

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



STATE OF HAWAII, DEPARTMENT OF
TRANSPORTATION, AIRPORTS DIVISION
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Honolulu, Hawaii 96819-1880

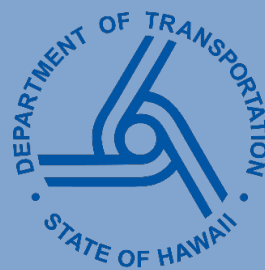


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List of Acronyms

AIR-EE	Airports Engineering Branch, Environmental Section
AIR-LS	Airports Certification, Security and Safety Specialist
AIR-M	Maui District Airport Manager
AIR-PM	Airports Property Management
AOA	Air 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
CWB	State of Hawaii, Department of Health, Clean Water Branch
DOH	State of Hawaii, Department of Health
DOTA	State of Hawaii, Department of Transportation, Airports Division
EHS	DOTA Environmental Health Specialist
EID	Environmental Identification Number
EPA	U.S. Environmental Protection Agency
FAA	Federal Aviation Administration
GA	General Aviation
GSE	Ground Service Equipment
HAR	Hawaii Administrative Rules
HDS	Hydrodynamic Separator
HEER	State of Hawaii, Department of Health, Hazard Evaluation and Emergency Response
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
OGG	Kahului Airport
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
UPS	United Parcel Service
WWB	State of Hawaii, Department of Health Wastewater Branch

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 covered industrial activities.

DOTA was granted a NGPC for OGG industrial stormwater discharges effective July 25, 2006 under File No. HI 80A414. The NGPC was administratively extended by DOH in October 2007, October 2012, and December 2017. 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 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.

1.1 FACILITY INFORMATION

Facility Name and Address: Kahului Airport (OGG)
1 Kahului Airport Rd.
Kahului, HI 96732
808-872-3830

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

Latitude: 20°53'48.45"N Longitude: 156°25'58.58"W

Estimated area of industrial activity exposed to stormwater: 32 acres

Names of surface waters that receive stormwater from facility: Kaliainui Gulch

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
808-587-2150

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

SWPPP Contact: AIR-EE
 400 Rodgers Boulevard, Suite 700
 Honolulu, HI 96819
 dot.air.environmental@hawaii.gov
 808-838-8835

Facility Contact: Maui EHS
 1 Kahului Airport Road, Unit 5
 Kahului, HI 96732-2327
 dot.air.environmental@hawaii.gov
 808-872-3808

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: Activities and Potential Pollutants

Party	Responsibilities
DOT Director	<ul style="list-style-type: none"> • Authority for the Permit. • Signatory certifying submittals on behalf of DOTA. • Supports enforcement actions. • Coordinates with DOH at Director level, if needed.
AIR-EE EHS Supervisor	<ul style="list-style-type: none"> • Manages the MSGP and SWPPP, including revisions. • Oversees the implementation and maintenance of control measures, and of correction actions when required. • Approves DOTA Tenant Agreement for Compliance with State Airport Drainage System. • Executes enforcement actions. • Oversees Airport EHSs and Consultants.
AIR-EE (EHS)	<ul style="list-style-type: none"> • AIR-EE personnel at the airport responsible for SWPPP oversight. • Conducts BMP inspections at DOTA facilities, airport common areas, and tenant 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-M	<ul style="list-style-type: none"> • Coordinates with AIR-EE to support training, reporting, inspections, and enforcement. • Assists with distribution of Airport Notices.

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

1.4 SITE DESCRIPTION AND MAPS

OGG is located on the northeast side of the island of Maui (Attachment A, Figure 1 – Airport Location Map) and encompasses approximately 1,391 acres of land owned and operated by the DOTA. OGG is the primary airport on the island of Maui, accommodating both overseas and interisland flights. It ranks second to the Daniel K. Inouye International Airport in passenger volume in the State of Hawaii.

Activities at OGG are primarily aircraft operations, including passenger and cargo carrier, helicopter, and general aviation. OGG contains two intersecting runways with multiple taxiways linking them to the terminal, a general aviation T-hangar and parking apron, and helicopter/air tour facilities (Attachment A, Figure 2 – Drainage Network). The airport includes a main passenger terminal and parking areas near the southwest ends of the taxiways. In relation to the terminal, a commuter terminal is situated to the

northwest, a ground equipment service facility to the north, a DOTA Maintenance Baseyard to the southwest, a consolidated rental car facility to the west, and a cargo facility to the south.

