Stormwater Pollution Prevention Plan
Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (HAR §11-55, Appendix B)
Daniel K. Inouye International Airport (HNL), Oahu
Revised July 2023

STATE OF HAWAII, DEPARTMENT OF TRANSPORTATION, AIRPORTS
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819-1880

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List of Acronyms

AIR-EE	Airports Engineering Branch, Environmental Section
AIR-LS	Airports Certification, Security and Safety Specialist
AIR-O	Oahu District Airport Manager
AIR-PM	Airports Property Management
AOA	Airport Operations Area
AOC	Airport Operations Controller
ARFF	Aircraft Rescue and Fire Fighting Unit
BMP	Best Management Practice
CCH	City and County of Honolulu
CDS	Continuous Deflective Separation (type of HDS)
CFR	Code of Federal Regulations
CNEE	Conditional No Exposure Exclusion
CWA	Clean Water Act
DOH	State of Hawaii, Department of Health
DOH CWB	State of Hawaii, Department of Health, Clean Water Branch
DOH HEER	State of Hawaii, Department of Health, Hazard Evaluation and Emergency Response
DOH WWB	State of Hawaii, Department of Health, Wastewater Branch
DOTA	State of Hawaii, Department of Transportation, Airports
EHS	DOTA Environmental Health Specialist
EID	Environmental Identification
EPA	U.S. Environmental Protection Agency
FAA	Federal Aviation Administration
GA	General Aviation
GSE	Ground Service Equipment
HAR	Hawaii Administrative Rules
HDS	Hydrodynamic Separator
HNL	Daniel K. Inouye International Airport
HSERC	Hawaii State Emergency Response Commission
LEPC	Local Emergency Planning Committee
MS4	Municipal Separate Storm Sewer System
MSGP	Multi-Sector General Permit
MST	Mobile Storage Tank
NGPC	Notice of General Permit Coverage
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NRC	National Response Center
OWS	Oil Water Separator
PBMP	Permanent BMP
SIC	Standard Industrial Classification
SPCC	Spill Prevention, Control, and Countermeasures
SWPCP	Stormwater Pollution Control Plan
SWPPP	Stormwater Pollution Prevention Plan
TMDL	Total Maximum Daily Load

1 Facility Description and Contact Information

Under the CWA NPDES program, the EPA regulates stormwater discharges from certain facilities classified as industrial according to their SIC code (defined in 40CFR 122.26 (b)(14)(i) through 122.26 (b)(14)(ix) and 122.26 (b)(14)(xi)).[1] In Hawaii, the DOH CWB regulates industrial stormwater discharge through HAR Chapter 11-55 Appendix B. DOH's MSGP became effective on January 15, 2022, and expires in January 2027. Applicants for coverage under the MSGP must meet the requirements of Appendices A and B of HAR Chapter 11-55. The purpose of the regulations is to protect water quality by reducing the amount of pollutants in stormwater runoff caused by permitted industrial activities.

DOTA applied for coverage under the new MSGP detailed in HAR Chapter 11-55 Appendix B in July 2022 and was issued a permit (HIR80G868) on January 3, 2023. Prior to 2022, HNL was operating under the industrial provisions (Sections F and H) of its Individual Permit covering both small MS4 and industrial discharges (Permit No. HIS000005). DOTA was issued a general permit (HI22KG724) for small MS4 discharges under Appendix K, and both the Small MS4 NPGC and MSGP replaced the former MS4 individual permit. Both the Small MS4 NPGC and MSGP became effective on January 3, 2023.

Airports are covered under the general provisions of the MSGP as well as more specific provisions of Subpart S, Air Transportation. The requirements for airports in Subpart S (see 8.S.2.1) pertain to stormwater discharges from "**only those portions of the air transportation facility that are involved in vehicle maintenance (including vehicle rehabilitation, mechanical repairs, painting, fueling and lubrication), or equipment cleaning operations**." Vehicles include aircraft, GSE, and automobiles.

HAR Chapter 11-55 Appendix B requires the permittee to develop and implement a SWPPP to minimize the discharge of pollutants in stormwater runoff and to guide compliance with the conditions of the MSGP.

1.1 Facility Information

Facility Name and Address: Daniel K. Inouye International Airport (HNL)
400 Rodgers Boulevard, Suite 700, Honolulu, HI 96819

Standard Industrial Classification Code: 4581 (Airports Flying Fields and Airport Terminal Services)

Latitude: 21°19'28.25"N Longitude: 157°55'30.26"W

Estimated area of industrial activity exposed to stormwater: 137 acres

Names of surface waters that receive stormwater from facility: Pacific Ocean, Mamala Bay, Keehi Lagoon, Manuwai Canal, and Kaloaloa Stream (aka Kaloaloa Canal)

1.2 Contact Information/Responsible Parties

DOTA is the designated applicant and is the facility operator. DOTA is responsible for the preparation, coordination, and management of this SWPPP.

Facility Owner: State of Hawaii DOT
869 Punchbowl Street, Suite 509, Honolulu, HI 96813
808-587-2150

[1] https://www.epa.gov/enforcement/water-enforcement

Facility Operator:	DOTA 400 Rodgers Boulevard, Suite 700, Honolulu, HI 96819
SWPPP Contact:	AIR-EE 400 Rodgers Boulevard, Suite 700, Honolulu, HI 96819 dot.air.environmental@hawaii.gov 808-838-8656
Facility Contact:	AIR-EE EHS 400 Rodgers Boulevard, Suite 700, Honolulu, HI 96819 dot.air.environmental@hawaii.gov 808-838-8064

1.3 STORMWATER POLLUTION PREVENTION TEAM

The stormwater pollution prevention team consists of several parties at the airport with responsibilities for stormwater protection. AIR-EE is responsible for overseeing development of the facility's SWPPP and modifying it as necessary, for implementing and maintaining control measures, taking corrective action, and/or additional implementation measure responses when required. AIR-EE has ready access to the 2022 MSGP, the most updated copy of the SWPPP, and other relevant documents that must be kept with the SWPPP. The SWPPP is administered by AIR-EE with the support of DOTA management and various parties within DOTA or hired by DOTA, as described in Table 1.

Table 1: Stormwater Pollution Prevention Team

Party	Responsibilities
DOT Director	• Authority for the Permit. • Signatory certifying submittals on behalf of DOTA. • Supports enforcement actions. • Coordinates with DOH at Director level, if needed.
AIR-EE Environmental Consultant	• Assists DOTA in meeting requirements of the airport NPDES permits.
AIR-EE Supervisor	• Manages the MSGP and SWPPP, including revisions. • Oversees the implementation and maintenance of control measures, and correction actions when required. • Approves DOTA Tenant Agreement for Compliance with State Airport Drainage System. • Executes enforcement actions. • Oversees AIR-EE EHSs and Consultants.
AIR-EE EHS	• AIR-EE personnel at the airport responsible for SWPPP oversight. • Conducts BMP inspections at DOTA facilities, airport common use areas, and tenant leased areas. • Investigates illicit discharges and spill responses. • Inspects airport drainage systems and structures. • Facilitates training and education for airport personnel. • Distributes environmental/spill control information to new tenants.
AIR-O	• Coordinates with AIR-EE to support training, reporting, inspections, and

Party	Responsibilities
	enforcement. • Assists with distribution of Airport Notices.
AIR-PM	• Executes and, if necessary, terminates lease agreements and revocable permits. • Manages the tenant database (Oracle Financial/Propworks). • Tracks leases, new lease agreements, and terminated leases.
AIR-LS	• Assists with inspection and enforcement related to spills and leaking equipment/vehicles.
ARFF	• Assists with spill responses.
Drainage System Maintenance Contractor	• Provides inspection and cleaning of storm drainage system (i.e., drainage manholes, catch basins, inlets, box culverts, outfalls, head walls, trench drains, canals, and trash/oil booms). • Provides cleaning and operational maintenance service to DOTA owned PBMPs (i.e., OWS, CDS/HDS units, and evaporation ponds). • Labels EIDs adjacent to storm drains.
Tank, Material Storage, Waste, and Chemical Management Contractor	• Provides waste materials, used oil, used batteries, and e-waste disposal services. • Provides aboveground storage tank, underground storage tank, oil-filled equipment, and material storage inspections, as well as maintenance/ repairs.
Tenants	• Implements BMPs at their location to reduce or eliminate potential pollutants associated with their operations. • Applies for DOH Industrial NPDES regulatory permits (CNEE, NOI-Appendix B, No-Discharge determinations) if they fall under an industrial SIC code and they have a regulated activity. • Cooperates with DOTA inspection and training requirements. • Promptly addresses findings from DOTA inspections. • Reports spills and illicit discharges to AIR-EE from their facilities and also those that occur on common use areas.
Ramp Control	• Receives spill reports. • Calls AOC and ARFF to report spill incidents. • Responds to spill incidents. • Inspects ramp areas.

1.4 Site Description and Maps

HNL is located on the southeast side of the island of Oahu (Attachment A, Figure 1 – Location Map). DOTA owns HNL, which consists of 4,520 acres of land immediately west of the City of Honolulu. Hickam Air Force Base is west of HNL; Keehi Lagoon, Kalihi Kai, and Sand Island are to the east; Ualena Street and North Nimitz Highway are to the north; an industrial area off Lagoon Drive and Keehi Lagoon Beach Park are to the northeast; and Mamala Bay and the Pacific Ocean are to the south. Two State waters occur within the HNL property: Manuwai Canal which generally runs from north to south and is located east of the terminals, and Kaloaloa Stream (also known as Kaloaloa Canal) that runs along the northeastern edge of the HNL property,. Other waterbodies within the HNL property include a drainage canal located north of Runway 8R-26L (Reef Runway), a drainage canal west of Runway 4L-22R, Ahua

Pond located at the southern outfall of Manuwai Canal, and a drainage canal (Aolele Ditch) located on the northeastern side of HNL, which parallels and is directly north of Aolele Street.

HNL is the busiest airport in the State of Hawaii and consists of four active runways and associated taxiways, seaplane landing area, three terminals, air carrier facilities, general aviation facilities, and two ARFF stations. Activities at HNL are primarily aircraft operations, including air carrier, air taxi, general aviation, cargo operations, and military use. Airport facilities at HNL are owned and maintained by DOTA. Multiple Federal Government agencies are located within the airport complex, including the United States Department of Agriculture, Federal Aviation Administration, Customs and Border Protection, and Transportation Security Administration. Joint Base Pearl Harbor Hickam (JBPHH) utilizes HNL runways and taxiways.

1.5 SITE INDUSTRIAL ACTIVITIES

The MSGP covers discharges from only those portions of the facility that are involved in vehicle maintenance (including repair, painting, and fueling) and equipment cleaning operations, as defined by HAR Chapter 11-55 Appendix B. At HNL, regulated activities are conducted by DOTA and airport tenants, and this section describes regulated industrial activities conducted by DOTA and airport tenants.

The MSGP Section 8.S.3.1 states that each individual industrial operator (airport authority or airport tenant) that discharges stormwater must obtain coverage under an NPDES stormwater permit. Each tenant with stormwater discharges from regulated industrial activities is required to file the necessary permit documents with DOH (an NOI or a CNEE if they qualify, or an individual permit if they don't meet the requirements of the general permit) and, if an NOI is filed, to prepare a SWPPP. DOTA coordinates with airport tenants, holding informational meetings, and preparing and providing guidance documents to assist tenants in preparing their permit documents. A list of tenants that conduct regulated industrial activities on DOTA property and are required to obtain permits for their tenant-controlled area is provided in Attachment B. A few airport tenants have industrial activities that qualify them as industrial under a different SIC code (such as land transportation and warehousing facilities (Sector P) and a medical waste handler (Sector K)) and not "Sector S" Air Transportation. They are tracked by DOTA and included in Attachment B. It should be noted that DOTA owns land east of Keehi Lagoon that does not discharge to HNL's Small MS4 System, but is still considered part of HNL owned land. DOTA does not conduct industrial activities in these areas, but periodically inspects the tenants that conduct industrial activities. Because there are no DOTA industrial activities in these areas, the tenants are included in Attachment B, but the areas are not included in HNL drainage basins.

Many tenants qualify for a CNEE because their regulated industrial activities are conducted indoors or under cover. Tenants that don't qualify for a CNEE will provide their SWPPP to DOTA in addition to submitting the NOI and SWPPP to DOH. All airport tenants are made aware that they are responsible for any stormwater and non-stormwater discharges originating from industrial activities performed at their leased properties.

