

**Stormwater Pollution Prevention Plan  
Multi-Sector General Permit for Stormwater Discharges  
Associated with Industrial Activity (HAR §11-55, Appendix B)  
Lihue Airport (LIH), Kauai  
July 2022**



**STATE OF HAWAII, DEPARTMENT OF  
TRANSPORTATION, AIRPORTS DIVISION**  
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## List of Acronyms

AIR-EE	Airports Engineering Branch, Environmental Section
AIR-LS	Airports Certification, Security and Safety Specialist
AIR-K	Kauai 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
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
DOTA	State of Hawaii Department of Transportation Airports Division
EHS	DOTA Environmental Health Specialist
EID	Environmental Identification
EPA	U.S. Environmental Protection Agency
FAA	Federal Aviation Administration
GSE	Ground Service Equipment
HAR	Hawaii Administrative Rules
HDS	Hydrodynamic Separator
HSERC	Hawaii State Emergency Response Commission
LIH	Lihue Airport
LEPC	Local Emergency Planning Committee
MS4	Municipal Separate Storm Sewer System
MSGP	Multi-Sector General Permit
MST	Mobile Storage Tank
NAICS	North American Industry Classification System
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
SPCC	Spill Prevention, Control, and Countermeasures
SIC	Standard Industrial Classification
SWPCP	Stormwater Pollution Control Plan
SWPPP	Stormwater Pollution Prevention Plan

## 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)).<sup>1</sup> 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 covered industrial activities.

DOTA was granted a NGPC for LIH by DOH on December 9, 2013, in accordance with the prior HAR Chapter 11-55 Appendix B. That NGPC was extended administratively by DOH in 2018. The new MSGP replaces the former NGPC and will become effective upon approval of DOTA's submittals to DOH.

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, ground service equipment, and automobile.

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. This SWPPP replaces the SWPCP prepared for compliance with LIH's 2013 NGPC. The SWPPP will be updated if facility conditions change and an up-to-date copy will be maintained on site upon approval of the plan.

### 1.1 FACILITY INFORMATION

Facility Name and Address: Lihue Airport (LIH)  
3901 Mokulele Loop, #6, Lihue, Kauai, HI 96766  
1 808-836-6411

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

Latitude: 21.978489491986007      Longitude: -159.34856778203726

Estimated area of industrial activity exposed to stormwater: 35.5 acres

Names of surface waters that receive stormwater from facility: Pacific Ocean

### 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/Operator: DOTA  
869 Punchbowl Street, Suite 509, Honolulu, HI 96813  
1 808-587-2150

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<sup>1</sup> <https://www.epa.gov/enforcement/water-enforcement>

SWPPP Contact: AIR-EE  
 400 Rodgers Boulevard, 7<sup>th</sup> Floor, Honolulu, HI 96819  
[dot.air.environmental@hawaii.gov](mailto:dot.air.environmental@hawaii.gov)  
 1 808-838-8656

Facility Contact: Kauai EHS  
 3901 Mokulele Loop, #6, Lihue, HI 96766  
[dot.air.environmental@hawaii.gov](mailto:dot.air.environmental@hawaii.gov)  
 1 808- 241-3904

### 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	<ul style="list-style-type: none"> <li>• Authority for the Permit.</li> <li>• Signatory certifying submittals on behalf of DOTA.</li> <li>• Supports enforcement actions.</li> <li>• Coordinates with DOH at Director level, if needed.</li> </ul>
AIR-EE EHS Supervisor	<ul style="list-style-type: none"> <li>• Manages the MSGP and SWPPP, including revisions.</li> <li>• Oversees the implementation and maintenance of control measures, and of correction actions when required.</li> <li>• Approves DOTA Tenant Agreement for Compliance with State Airport Drainage System.</li> <li>• Executes enforcement actions.</li> <li>• Oversees Airport EHSs and Consultants.</li> </ul>
AIR-EE (EHS)	<ul style="list-style-type: none"> <li>• AIR-EE personnel at the airport responsible for SWPPP oversight.</li> <li>• Conducts BMP inspections at DOTA facilities, airport common areas, and tenant areas.</li> <li>• Investigates illicit discharges and spill responses.</li> <li>• Inspects airport drainage systems and structures.</li> <li>• Facilitates training and education for airport personnel.</li> <li>• Distributes environmental/spill control information to new tenants.</li> </ul>
District Airport Manager	<ul style="list-style-type: none"> <li>• Coordinates with AIR-EE to support training, reporting, inspections, and enforcement.</li> <li>• Assists with distribution of Airport Notices.</li> </ul>
AIR-PM	<ul style="list-style-type: none"> <li>• Executes and terminates lease agreements and revocable permits.</li> <li>• Manages the tenant database (Oracle Financial/Propworks).</li> </ul>

