



**State of Hawaii Department of Transportation Harbors Division  
Compliance, BMP, and P2 Inspection Checklist for Tenant**

Harbors: \_\_\_\_\_  
Inspector(s): \_\_\_\_\_

Date/Time: \_\_\_\_\_  
Weather Conditions: \_\_\_\_\_

Tenant Business Name: _____	
Tenant Permit(s): _____	
Facility Location: _____	
Facility Mailing Address: _____	
Tenant Representative: _____	
Phone Number: _____	Mobile Number: _____
Fax Number: _____	E-mail Address: _____
EPA ID No. (if any): _____	IWDP No. (if any): _____

**Facility Description:**

**Site Drainage Description (including stenciling):**

**Any illicit discharge into Harbors storm water system?**  Yes  No  N/A

If "Yes", please describe here:

**Operations:**

<input type="checkbox"/> Vessel Maintenance	<input type="checkbox"/> Vessel Washing
<input type="checkbox"/> Vessel Fueling	<input type="checkbox"/> Vehicle/Equipment Fueling
<input type="checkbox"/> Vehicle/Equipment Maintenance	<input type="checkbox"/> Vehicle/Equipment Washing
<input type="checkbox"/> Petroleum Product Storage	<input type="checkbox"/> Material Storage
<input type="checkbox"/> Hazardous Material Storage	<input type="checkbox"/> Material Handling
<input type="checkbox"/> Waste Handling	<input type="checkbox"/> Building Maintenance

<b>NPDES Compliance</b> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	If "Yes", please complete this section
NPDES Permit Number: _____	Expiration Date: _____
DMR Compliance: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Last round of sampling: _____
SPCC Compliance: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
<ul style="list-style-type: none"> <li>• The facility maintains records of monitoring data for a minimum of five years? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</li> <li>• The facility has a SWMP and/or SWPCP? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</li> <li>• The facility has filed a Discharge/Connection Permit with Harbors? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</li> <li>• Discharge points do not exhibit unusual characteristics (e.g., sheen, color) <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</li> </ul>	

**Material Inventory:**

No.	Inspection Item	Yes	No	N/A	Remarks
<b>Storage</b>					
1	<b>SPCC Compliance:</b> Facility with an aggregate shell capacity of 1,320 gallons or more of petroleum products.				
2	<b>AST Containment:</b> ASTs are situated over an impervious surface, have adequate secondary containment and integrity protection, and containment drain valves are kept locked.				
3	<b>AST Overflow Protection:</b> Bulk product ASTs are equipped with overflow protection alarms or automatic shutdown pumps.				
4	<b>AST Malfunction:</b> Visible piping, tanks, and hoses exhibit signs of leakage, wear, or malfunction.				
5	<b>Oily Equipment:</b> Oily or leaking equipment is stored under cover or with drip pans. Drip pans are emptied or replaced as needed.				
6	<b>Storm Water Management:</b> Storm water accumulation in secondary containment is minimized, managed, disposed correctly, and logged.				
7	<b>Salvaged Equipment/Vehicle:</b> Fluids and batteries are removed from salvaged equipment/vehicle before storage.				
8	<b>Outdoor Material Storage:</b> Outdoor storage areas have coverings that prevent contact of these items with storm water. Materials are kept above the ground higher than the level of runoff.				
9	<b>Labeling:</b> Containers are properly labeled.				
10	<b>Compatibility:</b> Containers are stored in an organized manner, compatible with other stored materials, labeled correctly, and not stored past allowable holding times.				
11	<b>EPCRA:</b> The facility is required to report chemical inventory (Tier II) and/or Toxic Release Inventory (TRI) report.				
<b>Fueling</b>					
12	<b>Fueling BMPs:</b> Fueling area engineering controls and BMPs are effective in preventing storm water run on/off.				
13	<b>Fueling Inspections:</b> Equipment in fueling areas exhibit signs of leakage, wear, or malfunction. An inspection log is available for inspection.				
<b>Washing</b>					
14	<b>Vessel/Vehicle/Equipment Washing:</b> Vehicle or equipment washing is conducted with approval from HDOT Harbors.				
15	<b>Hand Washing:</b> Hand or dish washing is conducted over a sink that is plumbed to sanitary sewer or is disposed of appropriately.				
<b>Vessel/Vehicle/Equipment Maintenance</b>					
16	<b>Vehicle/Equipment Maintenance Area:</b> Maintenance is conducted in a designated area, preferably covered.				
17	<b>Preventative Maintenance:</b> Preventative maintenance is performed on vehicles and equipment to prevent leaks. Records are kept.				
18	<b>Maintenance Logs:</b> Vehicle and equipment are monitored periodically for leaks and drip pans are used.				
19	<b>Parts Washer:</b> Parts washer fluid is disposed appropriately with an authorized disposal contractor.				
<b>Material Handling</b>					
20	<b>Material Handling Area:</b> Loading areas are free of unattended stains or pavement degradation that would indicate poor material handling practices.				
<b>Spill Response</b>					
21	<b>Spills and Stains</b> are cleaned thoroughly.				
22	<b>Spills Kits</b> are kept in all high risk areas and are refilled as needed.				
23	<b>Spill Recording:</b> Records are kept of spills and releases in the SWPCP or SPCC Spill and Discharge Log.				
24	<b>Harbors Environmental Hotline:</b> Emergency storm water contact numbers have been posted on site.				

