Tenant Inspection & Enforcement Manual

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

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CERTIFICATION STATEMENT

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 gather and evaluate the information submitted. 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.

Stacy Paquette
Environmental Health Specialist

Date

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LIST OF ACRONYMS

ADM	Airport District Manager
AIR-EE	Airports Engineering Branch, Environmental Section
AIR-PM	DOTA, Property Management Section
AMS	Asset Management System
ARFF	Aircraft Rescue and Fire Fighting
AST	Aboveground Storage Tank
BMP	Best Management Practice
CFR	Code of Federal Regulations
CNEE	Conditional “No Exposure” Exclusion
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
EHS	Environmental Health Specialist
EPA	U.S. Environmental Protection Agency
HAR	Hawaii Administrative Rules
HDH	Kawaihapai Airfield (also known as Dillingham Airfield)
HDS	Hydrodynamic Separator
HNL	Daniel K. Inouye International Airport
HNM	Hana Airport
HRS	Hawaii Revised Statutes
ITO	Hilo International Airport
IWDP	Industrial Wastewater Discharge Permit
IWS	Individual Wastewater System
JHM	Kapalua Airport
JRF	Kalaeloa Airport
KOA	Ellison Onizuka Kona International Airport at Keahole
LID	Low Impact Development
LIH	Lihue Airport
LNY	Lanai Airport
LQG	Large Quantity Generator
LUP	Kalaupapa Airport
MEP	Maximum Extent Practicable
MKK	Molokai Airport
MOU	Memorandum of Understanding
MS4	Municipal Separate Storm Sewer System
MST	Mobile Storage Tank
MUE	Waimea-Kohala Airport
NOV	Notice of Violation
NGPC	Notice of General Permit Coverage
NPDES	National Pollutant Discharge Elimination System
OGG	Kahului Airport
OWS	Oil Water Separator
PAK	Port Allen Airport

LIST OF ACRONYMS CONTINUED

PBMP	Post Construction BMP or Permanent BMP
PMID	Property Management Identification Number
RCRA	Resource Conservation and Recovery Act
SIS	Site Investigation Sheet
SPCC	Spill Prevention, Control, and Countermeasure
SQG	Small Quantity Generator
SWMP	Stormwater Management Program Plan
SWPCP	Stormwater Pollution Control Plan
SWPPP	Stormwater Pollution Prevention Plan
TGM	Technical Guidance Manual
UIC	Underground Injection Control
UPP	Upolu Airport
UST	Underground Storage Tank
VSQG	Very Small Quantity Generator

1.0 BACKGROUND AND PURPOSE

DOTA has developed and implemented an industrial and commercial discharge management program to reduce, to the MEP, the discharge of pollutants from all industrial and commercial facilities and activities at State of Hawaii airports which are owned and operated by DOTA. This Tenant Inspection and Enforcement Manual (hereafter referred to as "Manual"), used by environmental personnel, consultants, and contractors responsible for implementing tenant environmental inspection and enforcement, details the procedures implemented by AIR-EE to ensure that all tenant operations comply with various local, State, and Federal environmental rules and regulations as well as DOTA environmental requirements. As such, DOTA AIR-EE has developed and refined BMPs to ensure tenants at all State of Hawaii airports comply with all current and applicable environmental laws and regulations. The adopted BMPs have been developed to target pollutant(s) of concern from tenant operations, which have been identified through tenant inspections, historical information, inventory of environmental assets, and stormwater monitoring data. The adopted BMPs have been made part of the DOTA environmental program and are included in various documents (e.g., SWPCP, SWPPP, SWMP), *Best Management Practice Field Manual for Operations at State of Hawaii Airports*, and other environmental documents developed for airport facilities. This Manual is based on various State and Federal environmental rules and regulations, including: NPDES, SPCC, UIC, RCRA, UST, etc., and local rules and regulations such as City and County of Honolulu IWDP.

To ensure tenants are inspected fairly and adequately, DOTA implements a risk ranking based on environmental impact either into the DOTA MS4, drainage system, or State waters. The risk ranking is applied to all airport tenants to establish environmental oversight of areas where operations are likely to have an environmental impact. Risk ranking also provides DOTA inspectors with an objective assessment of tenant activities. Refer to Section 3.0.

The enforcement procedures contained herein represent a partnership between DOTA and DOH, as both agencies strive to conduct business in the best interest of the State of Hawaii.

1.1 ENVIRONMENTAL SECTION

AIR-EE is centralized at the DOTA office within the Engineering Branch at HNL and reports directly to the Engineering Program Manager. The Engineering Program Manager reports to the Airports Administrator, who in turn reports to the Deputy Director of Airports.

AIR-EE consists of a Supervisor, several EHSs, and an Environmental Engineer. The physical locations for the positions are distributed throughout the DOTA Districts to better serve the program. Depending on availability, AIR-EE staff located in the neighbor island Districts may be assigned statewide tasks or assist with other Districts; however, their primary responsibility is to oversee environmental compliance within their District. This structure maximizes utilization of staff and allows for immediate access to AIR-EE by the neighbor island Districts.

1.2 INTERGOVERNMENTAL COORDINATION

Continued coordination between AIR-EE, DOH CWB, and EPA is an integral part of the Environmental Compliance Program at State of Hawaii airports. The AIR-EE Supervisor coordinates regulatory

compliance program activities which may include permitting, implementing policy and procedures, and staffing. Some compliance activities may also require the assistance of the State of Hawaii Attorney General's office. The AIR-EE Supervisor and/or the Engineering Program Manager shall be included in the coordination.

AIR-EE staff may interact with members of the DOH CWB or other regulatory agencies to address environmental issues and concerns as they arise. This will help maintain consistent compliance, enforcement, and prevent duplication of efforts between the State departments.

DOTA has an Environmental BMP Inspection Report that is utilized for routine tenant inspections at all State of Hawaii airports. This report is also used for other types of tenant inspections such as complaints, follow-up inspections, etc.

2.0 PROGRAM SCOPE

All State of Hawaii airports follow the procedures detailed in this Manual, including risk ranking, inspections, enforcement, reporting, and training, along with other local, State and Federal Environmental regulations. Failure to follow these procedures may result in penalties and/or lease termination.