The area around OGG includes fallow agricultural land to the south and east, Kanaha Beach Park and the Pacific Ocean to the north, and industrial/industrial properties and Kanaha Pond Wildlife Sanctuary to the west. 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 OGG, including catch basins, drain inlets, evaporation ponds, curbs, gutters, canals, pipes, culverts, and ditches designed to collect and convey stormwater runoff, identified within 12 drainage basins, labeled A through L on the Drainage Network map (Attachment A, Figure 2). Offsite runoff from Hana Highway and areas south of the Kahului Airport are diverted away from OGG through the Kalialinui Channel and a A&B drainage ditch.

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 OGG, regulated activities are conducted by DOTA and airport tenants, and this section describes regulated industrial activities conducted by both DOTA and tenants.

The MSGP Section 8.S.3.1 states that each individual industrial operator (airport authority or airport tenants) 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 the 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, Sector P) and not "Sector S" Air Transportation. They are tracked by DOTA and included in Attachment B.

Most 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 locations 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). 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). These spaces have a high turnover, and it would be onerous to have these tenants 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, Figure 3 also shows the locations of tenant-controlled industrial areas. These tenants that have filed separate NOIs and SWPPPs are responsible for the controls, monitoring, and reporting

required under the MSGP. Other tenants either do not have regulated industrial activity or have filed for a CNEE because their activities are under cover.

For industrial activities conducted at OGG by DOTA and tenants, DOTA provides the following information regarding the potential for discharge to stormwater (activities and locations discussed below are identified on Figures 3 and 4):

- **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. For most situations, the activities are not exposed to stormwater. The exception is Koolau Air, which conducts GSE maintenance activities under cover, but the area may receive stormwater run-on and thereby discharge industrial stormwater. However, this area is piped under Runway 5-23 and through a culvert to vegetated areas for infiltration. Although the discharge typically infiltrates, during exceptional rain events, the area capacity can be exceeded, and flow would then travel via culvert to vegetated areas north of the road.
 - 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 leased space.

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

- **Aircraft, vehicle, and equipment cleaning**
 - DOTA does not allow washing of large aircraft at OGG.
 - 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 enforces a strict “Wash Rack & Wash Area” program through their tenant agreements. Tenant cleaning activities that occur in tenant spaces must be conducted indoors so that wash water does not run off.
 - 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 Wash Water
DOTA Wash Rack South of Main Terminal	DOTA	Vehicles and equipment	Evaporation pond. To ensure pond capacity is not exceeded, wash rack is not used if water reaches the half-way level in the pond.

Wash Rack Title/Location	For Use By	For Washing	Disposal of Wash Water
DOTA Maintenance Building Wash Rack	DOTA	Vehicles and equipment	Small-capacity cesspool.
DOTA Autoshop Baseyard	DOTA	Vehicles and equipment	Impermeable boom is used to direct flow of wash water into large, vegetated area. There are no storm drains in the vicinity of this wash area and no runoff occurs.
GA Wash Areas (three areas north of T-hangars)	GA tenants	GA aircraft	Water puddles and evaporates. Washing is not conducted during rain events or when rain is expected. There are no storm drains in the vicinity of this wash area and no runoff occurs.
Heliport Area, north of the helipads	Helicopter tenants	Helicopters	Infiltration/evaporation. Discharge to a grassy area adjacent to the helipads. Washing is not conducted during rain events or when rain is expected. There are no storm drains in the vicinity of this wash area and no runoff occurs.
Tenant wash Rack - Alex Air/Maverick	Alex Air/Maverick	Helicopters	Helicopters washed in an uncovered area fronting their hangar. Wash water evaporates or is contained and removed so no discharge of wash water occurs. Washing is not conducted during rain events or when rain is expected.
Tenant wash Rack - Roberts Tour and Transportation	Roberts Tour and Transportation	Vehicles and equipment	OWS to sanitary sewer.
Tenant wash Rack - UPS	UPS	Vehicles	Recycled water wash rack system discharging to sanitary sewer.

Summary: No discharge occurs related to aircraft, vehicle, or equipment washing at OGG.

• **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, Figure 3). Only the Main Ramp fueling activities could result in a discharge of polluted stormwater, as all other areas discharge to vegetated areas where fluids would infiltrate, and no off-site discharge occurs.
- DOTA conducts vehicle and equipment fueling at their Autoshop Maintenance Baseyard; however, the fueling station is under cover and not exposed to stormwater.

- Roberts Tour and Transportation conducts fueling at their Baseyard.
- UPS fuels their vehicles off airport property.
- Signature Flight Support conducts fueling of trucks at their lease space that will operate on the airport ramp. Flow from this area would infiltrate in vegetated areas north of Runway 5-23.

