



STATE OF HAWAII
DEPARTMENT OF HEALTH
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**Testimony COMMENTING on SCR142 SD1/ SR134 SD1
URGING THE DEPARTMENT OF HEALTH TO MAKE RECOMMENDATIONS ON THE
ESTABLISHMENT OF DUST MONITORING STATIONS IN AND AROUND WAIMANALO GULCH
TO PROTECT PUBLIC HEALTH AND ENVIRONMENTAL QUALITY**

REPRESENTATIVE NICOLE E. LOWEN, CHAIR
HOUSE COMMITTEE ON ENERGY & ENVIRONMENTAL PROTECTION

Hearing Date, Time and Room Number: 04/17/2026, 10:05 am, 325

1 **Fiscal Implications:** Undetermined.

2 **Department Position:** The Department of Health (Department) respectfully offers comments.

3 **Department Testimony:** The Environmental Management Division, Clean Air Branch (EMD-CAB)
4 provides the following testimony on behalf of the Department.

5 The Department recognizes community interest in air quality monitoring in and around
6 the Waimānalo Gulch Municipal Solid Waste Landfill. The Department offers the following
7 comments regarding the request to make recommendations to establish particulate monitoring
8 stations at the landfill:

- 9 • Existing regulatory and permitting frameworks already require landfill operators to
- 10 control fugitive dust and prevent off-site impacts;
- 11 • Available data indicate that landfill-related dust impacts are minimal;
- 12 • Existing community particulate air monitors located in the Nānākuli, Makakilo, and
- 13 Kapolei communities surrounding the Waimānalo Gulch landfill currently provide
- 14 real time air monitoring data to the public. The Department is also in the process of
- 15 expanding Hawaii's particulate air monitoring network, including working with the

- 1 Department of Education (DOE) to enable installation of additional PM_{2.5} PurpleAir
2 sensors throughout Hawaii's schools;
- 3 • Studies conducted in Hawai'i indicate that particulate emissions from landfill
4 operations are below health-based standards and comparable to other monitored
5 areas;
 - 6 • Existing ambient air monitoring is designed to assess community-wide air quality
7 rather than emissions from a specific source; and
 - 8 • Monitoring at or near the Waimānalo Gulch Landfill would require a source-specific
9 approach, including new monitoring stations and supporting infrastructure with
10 associated costs.

11 The Waimānalo Gulch Municipal Solid Waste Landfill is subject to Hawai'i Administrative
12 Rules (HAR), Section 11-60.1-33 (Fugitive Dust), which requires reasonable precautions to
13 control fugitive dust and prohibits visible emissions from crossing the property boundary. The
14 landfill also operates under Clean Air Branch (CAB) permit conditions that require the
15 implementation of dust control measures, such as water application, covering of materials, and
16 operational practices to minimize the generation of dust, as well as corrective actions if
17 emissions exceed allowable thresholds. The landfill is also subject to Solid and Hazardous Waste
18 Branch (SHWB) HAR, Section 11-58.1-15 (Municipal Solid Waste Landfills – operating criteria) and
19 permit conditions that include dust control and operational requirements to minimize dust.
20 Information from both CAB and SHWB indicates that landfill operations are in compliance with
21 applicable permit conditions and dust control requirements.

22 Enforcement data does not indicate a demand for the proposed requirements. The
23 Department's records show that over the last 10 years (since January 1, 2016), the CAB
24 received less than 0.2% of complaints associated with three (3) landfills (5 dust complaints /
25 2,789 total complaints = 0.179%). No dust related complaints were associated with the
26 Waimānalo Gulch Landfill. SHWB also did not receive any dust-related complaints associated
27 with the landfill over the last 10 years.

1 Community air monitoring is currently performed on the west side of O’ahu in the
2 Kapolei, Nānākuli, Makakilo, and Wai’anae communities surrounding the Waimānalo Gulch
3 landfill. The Department operates an existing air monitoring station in Kapolei that monitors for
4 particulate, ozone, nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and carbon monoxide (CO). In
5 addition, the Department operates existing PM_{2.5} PurpleAir sensors located at Nānākuli High
6 School and Makakilo Elementary School. These monitors/sensors provide particulate air quality
7 information via the CAB public facing website for these areas surrounding the Waimānalo Gulch
8 Landfill. Hawaiian Electric operates three (3) community air monitoring stations on the west
9 side of O’ahu in Nānākuli, Makakilo, and Wai’anae monitoring ambient air for particulate (PM₁₀
10 and PM_{2.5}), NO₂, SO₂, CO, and ozone. This data is available to the public on Hawaiian Electric’s
11 website. Review of both the Department’s and Hawaiian Electric’s air monitoring data online do
12 not show any significant levels of particulate at these locations.

13 In addition, the Department operated a West Beach air monitoring station for over
14 twenty years which was located in the vicinity of the Ko’Olina/Honokai Hale communities next
15 to the Ko Olina golf course, the closest communities to the Waimanalo Gulch Landfill. This
16 station located south of the landfill that monitored for PM₁₀, SO₂, and NO₂, was closed after
17 20 years as readings were consistently below the ambient air quality standards.