Party	Responsibilities
	<ul style="list-style-type: none"> <li>Tracks leases, new lease agreements, and terminated leases.</li> </ul>
AIR-LS	<ul style="list-style-type: none"> <li>Assists with inspection and enforcement related to spills and leaking equipment/vehicles.</li> </ul>
ARFF	<ul style="list-style-type: none"> <li>Assists with spill responses.</li> </ul>
AIR-EE Environmental Consultant	<ul style="list-style-type: none"> <li>Assists DOTA in meeting requirements of the airport NPDES permits.</li> </ul>
Drainage System Maintenance Contractor	<ul style="list-style-type: none"> <li>Provides inspection and cleaning of storm drainage system (i.e., drainage manholes, catch basins, inlets, box culverts, outfalls, head walls, and trench drain lines).</li> <li>Provides cleaning and operational maintenance service to DOTA owned PBMPs (e.g., OWS, CDS/HDS units, and evaporation ponds).</li> <li>Labels EIDs adjacent to storm drains.</li> </ul>
Tank, Material Storage, Waste, and Chemical Management Contractor	<ul style="list-style-type: none"> <li>Provides waste materials, used oil, used batteries, and e-waste disposal services.</li> <li>Provides aboveground storage tank, underground storage tank, and material storage inspections as well as maintenance/repairs.</li> </ul>
Tenants	<ul style="list-style-type: none"> <li>Implement BMPs at their location to reduce or eliminate potential pollutants associated with their operations.</li> <li>Apply 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.</li> <li>Cooperate with DOTA inspection and training requirements.</li> <li>Promptly address findings from DOTA inspections.</li> </ul>
Security Dispatch	<ul style="list-style-type: none"> <li>Receives spill reports.</li> <li>Calls AOC and ARFF to report spill incidents.</li> <li>Responds to spill incidents.</li> </ul>
AOC	<ul style="list-style-type: none"> <li>Inspect ramp areas.</li> <li>Respond to spill incidents.</li> </ul>

**1.4 SITE DESCRIPTION AND MAPS**

LIH is located on the southeastern coast of the Island of Kauai (Attachment A, Figure 1 – Location Map). LIH encompasses approximately 872 acres of land and is owned and operated by DOTA.

Lihue Airport contains two paved runways, taxiways adjacent to the runways, a general aviation/commuter ramp, and hardstand areas (Attachment A, Figure 2 – Drainage Network). A passenger terminal, parking lots, and ARFF station are in a central area of the airport. The DOTA Maintenance Baseyard is northeast of the terminal. The remainder of the facility, aside from the airport tower and roads, are relatively flat, grassed areas. The area surrounding LIH includes vacant agricultural land to the north and west, a golf course and hotel to the south, and the Pacific Ocean to the east (Figure 2). The airport has a 6-foot-tall perimeter fence and guards for security. The airport tower has a clear view of the runways and AOA.

DOTA owns, operates, and maintains the storm drainage system at LIH, including catch basins, drain inlets, evaporation ponds, curbs, gutters, canals, pipes, culverts, and ditches. LIH drainage has been

assigned to six drainage basins, identified as A through F on the site map (Attachment A, Figure 2), which drain via outfalls to the Pacific Ocean east of the airport. Other than the Drainage Basin F outfall, airport runoff is discharged through headwalls onto grassed areas on the east side of Runway 3-21 and infiltrates or sheet flows to the Pacific Ocean. Of the six designated drainage basins, only Basin F drains areas of the airport that contain qualified industrial activities.

## 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 LIH, 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 (an NOI or a CNEE if they qualify, or an individual permit if they don't meet the requirements of the general permit) with DOH and, if an NOI is filed, to prepare a SWPPP. DOTA has coordinated with airport tenants, holding informational meetings, and preparing and providing a guidance document to assist tenants in preparing their permit documents. A list of tenants that conduct regulated industrial activities on DOTA property and that 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 NAICS code (for petroleum bulk stations and terminals) and not "Sector S" Air Transportation. They are also tracked by DOTA and included in the table in Attachment B.