2.1 STATE OF HAWAII AIRPORT FACILITIES

The DOTA operates and maintains 15 airports statewide:

Oahu: Daniel K. Inouye International Airport (HNL)
Kalaeloa Airport (JRF)
Kawaihapai Airfield (HDH)

Maui: Kahului Airport (OGG)
Hana Airport (HNM)
Kapalua Airport (JHM)

Lanai: Lanai Airport (LNY)

Molokai Molokai Airport (MKK)
Kalaupapa Airport (LUP)

Hawaii: Ellison Onizuka Kona International Airport at Keahole (KOA)
Hilo International Airport (ITO)
Waimea-Kohala Airport (MUE)
Upolu Airport (UPP)

Kauai: Lihue Airport (LIH)
Port Allen Airport (PAK)

2.2 TENANT RESPONSIBILITY

All DOTA tenant lease agreements, Revocable Permits, and Concessionaire's Agreements include language stating that the tenant is responsible to comply with all environmental laws and regulations. Tenants are made aware of the Environmental Compliance Program at DOTA's airports and are provided various environmental educational documents. Tenant spaces are inspected by an EHS or authorized representative for compliance. Failure to comply with DOTA BMPs may result in enforcement actions against tenants as detailed in Section 6.0.

3.0 RISK RANKING

3.1 PURPOSE

DOTA ranks each tenant that conducts industrial and commercial activities based on the tenant's operations, potential to contribute pollutants to stormwater runoff, and/or to have a non-stormwater discharge into the DOTA MS4, drainage system, or State waters, to determine their overall environmental risk. The risk designation of high, medium, or low is determined by a cumulative scoring system of ranking criteria, along with the tenant's NPDES permit coverage status (as applicable), which determines the frequency (i.e., quarterly, annually, or biennially) that each tenant is inspected. Additionally, AIR-EE may increase inspection frequency at their discretion.

There may be instances where tenants have more than one facility at the same airport under the same leaseholder, and each facility may be on a separate inspection schedule. For example, an airline may operate at the passenger terminal, at air cargo, and at a maintenance hangar. In this case, each facility would be ranked and inspected separately because the facilities are at different physical locations. Additionally, separate locations may have different points of contact or responsible parties, different operations, and may be located in separate drainage basins.

Each facility is evaluated based on the risk ranking criteria, which is conducted as part of the routine inspection process. Therefore, each facility is re-ranked after the routine inspection. For new tenants, DOTA will risk rank the facility during the first inspection. Information (i.e., company, airport, contact information, PMID, and property use) on new tenants may be obtained by electronic property management databases and leases. This information is then entered into Veoci®, the AMS. Tenants may obtain a copy of their current risk ranking from a DOTA EHS or inspector.

AIR-EE uses an online platform called Veoci® for various aspects of the environmental program including tenant inspections, spill reporting, asset management, etc. Spill reporting forms and training surveys are also hosted within this platform.

3.2 RISK RANKING CRITERIA

Facilities are ranked as high, medium, or low risk as determined by a cumulative score of the risk ranking assessment table in Section 3.3.14. The inspector will select the appropriate score ranging from zero to five for each criterion. If multiple criteria apply, the highest ranking is selected. The scores will be summed to determine a cumulative risk ranking score and associated risk ranking category. Only the space(s) leased/listed under the same Common Tenant Name are considered when updating the risk ranking criteria; therefore, this excludes tenant activities conducted on the ramp or common use areas. Certain risk ranking criteria includes a trigger for automatic assignment of a higher risk ranking regardless of the cumulative score, such as having a current NPDES Industrial permit issued to the tenant (Section 3.3.13).

Risk rankings are determined as follows:

- Low = Cumulative score of 5 or less;
- Medium = Cumulative score from 6 through 16; and
- High = Cumulative score of more than 16, or a score of 5 on any risk ranking criteria.

Tenants are also assessed for exemption from routine tenant inspections. The exempt category would not require regular inspections, but may be re-evaluated as necessary if changes are made to a tenant's activities. Tenants classified as exempt have operations with minimal potential to contribute pollutants to stormwater runoff, or result in non-stormwater discharges, and do not have other significant environmental risk factors. The exemption categories include:

- A tenant operating an office space;
- A tenant operating on the second floor or higher with no outdoor activities; and
- A tenant whose operations are not anticipated to contribute pollutants to stormwater, result in non-stormwater discharges, or have significant environmental risk factors (e.g., indoor storage space without outdoor areas, retail sales of dry goods, airline baggage sorting areas, ticketing booths, etc.).

Industrial facilities with a CNEE are still subject to inspection.

3.3 RISK RANKED INDUSTRIAL AND COMMERCIAL ACTIVITIES

Tenant facilities are ranked based on the following industrial and commercial activities:

3.3.1 Aircraft Maintenance and Repair

Aircraft maintenance and repair activities include parts replacement, parts washing, removing and/or replacement of fluids and greases, and dismantling parts. Sandblasting, sanding, and/or painting activities are allowed if the tenant has an approved (DOTA) paint booth at their facility (otherwise these activities are prohibited). Aircraft maintenance and repair shall be conducted inside or outside under cover only during dry weather with BMP measures implemented to prevent spills and/or leaks from contacting stormwater and reduce environmental risk.

3.3.2 Aircraft Fueling

Aircraft fueling includes fueling of aircraft and helicopters using a fuel hydrant system, mobile fuel tank truck, a stationary AST, or small fuel cans. Fueling inside of a building is a fire code violation and is prohibited.

3.3.3 Aircraft Washing

Aircraft washing includes washing or rinsing of the exterior of aircraft and helicopters and can only occur at DOTA wash racks/designated areas at various airports or at a tenant space that has a wash system that either contains the wash water (such as holding tanks, recirculating systems, or evaporation ponds) or discharges the wash water to the sanitary sewer. DOTA also has the discretion to provide a written approval for aircraft washing or rinsing activities under special circumstances.

3.3.4 Vehicle and/or Equipment Maintenance and Repair

Vehicle and/or equipment maintenance and repair activities include parts replacement, parts washing, removal and/or replacement of fluids or greases, and dismantling parts. Sandblasting, sanding, and/or painting activities are allowed if the tenant is a licensed autobody shop or has an approved paint booth

at their facility (otherwise these activities are prohibited). Vehicle and/or equipment maintenance and repair shall be conducted inside or outdoors under cover and only during dry weather with BMP measures implemented to prevent spills and/or leaks from contacting stormwater and reduce environmental risk.