Attachment A, Figure 3 – Industrial Areas and Outfalls, shows the location of industrial activities potentially exposed to stormwater at DOTA-controlled and at common use areas that are used by multiple tenants (such as gates where fueling occurs). These areas are covered by DOTA's SWPPP, and DOTA is responsible for the controls, monitoring, and reporting required under the MSGP. In addition, DOTA is responsible for checking for discharges from the GA tiedowns (individual small aircraft owners

and transient temporary assigned parking) where fueling occurs and T-Hangar 420.127 (temporary hangar for tie-down tenants) where maintenance occurs indoors. These spaces have a high turnover, and it would be onerous to have each tenant prepare an NOI and SWPPP for their parked planes. Attachment A, Figure 4 – DOTA Baseyard shows a map of the DOTA Baseyard Facilities.

Attachment A, Figures 5a, 5b, and 5c – Airport Tenants with Separate Industrial Permit Coverage, shows the location of tenant-controlled industrial areas. These tenants that have filed separate NOIs and developed SWPPPs are responsible for the controls, monitoring, and reporting required under the MSGP. Other tenants that do not have regulated industrial activities or their activities are under cover have filed for a CNEE (Attachment B).

For industrial activities conducted at HNL by DOTA and tenants, DOTA provides the following information regarding the potential for discharge to stormwater (activities and locations discussed below are identified on Attachment A, Figures 3, 4, and 5a-c).

- **Aircraft, vehicle, and equipment maintenance** (including painting and mechanical repairs, but excluding fueling, which is discussed separately below)
    - All DOTA and tenant maintenance activities are required to be conducted indoors or under cover, whenever feasible.
    - Maintenance activities may be conducted in emergency circumstances outdoors during dry weather with BMP measures implemented to prevent spills and/or leaks from coming in contact with stormwater, so that no discharges of contaminated stormwater occur.
    - Maintenance by tenants can only be conducted in their leased space or by a service provider that has a covered leased space.

  Summary: No discharge occurs related to regulated maintenance activities at HNL.

- **Aircraft, vehicle, and equipment cleaning**
    - Washing of aircraft, vehicles, and equipment can only occur in areas where wash water is contained and either drains to an OWS, is recycled, or is properly collected and disposed of to prevent contact with stormwater.
    - No wash water is allowed to comingle with stormwater or discharge to the airport drainage system or offsite.
    - DOTA tenant agreements require washing activities in tenant spaces to be either conducted indoors where wash water is collected, or to use other methods approved by DOTA that do not result in water to run off towards the drainage system or State waters (Attachment C).
    - A summary of wash rack information is provided in Table 2:

Table 2: Wash Rack Information

Wash Rack Title/Location	For Use By	For Washing	Disposal of Water
DOTA Maintenance Baseyard Wash Rack	DOTA	Vehicles and equipment	OWS to sanitary sewer, by typically not used as area is used for storing equipment
GA Wash Rack	T-hangar and Tie Down Tenants	Aircraft and GSE equipment	OWS to evaporation pond
North Ramp Wash Rack	Airport Tenants	GSE equipment	OWS to evaporation pond
South Ramp Wash Rack	South Ramp Tenants	Aircraft, GSE, and other equipment	OWS to evaporation ponds
East Wash Rack	DOTA and Wiki Wiki Buses	Buses and DOTA or tenant equipment/ vehicles	OWS to sanitary sewer

Summary: No discharge occurs related to aircraft, vehicle, or equipment cleaning at HNL.

- **Aircraft, vehicle, and equipment fueling**
  - Aircraft and GSE fueling is conducted by tenants using MSTs, truck-mounted tanks, hydrant trucks, or gasoline cans at various areas of the airport, namely at gates and hardstand areas, helipads, private aircraft parking, and GA Tiedowns (Figure 3). All these areas are uncovered and could result in a discharge of polluted stormwater.
  - DOTA conducts vehicle and equipment fueling at their Maintenance Baseyard; however, the fueling station is under cover and not exposed to stormwater.

Summary: Aircraft and GSE fueling activities are conducted at several locations that could discharge pollutants.

1.6 Drainage from Industrial Areas

The airport drainage has been attributed to five major drainage basins, A through E, with further subdivision into drainage areas (Attachment A, Figure 2). All the drainage basins except Basin C contain regulated industrial activities under the MSGP:

- **Drainage Basin A** contains the South Ramp and northeast portion of the Reef Runway discharging to Keehi Lagoon. Runoff from this basin occurs through outfalls on the south side of Lagoon Drive (Attachment A, Figure 2). Basin A contains numerous tenants that have obtained or are obtaining their own permits or CNEEs and conduct fueling, cleaning and maintenance activities at their lease spaces. Cleaning and maintenance activities are required to be conducted indoors or under cover, except for the allowed use of the two wash racks in this area (Attachment A, Figure 3). Drainage also occurs from the DOTA common use fueling areas along the South Ramp and at the GA parking (tie-downs) and T-Hangar area (Attachment A, Figure 3).
- **Drainage Basin B** contains runways, taxiways, the Hawaiian Airlines maintenance hangar, Aloha Air Cargo hangar, all of Terminal 1 and parts of Terminal 2 and their associated gate areas, and the northwest portion of the Reef Runway discharging to Manuwai Canal, Ahua Lagoon, and

Mamala Bay. Runoff from this basin is via overland flow directly to receiving waters or is captured by the facility storm drainage system and discharges via outfalls into Manuwai Canal (Attachment A, Figure 3). Basin B contains two tenants that have obtained or are obtaining their own permits or CNEEs and conduct fueling, cleaning and maintenance activities at their lease spaces. Cleaning and maintenance activities are required to be conducted indoors or under cover, except for the allowed use of the two wash racks in this area (Attachment A, Figure 3). Basin B also includes DOTA common use fueling areas along the terminal gates and hardstand areas (Attachment A, Figure 3).

- **Drainage Basin C** contains the Reef Runway taxiway and the south portion of the Reef Runway discharging to Ahua Pond and Mamala Bay. There are no industrial activities in this basin.
- **Drainage Basin D** includes the north and east areas of Terminal 2, Terminal 3, runway and gate areas, the DOTA Maintenance Baseyard, GSE facilities for several airlines, rental car tenants, and one industrial tenant located on Kalewa Street (Attachment A, Figure 5a). Runoff from this basin is collected via the airport's drainage system and into Kaloaloa Canal.
- **Drainage Basin E** includes Ualena Street discharging to Aolele Ditch (drainage ditch) then to Kaloaloa Canal (includes discharges from CCH MS4 along Ualena Street into HNL Small MS4). The basin includes light industrial/ commercial properties along the south side of Ualena Street, including Royal Hawaiian Movers, who obtained their own MSGP (Attachment A, Figure 5a).

2 Potential Pollutant Sources

Regulated industrial activities at the airport include those related to maintenance, fueling, and washing equipment and vehicles. For each area identified, the MSGP requires the SWPPP to document industrial activities in the area, potential pollutants or pollutant constituents for each identified activity, documentation of where significant spills have occurred, and where potential spills and leaks could contribute pollutants to stormwater discharges, evaluation of unauthorized non-stormwater discharges, and descriptions of stormwater control measures.

2.1 Potential Pollutants Associated with Industrial Activity

Industrial activities in each area were identified in Sections 1.5 and 1.6. Potential pollutants associated with HNL industrial activities, based on the analysis conducted above, are summarized in Table 3:

Table 3: Activities and Potential Pollutants

Covered Industrial Activity	Associated Pollutants
Fueling operations (including fuel storage and transfer)	Petroleum fuels
Maintenance operations (DOTA requires all maintenance activities to be conducted indoors or under cover; only emergency maintenance activities may occur outdoors with strict controls)	Oils, lubricants, solvents

2.2 Spills and Leaks

The MSGP requires applicants to document all significant spills and leaks of oil or toxic or hazardous substances that occurred at exposed areas, or that drained to a stormwater conveyance, in the three years prior to amending the SWPPP. 25 significant spills, as defined in HAR Chapter 11-55, Appendix B, Section 5.2.3.3 have occurred at HNL in the past three years. Attachment D provides a map showing the spill locations and a table containing more information on the resolution of these 25 spills. In all cases, DOTA and their tenants followed proper spill reporting and cleanup actions, and all cases were closed. DOTA employs spill control devices throughout the airport, including drain protection and oil-absorbing booms in drainage canals.

Due to the nature of activity at the airport, additional small spills and leaks have occurred but were promptly cleaned up and did not reach the storm drainage system or receiving waters. DOTA documents spills and leaks that occur at HNL by inputting spill reports into Veoci, an electronic database system that tracks environmental assets, inspections, training, and other operational tasks. Follow-up actions and outcomes are also tracked in Veoci.

MSGP permittees must also document where potential spills and leaks could occur that could contribute pollutants to stormwater discharges, and the corresponding outfalls that would be affected by such spills and leaks. A description of industrial areas and discharge points was provided in Section 1.6. Table 4 summarizes where potential spills and leaks could occur at HNL, the type of pollutants that could be discharged, and the potential discharge points. As all wash racks discharge to the sanitary sewer or evaporation ponds and maintenance activities are conducted indoors or under cover, only fueling locations are listed.

Table 4: Potential Spill/Leak and Discharge Locations

Location(s)	Potential Pollutant	Potential Discharge Point(s)
Fueling at the T-hangars, GA area, and South Ramp (Basin A)	Fuel	Various outfalls along Lagoon Drive, discharging to Keehi Lagoon
Fueling at hardstands, the Terminal 1 gates, and west end of Terminal 2 gates (Basin B)	Fuel	Outfall EIDs 5061 and 9709 at the northeast corner of the airport; Outfall EIDs 6456 and 7681 into Manuwai Canal
Fueling at east end of Terminal 2 gates and at Terminal 3 gates including hardstands (Basin D)	Fuel	Outfall 4572/4573 where the drainage system discharges to Kaloaloa Canal

2.3 Unauthorized Non-stormwater Discharges Evaluation

The MSGP authorizes the following non-stormwater discharges for all sectors of industrial activity:

- discharges from emergency/unplanned fire-fighting activities;
- fire hydrant flushings;
- potable water, including water line flushings;
- uncontaminated condensate from air conditioners, coolers/chillers, and other compressors from the outside storage of refrigerated gasses or liquids;
- irrigation drainage;
- landscaping watering provided all pesticides, herbicides, and fertilizers have been applied in accordance with the approved labeling;
- pavement wash waters where no detergents or hazardous cleaning products are used, and wash waters do not come into contact with oil and grease deposits, sources of pollutants associated with industrial activities or any other toxic or hazardous materials, unless residues are cleaned up using dry clean up methods and appropriate control measures are implemented to minimize discharges of mobilized solids and other pollutants;
- routine external buildings washdown/power wash water that does not use detergents or hazardous cleaning products;
- uncontaminated ground water or spring water;
- foundation or footing drains where flows are not contaminated with process materials;
- incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of the facility, but not intentional discharges from the cooling tower.

No other non-stormwater discharges, including wash water, are permitted by the MSGP. The MSGP does not authorize the discharge of aircraft, ground vehicle, runway and equipment wash waters. All wash waters are directed to the sanitary sewer or evaporation ponds.

The MSGP requires applicants to document that they have evaluated for the presence of unauthorized non-stormwater discharges. Documentation must include the date of the evaluation, a description of

the evaluation criteria used; a list of outfalls or onsite drainage points that were directly observed during the evaluation; and any action taken, including control measures to eliminate unauthorized discharge(s).

DOTA conducts comprehensive inspections of industrial facilities, both DOTA-owned and tenant facilities, with frequency based on potential risk posed by the activity. During the inspections, DOTA evaluates the facilities for environmental conditions and controls, as well as for sources of potential unauthorized discharges. Accessible outfalls are inspected quarterly during Routine Facility Inspections for indications of illicit discharges. The State MS4 Maintenance Contract also inspects/maintains outfalls and outlets annually. No unauthorized discharges have been indicated by facility or outfall inspections.

The spill reports summarized in Attachment D and described above in Section 2.2 qualify as unauthorized discharges. Other minor spills in gate areas have occurred but do not qualify as unauthorized discharges as they were cleaned up immediately and no discharge to the drainage system or to receiving waters occurred. Controls put in place, such as oil-absorbing booms in drainage canals, drain inlet protection, tenant training, tenant inspections, and providing tenants with up-to-date environmental guidance, are employed to limit the magnitude and effect of spills.

3 Stormwater Control Measures

By using proper management techniques and practices, it is possible to improve control of the identified potential sources of pollutants and reduce the number of spills/releases to the stormwater system. The MSGP requires permittees to select, design, install, and implement control measures (including BMPs) to minimize pollutant discharges that address the selection and design considerations in Part 2.1.1 of the MSGP, meet the non-numeric effluent limits in Part 2.1.2, meet limits contained in applicable effluent limitations guidelines in Part 2.1.3, and meet the water quality-based effluent limitations in Part 2.2. The selection, design, installation, and implementation of these control measures must be in accordance with good engineering practices and manufacturer's specifications and consistent with direction by the DOH.