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 12 major drainage basins, only five of these drainage basins contain regulated industrial activities under the MSGP:

- **Drainage Basin B** contains DOTA’s Maintenance Baseyard and Autoshop Baseyard, Roberts Tours and Transportation, and undeveloped areas located on the western side of the airport. Runoff from the DOTA Baseyard is collected by a drainage system along Keolani Place, which discharges to the Kalialinui Gulch ditch. However, all the regulated industrial activities conducted at the two DOTA maintenance facilities are conducted indoors or under cover. For Roberts Tours and Transportation, maintenance and general cleaning is conducted under cover, and their wash rack discharges to the sanitary sewer. However, fueling is conducted outdoors. There are no storm drain inlets along Kaonawai Place and runoff from this area discharges to vegetated areas between the site and the Kalialinui and A&B drainage ditches. Therefore, no discharge of industrial stormwater occurs from this drainage basin.
- **Drainage Basin D** contains the southwest side of the main passenger terminal building, public parking area, UPS baseyard, and the new consolidated rental car facility. Runoff from this basin is discharged at two locations to the Kalialinui Gulch ditch. UPS has its own NGPC for stormwater associated with industrial activity. Vehicle washing, fueling, and maintenance at the new consolidated rental car facility are conducted indoors. Washing is conducted using recycled water systems, with any discharge connected to the sanitary sewer.
- **Drainage Basin E** contains aircraft hardstand areas fronting the main terminal where aircraft fueling occurs, and the UPS facility southwest of the main terminal. Runoff from the hardstand area and the UPS facility is discharged via two outfalls, EIDs 15536 and 15537, to the Kalialinui Gulch ditch.
- **Drainage Basin G** includes the north end of the main terminal building, commuter terminal, GSE facilities for the airlines, part of Runway 2-20, and taxiway. Aircraft and GSE fueling occurs at the commuter terminal for small aircraft as well as at the apron areas fronting the main and commuter terminals. GSE equipment is maintained at three separate facilities at the north corner and along the north side of the main terminal area. For two of the GSE facilities, maintenance is conducted indoors. Koolau Aviation has an outdoor facility where maintenance and fueling is conducted under minimal cover and exposure to stormwater likely occurs. Discharge from this basin is piped under Runway 5-23 to outfall EID 15306, where it infiltrates in the vegetated area between the runway and the roadway. Although the discharge typically infiltrates, during exceptional rain events the area capacity can be exceeded, and flow would then travel via culvert to vegetated areas north of the road.

- **Drainage Basin I** includes the area east of Runway 2-20, the helicopter/air tour facilities, an aircraft fuel tank farm (completely enclosed) and MST filling locations, general aviation facilities and hangars (including larger companies Blue Hawaiian Helicopter, Pacific Helicopter Tours, Sunshine Helicopter, Alex Air/Maverick, Air Maui, and Maui Aviators). All aircraft, including helicopters, are serviced inside the hangar buildings. Runoff from this drainage basin flows to grassed areas or is collected through an inlet system and discharges to a vegetated area north of Runway 5-23, where it infiltrates.

In summary, Basin E has regulated industrial activities exposed to stormwater that could be discharged offsite via outfalls, EIDs 15536 and 15537 to Kalialinui Gulch ditch. Basin G has regulated industrial activity that could be discharged via Outfall 15306 to infiltrate and, rarely, to flow north of the road to off-site vegetated areas. For other areas, industrial activities are conducted indoors or under cover, or stormwater flow infiltrates and no discharge occurs.

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 includes 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 OGG industrial activities, based on the analysis conducted above, are summarized in Table 3.

Table 3: Activities and Potential Pollutants

Covered Industrial Activity	Associated Pollutants
Vehicle (including aircraft) fueling	Petroleum fuels
Maintenance operations (including material storage, waste management, equipment and vehicle repair, painting)	Oils, lubricants, solvents, paints, solid waste

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 OGG 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 OGG 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 4 summarizes where potential spills and leaks could occur at OGG, the type of pollutants that could be discharged, and the potential discharge points.

Table 4: Potential Spill/Leak and Discharge Locations

Activity/Location(s)	Potential Pollutant	Drainage Basin/ Potential Discharge Point(s)
Aircraft/GSE fueling at the main terminal apron	Fuel	Basin E/ Outfall EIDs 15536 and 15537 to Kalialinui Gulch
Aircraft/GSE fueling at the commuter terminal apron	Fuel	Basin G/ Outfall EIDs 15306
GSE maintenance and fueling at Koolau Aviation	Oil, solvents, fuel	Basin G/ Outfall EIDs 15306

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; and
- Incidental windblown mist from cooling towers that collects on rooftops or adjacent portions, but not intentional discharges from the cooling tower.