3.3.5 Vehicle and/or Equipment Fueling

Fueling of vehicles and/or equipment may be conducted from fuel pumps, as well as MSTs and/or fuel cans. Fueling inside of a building is a fire code violation and is prohibited.

3.3.6 Vehicle and/or Equipment Washing

Vehicle and/or equipment washing includes washing ground service equipment, maintenance equipment, and vehicles for individual tenant use or for commercial purposes, and can only occur at DOTA wash racks/designated wash areas located at various airports or at a tenant space that has a wash system that either contains the wash water (such as holding tanks, recirculating systems, or evaporation ponds) or discharges the wash water to the sanitary sewer. DOTA also has the discretion to provide a written approval for vehicle and equipment washing or rinsing activities under special circumstances.

3.3.7 Liquid Container Storage

Liquid container storage includes materials such as petroleum products (e.g., new and used oil, diesel, gasoline, etc.), chemical products, and other miscellaneous liquid materials. These materials may be stored in large containers of 25 gallons and greater, such as drums, totes, ASTs, and MSTs, and must be stored in secondary containment measures (such as spill containment pallets or double-wall tanks). Materials may also be stored in smaller containers less than 25 gallons, which also require secondary containment if stored outdoors. All containers, regardless of size, shall be stored indoors or under cover and labeled with the current contents and if no product remains, they should be labeled “empty.” Inspectors will check to evaluate that the liquid containers are properly stored (the term “properly stored” indicates that containers are in good condition and closed when not in use). This section does not include the additional regulations required for hazardous material, hazardous waste, and universal waste storage (refer to Section 3.3.10).

3.3.8 Material Storage and Handling

Material storage practices can include dry materials such as tires, metals, etc. and may be stored indoors or outdoors; however, if storing outdoors they shall be covered and stored on dunnage, if practicable. This section does not include hazardous material, hazardous waste, and universal waste storage (refer to Section 3.3.10). The methods and practices used to handle dry and liquid materials during daily activities may include but are not limited to: loading and unloading of materials (e.g., packaged products, drums, cans, bags, dry bulk products, containerized liquids, etc.), and materials used/handled during operations (e.g., paint, chemicals, etc.).

3.3.9 Leaks and Staining

Stains and leaks of any liquid material or free product from vehicles and equipment, drums, and open containers have the potential to track out and potentially comingle with stormwater runoff and discharge into waterways. All spills and leaks must follow the Spill and Leak Prevention and Response

procedures as listed in the *Best Management Practice Field Manual for Operations at State of Hawaii Airports*. Provide adequate training for any employees involved with material storage, handling and fueling, maintenance, and repair. Review the container's manufacturer specifications for proper product storage. Routinely service and maintain vehicles and equipment to prevent leaks. Evaluate your facility's current product and material storage BMPs and identify potential failure points that could occur while active operations are performed with your employees and assess for improvements. Repeat staining deficiencies show a lack of training or care with handling and/or storing products and fueling, maintenance, and repair tasks.

3.3.10 Waste Management

All waste management must follow the Waste Storage and Disposal procedures as listed in the *Best Management Practice Field Manual for Operations at State of Hawaii Airports.*

3.3.11 Spill History

All spills or leaks must be reported to Airport personnel according to the *Spill Reporting Fact Sheet* for each specific DOTA airport. Spills and leaks shall be reported immediately to DOH and/or other local and Federal agencies, as applicable per the criteria below:

1. A release of more than 25 gallons of petroleum product; or
2. A release of 25 gallons or less of petroleum product but is not contained or remedied within 72 hours; or
3. A release equal to or exceeding the reportable quantity criteria for one or more chemicals listed within the DOH HEER Office TGM; or
4. A release that enters a storm drain or water body; or
5. Any free product that appears on ground water.

If a spill enters a storm drain or water body, it is considered an illicit discharge and will be investigated by AIR-EE and documented on the Spill, Leak, and/or Illicit Discharge Reporting Form.

3.3.12 Environmental Compliance Program Enforcement History

The history of past environmental compliance warnings, as well as the response actions taken by the tenant related to warnings and/or inspections are assessed. Since the enforcement process is tiered, which involves escalated enforcement actions when corrective actions are not completed, the risk ranking is based on the highest level of enforcement within a two-year period.

3.3.13 NPDES Permit Coverage

Any tenant that has or requires an industrial NPDES permit under HAR § 11-55 Appendix B would be automatically designated as a high risk ranked tenant. However, any tenant that qualifies for, or has a CNEE, will not be designated as a high risk ranked tenant because a condition of no exposure indicates industrial activities are not a threat to stormwater.

3.3.14 Risk Ranking Assessment Table

The following table shall be used to determine the risk ranking of each tenant facility that discharges to the DOTA MS4, drainage system, or State waters.