Control measures are implemented by both DOTA and by tenants. As described above and as required by the MSGP, tenants apply for NPDES permits themselves when they have qualifying activities, and their activities are confined to tenant-controlled areas. DOTA monitors the activities and stormwater control measures of these industrial tenants through a strict inspection, training, and tenant enforcement program.

DOTA has a standard manual of BMPs, the BMP Field Manual for Operations at State of Hawaii Airports[2]. The document includes appropriate guidance for HNL's industrial activities covered by the MSGP. Tenants are provided the BMP Field Manual in their Tenant Information Package.

3.1 Non-Numeric Technology-Based Effluent Limits (BPT/BAT/BCT)

3.1.1 Minimize Exposure

The MSGP requires permittees to minimize the exposure of industrial activities and materials to rain and runoff to minimize pollutant discharges by either locating them inside or protecting them with storm resistant coverings. To the extent practicable, given the scale of the necessary activities at the airport, industrial activities and material storage occur indoors or are located such that potential leaks and spills are contained before discharge. Many of the BMPs in the BMP Field Manual are meant to minimize the entrainment of potential pollutants in stormwater, either through structural controls (e.g., wash racks discharged to the sanitary sewer) or practices (performing maintenance activities under cover). Airport practices include, but are not limited to, the following controls to minimize exposure:

- Grading, berming, or curbing is used to prevent runoff of contaminated flows and divert run-on away from these areas.
- To the extent practicable, outside activities and material storage occur more than 50 feet from storm drainage inlets so that spills and leaks are able to be contained or diverted before discharge.
- DOTA focuses on quick detection of spills and leaks and cleaning them up promptly so they are contained before discharge.

[2] http://hidot.hawaii.gov/airports/files/2022/01/BMP-Field-Manual-for-Operations-at-State-of-Hawaii-Airports-V4.pdf

- Leaky vehicles and equipment should be stored indoors. Vehicles or equipment stored outdoors are required to use drip pans and leaks promptly cleaned up. DOTA requires leaking vehicles and equipment to be promptly repaired or drained of fluids.
- Spill/overflow protection equipment is used for oil storage, including following the strict requirements for such technologies of the SPCC rule.
- Vehicle and equipment cleaning operations are performed indoors, under cover, or in bermed areas that prevent runoff and run-on and that also capture overspray.
- Fluids are drained from equipment and vehicles that will be decommissioned and from any equipment or vehicles that will remain unused for extended periods.

3.1.2 Good Housekeeping

At HNL, the only regulated industrial activity that could result in pollutant discharge is fueling, since all other activities are conducted indoors or under cover. Good housekeeping practices, such as maintaining a clean workshop floor to prevent tracking of oil, are utilized throughout the airport to ensure that other potential pollutants are not exposed to stormwater. Good housekeeping BMPs have been put in place by DOTA as part of their environmental management program and to meet the requirements of past permits. Subpart S of the MSGP cites specific good housekeeping requirements for air transportation facilities. Measures specified by the MSGP (Section 8.S.4.1) are (with DOTA's good housekeeping measures in bullets beneath the MSGP language):

- Aircraft, Ground Vehicle, and Equipment Maintenance Areas: Minimize the contamination of stormwater runoff from all areas used for aircraft, ground maintenance, and equipment maintenance through implementation of control measures such as the following, where determined to be feasible and that accommodate considerations of safety, space, operational constraints, and flight considerations: performing maintenance indoors; maintaining an organized inventory of material used in maintenance areas; draining all parts of fluids prior to disposal; prohibiting the practice of hosing down the apron or hangar floor; using dry cleanup methods; and collecting stormwater runoff from the maintenance area and providing treatment or recycling.
    - DOTA requires all maintenance activities to be conducted indoors or under cover. Only emergency maintenance can be conducted outdoors using strict controls.
    - DOTA conducts routine inspections of DOTA and tenant spaces to check for an organized inventory of materials.
    - DOTA has instituted BMPs for the draining of fluids and cleaning work areas.
    - DOTA requires discharge from floor drains in maintenance areas be treated via OWSs and routed to the sanitary sewer.
- Aircraft, Ground Vehicle, and Equipment Cleaning Areas: Clearly demark these areas using signage or other appropriate means and minimize the contamination of stormwater runoff from cleaning areas.
    - DOTA has clearly identified the aircraft, vehicle, and equipment cleaning areas at HNL and DOTA needs to approve any washing activities in other areas to ensure that proper controls are used so that runoff does not go into storm drains or State Waters (see Fact Sheet in Attachment E). DOTA routes the cleaning effluent through OWSs and then to the sanitary sewer system or evaporation ponds.

    - DOTA allows tenants to conduct cleaning activities indoors when the wash water is contained or leads to an OWS and the sanitary sewer.

- Aircraft, Ground Vehicle, and Equipment Storage Areas: Store all aircraft, ground vehicle, and equipment awaiting maintenance in designated areas only and implement control measures to minimize the discharge of pollutants in stormwater from these storage areas, where determined to be feasible and that accommodate considerations of safety, space, operational constraints, and flight considerations: storing aircraft and GSE indoors; using drip pans for the collection of fluid leaks; and perimeter drains, dikes, or berms around storage areas.
    - DOTA requires control measures to minimize the discharge of pollutants in stormwater at all areas where storage occurs.
    - DOTA requires good housekeeping BMPs to be used where vehicles and equipment are being stored.
- Material Storage Areas: Maintain the vessels of stored materials, such as fuels, oils, and solvents, in good condition to prevent or minimize contamination of stormwater. Plainly label containers. To minimize contamination of precipitation/runoff from these areas, implement control measures such as the following, where determined to be feasible and that accommodate considerations of safety, space, operational constraints, and flight considerations: storing materials indoors or under cover; storing materials in a centralized location; using secondary containment; and using dikes or berms around storage areas.
    - HNL has a SPCC Plan for management of its stored fuel. All oil storage tanks meet the requirements of the SPCC rules. DOTA conducts monthly inspections of the storage containers and their containment measures.
    - DOTA requires personnel who handle oil to take annual training on oil storage controls and BMPs.
    - DOTA requires good housekeeping/storage practices for tenant spaces that store these types of materials.
- Airport Fuel System and Fueling Areas: Minimize the discharge of pollutants in stormwater from airport fuel system and fueling areas through implementation of control measures such as the following, where determined to be feasible and that accommodate considerations of safety, space, operational constraints, and flight considerations: implementing spill and overflow practices; using only dry cleanup methods; and collecting stormwater runoff.
    - DOTA utilizes spill response procedures as described below in Section 3.1.4 and in Attachment E.

The control measures described above are specified by the MSGP for Sector S; however, DOTA requires additional control measures as summarized in DOTA's BMP Field Manual.

3.1.3 Maintenance

All maintenance of vehicles and equipment, including aircraft, is conducted indoors or under cover. Aircraft, vehicles, and equipment are evaluated regularly for safety and to provide environmental protection. Airport personnel conduct routine checks on their vehicles to ensure there are no leaks and they are functioning properly. The BMP Field Manual provides maintenance practices, including promptly repairing equipment drips and leaks so they do not discharge pollutants to stormwater.

3.1.4 Spill Prevention and Response

Permittees must minimize the potential for leaks, spills, and other releases that may be exposed to stormwater and develop plans for effective response to such spills if, or when, they occur to minimize pollutant discharges. Airport practices include the following spill prevention and response controls:

- clearly labeling containers that could be susceptible to spills or leaks to encourage proper handling and facilitate rapid response if spills or leaks occur;
- implementing procedures for fuel handling;
- developing training on the procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases;
- keeping spill kits on-site, located near areas where spills may occur or where a rapid response can be made; and
- notifying appropriate facility personnel when a leak, spill, or other release occurs.

Where a leak, spill or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under either 40 CFR Part 110, 40 CFR Part 117, or 40 CFR Part 302, occurs during a 24-hour period, permittees must notify the DOH Clean Water Branch at (808) 586-4309 during regular office hours, i.e., Monday through Friday (excluding holidays) from 7:45 a.m. until 4:30 p.m., or the Hawaii State Hospital at (808) 236-8200 outside of regular office hours. Contact information is kept in locations that are readily accessible and available. DOTA includes this information in annual spill response training for DOTA personnel, and in tenant training materials.

DOTA provides their personnel and tenants with spill reporting information contained in Attachment E. The Spill Reporting Fact Sheet includes spill reporting procedures, contact information, and a link to the Spill Reporting Form. The DOTA Construction and Maintenance Superintendent is responsible for implementing spill response procedures related to DOTA activities, while tenants are responsible for their spill response and reporting. However, both DOTA and tenants are trained to take responsibility to respond to any spill or potential spill they observe.

3.1.5 Erosion and Sediment Controls

The MSGP requires permittees to minimize erosion where industrial discharge occurs. DOTA monitors for erosion issues at discharge locations during outfall inspections and conducts inspections at all construction sites (DOTA or tenant) with earth disturbance.

3.1.6 Management of Runoff

Permittees must divert, infiltrate, reuse, contain, or otherwise reduce stormwater runoff to minimize pollutants in discharges. Safety and operational requirements limit the use of curbing or other structural controls in large areas and infiltration of stormwater is an important control at the airport where it can occur between runways and taxiways.

3.1.7 Employee Training

Permittees must train all employees who work in areas where industrial materials or activities are exposed to stormwater, or who are responsible for implementing activities necessary to meet the conditions of this permit (e.g., inspectors, maintenance personnel), including all members of the

stormwater pollution prevention team. Permittees must ensure the following personnel understand the requirements of the MSGP and their specific responsibilities with respect to these requirements:

- Personnel who are responsible for the design, installation, maintenance, and/or repair of controls (including pollution prevention measures).
- Personnel who are responsible for the storage and handling of chemicals and materials that could become contaminants in stormwater discharges.
- Personnel who are responsible for conducting and documenting inspections.
- Personnel who are responsible for taking and documenting corrective actions.

DOTA annually trains personnel in the following as related to the scope of their job duties:

- an overview of the SWPPP;
- spill response procedures, good housekeeping, maintenance requirements, and material management practices;
- the location and maintenance of all controls on the site required by this permit;
- procedures to follow with respect to the permit's pollution prevention requirements;
- when and how to conduct inspections, record applicable findings, and take corrective actions; and
- location where spills have occurred, and learning from past spills.

3.1.8 Non-Stormwater Discharges

Permittees must evaluate for the presence of non-stormwater discharges and must eliminate any non-stormwater discharges not explicitly authorized by the MSGP or covered by another NDPES permit. Prohibited non-stormwater discharges include vehicle and equipment wash water. DOTA's evaluation of non-stormwater discharges is described in Section 2.3. DOTA has strict prohibitions on the discharge of non-allowed, non-stormwater discharges that, for tenants, are enforced through tenant agreements.

3.1.9 Dust Generation and Vehicle Tracking of Industrial Materials

There are no dust-generating regulated industrial activities at the airport and, therefore, no tracking of dust occurs.

3.2 Numeric Effluent Limitations Based on Effluent Limitations Guidelines (ELGs)

This section is not applicable to HNL because the airport is not within an industrial category subject to one of the effluent limitation guidelines identified in Table 6-1 of the MSGP.

3.3 Water Quality-Based Effluent Limitations and Water Quality Standards

Discharges authorized by the MSGP shall not include:

- materials or substances that will settle to form sludge or bottom deposits;
- floating debris, grease, oil, scum or other floating materials;
- substances in amounts sufficient to produce taste in the water or detectable off-flavor in the flesh of fish, or in amounts sufficient to produce objectionable color, turbidity or other conditions in the receiving waters;

- temperatures that impact receiving waters, biocides, pathogenic organisms, toxic, radioactive, corrosive, or other deleterious substances at levels or in combinations sufficient to be toxic or harmful to human, animal, plant, or aquatic life, or in amounts sufficient to interfere with any beneficial use of the water;
- substances or conditions or combinations thereof in concentrations which produce undesirable effects to aquatic life; or
- soil particles resulting from erosion on land involved in earthwork, such as the construction of public works; highways; subdivisions; recreational, commercial, or industrial developments; or the cultivation and management of agricultural lands.

Discharges must be controlled as necessary to meet applicable water quality standards, i.e., not cause or contribute to an exceedance of applicable water quality standards. DOH expects that compliance with the conditions in the permit will control discharges as necessary to meet appliable water quality standards. If permittees become aware, or DOH determines, that a discharge does not meet applicable water quality standards, corrective action(s) must be taken and documented as required in the MSGP.

DOTA is not in an industrial sector that requires sampling and testing for water quality parameters. Keehi Lagoon is listed in the State's Impaired Water list, based on the 2022 State of Hawaii Water Quality Monitoring and Assessment Report[3], although no TMDLs have been identified. None of the three areas listed appear to coincide with the area of Keehi Lagoon fronting Lagoon Drive where airport discharges would occur. The first two Keehi Lagoon listings are at the north end of the Lagoon at the Beach Park. The third listing seems to be from the mouth of Keehi Lagoon (i.e., near the reef runway) to Pearl Harbor, which is significantly south of the airport's regulated industrial discharge locations. DOTA does not plan to conduct impaired water sampling under the MSGP for HNL.