Most tenants qualify for a CNEE because their regulated industrial activities are conducted indoors or under cover. Tenants that must file for an NOI will provide the SWPPP to DOTA in addition to submitting the document to DOH with their NOI. All the airport's 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 – DOTA Industrial Areas and Outfalls, shows the location of industrial activities potentially exposed to stormwater at DOTA-controlled and at common areas that are used by multiple tenants (such as gates where fueling occurs by and for multiple airport tenants). These areas are covered by DOTA's SWPPP, and DOTA is assuming responsible for the controls, monitoring, and reporting required under the MSGP. In addition, DOTA is assuming responsibility for discharges from the GA tiedowns (individual small aircraft owners and transient temporary assigned parking), because these spaces have a high turnover and users often move spaces, and it would be onerous to have them prepare an NOI and SWPPP for their parked planes. Attachment A, Figure 4 shows a map of the DOTA maintenance Baseyard facilities.

Attachment A, Figure 5 shows the location of tenant-controlled industrial areas. For the areas of the airport that are controlled by individual tenants and for which they have filed separate NOIs and developed SWPPPs, the tenant is responsible for the controls, monitoring, and reporting required under the MSGP. Other tenants at the airport do not have regulated industrial activity or their activities are under cover and they have filed for a CNEE (Attachment B).



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

- **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.
  - 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 LIH.**

- **Aircraft, vehicle, and equipment cleaning**
  - DOTA does not allow washing of large aircraft at LIH.
  - Washing of aircraft, vehicles and equipment can only occur in areas where wash water is contained and either drains to an OWS 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 equipment and vehicles is cleaned at a wash rack in the DOTA Maintenance Baseyard. Water is discharged through an OWS and then to the sanitary sewer.
  - Tenants have access to two wash racks at LIH. For both, water is discharged through an OWS and then to the sanitary sewer. DOTA has prepared guidance that is provided to tenants using the two wash racks (Attachment B).
  - Two tenants, UPS and Blue Hawaiian Helicopters (Attachment A, Figure 5), have wash racks that are connected to an OWS and discharge to the sanitary sewer.
  - Heliport tenants wash aircraft at their spaces. The wash area is bordered on three sides by vegetation and one side by pavement. DOTA allows tenants to wash aircraft in this area if they use an impermeable berm on the pavement side so that wash water infiltrates into the vegetation. They are required to use biodegradable soaps. There is no discharge of wash water from these areas.
  - All other equipment and vehicle cleaning that may occur in tenant spaces is conducted indoors and wash water does not run off.

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

- **Aircraft, vehicle, and equipment fueling**
  - Aircraft and GSE fueling is conducted by tenants using MSTs at various areas of the airport, namely the Main Ramp, Commuter Terminal, Helipads, Private Jet Parking, and GA Tiedowns (Attachment A, Figures 3 and 5). 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

While the airport drainage has been attributed to six major drainage basins, only one of these drainage basins, Basin F, contains regulated industrial activities under the MSGP (Attachment A, Figure 2). Drainage Basin F Basin F includes the passenger terminal ramp, commuter ramp, aircraft refueling areas, cargo handling area, parking lots, rental car lots, wholesale aviation fuel distributor, heliport, GA tenants, wash racks, and the DOTA Maintenance Baseyard. Runoff from the passenger terminal hardstand is treated by two OWSs before discharge to the storm water system (Attachment A, Figure 3). The runoff from the commuter terminal hardstand is treated by two OWSs before discharge to the storm water system. The storm drainage system discharges into an unnamed drainage channel. Overland flow from the tenant common fueling areas would also discharge to the drainage channel (Attachment A, Figure 3).

Two discharge points (no EID) into the channel have been identified as “substantially identical.” The discharge point at the north end of the channel (also no EID) has been characterized as a different discharge as it also receives flow from the DOTA Maintenance Baseyard. The channel discharges at a headwall into a vegetated area and may rarely reach the Pacific Ocean (Attachment A, Figure 3).

## 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 SWPPP must include 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 LIH industrial activities, based on the analysis conducted above, are summarized in Table 2:

*Table 2: Activities and Potential Pollutants*

Covered Industrial Activity	Associated Pollutants
Fueling operations (including fuel storage and transfer)	Petroleum fuels

### 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. No significant spills as defined in Section 5.2.3.3 have occurred at LIH in the past three years. Due to the nature of activity at the airport, 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 LIH by inputting spill reports into Veoci. Follow-up actions and outcomes are also tracked in Veoci.

Applicants 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 3 summarizes where potential spills and leaks could occur at LIH, the type of pollutants that could be discharged, and the potential discharge points.