Table 1: Risk Ranking Assessment

Risk Ranking Criteria\Risk Rank **Potential to discharge pollutants to the DOTA MS4, drainage system, or State waters**	**0** **None**	**1** **No Apparent or Anticipated** There is no apparent or anticipated potential to discharge pollutants to the DOTA MS4, drainage system, or State waters.	**2** **Minimal** There is minimal potential to discharge pollutants to the DOTA MS4, drainage system, or State waters.	**3** **Moderate** There is moderate potential to discharge to the DOTA MS4, drainage system, or State waters.	**4** **Significant** There is significant potential to discharge to the DOTA MS4, drainage system, or State waters.	**5** **(Automatic trigger to high-risk designation)** **High** There is a high potential and the tenant poses a high risk to discharge to the DOTA MS4, drainage system, or State waters.
3.3.1 Aircraft Maintenance and Repair	No maintenance activities are conducted.	Maintenance activities are conducted entirely indoors.	Maintenance activities are conducted outdoors, but under cover and with BMP measures implemented.	Maintenance activities are conducted outdoors, but under cover *without* BMP measures implemented.	Maintenance activities are conducted outdoors, in an uncovered area with BMP measures implemented.	Maintenance activities are conducted outdoors, in an uncovered area and *without* BMP measures implemented.
3.3.2 Aircraft Fueling	No fuel transfer activities are conducted.	Fueling of small aircraft (e.g., helicopters, personal planes) is conducted with BMP measures implemented.	Fueling of large aircraft (e.g., passenger planes, corporate jets) is conducted with BMP measures implemented.	Fueling of small aircraft is conducted *without* BMP measures implemented and not in close proximity to the MS4, drainage system, or State waters.	Fueling of large aircraft is conducted *without* BMP measures implemented and not in close proximity to the MS4, drainage system, or State waters.	Fueling of small or large aircraft is conducted *without* BMP measures implemented and within close proximity, and with a high potential to enter the MS4, drainage system or State waters.
3.3.3 Aircraft Washing	No aircraft washing is conducted at the facility.	Aircraft washing (using only biodegradable soap) is conducted in a DOTA approved wash area that is contained and covered.	Aircraft washing (using only biodegradable soap) is conducted in a DOTA approved wash area that is contained, but uncovered (e.g., washing conducted outside using a portable washer that contains all wash water in receptacles for proper removal).	Aircraft washing (using only biodegradable soap) is conducted in a DOTA approved wash area that is covered or uncovered, and with pervious surface (e.g., grassy or vegetated) or wash water runoff drains to a pervious area.	Aircraft washing is conducted in a covered or uncovered area, at an unapproved location, or at an uncontained location, and is not located in close proximity to the MS4, drainage system, or State waters.	Aircraft washing is conducted in a covered or uncovered area, at an unapproved location, or at an uncontained area that discharges directly to the DOTA MS4, drainage system, or State waters. This is an illicit discharge and is reported to AIR-EE and other appropriate authorities as specified in Section 3.3.11.
3.3.4 Vehicle and/or Equipment Maintenance and Repair	No maintenance activities are conducted.	Maintenance activities are conducted entirely indoors.	Maintenance activities are conducted outdoors, but under cover with BMP measures implemented.	Maintenance activities are conducted outdoors, but under cover *without* BMP measures implemented.	Maintenance activities are conducted outdoors, in an uncovered area with BMP measures implemented.	Maintenance activities are conducted outdoors, in an uncovered area *without* BMP measures implemented.

Table 1: Risk Ranking Assessment
(Continued)

Risk Ranking Criteria\Risk Rank **Potential to discharge pollutants to the DOTA MS4, drainage system, or State waters**	**0** **None**	**1** **No Apparent or Anticipated** There is no apparent or anticipated potential to discharge pollutants to the DOTA MS4, drainage system, or State waters.	**2** **Minimal** There is minimal potential to discharge pollutants to the DOTA MS4, drainage system, or State waters.	**3** **Moderate** There is moderate potential to discharge to the DOTA MS4, drainage system, or State waters.	**4** **Significant** There is significant potential to discharge to the DOTA MS4, drainage system, or State waters.	**5** **(Automatic trigger to high-risk designation)** **High** There is a high potential and the tenant poses a high risk to discharge to the DOTA MS4, drainage system, or State waters.
3.3.5 Vehicle and/or Equipment Fueling	No fuel transfer activities are conducted.	Vehicle and/or equipment fueling is conducted with or *without* cover and with containment measures (e.g., bermed area).	Vehicle and/or equipment fueling is conducted under cover, *without* containment measures, and not located within close proximity to the MS4, drainage system, or State waters.	Vehicle and/or equipment fueling is conducted *without* cover or containment measures, and not located within close proximity to the MS4, drainage system, or State waters.	Vehicle and/or equipment fueling is conducted under cover *without* containment measures, and located in close proximity to the MS4, drainage system, or State waters.	Vehicle and/or equipment fueling is conducted *without* cover or containment measures and within close proximity to the DOTA MS4, drainage system or State waters.
3.3.6 Vehicle and/or Equipment Washing	No vehicle or equipment washing is conducted.	Vehicle and/or equipment washing is conducted in a DOTA approved wash area that is contained and covered.	Vehicle and equipment washing is conducted in a DOTA approved wash area that is contained, but uncovered (e.g., washing conducted outside using a portable washer that contains all wash water in receptacles for proper removal).	Vehicle and equipment washing is conducted in a DOTA approved wash area within a pervious area (e.g., grassy or vegetated) or wash water runoff drains to a pervious area.	Vehicle and equipment washing is conducted in a DOTA approved wash area that is uncovered and uncontained with impervious surface and not in close proximity to DOTA MS4, drainage system or State waters.	Vehicle and equipment washing is conducted in an uncovered and uncontained area in close proximity to the MS4, drainage system, or State waters, or at an unapproved location that directly discharges to the DOTA MS4, drainage system, or State waters. This is an illicit discharge and needs to be reported to the AIR-EE and other appropriate authorities as specified in Section 3.3.11.
3.3.7 Liquid Container Storage	No materials are stored at the facility.	Containers of any size are properly stored per DOTA BMPs (i.e., under cover and within secondary containment, if applicable).	Containers of any size are stored outdoors within secondary containment measures, but *without* cover.	Small containers are stored outdoors, under cover, but *without* secondary containment measures.	Large containers are stored outdoors, under cover, but *without* secondary containment measures.	Containers of any size are stored outdoors *without* cover and *without* secondary containment measures, or facility does not have an existing SPCC Plan and requires one.

Table 1: Risk Ranking Assessment
(Continued)

