC are not introduced into the process water or added to the recycle?
- What protective equipment will employees of the facility be required to wear to prevent exposure to micro and nanoplastic pollution? What disclosures regarding risks associated with exposure to micro and nanoplastic pollution will be made to employees?
- What testing of the environment surrounding the facility will be done to establish a baseline that makes monitoring for increased microplastic pollution possible?

Environmental Management Director Segawa,
Honorable Chair Inaba and Hawai'i County Council
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- Do we have an environmental toxin lab in-state that can do this level/type of pollutant testing? Who will pay for such testing?
- What monitoring for microplastic pollution will be conducted, and by whom?
- Where will the facility be located? Will thorough outreach and research be done by the company proposing such plans?
- What plans are in place to conduct public outreach and inform the surrounding community about the proposed construction, including potential risks?
- Does the facility support policies designed to phase out Hawai'i's use of single-use plastic packaging?
- Are the facilities or companies willing to make a legally binding commitment to prevent the leakage of micro and nanoplastic particles into the environment?
- How is the wastewater going to be handled? Where does it go? Is there oversight?

Sincerely,

A handwritten signature in cursive script, appearing to read "Erica Perez", is shown within a rectangular grey box.

Erica Perez
Chair

cc: Environmental Management Commission