[3] https://attains.epa.gov/attains-public/api/documents/cycles/10287/206016

4 Schedules and Procedures

4.1 Good Housekeeping

DOTA has established appropriate schedules and procedures related to good housekeeping measures as summarized in Table 5:

Table 5: Schedule and Procedures – Good Housekeeping

Procedure	Schedule
Conduct routine facility inspections	• Conduct routine facility inspections as described in Section 4.5.1 at least quarterly to evaluate the efficacy of good housekeeping BMPs. • If deficiencies are identified, initiate corrective actions within 30 days. • Tenants will be responsible for meeting the same requirements under their permits.

4.2 Maintenance

DOTA has established appropriate schedules and procedures related to maintenance measures as summarized in Table 6.

Table 6: Schedule and Procedures – Maintenance

Procedure	Schedule
Maintenance	• Conduct inspections of drainage facilities and take appropriate maintenance actions, such as cleaning catch basins when the depth of debris reaches two-thirds of the sump depth and keeping the debris surface at least six inches below the lowest outlet pipe. • Maintain stocked spill kits where spills could occur. • Adequately train personnel. • If deficiencies are identified, initiate corrective actions within 30 days. • Tenants will be responsible for meeting the same requirements under their permits.

4.3 Spill Prevention and Response Procedures

Permittees must establish procedures for responding to spills. DOTA's spill response program is multi-faceted, with general spill response guidance provided in Attachment E. Spill response requirements are further emphasized in HNL's SPCC Plan. Table 7 provides DOTA's spill prevention response schedules and procedures.

Table 7: Schedule and Procedures – Spill Prevention and Response

Procedure	Schedule

Spill prevention and response	For spilled material less than reportable quantity, regardless of type, verbally notify Ramp Control and submit written notification to AIR-EE immediately.
	• Small spills of oil (less than 25 gallons) will be cleaned up immediately using absorbent materials or other acceptable practices.
	• Spills must be immediately reported per DOH and/or Federal requirements if one or more of the following conditions apply:
	  ○ If the release is more than 25-gallons of petroleum product.
	  ○ If the release is 25-gallons or less of petroleum product but is not contained or remedied within 72 hours.
	  ○ If the release is equal to or exceeds the reportable quantity criteria for one or more chemicals listed within the DOH HEER Office Technical Guidance Manual (TGM): https://health.hawaii.gov/heer/tgm/
	  ○ If the release enters a storm drain or water body.
	• If spill is 25 gallons or less of petroleum and not contained within 72 hours, submit written notifications to DOH HEER no later than 30 days following discovery of release, with an explanation as to why the spill was not cleaned within 72 hours.
	• If spilled material is of a reportable quantity, verbally notify Ramp Control, then HSERC/HEER, LEPC and NRC and obtain a Case Number to provide to AIR-EE. Submit written notifications to HSERC/HEER and NRC no later than 30 days following discovery of release (copy AIR-EE on all correspondence).
	• If spilled material enters a storm drain or water body, verbally notify Ramp Control, then DOH CWB, HSERC/HEER, LEPC and NRC and a obtain Case Number to provide to AIR-EE. Submit written notifications to DOH CWB, HSERC/HEER, LEPC, and NRC no later than 30 days following discovery of release (copy AIR-EE on all correspondence). If it is found that the release was contained within an OWS, then reporting to DOH might not be necessary.
	• If spilled material is wastewater that enters state waters or is >1,000 gallons, verbally notify Ramp Control, then DOH WWB. Consult with AIR-EE on a press release, water disinfecting and monitoring of the receiving water for bacteria. Submit written follow-up report to DOH WWB (copy AIR-EE on all correspondence).

4.4 EMPLOYEE TRAINING

DOTA has developed and implemented an annual mandatory environmental training program. Employee and tenant training programs are used to inform personnel, at all levels of responsibility, of the processes and materials with which they are working, the health and safety hazards, the practices for preventing spills, and the procedures for responding properly and rapidly to spills of toxic and hazardous materials. The program focuses on permit conditions and the responsibilities of DOTA personnel and tenants, as described in Section 3.1.7 and ensures DOTA employees and airport tenants

understand pollution laws, regulations, and methods of compliance. Training for DOTA employees and tenants is conducted annually and each party's training record is maintained.

4.5 INSPECTIONS AND ASSESSMENTS

The MSGP requires permittees to document in the SWPPP their procedures and schedules for performing the types of inspections required by the MSGP, including routine facility inspections and quarterly visual assessments of stormwater discharges.

4.5.1 Routine Facility Inspections

DOTA performs routine facility inspections during the term of the MSGP to check that BMPs are in place and in proper working order and to evaluate for non-authorized, non-stormwater discharges. Inspections of areas covered by the requirements in this permit include the following:

- Areas where industrial materials or activities are exposed to stormwater
  - As previously described, the only regulated industrial activity that could result in pollutant discharge is fueling, since all other activities are conducted indoors or under cover. Areas of the site where fueling occurs are shown as shaded areas identified as Common Use Fueling Areas (CUFAs) 1 through 10 on Attachment A, Figure 3. Each of these areas will be inspected during the quarterly Routine Facility Inspection and the results recorded on an inspection checklist that will be included in the Annual Report.
- Areas identified in the SWPPP and those that are potential pollutant sources
  - Only the fueling areas described above are considered potential pollutant sources under this SWPPP.
- Areas where spills and leaks have occurred in the past three years
  - 25 spills are documented in Attachment D for the period of July 2020 to June 2023. Most were fuel spills that occurred in the CUFAs and these areas will be inspected during inspections of the CUFAs.
- Discharge points
  - Discharge points consist of the following (Attachment A, Figure 6):
    - Outfalls to Manuwai Canal: EIDs 4128, 9709, and 5061/18069. EID 6456 discharges to Manuwai Canal but is not accessible for inspection because it is not visible (the discharge pipe is within a concrete culvert) and within the Airport Movement Area.
    - Outfalls to Kaloaloa Canal: EIDs 4572, and 4573.
    - Outfalls to Keehi Lagoon: EIDs 5751 and 4622. Outfall EIDs 4658, 4678, 4687, 4717, and 4734 discharges to Keehi Lagoon and are submerged and not visible for inspection.
- Control measures used to comply with the effluent limits contained in this permit
  - HNL does not have control measures to comply with effluent limits.

The MSGP requires routine inspections to be conducted at least quarterly. At least once each calendar year, the routine inspection must be conducted during a period when a stormwater discharge is occurring. During inspections, the permittee must examine or look for the following:

- Industrial materials, residue or trash that may have or could come into contact with stormwater.

- Leaks or spills from industrial equipment, drums, tanks, and other containers.
- Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site.
- Control measures needing replacement, maintenance, or repair.

During an inspection occurring during a stormwater event or discharge, control measures implemented to comply with effluent limits must be observed to ensure they are functioning correctly. Discharge points, described below in Section 4.5.2, will also be observed during this inspection. If discharge locations are inaccessible, nearby locations will be inspected, and inspection issues will be discussed in the Annual Report. Table 8 summarizes information related to routine inspections:

Table 8: Schedule and Procedures – Routine Inspections

Procedure	Schedule
Inspection Responsibility	• AIR-EE is responsible for conducting routine inspections of DOTA-controlled areas (DOTA maintenance areas and common use areas). • Tenants are responsible for conducting the routine inspections of their operations at leased spaces.
Routine Inspections	• Routine inspections will occur at least quarterly. • At least once each calendar year, the routine inspection will be conducted during a period when a stormwater discharge is occurring. • HNL is situated in a "semi-arid area" (annual rainfall averages between 10 and 20 inches[4]), which allows an adjustment to the schedule as needed to conduct an inspection during stormwater discharge.

4.5.2 Quarterly Visual Assessment of Stormwater Discharges

Once each quarter for the entire permit term, DOTA will collect a stormwater sample from each designated outfall and conduct a visual assessment of each sample. These samples are not required to be collected consistent with 40 CFR Part 136 procedures but must be collected in such a manner that the samples are representative of the stormwater discharge. The visual assessment must be made as follows:

- Visual assessment must be of a sample in a clean, colorless glass or plastic container, and examined in a well-lit area.
- Samples must be collected within the first 30 minutes of an actual discharge from a storm event.
- If it is not possible to collect the sample within the first 30 minutes of discharge, then the sample must be collected as soon as practicable after the first 30 minutes and DOTA will document why it was not possible to take the sample within the first 30 minutes.
- For storm events, on discharges that occur at least 72 hours from the previous discharge (not applicable if it is documented that less than a 72-hour interval is representative for local storm events during the sampling period).

[4] https://www.weather.gov/wrh/Climate?wfo=hfo

DOTA will visually inspect or observe the sample for the following water quality characteristics at outfalls discharging DOTA-controlled or common use areas:

- Color
- Odor
- Clarity (diminished)
- Floating solids
- Settled solids
- Suspended solids
- Foam
- Oil sheen
- Other obvious indicators of stormwater pollution

Certain exceptions to quarterly visual assessments are allowed under the MSGP:

- Adverse weather conditions: When adverse weather conditions prevent the collection samples during the quarter, DOTA will obtain a substitute sample during the next qualifying storm event. Adverse conditions are those that are dangerous or create inaccessibility for personnel, such as local flooding, high winds, or situations that make sampling impractical.
- Climates with irregular stormwater runoff: If the facility is in an area where limited rainfall occurs during many parts of the year (e.g., arid or semi-arid climate) that prevent runoff from occurring for extended periods, then samples for the quarterly visual assessments may be distributed during seasons when precipitation runoff occurs. HNL's average annual rainfall qualifies it as a semi-arid area.
- Substantially identical outfalls: If the facility has two or more outfalls that discharge substantially identical effluents, as defined in the MSGP Part 5.2.5.3, quarterly visual assessments of the discharge may be conducted at just one of the outfalls and reported that the results also apply to the substantially identical outfall(s). Visual assessments must be performed on a rotating basis of each substantially identical outfall throughout the permit period. If stormwater contamination is identified through visual assessment performed at a substantially identical outfall, permittees must assess and modify their control measures as appropriate for each outfall represented by the monitored outfall.

An evaluation of HNL's drainage has led to the determination that all outfalls at the airport (Appendix A, Figures 3 and 7) can be considered substantially identical, based on the identical industrial activities (fueling), potential pollutants (fuels), and estimated runoff coefficients (the fueling areas being paved low-gradient airfield pavement) in all drainage areas. Outfalls identified below are considered substantially identical and one outfall will be sampled quarterly on a rotating basis, with the following additional considerations:

- Outfalls to Manuwai Canal: substantially identical EIDs 4128, 9710 (EID 9709 can be visually observed, but within fenced security area and inaccessible for sampling), 5061/18069 (two outfalls at a joint headwall), and 6456. EID 6456 sample is obtained using an installed autosampler.
- Outfalls to Kaloaloa Canal: substantially identical EIDs 4572, 4573 are submerged and cannot be sampled. Upstream manholes are in the Airport Movement Area and cannot be accessed for sampling.

- Outfalls to Keehi Lagoon: substantially identical EIDs 5751 and 4622 are partially submerged and can be viewed but cannot be sampled. Outfall EIDs 4658, 4678, 4687, and 4734 discharging to Keehi Lagoon are submerged and not accessible for sampling. Samples representing discharge at these partially submerged or submerged outfalls will be obtained at a manhole upstream in the drainage system, between the potential pollutant source and the outfall (Appendix A, Figure 7). Outfall EID 4717 is submerged and cannot be sampled, and upstream manholes are in the Airport Operations and Movement Areas and cannot be sampled.

In summary, the following outfalls are accessible or can likely be sampled using an accessible upstream manhole and will be sampled on a rotating basis as substantially identical:

- ***EIDs 4128, 9710, 5061/18069, 6456, 5751, 4622, 4658, 4678, 4687, and 4734***

Documentation of the visual assessment will include:

- sample location(s);
- sample collection date and time, and visual assessment date and time for each sample;
- personnel collecting the sample and performing visual assessment, and their signatures;
- nature of the discharge;
- results of observations of the stormwater discharge;
- probable sources of any observed stormwater contamination;
- if applicable, why it was not possible to take samples within the first 30 minutes; and
- a statement, signed and certified in accordance with HAR Chapter 11-55, Appendix A, Subsection 15

Table 9 provides a summary of the procedures and schedules for the quarterly assessments:

Table 9: Schedule and Procedures – Quarterly Visual Assessments of Stormwater Discharges

Procedure	Schedule
Inspection Responsibility	• AIR-EE is responsible for conducting the quarterly visual inspections of DOTA-controlled areas (DOTA maintenance areas and common use areas). • Tenants are responsible for conducting the quarterly visual inspections of their operations at leased spaces.
Quarterly Visual Assessments	• Quarterly visual assessments will occur during each quarter, unless stormwater discharge timing (including no discharge in the semi-arid setting) results in a change, which will be documented in the inspection report. • If substantially identical outfalls are used, the outfall assessed will be rotated among the substantially identical outfalls. • Samples will be conducted in daylight hours and sampling equipment will consist of a clean, colorless glass or plastic bottle. • Samples will be collected within the first 30 minutes of an actual discharge from a storm event.