Risk Ranking Criteria\Risk Rank **Potential to discharge pollutants to the DOTA MS4, drainage system, or State waters**	**0** **None**	**1** **No Apparent or Anticipated** There is no apparent or anticipated potential to discharge pollutants to the DOTA MS4, drainage system, or State waters.	**2** **Minimal** There is minimal potential to discharge pollutants to the DOTA MS4, drainage system, or State waters.	**3** **Moderate** There is moderate potential to discharge to the DOTA MS4, drainage system, or State waters.	**4** **Significant** There is significant potential to discharge to the DOTA MS4, drainage system, or State waters.	**5** **(Automatic trigger to high-risk designation)** **High** There is a high potential and the tenant poses a high risk to discharge to the DOTA MS4, drainage system, or State waters.
3.3.8 Material Storage and Handling	No materials are stored or handled.	Materials are stored and/or handled entirely indoors.	Materials are stored and/or handled outdoors with BMPs implemented (e.g., materials are stored and/or handled under cover and stored on dunnage).	Materials are stored or handled outdoors and with partial BMPs implemented (e.g., materials are stored either under cover or on dunnage, but not both) and not in close proximity to the MS4, drainage system, and State waters.	Materials are stored or handled outdoors *without* implementing BMPs on a pervious surface (e.g., materials are not stored under cover or on dunnage), but are not in close proximity to the MS4, drainage system, and State waters.	Materials are stored or handled outdoors *without* implementing BMPs, or only partial BMPs (e.g., materials are not stored under cover or on dunnage, or materials are handled without cover or implementing BMPs) and within close proximity to the MS4, drainage system, or State waters.
3.3.9 Leaks and Staining	Leaks/stains exhibiting a sheen were not observed.	Leaks/stains exhibiting a sheen were observed on impermeable surface, without apparent risk of discharge to the MS4, drainage system, and State waters, but small in size.	Leaks/stains exhibiting a sheen were observed on impermeable surfaces, along with some weathered staining, which indicates the lack of training/immediate cleaning. There is minimal risk of discharges to MS4, drainage system, or State waters.	Leaks/stains exhibiting a sheen were observed on impermeable surfaces, along with weathered staining, which indicates the lack of training/immediate cleaning. There is a moderate risk of discharges to MS4, drainage system, or State waters.	Leaks/stains exhibiting a sheen were observed on impermeable surfaces, along with weathered staining, which indicates the lack of training/immediate cleaning. Staining immediately upgradient of the MS4, drainage system or State waters.	Leaks or petroleum staining was observed on a **permeable surface** OR were observed discharging into the MS4, drainage system or State waters.
3.3.10 Waste Management	No waste is stored.	Non-hazardous waste is generated and properly stored indoors or under cover.	Hazardous waste is generated, and the tenant is classified as a VSQG or less. Hazardous waste is properly stored and disposed. • VSQG generates 100 kilograms or less of hazardous waste in one calendar month. Quantity of hazardous waste on-site must never exceed 1,000 kilograms.	Hazardous waste is generated, and the tenant is classified as an SQG or LQG. Hazardous waste is properly stored and disposed. • SQG generates more than 100 kilograms, but less than 1,000 kilograms of hazardous waste in one calendar month. Quantity of hazardous waste on-site must never exceed 6,000 kilograms. • LQG generates more than 1,000 kilograms of hazardous waste in one calendar month.	Hazardous waste is generated, and the tenant is classified as a VSQG. Hazardous waste is improperly stored (i.e., outside *without* cover, *without* secondary containment measures, etc.), and/or improperly disposed of.	Hazardous waste is generated, and the tenant is classified as an SQG or LQG. Hazardous waste is improperly stored (i.e., outside *without* cover, *without* secondary containment measures, etc.) and/or improperly disposed.

Table 1: Risk Ranking Assessment
(Continued)

Risk Ranking Criteria\Risk Rank **Potential to discharge pollutants to the DOTA MS4, drainage system, or State waters**	**0**	**1**	**2**	**3**	**4**	**5** **(Automatic trigger to high-risk designation)**
	None	**No Apparent or Anticipated** There is no apparent or anticipated potential to discharge pollutants to the DOTA MS4, drainage system, or State waters.	**Minimal** There is minimal potential to discharge pollutants to the DOTA MS4, drainage system, or State waters.	**Moderate** There is moderate potential to discharge to the DOTA MS4, drainage system, or State waters.	**Significant** There is significant potential to discharge to the DOTA MS4, drainage system, or State waters.	**High** There is a high potential and the tenant poses a high risk to discharge to the DOTA MS4, drainage system, or State waters.
3.3.11 Spill History	No history of spills in the past two years.	One to three spills with volumes less than 25 gallons of petroleum, or less than the Reportable Quantity for other chemicals in the past two years.	One to three spills greater than the Reportable Quantity (see 40 CFR § 302.4) in the past two years.	More than three spills greater than the Reportable Quantity (see 40 CFR § 302.4) in the past two years.	More than five spills greater than the Reportable Quantity (see 40 CFR § 302.4) during a calendar year.	Tenant has been identified as the responsible party in a completed DOTA SIS during past two years.
3.3.12 Environmental Compliance Program Enforcement History	No enforcement history in the past two years.	Written Warning received in the past two years.	Repeat deficiency identified during two consecutive tenant inspections.	Repeat deficiency identified during three consecutive tenant inspections.	NOV received in the past two years, or a breach of a Lease Agreement or Revocable Permit.	Second breach of Lease Agreement or Revocable Permit or the tenant has been issued an enforcement action by DOH or EPA for non-compliance in the past two years.
3.3.13 NPDES Permit Coverage	Tenant does not require industrial NPDES permit coverage.	N/A	N/A	N/A	N/A	Tenant has or requires industrial NPDES permit coverage.

3.4 INSPECTION FREQUENCY

The frequency of tenant inspections is based on a combination of NPDES permit coverage status and the tenant risk ranking determination of high, medium, or low threat.

At a minimum, DOTA inspects each tenant in each ranking class as follows:

- High-risk ranked tenants that have NPDES permit coverage are inspected at least annually.
- High-risk ranked tenants that **are not required to have NPDES permit coverage** are inspected at least quarterly.
- Medium-risk ranked tenants are inspected at least annually.
- Low-risk ranked tenants are inspected at least biennially (i.e., every two years).

4.0 INSPECTION DESCRIPTION

The purpose of routine inspections is to:

1. Evaluate how tenant operations comply with the facility's SWPCP/SWPPP (if applicable), or *Best Management Practice Field Manual for Operations at State of Hawaii Airports* located in Appendix I.
2. Develop and maintain an accurate inventory of environmental assets owned and operated by each tenant facility. These assets are described in Section 4.2.
3. Ensure tenants comply with HRS § 342D; HAR § 11-54 and HAR § 11-55; 40 CFR § 122; applicable NPDES general and individual permits issued to DOTA and tenants; and other local, State, and Federal environmental permitting/plan requirements.
4. Provide tenants with educational materials as a preventative measure for spills and illicit discharges.

Inspections are conducted under the following circumstances:

1. As determined per the risk ranking process;
2. Investigations of reported unauthorized discharges of pollutants to the DOTA MS4, drainage system, or State waters;
3. Initial evaluation of new tenant operations and/or spaces;
4. Joint inspections with DOH and/or EPA representatives; and
5. As discussed in Sections 3.1, 3.2, 3.4, 4.3, 4.4, and 4.5.

4.1 ENVIRONMENTAL BEST MANAGEMENT PRACTICES

Environmental BMPs are described in detail in the *Best Management Practice Field Manual for Operations at State of Hawaii Airports* in Appendix I.