No other non-stormwater discharges, including wash water, are permitted by the MSGP (although OGG's MS4 permit allows for certain additional non-stormwater discharges). The MSGP does not authorize the discharge of aircraft, ground vehicle, runway and equipment wash waters. All wash waters are infiltrated, evaporated, or directed to the sanitary sewer.

The MSGP requires applicants to document that they have evaluated 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 DOTA and tenant facilities for more than 5 years. During inspections, DOTA evaluates the facilities for a variety of environmental conditions and controls, as well as for sources of potential unauthorized discharges. Outfalls are inspected twice per year for indications of illicit discharges. 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 in place, such as tenant training, tenant inspections, and providing tenants with up-to-date environmental guidance, have limited 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 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 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 "*Best Management Practice Field Manual for Operations at State of Hawaii Airports*"² (BMP Field Manual). The document includes appropriate guidance for OGG's 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

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 (e.g., 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 or under cover, or in bermed areas that prevent runoff and run-on and that also capture overspray, or where water infiltrates (with the use of biodegradable soaps and other BMPs to limit pollution of wash water infiltrated); and
- 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

Good housekeeping practices, such as maintaining a clean ramp area to prevent tracking of oil, are utilized throughout the airport to ensure that other potential pollutants are not exposed to stormwater. Many of the BMPs in DOTA's BMP Field Manual are good housekeeping practices to limit exposure of potential pollutants to stormwater.

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.
 - 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 stormwater runoff from cleaning areas.
 - DOTA allows aircraft cleaning only in well-delineated areas where water is treated (recycled system and/or OWS to the sanitary sewer) or infiltrates or evaporates. Tenants may not use these areas for cleaning equipment or vehicles. Other tenant cleaning activities must be conducted under cover or indoors and wash water contained or treated and discharged to the sanitary sewer.
 - Wash water is not permitted to discharge offsite via the storm drainage 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 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.
 - At all areas where storage occurs, DOTA requires control measures to minimize the discharge of pollutants in stormwater.
 - 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; storing materials in a centralized location; and using perimeter drains, dikes, or berms around storage areas.
 - OGG 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.
 - Personnel who handle oil are required to take annual training on oil storage controls and BMPs.

- **Airport Fuel System and Fueling Areas:** Minimize the discharge of pollutants in stormwater from airport fuel systems 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 C.

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, but are not limited to, 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 CWB 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 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.

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 DOTA 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. In addition to the Construction Site Runoff Control Program implemented under OGG's MS4 permit, 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 limit the use of curbing or other structural controls in large areas and infiltration of stormwater is an important control at the airport.

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 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.

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 OGG 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 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. OGG does not discharge to identified impaired waters; therefore, the requirements for impaired water sampling do not apply.

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	<ul style="list-style-type: none">• 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
Vehicle and equipment maintenance	<ul style="list-style-type: none">• Conduct inspections of maintenance areas exposed to stormwater as described in Section 4.5.1 at least quarterly to evaluate the efficacy of maintenance area BMPs.• 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 C. Spill response requirements are further emphasized in OGG'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	<ul style="list-style-type: none">• Small spills of oil (less than 25 gallons) will be cleaned up immediately using absorbent materials or other acceptable practices.

Procedure	Schedule
	<ul style="list-style-type: none"> • 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"> ○ 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: 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 HEER no later than 30 days following discovery of release, also explain why the spill was not cleaned within 72 hours. • If spilled material is of a reportable quantity, verbally notify Security Dispatch, then HSERC/HEER, LEPC and NRC and obtain 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 storm drain or water body, verbally notify Security Dispatch, then CWB, HSERC/HEER, LEPC and NRC and obtain Case Number to provide to AIR-EE. Submit written notifications to CWB, HSERC/HEER, LEPC, and NRC no later than 30 days following discovery of release (copy AIR-EE on all correspondence). • If spilled material is wastewater that enters state waters or is >1,000 gallons, verbally notify Security Dispatch, then WWB. Consult with AIR EE on press release, water disinfecting and monitoring of the receiving water for bacteria. Submit written follow-up report to WWB (copy AIR-EE on all correspondence). • 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.

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, regulation, and methods of compliance. 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 ASSESSMENT

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. Inspections of areas covered by the requirements in this permit include, 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 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; 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 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	<ul style="list-style-type: none"> • AIR-EE is responsible for conducting the routine inspections of DOTA-controlled areas (DOTA maintenance areas and common areas). • Tenants are responsible for conducting the routine inspections of their operations.