Procedure	Schedule
	• If it is not possible to collect the sample within the first 30 minutes of discharge, then the sample must be collected as soon as practicable after the first 30 minutes. • If possible, samples will be obtained from discharges that occur at least 72 hours from the previous discharge.

DOTA will document the results of the quarterly visual assessments and maintain this documentation onsite with their SWPPP and will summarize the findings in their Annual Report.

4.6 MONITORING

Other monitoring is not required for HNL as the airport does not meet any of the monitoring criteria specified for indicator, impaired water, benchmark, effluent limitations guidelines or state- or tribal-specific monitoring.

5 Corrective Actions and Additional Implementation Measures

The MSGP requires permittees to undertake corrective actions under certain conditions to prevent the discharge of pollutants in stormwater.

5.1 Conditions Requiring SWPPP Review and Revision To Meet Effluent Limits

When any of the following conditions occur or are detected during an inspection, monitoring, or other means, or DOH informs DOTA that any of the following conditions have occurred, DOTA will review and revise, as appropriate, their SWPPP (e.g., sources of pollution; spill and leak procedures; non-stormwater discharges; the selection, design, installation and implementation of control measures) until DOH has no further technical comments or requirements, and pollutant discharges are minimized and in compliance with the effluent limits imposed in this permit:

- An unauthorized release or discharge (e.g., spill, leak, or discharge of non-stormwater not authorized by this or another NPDES permit to a state water) occurs at the facility.
- Control measures are not adequate for the discharge to meet applicable water quality standards or the non-numeric effluent limits in this permit.
- A required control measure was never installed, was installed incorrectly, or is not being properly operated or maintained.
- Whenever a visual assessment shows evidence of stormwater pollution (e.g., color, odor, floating solids, settled solids, suspended solids, foam).

5.2 Conditions Requiring SWPPP Review to Determine if Modifications Are Needed

If any of the following conditions occur, DOTA will review their SWPPP (e.g., sources of pollution, spill and leak procedures, non-stormwater discharges, selection, design, installation, and implementation of control measures) to determine if modifications are necessary to meet the effluent limits in this permit:

- Construction or a change in design, operation, or maintenance at the facility that significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged.
- Direction by the DOH that the SWPPP fails to adequately address potential pollutant sources identified.

5.3 Corrective Actions and Deadlines

5.3.1 Immediate Actions

If correction action is needed, DOTA will immediately take all reasonable steps necessary to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational, including cleaning up any contaminated surfaces so that the material will not discharge in subsequent storm events. The MSGP states that "immediately" in this context requires the permittee to, on the same day a condition requiring corrective action is found, take all reasonable steps to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational. For problems identified at a time in the workday when it is too late to initiate corrective action, the initiation of corrective action must begin no later than the following day. "All reasonable steps" means that the

permittee has undertaken initial actions to assess and address the condition causing the corrective action, including, for example, cleaning up any exposed material that may be discharged in a stormwater event (e.g., through sweeping, vacuuming) or scheduling a new BMP to be installed. For the purposes of complying with Section 5.2, above, if a corrective action is determined to be not necessary, DOTA will document the basis of the determination.

5.3.2 Escalating Actions

If DOTA determines that additional actions are necessary beyond those implemented under Section 5.3.1 or if the conditions continue to occur, DOTA will conduct additional corrective actions, such as installing a new or modified control or repairing an existing control. The corrective action will be initiated before the next storm event if possible, and within 14 calendar days from the time of discovery of the condition. If it is infeasible to complete the corrective action within 14 days, DOTA will document why it is infeasible. DOTA will also identify their schedule for completing the work. The MSGP states the work must be done as soon as practicable after the 14-day timeframe but no longer than 45 days after discovery. If the completion of the corrective action will exceed the 45-day time frame, DOTA will take the minimum additional time necessary to complete the corrective action but must notify DOH of their intention to exceed 45 days, the rationale for an extension, and an anticipated completion date, which must also be included in DOTA's corrective action documentation. Where corrective actions result in changes to any of the controls or procedures documented in the SWPPP, DOTA will modify the SWPPP accordingly within 14 days of completing the corrective action work. For conditions that continue to occur, DOTA will implement escalating levels of corrective actions.

5.4 Corrective Action Documentation

The MSGP requires documentation of the existence of any of the conditions listed above in Sections 5.1 and 5.2 within 24 hours of becoming aware of such condition. Corrective action documentation is not required to be submitted to DOH, unless specifically requested to do so. However, the findings must be summarized in DOTA's Annual Report. DOTA will include the following information in the corrective action documentation:

- Description of the condition triggering the need for corrective action. For any spills or leaks, the following information will be included: a description of the incident including material, date and time, amount, location, and reason for spill, and any leaks, spills or other releases that resulted in discharges of pollutants to state waters, through stormwater or otherwise.
- Date the condition was identified.
- Description of immediate actions taken pursuant to Section 5.3.1 above to minimize or prevent the discharge of pollutants. For any spills or leaks, include response actions, the date and time cleanup was completed, notifications made, and staff involved. Any measures taken to prevent the reoccurrence of such releases will be included.
- A statement, signed and certified in accordance with HAR Chapter 11-55, Appendix A, Subsection 15.

Permittees must also document the corrective actions taken or to be taken as a result of the conditions listed in Sections 5.1 or 5.2 (or, for triggering events in Section 5.2 where it is determined that corrective action is not necessary as the basis for this determination) within 14 days from the time of discovery of any of these conditions. DOTA will provide the dates when each corrective action was initiated and completed (or is expected to be completed). If applicable, DOTA will document why it is infeasible to

complete the necessary installations or repairs within the 14-day time frame and will document their schedule for installing the controls and making them operational as soon as practicable after the 14-day time frame. If DOTA notifies DOH regarding an extension of the 45-day time frame, they will document their rationale for an extension.

5.5 ANNUAL REPORT

DOH requires an Annual Report to be submitted electronically, using DOH's e-permitting portal, by January 30th for each year's permit coverage containing information generated from the past calendar year. The Annual Report must contain the following:

- A summary of the past year's routine facility inspection documentation and a summary of the past year's quarterly visual assessment documentation.
- A summary of the past year's corrective action documentation. If corrective action is not yet completed at the time of submission of the Annual Report, DOTA will describe the status of any outstanding corrective actions. Any incidents of noncompliance in the past year or currently ongoing will be described or, if none, DOTA will provide a statement that they are in compliance with the permit.
- The Annual Report must also include a statement, signed and certified in accordance with HAR Chapter 11-55, Appendix A, Subsection 15.

6 SWPPP Preparation and Certification

6.1 SWPPP Preparation

The SWPPP was prepared under the supervision of the AIR-EE Supervisor, meeting the MSGP requirement that the SWPPP be prepared in accordance with good engineering practices and to industry standards. It must be developed by a "qualified person," who is defined as a person knowledgeable in the principles and practices of industrial stormwater controls and pollution prevention and possesses the education and ability to assess conditions at the industrial facility that could impact stormwater quality, and the education and ability to assess the effectiveness of stormwater controls selected and installed to meet the requirements of the permit.

6.2 SWPPP Certification

The SWPPP shall include the following language and be certified by a person who meets the requirements of HAR Chapter 11-55, Appendix B, Subsection 11.A.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information contained therein. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Stacy Paquette Title: Environmental Health Specialist

Signature: Stacy Paquette Date: 08/03/2023

7 SWPPP Modifications

HNL's SWPPP is a "living" document and will be modified and updated, as necessary, in response to corrective actions and deadlines. SWPPP modifications will be documented in the following log:

Table 10: SWPPP Modification Tracking

Date	Description of Modification/ Sections Affected	Person Making Revision	Signature and Date
July 2023	• Section 2.2: Updated spill reporting data for "preceding 3-year" window • Section 4.2: Revised description of maintenance to better match permit requirements • Section 4.5.1: Provided more detail on Routine Facility Inspection locations and added Attachment A, Figure 6 – Routine Facility Inspection Locations • Section 4.5.2: Revised Quarterly Visual Assessment sampling locations based on findings in the field and discussions with DOH. Added Attachment A, Figure 7 – Quarterly Visual Sampling Locations • Updated Attachment B - List of Industrial Tenants • Updated Attachment D – Significant Spills at HNL in the Past 3 Years	Janice Marsters, Haley & Aldrich, Inc.	July 7, 2023

8 SWPPP Availability

HNL's SWPPP is available to the public on DOTA's environmental compliance website, at a link specifically for the airport.[5] In addition, the SWPPP is available via a direct link provided in the NOI submitted to DOH.

[5] https://hidot.hawaii.gov/airports/doing-business/engineering/environmental/hnl-environmental-compliance/

SWPPP Attachments

Attachment A – Figures

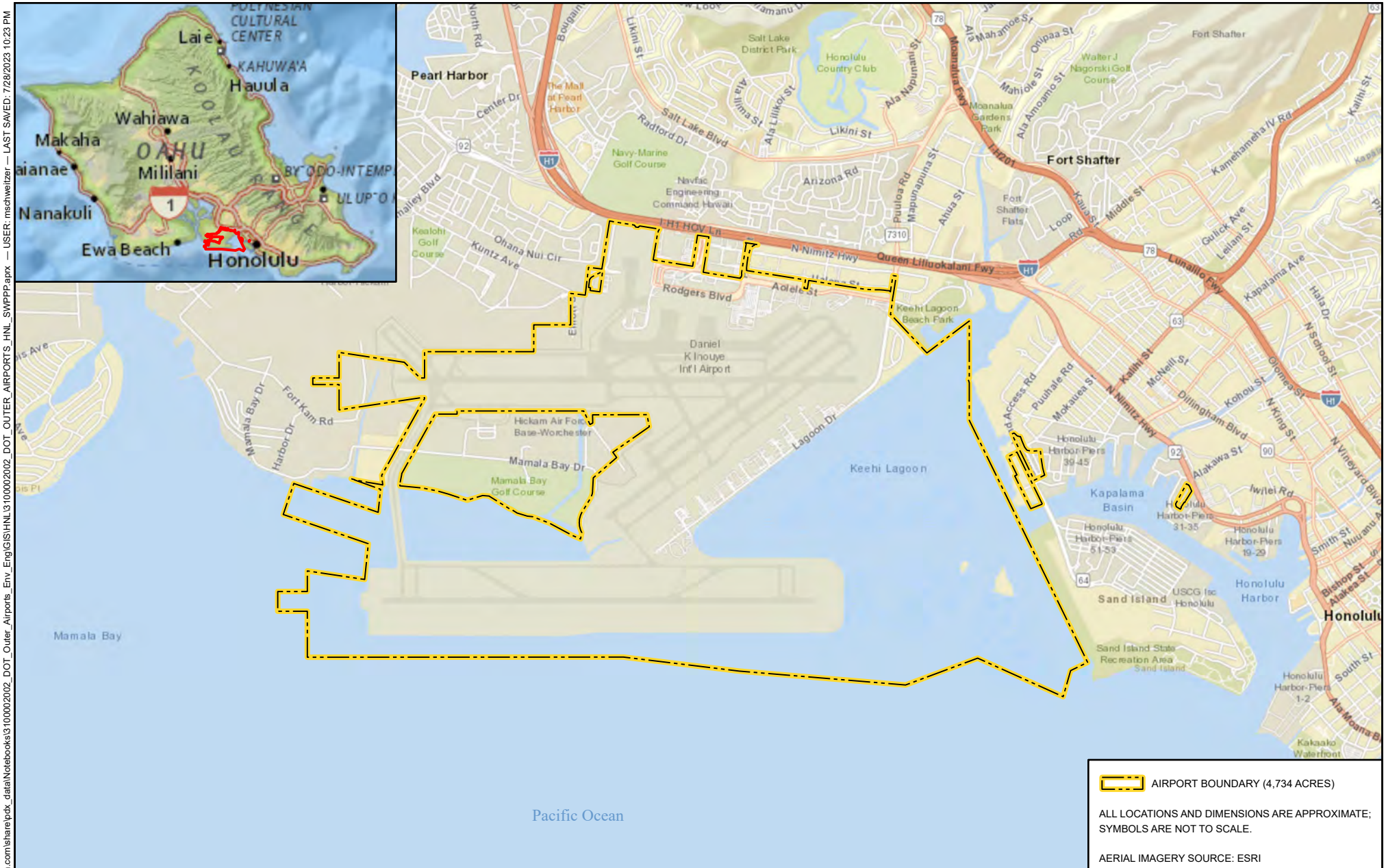
Attachment B – List of Industrial Tenants