*Table 3: Potential Spill/Leak and Discharge Locations*

Location(s)	Potential Pollutant	Potential Discharge Point(s)
Fueling at the main and commuter terminal hardstand, and at the DOTA Maintenance Baseyard	Fuel	Unnamed outfall at north end of drainage line.
Fueling at tenant spaces, GA tiedowns, helicopter pads	Fuel	Two substantially identical unnamed outfalls at the south end of the drainage channel.

### 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 and 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; and
- Incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of your 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 and all wash waters are infiltrated or directed to the sanitary sewer.

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 has been conducting comprehensive inspections of airport industrial facilities, both its own and tenant facilities, for more than 5 years. The inspections are conducted for facilities with a potential for unauthorized non-stormwater discharges (such as fuels or vehicle/equipment wash water) at least once per year. Tenants are ranked based on their potential risk to contribute to stormwater pollution. Higher-risk tenants, such as fueling companies, may be inspected quarterly and problem tenants may be selected for more frequent inspections regardless of ranking. During the inspections, DOTA or their consultants evaluate the facilities for a variety of environmental conditions and controls, as well as for sources of potential unauthorized discharges. The latest inspection of the DOTA Maintenance Baseyard facility was conducted on May 20, 2022. Outfalls are inspected at least once per year for indications of illicit discharges, or more frequently if a concern is identified. No unauthorized discharges have been indicated by facility or outfall inspections.

Due to the nature of activity at the airport and the frequent covered industrial activities, spills of a non-stormwater nature, such as small fuel spills on the hardstand, have occurred. These incidents 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 into place, such as tenant training, tenant inspections, and providing tenants with up-to-date environmental guidance, have limited the magnitude and effect of these small 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 best management practices) 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 may be implemented at the airport by both DOTA and by tenants. As described above and as required by the MSGP, tenants are applying 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 Best Management Practice Field Manual for Operations at State of Hawaii Airports<sup>2</sup>. The guidance addresses all the industrial activities covered by the MSGP. Tenants are provided the BMP Field Manual in their Tenant Information Package, and measures are discussed during tenant inspections.

#### 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. DOTA's goal with their BMP program is to minimize exposure as the first line of stormwater protection. 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;

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

- DOTA focuses on quick detection of spills and leaks and cleaning them up promptly so they are contained before discharge;
- Leaky vehicles and equipment are 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;
- 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 any equipment or vehicles that will remain unused for extended periods and are inspected at least monthly for leaks.

### 3.1.2 Good Housekeeping

At LIH, the only regulated industrial activity that could result in pollutant discharge is aircraft fueling, since all other activities are conducted under cover or do not result in a discharge. However, good housekeeping practices, such as maintaining a clean workshop floor to prevent tracking of oil to the outdoors, 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. Measures specified by the MSGP (Section 8.S.4.1) are:

- 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.
  - 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; further BMPs are described below in Section 3.1.3.
  - Discharge from floor drains in maintenance areas is 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 storm water runoff from cleaning areas.
  - DOTA has clearly identified the two aircraft, vehicle, and equipment cleaning areas at LIH, and cleaning is not permitted outside these areas (see Fact Sheet in Attachment B).

- DOTA routes the cleaning effluent through OWSs and then to the sanitary sewer system.
- 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 storm water 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.
  - At all areas where storage occurs, DOTA requires control measures to minimize the discharge of pollutants in stormwater.
  - DOTA requires such 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; storing materials in a centralized location; and using perimeter drains, dikes, or berms around storage areas.
  - LIH has a SPCC Plan for management of its stored fuel. All oil storage tanks meet the rigorous requirements of the SPCC rules. DOTA conducts monthly inspections of the storage containers and their containment measures.
  - Personnel who handle oil at the airport are required to take annual training on oil storage controls and BMPs.
- Airport Fuel System and Fueling Areas: Minimize the discharge of pollutants in storm water 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 strict spill response procedures as described below in section 3.1.4 and in Attachment D.

The control measures described above are specified by the MSGP for Sector S; however, DOTA requires additional control measures as summarized in DOTA's previously cited Best Management Practice Field Manual for Operations at State of Hawaii Airports.

### 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 that there are no leaks and that they are functioning properly. The BMP Field Manual provides maintenance practices, including promptly repairing equipment drips and leaks so they do not provide 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:

- Plainly 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 Clean Water Branch at (808) 586-4309 during regular office hours, i.e., Monday through Friday (excluding holidays) from 7:45 a.m. until 4:15 p.m., or the Hawaii State Hospital Operator at (808) 247-2191 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 required annually.