BMPs are defined in 40 CFR §122.2 as:

> "…schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of 'waters of the United States.' BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage."

Operational BMPs are intended to prevent pollutants from entering the environment by altering activities to eliminate or to minimize the pollution produced. Spill response BMPs rely on a combination of structural controls, employee awareness, and training to be effective methods for protecting the environment.

Operational BMPs include good housekeeping practices for activities such as:

- Aircraft, vehicle, and equipment maintenance and repair;
- Aircraft, vehicle, and equipment body repair;
- Aircraft, vehicle, and equipment washing;
- Aircraft, vehicle, and equipment fueling;
- Vehicle, and/or equipment maintenance and repair;
- Fertilizer and pesticide storage and application;
- Container and material storage and handling;
- Waste storage and disposal;
- Spill and leak prevention and response;
- Outdoor loading and unloading practices; and
- Triturator and DOTA approved wash area operation practices.

PBMPs are physical devices or systems that are designed to reduce the stormwater volume or improve water quality after construction is completed. Subcategories include LID PBMP, Source Control PBMP, and Treatment Control PBMP. Various types of PBMPs, such as OWSs (that discharge to the DOTA MS4), evaporation ponds, detention ponds, bioswales, permeable pavement, dry wells, HDS, drain inlet inserts, etc., are utilized at State of Hawaii airports. To be effective, all PBMPs require regular inspection and maintenance. While DOTA staff or its authorized representatives conduct inspection and maintenance of PBMPs located in the common use areas, **tenants are responsible for inspection and maintenance of the PBMPs located within their leased spaces**. In some circumstances, PBMP inspections have been assigned to tenants under a concessionaire's agreement. Tenants can refer to the *PBMP Inspection & Maintenance Fact Sheet* on the DOTA website to learn more about inspection and maintenance of PBMPs.

Tenants are required to maintain documentation of the following, either in hard copy format, or readily available in an electronic database:

- DOTA requirements (e.g., DOTA discharge permit, or BMP Plan, if applicable);
- NPDES permit documentation (e.g., NGPC, Individual NPDES Permit, or CNEE, if applicable);
- NPDES regulatory documentation (e.g., SWPCP/SWPPP, SWPCP/SWPPP annual report, spill history for the past three years);
- SPCC rule documentation (e.g., SPCC Plan, AST, MST, Material Storage inspections, SPCC annual training records);
- UST permit and inspections;
- UIC permit and inspections;
- RCRA rule documentation (e.g., monthly determination of hazardous waste generator classification status and waste disposal records/manifests);
- City and County of Honolulu IWDP;

- IWS letter of approval;
- Tenant assigned drainage feature annual inspections and maintenance;
- PBMP annual inspections and maintenance; and
- Other pertinent environmental permits (such as DOH Solid Waste Management Permit).

Tenants are also required to take Environmental Compliance Training annually.

4.2 ENVIRONMENTAL ASSET INVENTORY

DOTA inventory of environmental assets is verified and updated during routine inspections of tenant's and DOTA's facilities and operations. Veoci®, an AMS, has been developed and is maintained in which unique identification numbers are assigned to operations and equipment considered to have environmental significance. Key environmental asset categories include, but are not limited to MSTs, ASTs, USTs, UICs, PBMPs, IWSs, and DOTA approved wash areas.

Information within the AMS is used during routine inspections, illicit discharge investigations, enforcement actions, and lease termination proceedings. Therefore, verifying and updating electronic records of environmental assets allows DOTA to complete a comprehensive evaluation of operations at each tenant facility and creates effective communication with tenants regarding changes in applicable regulations and/or policies.

4.3 ILLICIT DISCHARGE RESPONSE

Illicit discharges observed during tenant inspections, as well as any illicit discharge investigations involving tenants, are addressed by the tenant inspection procedures described in Section 5.0. Whenever a pollution complaint is received or potential illicit discharge to the DOTA MS4, drainage system or State waters is observed during regular operations at State of Hawaii airports, AIR-EE will investigate and document it with its current Spill, Leak, and/or Illicit Discharge Reporting Form. If an illicit discharge is confirmed, DOTA will follow enforcement actions as described in Section 6.0 and other respective documents (e.g., SWPCPs/SWPPPs, *Best Management Practice Field Manual for Operations at State of Hawaii Airports*, SWMPs, and other environmental documents).

4.4 NEW TENANT EVALUATION

A new lease will initiate an evaluation of the potential environmental impacts of the tenant and, if necessary, an inspection. The purpose of this inspection is to identify any environmental assets, to assign a risk ranking, and to convey the environmental BMPs to the tenant. The AMS will be updated with the new tenant information so that future inspections can be scheduled per the risk ranking.

4.5 TERMINATION OF LEASE

Following a Notice of Termination, AIR-EE will conduct site investigations of all lease spaces at the request of AIR-PM. If appropriate, tenants may be required by the ADM or AIR-PM to conduct Phase I and/or Phase II Environmental Site Assessments to ascertain the presence and extent of environmental contamination that may have resulted from their operations.

5.0 INSPECTION PROCEDURES

Inspection procedures are implemented at State of Hawaii airports and are designed to ensure compliance with local, State, Federal, and DOTA environmental rules and regulations.

5.1 ENTRY

Leases and Revocable Permits issued by AIR-PM provide DOTA or its authorized representatives the legal right to enter tenant facilities for the purpose of conducting inspections. While notifying tenants is not a requirement, it does enable the tenant to gather necessary records, to make a facility representative available to accompany the inspector, and to prepare themselves to discuss environmental questions or concerns. DOTA may conduct unannounced inspections at its discretion or as deemed necessary.

5.2 PRE-INSPECTION PREPARATION

Inspections are scheduled approximately 30 days ahead of time. After an inspection date has been established, a confirmation email is sent to tenants requesting all applicable permits and documentation to be provided for review. A reminder email of the upcoming inspection is typically sent to tenants a week prior to the scheduled inspection date. Since DOTA inspections have the dual purpose of environmental outreach and environmental compliance, scheduling the inspection 30 days in advance fosters a more productive working relationship with DOTA tenants.

Prior to the inspection, inspectors will review the AMS for background information including previous inspection reports, assets at the facility, airport layout maps, electronic file copies of relevant plans (i.e., SWPCP/SWPPP, SPCC, etc.), and drainage maps to determine if any drains are on or near the leased space. Records, such as annual reports, waste disposal manifests, or SPCC documentation, will also be reviewed, if available. Documents may be reviewed prior to the inspection or during the inspection while assets and drains will be verified during the inspection.