Procedure	Schedule
Routine Inspections	<ul style="list-style-type: none"> • 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. • OGG is situated in a “semi-arid area” (annual rainfall averages between 10 and 20 inches³), 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 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 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 a substitute sample during the next qualifying storm event.

³ <https://www.weather.gov/wrh/Climate?wfo=hfo>

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. OGG'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. According to the MSGP Part 5.2.5.3, to use the substantially identical outfall exception for quarterly visual assessment requirements, permittees must document:
 - Location of the substantially identical outfalls;
 - Description of the general industrial activities conducted in the drainage area of each outfall;
 - Description of the control measures implemented in the drainage area of each outfall;
 - Description of the exposed materials located in the drainage area of each outfall that are likely to be significant contributors of pollutants to stormwater discharges;
 - An estimate of the runoff coefficient of the drainage areas; and
 - Why the outfalls are expected to discharge substantially identical effluents.

An evaluation of OGG's drainage has led to the following information on outfalls, substantially identical outfalls, and visual sampling locations:

- Drainage Basin E: Two outfalls into Kalialinui Gulch ditch, EID 15536 and 15537 (Attachment A, Figure 3) were identified as capturing stormwater flow from the area of concern, the common use apron area fronting the terminal where fueling occurs. However, both these outfalls discharging to the ditch are inaccessible for sampling as they are underground. A nearby manhole (EID 15262) is accessible and receives flow prior to the discharge at EID 15537. Therefore, sampling will be conducted in the manhole as representative of the industrial discharge from this basin. In this case, EID 15262 is considered substantially identical, but since the other two substantially identical outfalls not accessible, only EID will be sampled (i.e., the sampling will not be rotated among substantially identical outfalls). Table 9 summarizes the information required to assess the suitability of identifying these outfalls as substantially identical:

Table 9: Substantially Identical Outfalls

Outfall(s)	Location/ Drainage Area	Industrial activities	Control Measures	Potential Pollutants	Estimate of Runoff Coefficient
15262, 15536, 15537	Drainage Basin E, to Kalialinui Gulch	Aircraft fueling in common use fueling areas	Fueling BMPs; spill kits; spill response and reporting	Petroleum fuels	High (estimated 90%)

- Drainage Basin G: Drainage from Basin G, which holds the Commuter Terminal fueling apron as well as Koolau Aviation’s maintenance area, discharges to an outfall EID 15306 on the north side of Runway 5-23 (Attachment A, Figure 3). While the discharge typically infiltrates just north of the runway, the capacity of the infiltration area could be exceeded during unusually high rainfall events, and flow may pass through a culvert under the perimeter road and toward the Pacific Ocean. Because of the industrial areas in this basin, DOTA will conduct quarterly visual sampling at EID 15306. There are no substantially identical outfalls for this discharge.

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

Table 10: Schedule and Procedures – Quarterly Visual Assessments of Stormwater Discharges

Procedure	Schedule
Inspection Responsibility	<ul style="list-style-type: none"> • AIR-EE conducts the quarterly visual inspections of DOTA-controlled areas (DOTA maintenance areas and common areas). • Tenants are responsible for conducting the quarterly visual inspections of their operations.
Quarterly Visual Assessments	<ul style="list-style-type: none"> • 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. • 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.

Procedure	Schedule
	<ul style="list-style-type: none"> • Samples will 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. • If possible, samples will be obtained from discharges that occur at least 72 hours (three days) 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 OGG 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 Reporting

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 corrective 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 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 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; 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 5.1 or 5.2, (or, for triggering events in part 5.2 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 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; 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 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. The SWPPP shall be prepared under the supervision of the AIR-EE Supervisor, who meets the requirement.

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: Jade T. Butay Title: Director of Transportation
Signature:  Date: Jul 11, 2022

8 SWPPP Availability

OGG's SWPPP is available to the public through DOTA's environmental compliance website, at a link specifically for the airport.⁴

⁴ <https://hidot.hawaii.gov/airports/doing-business/engineering/environmental/ogg-environmental-compliance/>

Attachment A – Figures

Figure 1: Airport Location Map

Figure 2: Drainage Network

Figure 3: Industrial Areas and Outfalls

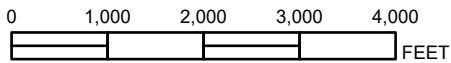
Figure 4: DOTA Baseyard Facilities

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PACIFIC OCEAN






KANAHA BEACH

Kali'aimui'li



DRAINAGE NETWORK KAHULUI AIRPORT (OGG)