DOTA provides their personnel and tenants with spill reporting information contained in Attachment C. The Spill Reporting Fact Sheet is used to document spills and associated response actions, including spill reporting procedures, contact information, and a link to the Spill Reporting Form. The General Construction and Maintenance Supervisor 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.

### 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 at the airport limit the use of curbing or other structural controls in large areas of the airport and infiltration of stormwater is an important control at the airport, as previously described for various drainage basins.

### 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 those requirements:

- Personnel who are responsible for the design, installation, maintenance, and/or repair of controls (including pollution prevention measures);
- Personnel 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 monitoring and inspections; and
- 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 what is in the SWPPP;
- Spill response procedures, good housekeeping, maintenance requirements, and material management practices;
- The location of all controls on the site required by this permit, and how they are to be maintained;
- The proper 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
- Where spills have occurred, with the goal of learning from past failures.

### **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 LIH 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 applicable 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. LIH does not discharge to identified impaired waters; therefore, the requirements for impaired water sampling do not apply.

### **3.4 SECTOR-SPECIFIC NON-NUMERIC EFFLUENT LIMITS**

The MSGP for Sector S requires good housekeeping measures that are specific to airports. DOH acknowledges in the MSGP that control measures must accommodate considerations of safety, space, operational constraints, and flight considerations.

## 4 Schedules and Procedures

### 4.1 GOOD HOUSEKEEPING

DOTA has established appropriate schedules and procedures related to good housekeeping measures as summarized in Table 4:

*Table 4: Schedule and Procedures – Good Housekeeping*

Procedure	Schedule
Conduct DOTA and tenant facility inspections	Inspect DOTA facilities at least annually. Inspect tenant facilities at least every two years (more frequently depending on risk ranking) to evaluate good housekeeping measures

### 4.2 MAINTENANCE

DOTA has established appropriate schedules and procedures related to maintenance measures as summarized in Table 5.

*Table 5: Schedule and Procedures – Maintenance*

Procedure	Schedule
Vehicle and Equipment Maintenance	Inspect DOTA facilities at least annually. Inspect tenant facilities at least every two years (more frequently depending on risk ranking) to evaluate good housekeeping measures.

### 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 C. Spill response requirements are further emphasized in LIH’s SPCC Plan. Table 6 provides DOTA’s spill prevention response schedules and procedures.

*Table 6: Schedule and Procedure – Spill Prevention and Response*

Procedure	Schedule
Spill prevention and response	<ul style="list-style-type: none"> <li>• Small spills of oil (less than 25 gallons) will be cleaned up immediately using absorbent materials or other acceptable practices, without disrupting facility operations.</li> <li>• Spills must be immediately reported per DOH and/or Federal requirements if one or more of the following conditions apply:               <ul style="list-style-type: none"> <li>○ If the release is more than 25-gallons of petroleum product.</li> <li>○ If the release is 25-gallons or less of petroleum product but is not contained or remedied within 72 hours.</li> <li>○ If the release is equal to or exceeds the reportable quantity criteria for one or more chemicals listed within the DOH HEER Office Technical</li> </ul> </li> </ul>

Procedure	Schedule
	<p>Guidance Manual (TGM): <a href="http://www.hawaiidoh.org/tgm-pdfs/TGM%20Section%2002-D.pdf">http://www.hawaiidoh.org/tgm-pdfs/TGM%20Section%2002-D.pdf</a>.</p> <ul style="list-style-type: none"> <li>○ If the release enters a storm drain or water body.</li> <li>● 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, also explain why the spill was not cleaned within 72 hours.</li> <li>● If spilled material is of a reportable quantity, verbally notify Dispatch, then DOH HSERC/HEER, LEPC and NRC and obtain Case Number to 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).</li> <li>● If spilled material enters storm drain or water body, verbally notify Dispatch, then DOH CWB, DOH HSERC/HEER, LEPC and NRC and obtain Case Number to 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).</li> <li>● If spilled material is wastewater that enters state waters or is &gt;1,000 gallons, verbally notify Dispatch, then DOH WWB. Consult with AIR-EE on 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).</li> <li>● Spilled material less than reportable quantity, regardless of type, shall be reported verbally to Security Dispatch immediately and in writing to AIR-EE within 72 hours.</li> </ul>

**4.4 EMPLOYEE TRAINING**

DOTA has developed and implemented an annual mandatory environmental training program. This employee training program is designed to ensure that the DOTA employees and airport tenants understand pollution laws, regulation, and methods of compliance. The program focuses on permit conditions and the responsibilities of DOTA personnel and tenants, as described in Section 3.1.7. 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. Training for DOTA employees and tenants is conducted annually. Training is tracked in Veoci so that 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 will perform routine facility inspections during the term of the MSGP to ensure that BMPs are in place and in proper working order and to evaluate for non-authorized non-stormwater discharges. During normal facility operating hours, DOTA will conduct inspections of areas of the facility covered by the requirements in this permit, including, but not limited to, the following:

- Areas where industrial materials or activities are exposed to stormwater;
- Areas identified in the SWPPP and those that are potential pollutant sources;
- Areas where spills and leaks have occurred in the past three years;
- Discharge points; and
- Control measures used to comply with the effluent limits contained in this permit.