No.	Inspection Item	Yes	No	N/A	Remarks
	<b>Building Maintenance &amp; Housekeeping</b>				
25	<b>Sweeping:</b> Trash, debris, and dirt are swept up regularly.				
26	<b>Deck/Floor Washing:</b> Dry sweeping or mopping is conducted instead of spraying/hosing down.				
27	<b>Sumps and OWS Maintenance:</b> Structural controls such as containment sumps or OWSs are emptied and serviced regularly.				
28	<b>Cleanliness:</b> All work areas and storage areas are neat and clean.				
	<b>Waste Handling</b>				
30	<b>Trash Bins:</b> Trash bins are kept closed when not in use and are not overflowing.				
31	<b>Used Batteries:</b> Spent lead acid batteries are protected from contact with stormwater runoff and placed in secondary containment while awaiting disposal. Batteries are disposed in a timely manner.				
32	<b>EPA Generators:</b> Wastes are disposed properly, records are kept and hazardous waste generator status is known. Facility has an Environmental Protection Agency (EPA) hazardous waste generator identification number and follows appropriate regulations/requirements (CESQG, SQG, LQG).				
33	<b>Hazardous Waste Containment:</b> Hazardous waste and used oil storage areas have impermeable surfaces, adequate secondary containment, and integrity protection.				
34	<b>Chemical Toilets</b> are cleaned by contractors in a manner that does not allow chemicals (i.e. blue liquid) to enter the Harbor.				
	<b>Training</b>				
35	<b>HDOT Harbors Annual Training:</b> A representative has attended the most recent HDOT Harbors Storm Water Awareness Training.				If "No", the latest training attended:
36	<b>Material Handling Training:</b> Records of training are available for employees involved in material handling (e.g. forklift operators).				Most recent training date:
37	<b>Container Storage Training:</b> Records of training are available for employees involved in inspection of ASTs or chemical storage areas.				Most recent training date:
38	<b>Fueling Training:</b> Records of training are available for employees involved in large scale vehicle and equipment fueling.				Most recent training date:
39	<b>Hazardous Waste Training:</b> Records of training are available for employees involved hazardous/universal waste handling/disposal activities.				Most recent training date:
	<b>General Observed BMPs</b>				
40	Good Housekeeping				
41	Good Recordkeeping				
42	All personnel are well-trained				