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

-  OUTFALL
-  STORM DRAINAGE SYSTEM
-  STATE WATER
-  DRAINAGE BASIN
-  AIRPORT BOUNDARY

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

AERIAL IMAGERY SOURCE: ESRI

FIGURE
2

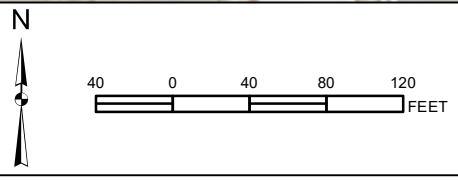
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- INLET
- DOTA OWS
- WASH RACK
- ← FLOWLINE
- STORM DRAINAGE SYSTEM
- AIRPORT BOUNDARY

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

AERIAL IMAGERY SOURCE: ESRI



**DOTA BASEYARDS
KAHULUI AIRPORT (OGG)**

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

FIGURE
4

Attachment B – List of Industrial Tenants

**OGG TENANTS CONDUCTING INDUSTRIAL ACTIVITIES
NPDES NOI-B MSGP/CNEE STATUS**

Table of OGG Tenants (July 1, 2022)

tenants applying for CNEE tenants applying for MSGP

No.	Common Tenant Name	SIC Code	PMID(s)	Permit Type	Type of Industrial Activity at Tenant Lease Space
1	Air Maui Helicopter Tours	4522	OGG.517.517.01.10	CNEE	Helicopter maintenance
2	Air Maui Helicopter Tours - Hangar 411.106	4581	OGG.411.411.01.06	CNEE	
3	Air Service Hawaii	4581	OGG.820.820.01.24F;OGG.820.820.01.20C;OGG.230.230.01.02;OGG.230.230.01.01;OGG.220.220.01.03;OGG.220.220.01.02;OGG.220.220.01.01	MSGP	Fueling, maintenance of fueling vehicles.
4	Alex Air/Maverick	4522	OGG.517.517.01.08;OGG.237.237.01.00	MSGP	Helicopter cleaning, maintenance, fueling
5	Aloha Air Cargo - GSE	4581	OGG.001.001.01.14C	CNEE	Aircraft maintenance
6	Baldwin, William - Hangar 411.111 & 411.113	4581	OGG.411.411.01.13;OGG.411.411.01.11	CNEE	Aircraft maintenance
7	Blue Hawaiian Helicopters	4522	OGG.517.517.01.05;OGG.244.244.01.01	CNEE	Aircraft maintenance
8	Blue Hawaiian Helicopters - Hangar 409.110	4581	OGG.409.409.01.10	CNEE	Aircraft maintenance
9	Boulton, James - Hangar 410.103	4581	OGG.410.410.01.03	CNEE	Aircraft maintenance
10	Civil Air Patrol - Hangar 411.101 & 411.103	4581	OGG.411.411.01.03;OGG.411.411.01.01	CNEE	Aircraft maintenance
11	Coscarelli, Guihermo	4581	OGG.409.409.01.07	CNEE	Aircraft maintenance
12	Dixon, Jack - Hangar 411.110	4581	OGG.411.411.01.10;OGG.411.411.01.10	CNEE	Aircraft maintenance
13	First Hawaiian Shirts - Hangar 410.109	4581	OGG.410.410.01.09	CNEE	Aircraft maintenance
14	Gilling, Bert - Hangar 410.106	4581	OGG.410.410.01.06	CNEE	Aircraft maintenance
15	Hawaii Helicopters	4581	OGG.517.517.01.06;OGG.235.235.01.00	CNEE	Aircraft maintenance
16	Hawaii Helicopters - Hangar 409.105	4581	OGG.409.409.01.05	CNEE	Aircraft maintenance
17	Hawaiian Airlines - GSE	4581	OGG.103.103.01.07;OGG.103.103.01.06;OGG.103.103.01.05;OGG.103.103.01.04C;OGG.103.103.01.04B;OGG.103.103.01.04A	CNEE	GSE maintenance
18	Howard, Word	4581	OGG.411.411.01.08	CNEE	Aircraft maintenance
19	JF Air, LLC	4581	OGG.414.414.01.01	CNEE	Aircraft maintenance
20	Koolau Aviation - GSE	4581	OGG.001.001.01.14A	MSGP	GSE maintenance, fueling
21	Lewis, Everett - Hangar 410.111	4581	OGG.410.410.01.11	CNEE	Aircraft maintenance
22	Maui Aloft - Hangar 409.112 & 409.114	4581	OGG.409.409.01.14;OGG.409.409.01.12	CNEE	Aircraft maintenance
23	Maui Aviators - Hangar 411.107	4581	OGG.411.411.01.07	CNEE	Aircraft maintenance