The MSGP requires inspections to be conducted at least quarterly (i.e., once each calendar quarter). At least once each calendar year, the routine inspection must be conducted during a period when a stormwater discharge is occurring. During the routine inspections, the permittee must examine or look out 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; and
- 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, as defined above in Section 2.2, will also be observed during this inspection. If such discharge locations are inaccessible, nearby downstream locations will be inspected. Table 7 summarizes information related to routine inspections:

*Table 7: Schedule and Procedure – Routine Inspections*

Procedure	Schedule
Inspection Responsibility	<ul style="list-style-type: none"> <li>• AIR-EE (and/or their engineering consultant) is responsible for conducting the routine inspections of DOTA-controlled areas (DOTA maintenance areas and common areas)</li> <li>• Tenants are responsible for conducting the routine inspections of their operations.</li> <li>• AIR-EE (and/or their engineering consultant) conducts routine tenant inspections (annually for tenants that may pose a greater threat to stormwater) to evaluate tenant compliance with inspection requirements</li> </ul>
Routine Inspections	<ul style="list-style-type: none"> <li>• Routine inspections will occur at least quarterly</li> <li>• At least once each calendar year, the routine inspection will be conducted during a period when a stormwater discharge is occurring</li> </ul>

#### 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:

- 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, 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; and
- For storm events, on discharges that occur at least 72 hours (three days) from the previous discharge (not applicable if it is documented that less than a 72-hour (three-day) interval is representative for local storm events during the sampling period).

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

- Color;
- Odor;
- Clarity (diminished);
- Floating solids;
- Settled solids;
- Suspended solids;
- Foam;
- Oil sheen; and
- 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 take 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 otherwise 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.
- 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 LIH’s drainage has led to the following determination of sampling locations:

- Two discharge points (no EID) that drain the common use hardstand area southwest of the tenant GA and heliport areas have been identified as “substantially identical.” One of these outfalls will be sampled each quarter, alternating for each sampling event.
- The discharge point at the north end of the channel (also no EID) has been characterized as a different discharge as it also receives flow from the DOTA Maintenance Baseyard. However, sampling at this outfall into the channel cannot occur as it is in the AOA with no allowed access. The channel discharges at a headwall into a vegetated area east of the access roadway (Figure 3). Therefore, sampling will occur at the headwall east of the access roadway.
- The discharge at the headwall east of the roadway will be comingled with the discharge from the GA hardstand area but sampling at both areas will allow evaluation of the source of concerns.

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; and
- 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 8 provides a summary of the procedures and schedules for the quarterly assessments:

*Table 8: Schedule and Procedure – Quarterly Visual Assessments of Stormwater Discharges*

Procedure	Schedule
Inspection Responsibility	<ul style="list-style-type: none"> <li>• AIR-EE (and/or their engineering consultant) is responsible for conducting the quarterly visual inspections of DOTA-controlled areas (DOTA maintenance areas and common areas).</li> <li>• Tenants are responsible for conducting the quarterly visual inspections of their operations.</li> <li>• AIR-EE (and/or their engineering consultant) conducts routine tenant inspections (annually, or quarterly for tenants that may pose a greater threat to stormwater) to evaluate tenant compliance with inspection requirements.</li> </ul>
Quarterly Visual Assessments	<ul style="list-style-type: none"> <li>• Quarterly visual assessments will tentatively occur during the last two weeks of each quarter, unless stormwater discharge timing results in a change, which will be documented in the inspection report.</li> </ul>



Procedure	Schedule
	<ul style="list-style-type: none"> <li>• If substantially identical outfalls are used, the outfall assessed will be rotated among the substantially identical outfalls.</li> <li>• Samples will be conducted in daylight hours and sampling equipment will consist of a clean, colorless glass or plastic bottle.</li> <li>• Samples will be collected within the first 30 minutes of an actual discharge from a storm event.</li> <li>• If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as practicable after the first 30 minutes.</li> <li>• If possible, samples will be obtained from discharges that occur at least 72 hours (three days) from the previous discharge.</li> </ul>