Tenant Risk Ranking Criteria		Score
<b>1</b>	<b>Vessel Maintenance and Repair</b>	
0	No maintenance activities are conducted.	
1	Maintenance activities on any size vessel are conducted entirely indoors (with proper dust control BMPs), with no or minimal potential for discharge of pollutants.	
2	Minor maintenance (30 day or less duration) for small vessels is conducted in their berth (with proper dust control BMPs) with minimal potential for discharge of pollutants.	
3	Maintenance activities on large vessels are conducted outdoors and out of the water (with proper dust control BMPs), with minimal potential for discharge of pollutants.	
4	Major maintenance activities on any size vessel are conducted in a partially confined or unconfined area with moderate potential for discharge of pollutants.	
5	Maintenance activities on any size vessel are conducted in an unconfined area or in an area with significant potential for discharge of pollutants. <b>(Automatic trigger to high risk designation)</b>	
<b>2</b>	<b>Vessel Fueling</b>	
0	No fuel transfer activities are conducted.	
1	Fueling of small vessel is conducted by a fueling company with proper spill containment and diversion.	
2	Fueling of small vessel is conducted with spill containment and diversion.	
3	Fueling of large vessel is conducted in designated area with spill containment and diversion.	
4	Fueling of small vessel is conducted in areas WITHOUT spill containment and diversion.	
5	Fueling of large vessels is conducted in areas WITHOUT spill containment or diversion. <b>(Automatic trigger to high risk designation)</b>	
<b>3</b>	<b>Vessel Washing</b>	
0	No vessel washing is conducted.	
1	Vessel washing is permitted and conducted in an area designed to contain wash water and debris, with no or minimal potential discharge of pollutants.	
2	Vessel washing is permitted and conducted in an uncontained area with no direct connection to Harbors storm water drainage system, or having a minimal potential for discharge of pollutants.	
3	Vessel washing is permitted and conducted in an uncontained area with no direct connection to Harbors storm water drainage system, but having a moderate potential for discharge of pollutants.	
4	Vessel washing is conducted in an uncontained area directly connected to Harbors storm drainage system, and has a moderate to significant potential for discharge of pollutants.	
5	Vessel washing is conducted WITHOUT prior consent from Harbors, or not in compliance with EPA VGP or sVGP. <b>(Automatic trigger to high risk designation)</b>	
<b>4</b>	<b>Vehicle and/or Equipment Maintenance and Repair</b>	
0	No equipment and/or vehicle maintenance activities are conducted.	
1	Maintenance activities are conducted entirely indoors, on a small scale, with minimal potential for discharge of pollutants.	
2	Maintenance activities are conducted entirely indoors, on a large scale, with minimal potential for discharge of pollutants.	
3	Maintenance activities are conducted in a covered area with minimal to moderate potential for discharge of pollutants.	
4	Maintenance activities are conducted outdoors within containment or in an area with minimal to moderate potential for discharge of pollutants.	
5	Maintenance activities are conducted outdoors or in an area with significant potential for discharge of pollutants. <b>(Automatic trigger to high risk designation)</b>	
<b>5</b>	<b>Vehicle and/or Equipment Fueling</b>	
0	No equipment and/or vehicle fueling activities are conducted.	
1	Equipment and/or vehicle fueling is conducted by a fueling company with spill containment and diversion.	
2	Equipment and/or vehicle fueling is conducted on a small scale in areas with spill containment and diversion.	
3	Equipment and/or vehicle fueling is conducted on a large scale in areas with spill containment and diversion.	
4	Equipment and/or vehicle fueling is conducted on a small scale WITHOUT spill containment and diversion, but not in areas adjacent to Harbors storm drainage system and nation's water.	

Tenant Risk Ranking Criteria		Score
5	Equipment and/or vehicle fueling is conducted on large scale WITHOUT spill containment and diversion, or on any scale adjacent to Harbors storm drainage system WITHOUT spill containment and diversion. <b>(Automatic trigger to high risk designation)</b>	
<b>6 Vehicle and/or Equipment Washing</b>		
0	No equipment and/or vehicle washing is conducted.	
1	Equipment and/or vehicle washing is conducted in an approved and covered wash area following an approved method, with no or minimal potential discharge of pollutants.	
2	Equipment and/or vehicle washing is conducted in an approved and uncovered wash area following an approved method with minimal potential discharge of pollutants.	
3	Equipment and/or vehicle washing is conducted in an approved and uncovered wash area following an approved method with moderate to significant potential discharge of pollutants (e.g., adjacent to Harbors storm drainage system or nation's water).	
4	Equipment and/or vehicle washing is conducted WITHOUT Harbors' approval and in an area with no direct connection to Harbors' storm drainage system and nation's water, and has a moderate to significant potential for discharge of pollutants.	
5	Equipment and/or vehicle washing is conducted WITHOUT Harbors' approval and in an area that directly discharges to Harbors storm drainage system and nation's waters. <b>(Automatic trigger to high risk designation)</b>	
<b>7 Aboveground Oil Storage (size of container ≥ 55-gallon ONLY)</b>		
0	No oil product is stored.	
1	Less than 1,320 gallons of oil is properly stored in a covered area and has no or minimal potential for discharge of pollutants.	
2	Less than 1,320 gallons of oil is properly stored in an uncovered area and has no or minimal potential for discharge of pollutants.	
3	More than 1,320 gallons of oil is properly stored with no or minimal potential for discharge of pollutants, and the facility has an SPCC Plan.	
4	More than 1,320 gallons of oil is properly stored with no or minimal potential for discharge of pollutants, but the facility does not have a SPCC Plan.	
5	Oil is improperly stored and/or managed and has a significant potential for discharge of pollutants. <b>(Automatic trigger to high risk designation)</b>	
<b>8 Container Storage</b>		
0	No materials are stored.	
1	All materials are properly managed and stored completely indoors and have no or minimal potential for discharge of pollutants.	
2	All materials are properly managed and stored under cover, and have minimal potential for discharge of pollutants.	
3	Low toxicity materials are stored with moderate potential for discharge of pollutants.	
4	Low toxicity materials are improperly managed and/or stored outdoors with significant potential for discharge of pollutants.	
5	High toxicity materials are improperly managed and/or stored outdoors with moderate to significant potential for discharge of pollutants. <b>(Automatic trigger to high risk designation)</b>	
<b>9 Material Storage and Handling</b>		
0	No materials/cargo are loaded/unloaded and stored.	
1	All materials are handled and stored entirely indoors with no or minimal potential for discharge of pollutants.	
2	Materials are handled and stored indoors and outdoors with minimal potential for discharge of pollutants with relevant BMPs in good and effective condition.	
3	Materials are handled and stored outdoors with moderate potential for discharge of pollutants with relevant BMPs in fair condition.	
4	Material handling and storage is conducted with significant potential for discharge of pollutants with relevant BMPs in poor condition.	
5	Material handling and storage is conducted with significant potential for discharge of pollutants and no relevant BMPs in place. <b>(Automatic trigger to high risk designation)</b>	
<b>10 Waste Handling and Disposal (excluding Used Oil)</b>		
0	No waste is stored.	
1	All wastes are non-hazardous and stored indoors or outdoors in covered areas, and have no or minimal potential for discharge of pollutants.	