The DOTA may schedule a pre-inspection conference with the tenant. This allows the purpose and order of the inspection to be explained and for the facility representative to locate additional documents or key personnel necessary.

The inspection is conducted to acquire specific information from the tenant (e.g., copies of current permits or plan revisions) or to convey specific information to the tenant. A facility representative and/or other employees with specialized roles and knowledge of the facility operations shall accompany the inspector during the inspection to answer questions and describe operations, as well as address safety and liability considerations.

If the tenant provides documentation during the inspection, it can be reviewed during or after the inspection, as necessary.

5.3 INSPECTION

The inspection offers an opportunity for the tenant to request guidance on environmental concerns and the inspector may provide guidance concerning environmental improvements that correspond to the

facility operations, such as storage techniques, product substitutions, labeling requirements, or proper housekeeping protocols, as appropriate.

The inspector will observe all operations and areas of the facility that have the potential to have an environmental impact. During an initial inspection, the entire facility will be inspected to ensure all possible sources have been identified; during this initial inspection, the inspector can designate areas, such as offices, that would not require inspection during subsequent facility inspections.

Many inspections generate follow-up activities, for both the inspector and the tenant, which contribute to the goal of achieving environmental compliance in tenant operations.

However, DOTA is not the regulating agency for all possible environmental regulations that tenants may encounter. **It is each tenant's responsibility to ensure they are compliant with all applicable regulations**. EPA and DOH can also conduct inspections of tenants at any time with or without advance notification.

5.4 DOCUMENTATION AND RECORDKEEPING

The Environmental BMP Inspection Report is the primary recordkeeping document utilized during the inspection. The inspector will review each relevant area (i.e., Aircraft, Vehicle, and Equipment Maintenance and Repair; Aircraft, Vehicle, and Equipment Fueling; Container/Material Storage and Handling, etc.) and complete each section documenting comments and observations. Each line item will be checked as either "yes," "no," or "N/A" (i.e., not applicable). Any items checked "no" requires, at a minimum, qualifying comments or explanation from the tenant, and/or further investigation needs.

An Environmental BMP Inspection Report shall be completed and include any documentation and records requested, a description of deficiencies identified, any additional comments and recommendations, and any photographs taken during the inspection. The deficiencies listed in the inspection report will include a due date for corrective action. The inspector will provide the inspection report via email to the tenant's representative within seven business days unless circumstances or requests for information requires additional time. The inspection report will become a part of the permanent DOTA tenant file. Tenants will have 30 days to complete all deficiencies listed, unless a deficiency poses a significant risk, at which time, the inspector can require the deficiency to be corrected immediately or within a shorter time frame based on risk. Also, AIR-EE may grant the tenant an extension to the 30-day completion date, on a case-by-case basis, to allow for any design development and/or purchase and delivery of necessary BMP equipment or parts needed.

Information collected during an inspection may be utilized by other DOTA sections, such as AIR-PM or ARFF, as needed for their informational or enforcement purposes.

6.0 ENFORCEMENT

The primary objective of DOTA's Tenant Inspection and Enforcement Program is:

1. To assist tenants in achieving compliance with DOTA requirements and policies, and other local, State, and Federal environmental regulations;
2. To correct any deficiencies or violations in a timely manner; and
3. To have tenants operate their facilities and BMPs effectively and appropriately to maintain continued compliance.

Inspectors are encouraged to discuss commonly established practices on how to achieve environmental compliance by suggesting ideas or products that have worked in similar situations. Inspectors may also suggest that tenants obtain the advice of a consultant if one is needed.

6.1 SCOPE OF AUTHORITY

The enforcement options available to DOTA range from administrative actions, including written warnings, to possible eviction and referral to DOH CWB or other State of Hawaii and EPA Enforcement Offices. DOH CWB may issue citations and/or seek a district court verdict of a misdemeanor or fine. In addition to the Federal NPDES, RCRA, SPCC, UST, and other programs, there are two general areas of environmental enforcement DOTA may refer to in support of its actions.

A. HAR Title 19 – Establishes uniform safety measures, operational standards and requirements, and the conduct for all tenants at DOTA airports; and

B. Tenant Lease Agreement or Revocable Permits – Authorizes DOTA to issue a Letter of Revocation and Notice to Vacate due to breach of the terms and conditions of the Lease or Revocable Permit, and to terminate the Lease or Revocable Permit, if necessary.

6.2 ENFORCEMENT OF DOH REGULATIONS

A Memorandum of Understanding (MOU; see Appendix II), dated March 29, 2000, between DOTA and DOH, established a protocol that authorizes DOTA to participate in the enforcement of HRS § 342D, particularly to control illicit discharges. In the event a violation is unresolved after DOTA has exhausted all options available to them, DOTA will request DOH to pursue enforcement.

6.3 DOTA ENFORCEMENT DOCUMENTATION

DOTA has adopted a tiered approach of escalating enforcement actions based on the severity of the violation and the tenant's compliance response history. The levels of written enforcement actions in order of increasing severity are as follows:

1. Written warning (inspection report, or letter and inspection report);
2. Notice of Violation; and
3. Letter of Revocation and Notice to Vacate (Termination of Lease or Revocable Permit).

Once all corrective actions have been addressed, a closure report will be completed by the inspector and sent to the tenant.

The following sections contain brief descriptions of each level of enforcement action and procedures for implementation.

6.3.1 Written Warning

The inspector will discuss all observed deficiencies or violations with the tenant or their representative at the time of the inspection. A written warning is the inspection report sent via email that documents any deficiencies or violations observed at the time of the inspection. Deficiencies or violations are any unaddressed or unexplained "no" items on the inspection report, missing records or permit documentations as indicated on the inspection report. If the deficiency or violation is considered to be severe, the enforcement action may go directly to a NOV being issued.

Note: If confirmation of delivery (read receipt and/or response) is not received from the tenant, then a letter with the inspection report will be sent via certified mail.

The inspection report will be provided to the tenant once the report has been finalized and will include a due date for all corrective action items to be resolved (typically 30 days from the date the finalized report was provided to the tenant).