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

#### 4.6 MONITORING

Other monitoring is not required for LIH 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 correct and 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-storm water discharges; the selection, design, installation and implementation of your control measures) so that the permit's effluent limits are met, 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-storm water not authorized by this or another NPDES permit to a state water) occurs at the facility.
- Control measures are not stringent enough 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 not in accordance with Parts 2 and/or 8, or is not being properly operated or maintained.
- Whenever a visual assessment shows evidence of storm water 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-storm water 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 storm water from your facility, or significantly increases the quantity of pollutants discharged.
- Direction by the DOH that the SWPPP fails to adequately address potential pollutant sources identified at the regulated facility.

### 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 work day 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 5.3.1 or if the conditions continue to occur, DOTA will conduct additional corrective actions, such as installing a new or modified control and making it operational or repairing a 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 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 the annual report. DOTA will include the following information in the corrective action documentation:

- Description of the condition triggering the need for corrective action review period 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; and
- 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 parts 4.1 or 4.2 (or, for triggering events in part 4.2 where it is determined that corrective action is not necessary, 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 years 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; and
- 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 MSGP requires the SWPPP to 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 storm water controls and pollution prevention and possesses the education and ability to assess conditions at the industrial facility that could impact storm water quality, and the education and ability to assess the effectiveness of storm water controls selected and installed to meet the requirements of the permit. The SWPPP was prepared under the supervision of the AIR-EE Supervisor, who meets the requirement.

### 6.2 SWPPP CERTIFICATION

This SWPPP is certified by a person who meets the requirements of HAR Section 11-55, Appendix B, Subsection 11.A, of the 2021 MSGP.

*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: \_\_\_\_\_ Title: \_\_\_\_\_  
Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## 7 SWPPP Modifications

The 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 9: SWPPP Modification Tracking*

Date	Description of Modification/ Sections Affected	Person Making Revision	Signature and Date

## 8 SWPPP Availability

LIH's SWPPP is available to the public on DOTA's environmental compliance website, at a link specifically for the airport.<sup>3</sup> In addition, a direct link to the SWPPP was provided in the NOI submitted to DOH.

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<sup>3</sup> <https://hidot.hawaii.gov/airports/doing-business/engineering/environmental/lih-environmental-compliance/>

## **SWPPP Attachments**

**Attachment A – Figures**

**Attachment B – List of LIH Industrial Tenants**

**Attachment C – Wash Rack and Wash Area BMPs Fact Sheet**

**Attachment D – Spill Reporting Fact Sheet**



## **Attachment A – Figures**

**Figure 1: Location Map**

**Figure 2: Drainage Network**

**Figure 3: DOTA Industrial Areas and Outfalls**

**Figure 4: DOTA Baseyard**

**Figure 5: Airport Tenants with Separate Industrial Permit Coverage**

**Attachment B – List of LIH Industrial Tenants**

**Attachment C – Wash Rack and Wash Area BMPs Fact Sheet**

# WASH RACK & WASH AREA BMPS

## Lihue 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
- Only biodegradable or phosphate-free detergents are acceptable for use
- Sponge wash with a bucket of water to eliminate excess wash water, where applicable
- Provide secondary containment for washing supplies
- Prevent dirt and debris from washing activities from getting into the drain as it will clog the drain lines and system
- Clean up any soap residues, dirt etc. onto 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
- Reuse contaminated rags by having them cleaned by an industrial laundry service
- Pressure washing for the purpose of removing paint, adhesives, etc. is not allowed at wash racks
- ONLY Washing and rinsing of aircraft, vehicles, and equipment is allowed
- 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

## Lihue Airport

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### WASH RACK AND WASH AREA LOCATIONS & USES

#### DOTA Wash Rack #1 – Tower Wash Rack

*For use by:* Tenants

*For washing:* GSE, DOTA vehicles, small aircraft, and helicopters

#### DOTA Wash Rack #2 – North Wash Rack

*For use by:* Tenants

*For washing:* GSE, DOTA vehicles, small aircraft, and helicopters

DOTA does not allow washing of large aircraft at the Lihue Airport.