Tenant Risk Ranking Criteria		Score
2	All wastes are non-hazardous and stored outdoors uncovered, and have moderate potential for discharge of pollutants.	
3	Hazardous wastes are generated and tenant is classified as a CESQG. Hazardous wastes are properly managed, stored, and disposed of. Storage areas have no or minimal potential for discharge of pollutants.	
4	Hazardous wastes are generated and the tenant is classified as a SQG or LQG. Hazardous wastes are properly managed, stored and/or disposed of. Storage areas have no or minimal potential for discharge of pollutants.	
5	Hazardous wastes are generated and the tenant is classified as a CESQG, SQG or LQG. Hazardous wastes are improperly managed, stored, and/or disposed of. Storage areas have significant potential for discharge of pollutants. <b>(Automatic trigger to high risk designation)</b>	
<b>11</b>	<b>Spill History</b>	
0	No history of oil/chemical spills.	
1	One to three oil/chemical spills in minimal quantity (e.g., less than five gallons for oil) in the past three years.	
2	One to three oil/chemical spills in moderate quantity (e.g., oil spill greater than 5 gallons but less than 25 gallons; for all other chemicals please refer to 40 CFR 302.4) in the past three years.	
3	One to three oil/chemical spills greater than the reportable quantity (see 40 CFR 302.4) in the past three years.	
4	More than three oil/chemical spills greater than reportable quantity in the past three years.	
5	More than two oil/chemical spills entered into Harbors storm drainage system. Or more than five oil/chemical spills of any quantity in one calendar year. <b>(Automatic trigger to high risk designation)</b>	
<b>12</b>	<b>Enforcement History</b>	
0	No verbal or written warnings were issued in the past three years.	
1	Class II violations (such as verbal/written warnings and potential violations identified in an inspection report) were issued in the past three years and corrective actions were immediately taken by the tenant.	
2	Class I violations (identified in an inspection report and documented in an NAV) were issued in the past three years and corrective actions were taken by the tenant.	
3	Class II violations were issued in the past three years, but corrective actions were NOT immediately taken by the tenant.	
4	Class I violations were issued in the past three years, but corrective actions were NOT immediately taken by the tenant.	
5	Civil penalties were assessed for non-compliance in the past three years. <b>(Automatic trigger to high risk designation)</b>	
<b>13</b>	<b>Training Attendance History</b>	
-2	The tenant has attended all annual trainings during its tenancy.	
-1	The tenant has attended the most recent training.	
1	The tenant has not attended the most recent training.	
2	The tenant has never attended the training.	
<b>14</b>	<b>Storm Drainage System Protection</b>	
0	There are no storm drain inlets on or down-gradient of the premises.	
1	All storm drain inlets (on or near the premise) are stenciled and BMPs are in place and in good condition.	
2	BMPs are in place and in fair condition.	
4	BMPs are in place, but in poor condition and needed to be replaced.	
5	The storm drain inlets do not have BMPs and are directly exposed to potential pollutants.	
<b>15</b>	<b>Lease Agreement and/or Revocable Permit Requirements</b>	
0	Tenant appears to be in compliance with environmental requirements in their tenant lease or revocable permit.	
5	Tenant is not in compliance with their revocable permit or lease.	

Total Risk Ranking Score: 0  
Tenant Risk Ranking Category: \_\_\_\_\_