18 Currently, the Department is in the process of expanding Hawaii’s PM_{2.5} PurpleAir
19 network, working with the DOE on a Memorandum of Agreement to enable installation of
20 additional sensors throughout Hawaii’s schools. These sensors will provide valuable public
21 facing particulate air quality information for areas where children who are more susceptible to
22 air pollution spend much of their day. Upon required approvals by the DOE, schools such as
23 Nānāikapono Elementary School, located in lower Nānākuli, would be a part of this effort.

24 Each of the communities surrounding the Waimanalo Gulch Landfill (Nānākuli,
25 Ko Olina/Honkai Hale, Kapolei, and Makakilo) are already supported by these particulate
26 monitors/sensors that provide real time public facing air quality information for their areas.
27 Community air monitoring enables direct monitoring of the actual air quality conditions taking

1 place in the area being monitored and provides immediate notification if the community's air
2 quality is being negatively impacted.

3 Numerous studies conducted in Hawai'i between 2005 and 2019 involving particulate air
4 monitoring and modeling have shown that particulate emissions associated with landfill
5 operations were well below health-based standards and did not result in significant impacts to
6 overall air quality. These studies also found that particulate concentrations were comparable to
7 levels measured at other ambient monitoring locations.

8 Existing ambient air monitoring stations, such as the Kapolei station, are designed to
9 assess community-wide exposure and compliance with national ambient air quality standards,
10 rather than emissions from a specific source. As such, the type of monitoring requested under
11 this resolution would represent a different approach focused on near-source or fenceline
12 conditions. The requested monitoring would require new monitoring stations and supporting
13 infrastructure to be added to the Department's current ambient monitoring network. Ambient
14 air monitoring also presents technical limitations. Measured concentrations of PM_{2.5} and PM₁₀
15 can include contributions from multiple sources, such as roadway dust, construction activity,
16 windblown soils, and regional influences including vog. In addition, particulate concentrations
17 can vary based on wind speed, wind direction, and other weather conditions.

18 Establishing dust monitoring stations in and around the Waimānalo Gulch Landfill would
19 require expansion of the Department's monitoring network to include at least two (2) new
20 monitoring stations, supporting infrastructure to conduct near-source or fenceline monitoring,
21 and ongoing operational resources. Based on preliminary estimates, installation costs for
22 necessary equipment, materials, and site preparation range from \$600,000 to \$700,000.
23 Recurring costs for particulate monitoring alone have been estimated at approximately
24 \$230,000 annually for maintenance, data management, and contractor support, and may
25 increase depending on the monitoring scope and parameters. If the intent of this Concurrent
26 Resolution is to include sampling and analysis beyond particulate monitoring (e.g., heavy metals

1 or other additional pollutants) additional funding would be required for an air sampling and
2 laboratory analytical services contract.

3 **Offered Amendments:** None

4 Thank you for the opportunity to testify on this measure.



April 17, 2026

Representative Nicole E. Lowen, Chair
Representative Amy A. Perruso, Vice Chair
House Committee on Energy & Environmental Protection

Strong Support of SCR 142, SD1 URGING THE DEPARTMENT OF HEALTH (DOH) TO MAKE RECOMMENDATIONS ON THE ESTABLISHMENT OF DUST MONITORING STATIONS IN AND AROUND WAIMANALO GULCH TO PROTECT PUBLIC HEALTH AND ENVIRONMENTAL QUALITY.

EEP Committee Hearing: Friday, April 17, 2026, at 10:05 a.m.
State Capitol, Conference Room 325, and VIA VIDEOCONFERENCE

The Land Use Research Foundation of Hawaii (LURF) is a private research and trade organization originally founded in 1979, whose members include major Hawaii landowners, developers, real estate investment trusts, utility companies, and land use professionals. LURF's mission is to research, educate, and advocate for reasonable, rational, and equitable land use planning, laws, and regulations that encourage well-planned and sustainable economic growth, agriculture, housing, renewable energy, commercial and industrial uses, health care, and tourism, while safeguarding Hawaii's significant natural, environmental, historic, and cultural resources, public health, and safety.

LURF is in **strong SUPPORT of SCR 142, SD1**, which urges the DOH to make recommendations on the establishment of dust monitoring stations in and around Waimanalo Gulch Landfill to protect public health and safety and environmental quality.

Surrounding communities can be negatively affected by dust from the Waimanalo Gulch Landfill that may carry heavy metals, organic chemicals, pathogens, bioaerosols, silica, asbestos, or other harmful substances. The DOH recommendations on the establishment of monitoring stations could lead to future Legislative funding for dust monitoring stations in and around Waimanalo Gulch that will collect critical data to inform public health policy decisions, support the enforcement of environmental regulations, and guide dust control and mitigation strategies to protect surrounding communities and the public from any harmful dust from the Waimanalo Gulch Landfill.

Based on the above, **LURF supports SCR 142, SD1**, and respectfully requests your favorable consideration.

Thank you for the opportunity to testify regarding this measure.