**OGG TENANTS CONDUCTING INDUSTRIAL ACTIVITIES
NPDES NOI-B MSGP/CNEE STATUS**

Table of OGG Tenants (July 1, 2022)

tenants applying for CNEE tenants applying for MSGP

No.	Common Tenant Name	SIC Code	PMID(s)	Permit Type	Type of Industrial Activity at Tenant Lease Space
24	Maui Aviators - Hangar 411.109	4581	OGG.411.411.01.09	CNEE	Aircraft maintenance
25	Maui Neurological Assoc. - Hangar 410.108	4581	OGG.410.410.01.08	CNEE	Aircraft maintenance
26	McGrath, Robert - Hangar 410.112 & 410.114	4581	OGG.410.410.01.14;OGG.410.410.01.12	CNEE	Aircraft maintenance
27	Mertens, William & Blair - Hangar 411.105	4581	OGG.411.411.01.05	CNEE	Aircraft maintenance
28	Mokulele Airlines - Commuter Terminal	4581	OGG.225.225.01.07E;OGG.225.225.01.07D;OGG.225.225.01.07C;OGG.225.225.01.07B;OGG.225.225.01.07A;OGG.225.225.01.01H;OGG.225.225.01.01G;OGG.225.225.01.01F;OGG.225.225.01.01E;OGG.225.225.01.01D;OGG.225.225.01.01C;OGG.225.225.01.01B;OGG.225.225.01.01A	CNEE	Aircraft maintenance, fueling
29	Mokulele Airlines - Hangar 410.104	4581	OGG.410.410.01.04	CNEE	Aircraft maintenance
30	Oxford Electronics	4581	OGG.410.410.01.02	CNEE	Aircraft maintenance
31	Pacific Helicopters - Hangar 409.106	4581	OGG.409.409.01.06	CNEE	Aircraft maintenance
32	Pacific Helicopters - Hangar 410.107	4581	OGG.410.410.01.07	CNEE	Aircraft maintenance
33	Pacific Helicopters - Hangar 517.109	4522	OGG.517.517.01.09;OGG.241.241.01.01	CNEE	Aircraft maintenance
34	Prosser, William - Hangar 410.110	4581	OGG.410.410.01.10	CNEE	Aircraft maintenance
35	PWC Hawaii - Hangar 410.105	4581	OGG.410.410.01.05	CNEE	Aircraft maintenance
36	Roberts Tours and Transportation	4173	OGG.165.165.01.00;OGG.002.002.01.05;OGG.002.002.01.04	MSGP	Vehicle maintenance and fueling
37	Signature Flight Support	5172	OGG.820.820.01.20B;OGG.613.613.01.13G;OGG.613.613.01.13F;OGG.613.613.01.13E;OGG.613.613.01.13D;OGG.613.613.01.13C;OGG.613.613.01.13B;OGG.613.613.01.13A;OGG.243.243.01.00;OGG.242.242.01.00;OGG.004.004.01.09	MSGP	Fueling, maintenance of fueling vehicles.
38	Stodd, Russell	4581	OGG.411.411.01.04	CNEE	Aircraft maintenance
39	Sundin, James - Hangar 409.104	4581	OGG.409.409.01.04	CNEE	Aircraft maintenance
40	Sunshine Helicopters	4522	OGG.517.517.01.07;OGG.236.236.01.00	CNEE	Aircraft maintenance

**OGG TENANTS CONDUCTING INDUSTRIAL ACTIVITIES
NPDES NOI-B MSGP/CNEE STATUS**

Table of OGG Tenants (July 1, 2022)

tenants applying for CNEE tenants applying for MSGP

No.	Common Tenant Name	SIC Code	PMID(s)	Permit Type	Type of Industrial Activity at Tenant Lease Space
41	United Parcel Service	4513	OGG.612.612.01.05C;OGG.612.612.01.05B;OGG.612.612.01.05A;OGG.612.612.01.04C;OGG.003.003.01.26	MSGP	Vehicle maintenance and washing
42	Windward Aviation - Hangar 409.108, Office & Storage	4581	OGG.409.409.01.08	CNEE	Aircraft maintenance
43	Windward Aviation - Hangar 409.109	4581	OGG.409.409.01.09	CNEE	Aircraft maintenance
44	Windward Aviation - Hangar 411.112 & 411.114	4581	OGG.411.411.01.14;OGG.411.411.01.12	CNEE	Aircraft maintenance