Attachment C – Wash Rack and Wash Areas BMP Fact Sheet

Attachment D – Significant Spills at HNL in the Past 3 Years

Attachment E – Spill Reporting Fact Sheet

Attachment A – Figures



AIRPORT LOCATION
DANIEL K. INOUYE INTERNATIONAL AIRPORT (HNL)

INDUSTRIAL STORMWATER POLLUTION PREVENTION PLAN
STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION - AIRPORTS

FIGURE
1

N

1,000 0 1,000 2,000 3,000 FEET

DRAINAGE NETWORK
DANIEL K. INOUYE INTERNATIONAL AIRPORT (HNL)

INDUSTRIAL STORMWATER POLLUTION PREVENTION PLAN
STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION - AIRPORTS

FIGURE
2

GIS: \\aileyaldrich.com\share\pdx_data\Notebooks\3100002002_DOT_Outer_Airports_Env_Eng\GIS\HNL\3100002002_DOT_OUTER_AIRPORTS_HNL_SWPPP.aprx - mschweitzer - 7/28/2023 10:31 PM

INDUSTRIAL AREAS AND OUTFALLS
DANIEL K. INOUYE INTERNATIONAL AIRPORT (HNL)

INDUSTRIAL STORMWATER POLLUTION PREVENTION PLAN
STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION - AIRPORTS

FIGURE
3

AOLELE ST DRAINAGE DITCH
EMPLOYEE PARKING
PAINT BOOTH
PAINT SHOP
AUTOMOTIVE SHOP
BASEYARD ACCESS ROAD
T-HANGER CONVERTED (STORAGE)
LANDSCAPE NURSERY
VEHICLE/EQUIPMENT AND MATERIAL STORAGE
T-HANGER CONVERTED (STORAGE)
OFFICE
STORAGE SHED
EQUIPMENT PARKING
MAIN OFFICE
WAREHOUSE
CARPENTRY SHOP
MAINTENANCE SHOP
VEHICLE/EQUIPMENT PARKING
OFFICE
GROUNDS MAINTENANCE BUILDING
COVERED FUELING AREA
WASTE BINS
HEAVEY EQUIPMENT PARKING STRUCTURE
OFFICE
GREEN HOUSE
AGGREGATE STORAGE
SHERIFF OFFICE TRAILER
MATERIAL STORAGE BUILDING
SWEEPER WASHOUT
AGGREGATE STORAGE
VEHICLE PARKING
COVERED PARKING
MATERIAL, VEHICLE/EQUIPMENT & PARTS STORAGE
AIRPORT ACCESS ROAD
No EID
Kaloaloa Canal
Kaloaloa Canal

- INLET
- DOTA OWS
- WASH RACK
- DOTA INDUSTRIAL OUTFALL
- FLOWLINE
- STATE WATER
- STORM DRAINAGE SYSTEM

ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE; SYMBOLS ARE NOT TO SCALE.

AERIAL IMAGERY SOURCE: ESRI

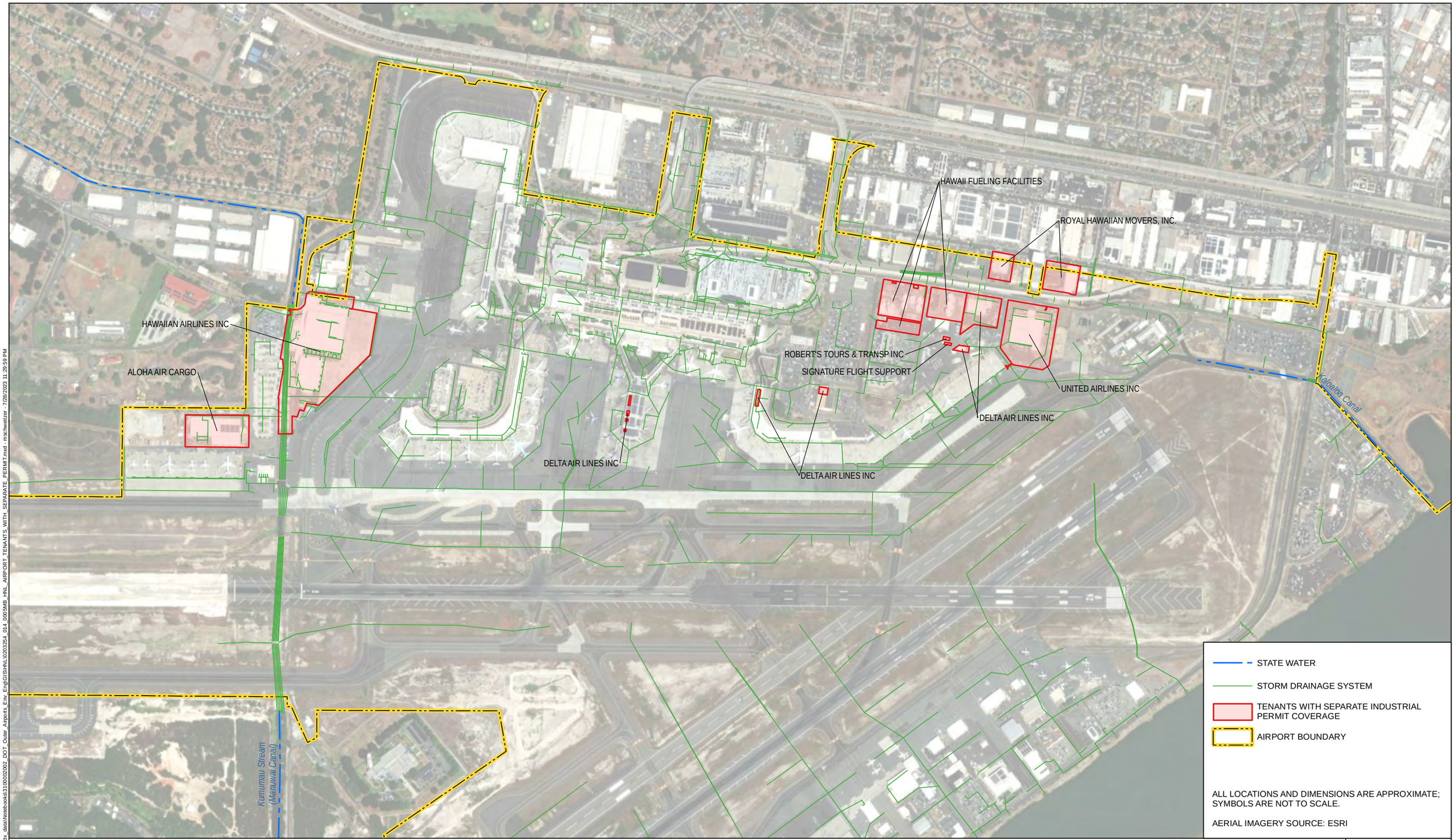
N

30 0 30 60 90 FEET

DOTA BASEYARD
DANIEL K. INOUYE INTERNATIONAL AIRPORT (HNL)
INDUSTRIAL STORMWATER POLLUTION PREVENTION PLAN
STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION - AIRPORTS

FIGURE
4

GIS: \\halleyaldrich.com\share\pdx_data\Notebooks\3100002002_DOT_Outer_Airports_Env_Eng\GIS\HNL\3100002002_DOT_OUTER_AIRPORTS_HNL_SWPPP.aprx - mschweitzer - 7/28/2023 10:50 PM



N

400 0 400 800 1,200 FEET

AIRPORT TENANTS WITH SEPARATE INDUSTRIAL PERMIT COVERAGE - NORTH
DANIEL K. INOUYE INTERNATIONAL AIRPORT (HNL)

INDUSTRIAL STORMWATER POLLUTION PREVENTION PLAN
STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION - AIRPORTS

FIGURE
5a

GIS: \\halleyaldrich.com\share\gdx_data\Notebooks\31000002002_DOT_Outer_Airports_Env_Engr\GIS\HNL\0203254_014_0005MB_HNL_AIRPORT_TENANTS_WITH_SEPARATE_PERMIT.mxd - mscitweitzer - 7/28/2023 11:29:59 PM

VIP TRANS INC

Kalaloa Canal

HAWAIIAN AIRLINES INC

SIGNATURE FLIGHT SUPPORT

SIGNATURE FLIGHT SUPPORT

AIR SERVICE HAWAII,INC

EAGLE AIR MED CORPORATION

SIGNATURE FLIGHT SUPPORT

NOVICTOR AVIATION, LLC

SCHUMAN AVIATION COMPANY LTD

HAWAII PACIFIC AVIATION INC

HONOLULU HELICOPTER TOURS, LLC

HAWAII FUELING FACILITIES

SIGNATURE FLIGHT SUPPORT

PACIFIC AIR CARGO LLC

CASTLE & COOKE HOMES HAWAII, INC.

HAWAII PACIFIC AVIATION INC

AIR SERVICE HAWAII,INC

CORPORATE AIR

UNITED PARCEL SERVICE, INC

AIR SERVICE HAWAII,INC

KALITTA AIR LLC

FEDERAL EXPRESS CORP

KEEHI LAGOON

STATE WATER

STORM DRAINAGE SYSTEM

TENANTS WITH SEPARATE INDUSTRIAL PERMIT COVERAGE

AIRPORT BOUNDARY

ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE; SYMBOLS ARE NOT TO SCALE.

AERIAL IMAGERY SOURCE: ESRI

N

400 0 400 800 1,200 FEET

AIRPORT TENANTS WITH SEPARATE INDUSTRIAL PERMIT COVERAGE - SOUTH
DANIEL K. INOUYE INTERNATIONAL AIRPORT (HNL)

INDUSTRIAL STORMWATER POLLUTION PREVENTION PLAN
STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION - AIRPORTS

FIGURE
5b

GIS: \\halleyaldrich.com\share\gdx_data\Notebooks\31000020\02_DOT_Outer_Airports_Env_Eng\GIS\HNL\0203254_014_0005MB_HNL_AIRPORT_TENANTS_WITH_SEPARATE_PERMIT.mxd - mscltweltzer - 7/28/2023 11:27:22 PM

HAWAII FUELING FACILITIES

TESORO HAWAII CORPORATION

HONOLULU FREIGHT SERVICE

KEEHI LAGOON

DMX

STATE WATER

STORM DRAINAGE SYSTEM

TENANTS WITH SEPARATE INDUSTRIAL PERMIT COVERAGE

AIRPORT BOUNDARY

ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE; SYMBOLS ARE NOT TO SCALE.

AERIAL IMAGERY SOURCE: ESRI

N

400 0 400 800 1,200 FEET

AIRPORT TENANTS WITH SEPARATE INDUSTRIAL PERMIT COVERAGE - EAST
DANIEL K. INOUYE INTERNATIONAL AIRPORT (HNL)

INDUSTRIAL STORMWATER POLLUTION PREVENTION PLAN
STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION - AIRPORTS

FIGURE
5c

GIS: \\haleyaldrich.com\share\lydx_data\Notebooks\3100\02\02_DOT_Outer Airports_Env_Eng\GIS\HNL\0203254_014_0005MB_HNL_AIRPORT_TENANTS_WITH_SEPARATE_PERMIT.mxd - mscltweitzer - 7/28/2023 11:27:22 PM

5061/18069
9709
4128
4572
4573
4622
5751
1
2
3
4
5
6
7
8
9
10
RUNWAY 8L-26R
RUNWAY 4L-22R
RUNWAY 4R-22L
MANUWAI CANAL
KALOIHOA CANAL
KEEHI LAGOON
AHUA LAGOON
T-HANGERS

ROUTINE FACILITY INSPECTION DISCHARGE POINT

INLET

FLOWLINE

STORM DRAINAGE SYSTEM

1 COMMON USE FUELING AREA AND ID

AIRPORT BOUNDARY

ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE; SYMBOLS ARE NOT TO SCALE.

OUTFALLS NOT IDENTIFIED FOR FACILITY INSPECTIONS ARE EITHER COMPLETELY SUBMERGED OR ARE IN A LOCATION WHERE THEY CANNOT BE OBSERVED.