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

# Wash Racks

Legend  
📍 Wash Rack



**Attachment D – Spill Reporting Fact Sheet**

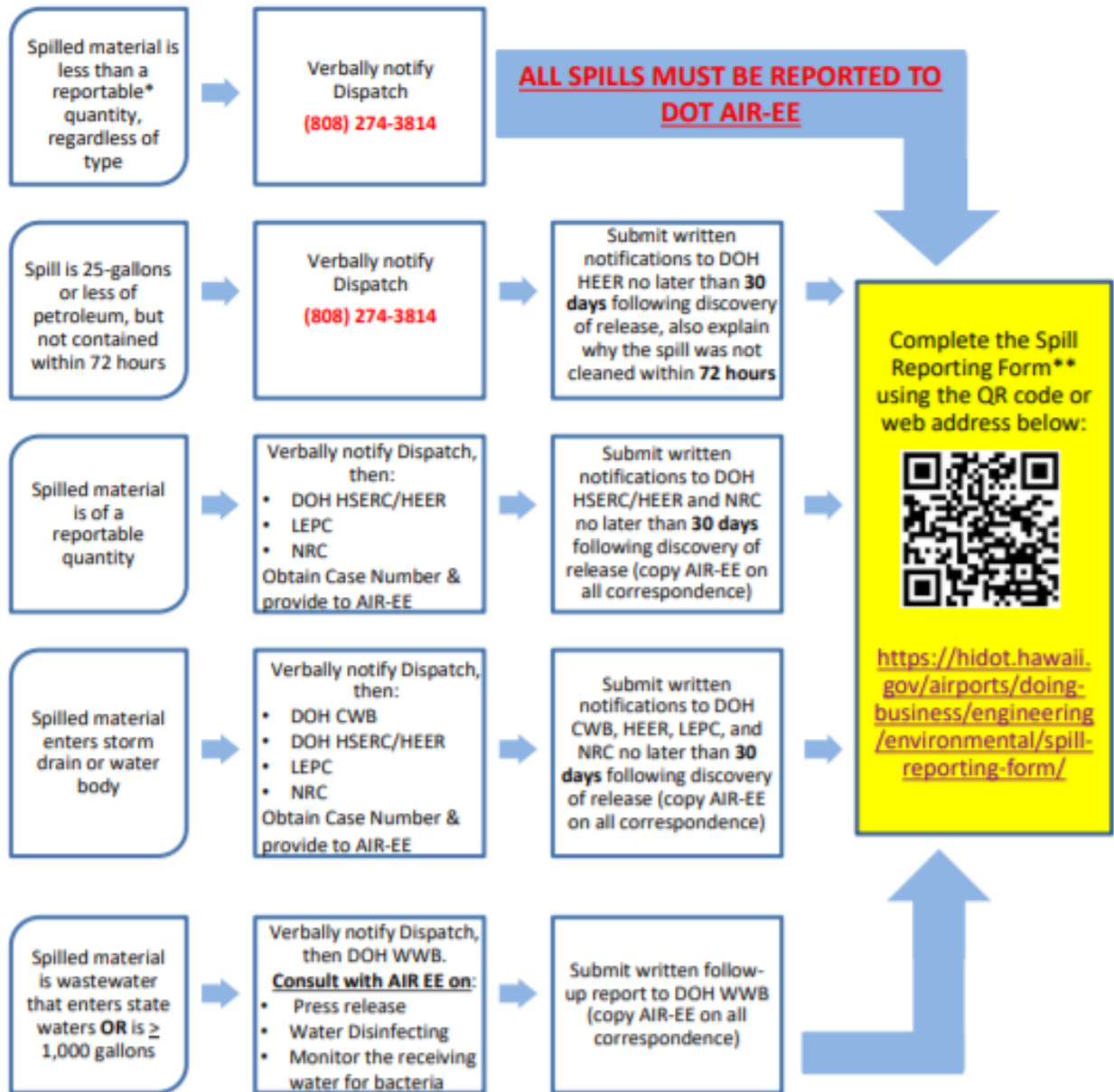
# SPILL REPORTING

## Lihue 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.



\*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

## Lihue 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.

<i>Personnel or Agency</i>	<i>Contact Information</i>
<b>Dispatch (Airport Security)*</b>	<b>Phone: (808) 274-3814</b>
LIH Airport Rescue and Fire Fighting (ARFF)	Phone: (808) 274-3803
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) 838-8656 Email: <a href="mailto:reid.r.kawane@hawaii.gov">reid.r.kawane@hawaii.gov</a> or <a href="mailto:dot.air.environmental@hawaii.gov">dot.air.environmental@hawaii.gov</a>
Local Emergency Planning Committee (LEPC)	Phone: (808) 241-1800 or (808) 241-1711 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.**