Attachment C – Spill Reporting Fact Sheet

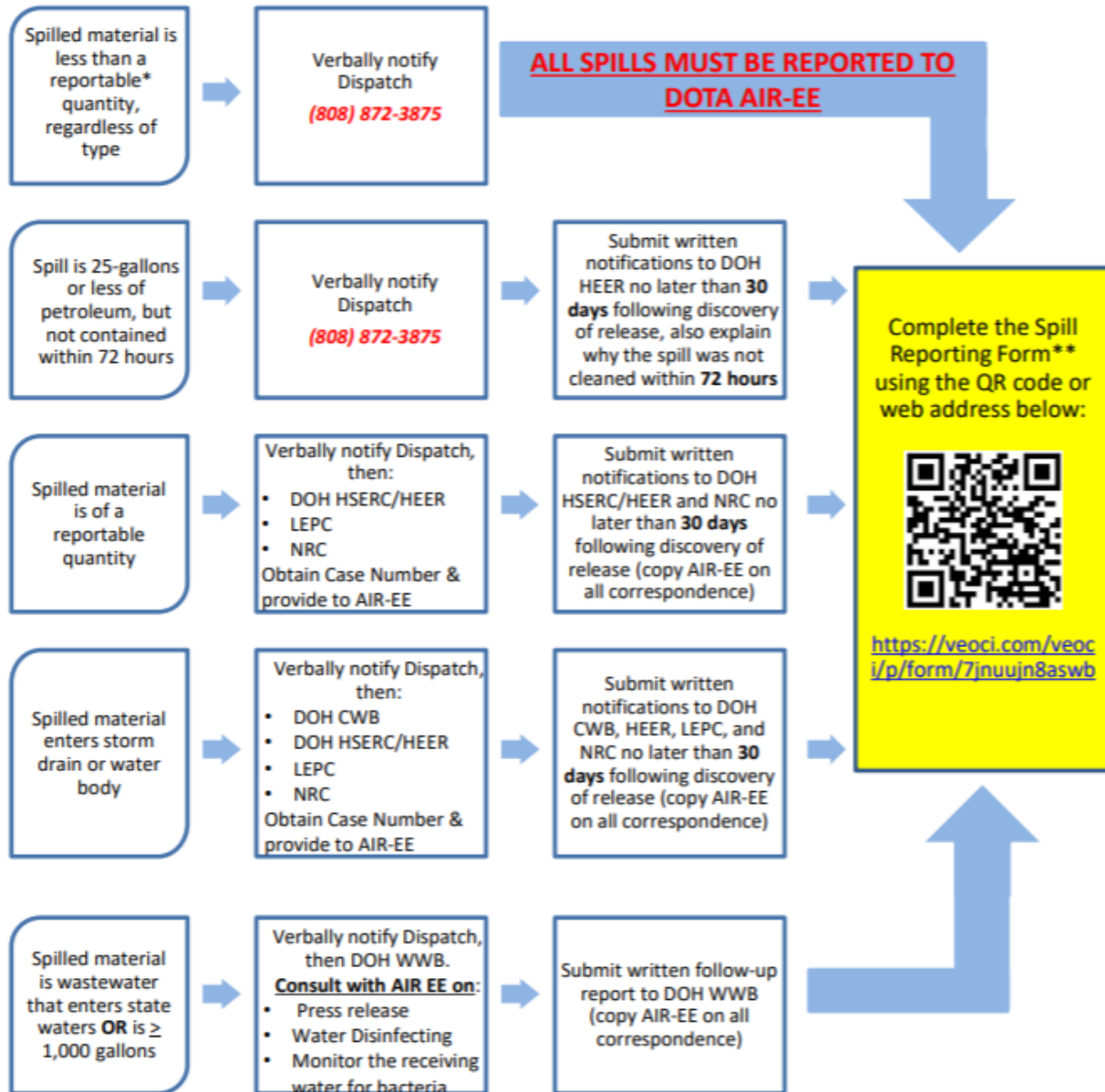
SPILL REPORTING

Kahului Airport (OGG)

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

Kahului 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>
Dispatch (Airport Security)*	Phone: (808) 872-3875
OGG Airport Rescue and Fire Fighting (ARFF)	Phone: (808) 872-3888
DOT Airports Environmental Hotline	Phone: (808) 838-8002
DOT Airports Environmental Section (AIR-EE)*	Phone: (808) 872-3407 Email: richard.g.stook@hawaii.gov or dot.air.environmental@hawaii.gov
Local Emergency Planning Committee (LEPC)	Phone: (808) 270-7911 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.