AERIAL IMAGERY SOURCE: HEXAGON

N

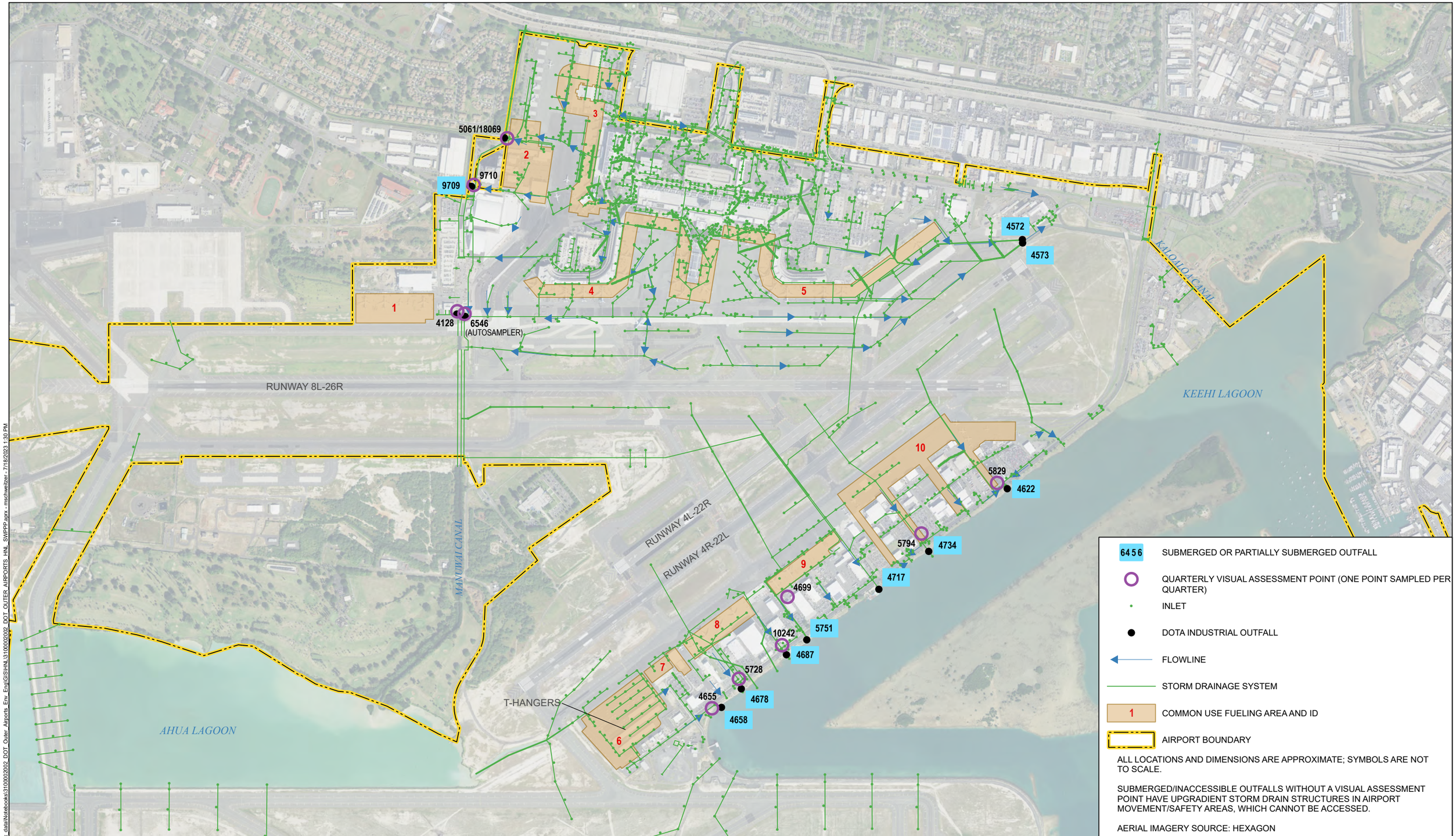
0 1,000 2,000
SCALE IN FEET

ROUTINE FACILITY INSPECTION LOCATIONS
DANIEL K. INOUYE INTERNATIONAL AIRPORT (HNL)

INDUSTRIAL STORMWATER POLLUTION PREVENTION PLAN
STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION - AIRPORTS

FIGURE
6

GIS: \\haleyaldrich.com\share\jobs_data\Notebooks\3100002002_DOT_Outer_Airports_Env_Eng\GIS\HNL\3100002002_DOT_OUTER_AIRPORTS_HNL_SWPPP.aprx - mschweitzer - 7/18/2023 1:28 PM



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0 1,000 2,000
SCALE IN FEET

QUARTERLY VISUAL ASSESSMENT LOCATIONS
DANIEL K. INOUYE INTERNATIONAL AIRPORT (HNL)

INDUSTRIAL STORMWATER POLLUTION PREVENTION PLAN
STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION - AIRPORTS

FIGURE
7

Attachment B – List of Industrial Tenants

Appendix B: List of Industrial Tenants

Common Tenant Name	PMIDs
Air Service Hawaii	HNL.206.206.01.35B;HNL.206.206.01.35A;HNL.206.206.01.34;HNL.206.206.01.11;HNL.206.206.01.10B;HNL.206.206.01.10A;HNL.009.009.01.76;HNL.009.009.01.75;HNL.009.009.01.15B
Air Service Hawaii - Makai Hangar	HNL.011.011.01.20B;HNL.011.011.01.12
Aloha Air Cargo	HNL.004.004.01.52
Castle & Cooke Homes Hawaii	HNL.217.217.01.01B;HNL.009.009.01.69A;HNL.009.009.01.72;HNL.009.009.01.73;HNL.217.217.01.01A;HNL.009.009.01.74;HNL.009.009.01.67;HNL.009.009.01.68;HNL.009.009.01.69B;HNL.009.009.01.07B;HNL.009.009.01.70
Corporate Air - Tie-Down	HNL.423.423.01.90G;HNL.423.423.01.90F;HNL.423.423.01.90E;HNL.423.423.01.90D;HNL.423.423.01.90C;HNL.423.423.01.90B;HNL.423.423.01.90A
Delta Air lines - Gates E3, E5 & E7	HNL.612.612.01.15R;HNL.612.612.01.15Q;HNL.612.612.01.15P;HNL.612.612.01.15N;HNL.612.612.01.15M;HNL.612.612.01.15L;HNL.612.612.01.15K;HNL.612.612.01.15J;HNL.612.612.01.15H;HNL.612.612.01.15G;HNL.612.612.01.15F;HNL.612.612.01.15E;HNL.612.612.01.15D;HNL.612.612.01.15C;HNL.612.612.01.15B;HNL.612.612.01.15A
Delta Air Lines (Cargo)	HNL.137.137.01.03;HNL.137.137.01.02;HNL.137.137.01.01;HNL.001.001.01.20;HNL.001.001.01.19
Delta Air Lines (Gate G1)	HNL.613.613.01.02M;HNL.613.613.01.02L;HNL.613.613.01.02K;HNL.613.613.01.02J;HNL.613.613.01.02H;HNL.613.613.01.02G;HNL.613.613.01.02F;HNL.613.613.01.02E;HNL.613.613.01.02D;HNL.613.613.01.02C;HNL.613.613.01.02B;HNL.613.613.01.02A
Delta Air Lines (GSE)	HNL.132.132.01.04;HNL.001.001.01.22D
Delta Air Lines (ULD Container Repair Shop)	HNL.121.121.01.00;HNL.001.001.01.15
FedEx - Express	HNL.009.009.01.90;HNL.009.009.01.89;HNL.009.009.01.88C
Hawaii Life Flight	HNL.009.009.01.51
Hawaii Pacific Aviation - Tie-Down Helicopter	HNL.548.548.01.01B;HNL.548.548.01.01A;HNL.424.424.01.03
Hawaiian Airlines - Elliot Street Maintenance Hangar	HNL.004.004.01.07;HNL.538.538.01.20A;HNL.157.157.01.00;HNL.004.004.01.55;HNL.004.004.01.14;HNL.004.004.01.13;HNL.004.004.01.11
Hawaiian Airlines - Ohana Maintenance Hangar	HNL.009.009.01.07A;HNL.221.221.01.02;HNL.221.221.01.01
Honolulu Freight Service	HNL.298.298.01.01;HNL.299.299.01.01;HNL.297.297.01.01;HNL.014.014.01.06;HNL.014.014.01.05;HNL.014.014.01.04;HNL.014.014.01.03;HNL.014.014.01.02;HNL.014.014.01.01
Honolulu Helicopter Tours - Tie-Down Helicopter	HNL.548.548.01.01C
Island Movers	HNL.223.223.01.03;HNL.223.223.01.02;HNL.223.223.01.01D;HNL.223.223.01.01C;HNL.223.223.01.01B;HNL.223.223.01.01A;HNL.009.009.01.62;HNL.009.009.01.61B;HNL.009.009.01.61A;HNL.009.009.01.60;HNL.009.009.01.59;HNL.009.009.01.03
Pacific Air Cargo	HNL.011.011.01.07;HNL.009.009.01.88E
Par Pacific Holdings, Inc.	HNL.010.010.01.03
Rainbow Helicopters - Tie- Down Helicopter	HNL.548.548.01.01H;HNL.548.548.01.01G;HNL.548.548.01.01F;HNL.548.548.01.01E;HNL.548.548.01.01D
Robert's Tours and Transportation - Wiki Wiki Bus	HNL.001.001.01.09F
Royal Hawaiian Movers - 3017 Ualena Street	HNL.193.193.01.01;HNL.192.192.01.02;HNL.192.192.01.01;HNL.005.005.01.11
Royal Hawaiian Movers - 3039 Ualena Street	HNL.005.005.01.10
Royal Hawaiian Movers - 3077 Ualena Street	HNL.191.191.01.03C;HNL.191.191.01.03B;HNL.191.191.01.03A;HNL.191.191.01.02;HNL.191.191.01.01;HNL.005.005.01.06C;HNL.005.005.01.06B;HNL.005.005.01.06A
Schuman Aviation - (Magnum Helicopter)	HNL.009.009.01.58B;HNL.009.009.01.58A
Signature Flight Support - Dolly Maintenance Area	HNL.220.220.01.00;HNL.009.009.01.15D
Signature Flight Support - Fueling Operations	HNL.603.603.01.07
Signature Flight Support - Private Hangar	HNL.224.224.01.02;HNL.224.224.01.01;HNL.207.207.01.00;HNL.204.204.01.00;HNL.009.009.01.09H;HNL.009.009.01.09F;HNL.009.009.01.09E;HNL.009.009.01.09D;HNL.009.009.01.09C;HNL.009.009.01.09B;HNL.009.009.01.09A;HNL.009.009.01.08

Appendix B: List of Industrial Tenants

Common Tenant Name	PMIDs
Signature Flight Support - USPS Mail Operations	HNL.009.009.01.07C
Signature HFFC Sand Island	HNL.010.010.01.01B;HNL.010.010.01.01A;HNL.010.010.01.02
Signature HFFC Storage Plants 1-5 and South Ramp Loading Rack	HNL.001.001.01.06;HNL.001.001.01.13;HNL.001.001.01.07;HNL.001.001.01.05;HNL.009.009.01.17E;HNL.001.001.01.12
Speedi Shuttle - Wiki Wiki Bus	HNL.810.810.01.20;HNL.810.810.01.18;HNL.120.120.01.01;HNL.001.001.01.09B;HNL.001.001.01.09A
United Airlines - Cargo	HNL.001.001.01.24C;HNL.001.001.01.24B;HNL.001.001.01.24A;HNL.001.001.01.24
UPS Hawaii - Main Facility	HNL.009.009.01.87;HNL.009.009.01.86;HNL.009.009.01.85;HNL.009.009.01.84;HNL.009.009.01.81
VIP Trans, Inc	HNL.274.274.01.00;HNL.007.007.01.11C;HNL.007.007.01.11B;HNL.007.007.01.11A;HNL.007.007.01.10

Attachment C – Wash Rack and Wash Areas BMP Fact Sheet

WASH RACK & WASH AREA BMPS
Daniel K. Inouye International Airport

FACT SHEET

All washing of aircraft, vehicles, and equipment must be conducted at a DOTA wash rack or a tenant facility wash area that has been approved by DOTA.

Designated DOTA wash racks or tenant wash areas are located inside a building or on an impervious area where wash water can be contained and directed to an OWS that drains to the sewer system, wells, or evaporation ponds.DO NOT discharge wash water to the storm drain system or surface water. When possible, use off-site commercial washing or dry washing techniques instead of using a wash rack/wash area.

BMPs

- Use minimal water
- Use biodegradable, phosphate-free detergents
- Sponge wash with a bucket of water to eliminate excess wash water, where applicable
- Provide secondary containment for washing supplies such as additives, solvents and other hazardous materials
- Use the minimum amount of hydrocarbons or solvents and avoid over spraying, showering and splashing
- Clean up any residues on the ground using absorbent materials or a wet/dry vacuum immediately after washing
- Allow vehicles to dry as much as possible before leaving the wash rack/wash area
- Only wash exterior surfaces, no engines or under carriages
- Reuse contaminated rags by having them cleaned by an industrial laundry service
- Washing of personal vehicles is prohibited

WHY?

Wash water may contain oils, greases, heavy metals, sediments, and other pollutants that can pose a threat to the storm drain system and receiving water bodies. Soaps that contain phosphates promote algae growth, which robs the ocean of essential oxygen. Algae also blocks light, limiting aquatic photosynthesis that coral need to survive. Even soaps that do not contain phosphates still bind to the tissue of fish and suffocate them. Following the wash rack BMPs will help reduce these harmful impacts.

WASH RACK & WASH AREA BMPS
Daniel K. Inouye International Airport

FACT SHEET

WASH RACK AND WASH AREA LOCATIONS & USES

General Aviation Wash Rack
For use by: T-hangar and Tie Down Tenants
For washing: planes and GSE equipment

North Ramp Wash Rack
For use by: Aviation Tenants
For washing: GSE equipment

South Ramp Wash Rack
For use by: South Ramp Tenants
***For washing*:** planes, GSE, and other equipment

East Wash Rack
For use by: DOTA and Wiki Wiki Buses
For washing: buses and DOTA equipment/vehicles

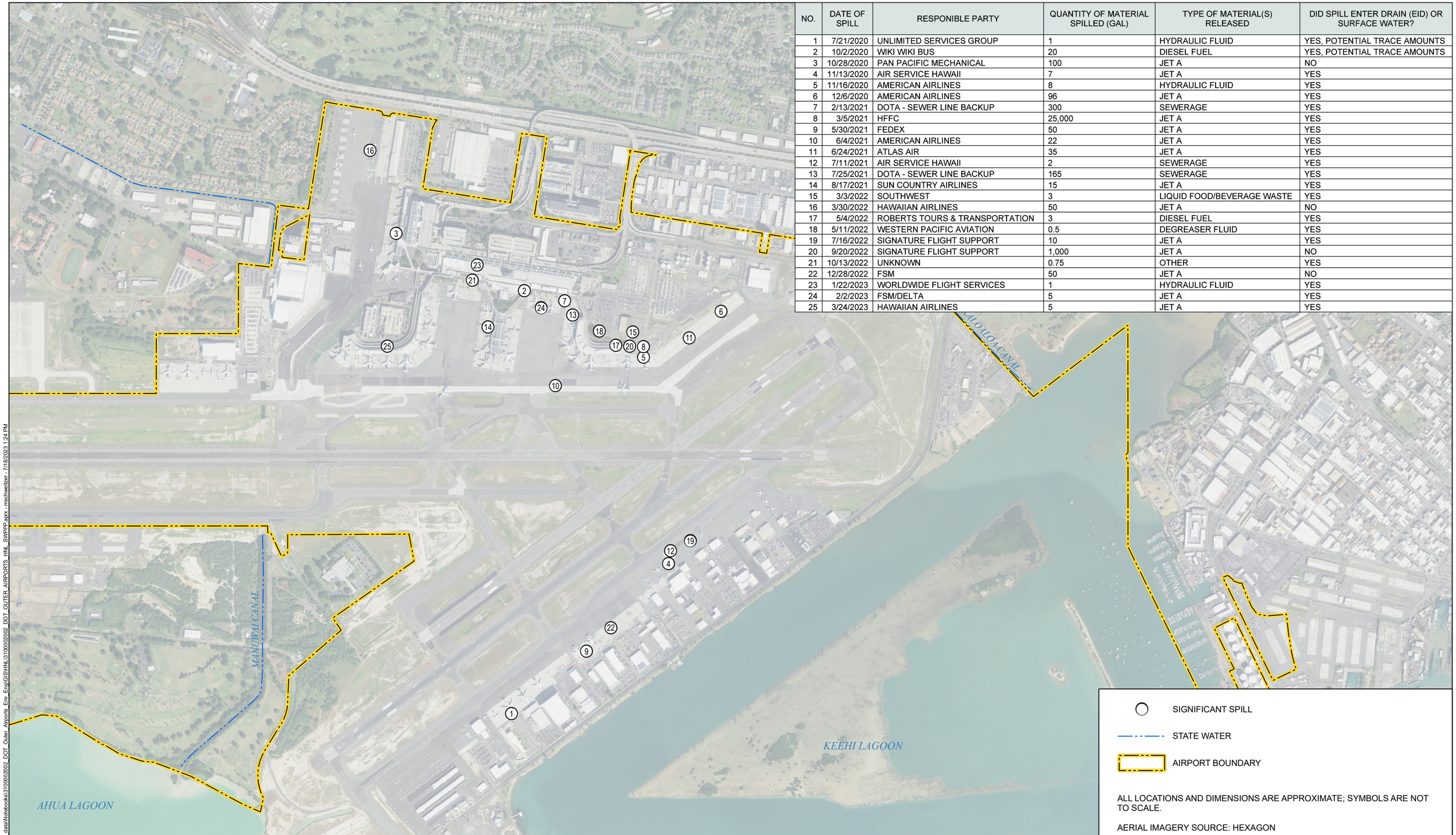
Hawaiian Airlines Maintenance Hangar (front of hangar west of trench drain): ***For use by:*** Hawaiian Airlines
For washing: planes and GSE/vehicles

Washing at any other locations on the Airport than listed here is prohibited and will need approval from AIR-EE.


Hawaiian Airlines Wash Rack
East Wash Rack
North Ramp Wash Rack
South Ramp Wash Rack
General Aviation Wash Rack

Attachment D – Significant Spills at HNL in the Past 3 Years

NO.	DATE OF SPILL	RESPONIBLE PARTY	QUANTITY OF MATERIAL SPILLED (GAL)	TYPE OF MATERIAL(S) RELEASED	DID SPILL ENTER DRAIN (EID) OR SURFACE WATER?
1	7/21/2020	UNLIMITED SERVICES GROUP	1	HYDRAULIC FLUID	YES, POTENTIAL TRACE AMOUNTS
2	10/2/2020	WIKI WIKI BUS	20	DIESEL FUEL	YES, POTENTIAL TRACE AMOUNTS
3	10/28/2020	PAN PACIFIC MECHANICAL	100	JET A	NO
4	11/13/2020	AIR SERVICE HAWAII	7	JET A	YES
5	11/16/2020	AMERICAN AIRLINES	8	HYDRAULIC FLUID	YES
6	12/6/2020	AMERICAN AIRLINES	96	JET A	YES
7	2/13/2021	DOTA - SEWER LINE BACKUP	300	SEWERAGE	YES
8	3/5/2021	HFFC	25,000	JET A	YES
9	5/30/2021	FEDEX	50	JET A	YES
10	6/4/2021	AMERICAN AIRLINES	22	JET A	YES
11	6/24/2021	ATLAS AIR	35	JET A	YES
12	7/11/2021	AIR SERVICE HAWAII	2	SEWERAGE	YES
13	7/25/2021	DOTA - SEWER LINE BACKUP	165	SEWERAGE	YES
14	8/17/2021	SUN COUNTRY AIRLINES	15	JET A	YES
15	3/3/2022	SOUTHWEST	3	LIQUID FOOD/BEVERAGE WASTE	YES
16	3/30/2022	HAWAIIAN AIRLINES	50	JET A	NO
17	5/4/2022	ROBERTS TOURS & TRANSPORTATION	3	DIESEL FUEL	YES
18	5/11/2022	WESTERN PACIFIC AVIATION	0.5	DEGREASER FLUID	YES
19	7/16/2022	SIGNATURE FLIGHT SUPPORT	10	JET A	YES
20	9/20/2022	SIGNATURE FLIGHT SUPPORT	1,000	JET A	NO
21	10/13/2022	UNKNOWN	0.75	OTHER	YES
22	12/28/2022	FSM	50	JET A	NO
23	1/22/2023	WORLDWIDE FLIGHT SERVICES	1	HYDRAULIC FLUID	YES
24	2/2/2023	FSM/DELTA	5	JET A	YES
25	3/24/2023	HAWAIIAN AIRLINES	5	JET A	YES



SIGNIFICANT SPILL

STATE WATER

AIRPORT BOUNDARY

ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE; SYMBOLS ARE NOT TO SCALE.

AERIAL IMAGERY SOURCE: HEXAGON

N

0 1,000 2,000

SCALE IN FEET

SIGNIFICANT SPILLS
DANIEL K. INOUYE INTERNATIONAL AIRPORT (HNL)

INDUSTRIAL STORMWATER POLLUTION PREVENTION PLAN
STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION - AIRPORTS

FIGURE
D-1

Attachment E – Spill Reporting Fact Sheet

SPILL REPORTING
Daniel K. Inouye International Airport

FACT SHEET

Each row below is a scenario and multiple scenarios may apply to a single spill event. Please review all scenarios!
Contact information is listed on the next page.

Spilled material is less than a reportable* quantity, regardless of type	Verbally notify Ramp Control (808) 836-6670		
Spill is 25-gallons or less of petroleum, but not contained within 72 hours	Verbally notify Ramp Control (808) 836-6670	Submit written notifications to DOH HEER no later than **30 days** following discovery of release, also explain why the spill was not cleaned within **72 hours**	
Spilled material is of a reportable quantity	Verbally notify Ramp Control, then: • DOH HSERC/HEER • LEPC • NRC Obtain Case Number & provide to AIR-EE	Submit written notifications to DOH HSERC/HEER and NRC no later than **30 days** following discovery of release (copy AIR-EE on all correspondence)	
Spilled material enters storm drain or water body	Verbally notify Ramp Control, then: • DOH CWB • DOH HSERC/HEER • LEPC • NRC Obtain Case Number & provide to AIR-EE	Submit written notifications to DOH CWB, HEER, LEPC, and NRC no later than **30 days** following discovery of release (copy AIR-EE on all correspondence)	
Spilled material is wastewater that enters state waters **OR** is ≥ 1,000 gallons	Verbally notify Ramp Control, then DOH WWB. **Consult with AIR EE on**: • Press release • Water Disinfecting • Monitor the receiving water for bacteria	Submit written follow-up report to DOH WWB (copy AIR-EE on all correspondence)	

ALL SPILLS MUST BE REPORTED TO DOT AIR-EE

Complete the Spill Reporting Form** using the QR code or web address below:

https://hidot.hawaii.gov/airports/doing-business/engineering/environmental/spill-reporting-form/

*See Reporting Procedures on page 2 for definition of "reportable".
**A pdf version of the Spill Reporting Form can be provided by emailing AIR-EE.

SPILL REPORTING
Daniel K. Inouye International Airport

FACT SHEET

REPORTING PROCEDURES

Materials used and stored at the tenant facility have the potential to spill and contaminate stormwater runoff and surface water bodies. The procedures outlined in this fact sheet are intended to detail general procedures to be followed in the event of a spill. Please see all current state and federal guidelines for complete details.

Spills must be immediately reported per DOH and/or Federal requirements (Airports has additional requirements) if one or more of the following conditions apply:

1. If the release is more than 25-gallons of petroleum product
2. If the release is 25-gallons or less of petroleum product but is not contained or remedied within 72 hours.
3. If the release **is *equal to or exceeds the reportable quantity criteria*** for one or more chemicals listed within the DOH HEER Office Technical Guidance Manual (TGM): http://www.hawaiidoh.org/tgm-pdfs/TGM%20Section%2002-D.pdf.
4. If the release enters a storm drain or water body.

CONTACT INFORMATION

In the event a spill occurs, the contact information for pertinent personnel and agencies listed below are intended to be used for reference during the necessary reporting procedures detailed on Page 1.

Personnel or Agency	*Contact Information*
HNL Ramp Control*	Phone: Pax Line 711 or (808) 836-6670
Airport Duty Manager/Code 22	Phone: (808) 836-6434
HNL Airport Rescue and Fire Fighting (ARFF)	Phone: (808) 836-6670
Hawaii State Emergency Response Commission (HSERC) / DOH Hazard Evaluation and Emergency Response (HEER)	Phone: (808) 586-4249 Phone: (808) 236-8200 after hours
DOT Airports Environmental Hotline	Phone: (808) 838-8002
DOT Airports Environmental Section (AIR-EE)*	Phone: (808) 838-8064 Email: kylie.e.emily@hawaii.gov or dot.air.environmental@hawaii.gov
Local Emergency Planning Committee (LEPC)	Phone: (808) 723-8960 or 911 after hours
National Response Center (NRC)	Phone: (800) 424-8802
DOH Clean Water Branch (CWB)	Phone: (808) 586-4309
DOH Wastewater Branch (WWB)	Phone: (808) 586-4294

*Should be notified for **ALL** spills regardless of quantity or type.

Note: Written notifications must be provided per the reporting procedures detailed on Page 1, and must include verbal notification information, photos, and any other related information not previously provided. The written notification may be provided via certified mail, fax, hand-delivery, or other means that provides proof of delivery.