The tenant, with justification, may request an extension of time to provide corrective actions. DOTA may grant extensions based on the merit of each individual request. Documentation and/or photos of all corrective action items is required to close out the deficiencies or violations. The inspector may choose to conduct a follow-up inspection. The inspection report becomes a part of DOTA's permanent tenant file.

If the deficiency or violation is resolved within the 30-day period or approved extension of time, the enforcement will be closed.

If the tenant does not provide corrective action documentation by the deadline (original or extended), DOTA will proceed to the next enforcement action and issue an NOV for any unresolved items identified in the original inspection.

For illicit discharges classified as violations, DOTA may further escalate the enforcement based on the severity of the illicit discharge.

6.3.2 Notice of Violation

An NOV is issued to a tenant by certified mail as part of the enforcement escalation or if the deficiency or violation was determined to be severe and/or are repeat issues.

If the deficiency or violation is resolved within 30 days of issuance, the enforcement will be closed (send closure letter to the tenant).

If the tenant does not provide corrective action documentation by the deadline, DOTA will proceed to the next enforcement action and issue a Letter of Revocation and Notice to Vacate.

6.3.3 Letter of Revocation and Notice to Vacate (Termination of Lease or Revocable Permit)

A Letter of Revocation and Notice to Vacate documents DOTA's efforts to work with the tenant and serves as DOTA's right to revoke the lease agreement. AIR-EE will work with DOTA upper management to inform them of the situation that all options are exhausted, and the tenant was unwilling to comply.

AIR-PM will send the Letter of Revocation to the tenant which serves as a notice to vacate and to remove all personal property from the tenant's leased or permitted spaces.

If the tenant does not vacate or challenges the termination of the lease, DOTA has the authority to regain possession of the tenant's leased or permitted spaces administratively without court action. DOTA may also refer the tenant to DOH.

6.3.4 DOH Enforcement

Upon referral from DOTA or on their own accord, DOH can conduct their own inspections and issue enforcement actions depending on the nature and severity of the deficiency or violation.

7.0 TRAINING

Training programs provided to DOTA tenants are designed to establish a clear understanding of environmental pollution prevention requirements, responsibilities, and facilitates education on DOTA BMPs.

7.1 ENVIRONMENTAL COMPLIANCE PROGRAM TRAINING

Environmental Compliance Program Training is provided annually to tenants whose activities may have an environmental impact at all State of Hawaii airports. The mandatory annual training discusses how and why environmental pollution discharges are regulated, provides an in-depth discussion of BMPs developed to address the most common sources of pollution, explains the inspection criteria used by DOTA during tenant inspections, and covers the basics of spill response and clean-up.

REFERENCES

1. Hawaii Revised Statutes (HRS), Chapter 342D, “Water Pollution”
2. State of Hawaii Administrative Rules (HAR), Title 11, Department of Health (DOH) https://health.hawaii.gov/opppd/department-of-health-administrative-rules-title-11/
    - Chapter 54, Water Quality Standards
    - Chapter 55, Water Pollution Control
3. United States (U.S.) Environmental Protection Agency (EPA), Office of Water Enforcement and Permits. “Guidance for Developing Control Authority Enforcement Response Plans.” https://www3.epa.gov/npdes/pubs/owm0015.pdf

APPENDIX I
Best Management Practice Field Manual for Operations at State of Hawaii Airports

Best Management Practice Field Manual for Operations at State of Hawaii Airports

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

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LIST OF ACRONYMS

AIR-EE	Airports Engineering Branch, Environmental Section
AOA	Airport Operations Area
AOC	Airport Operations Control
AOM	Airport Operations Maintenance
ARFF	Aircraft Rescue and Firefighting
AST	Aboveground Storage Tank
BMP	Best Management Practice
CFR	Code of Federal Regulations
DOH	State of Hawaii, Department of Health
DOH HEER	State of Hawaii, Department of Health, Hazard Evaluation and Emergency Response
DOH SHWB	State of Hawaii, Department of Health, Solid and Hazardous Waste Branch
DOT	State of Hawaii, Department of Transportation
DOTA	State of Hawaii, Department of Transportation, Airports
EC	Emergency Coordinator
EPA	U.S. Environmental Protection Agency
GSE	Ground Service Equipment
HAR	Hawaii Administrative Rules
HAZMAT	Hazardous Materials
HRS	Hawaii Revised Statutes
LQG	Large Quantity Generator
MS4	Municipal Separate Storm Sewer System
MST	Mobile Storage Tank
NRC	National Response Center
OWS	Oil Water Separator
PBMP	Post Construction BMP or Permanent BMP
PPE	Personal Protective Equipment
SDS	Safety Data Sheet
SPCC	Spill Prevention, Control, and Countermeasure
SQG	Small Quantity Generator
SWPPP	Storm Water Pollution Prevention Plan
UIC	Underground Injection Control
UST	Underground Storage Tank
VOC	Volatile Organic Compound
VSQG	Very Small Quantity Generator

INTRODUCTION

Industrial and commercial activities conducted at airports have the potential to discharge pollutants into the environment including soil, groundwater, and the DOTA MS4, drainage system, or State waters. Drainage systems may include ditches, canals, inlets, and/or drainage wells (such as UIC wells). Airport tenants (those who lease space(s) from DOTA, sublets, service providers, and concessionaires) have a responsibility to prevent or reduce the release or discharge of pollutants generated by their operations at their tenant space(s) and the common use areas of the AOA, such as the ramp or hardstand areas. This Best Management Practice Field Manual for Operations at State of Hawaii Airports (hereafter referred to as "Manual") shall serve as a guidance document for general activities conducted by any and all tenants, concessionaires, and service providers at all State of Hawaii airports owned or operated by DOTA. A reference list of local, State, and Federal regulations that apply to environmental compliance at State of Hawaii airports can be found at the end of this Manual. It is every airport user's responsibility to ensure that their activities comply with all current and applicable environmental laws and regulations, as well as their signed lease agreement or contract with DOTA.

All tenants and/or their contractors, service providers, and concessionaires operating at State of Hawaii airports shall adhere to the following BMPs in their tenant space(s) and common use areas, airport responsibilities as described in HAR Title 19, Subtitle 2 – Airports Division, and pertinent State and Federal regulations. In the case of a conflict between tenants and/or their contractors' company policies or procedures and the BMPs provided by DOTA, tenants and/or their contractors shall follow the more stringent BMPs.

Implementation of the following BMPs is designed to prevent or reduce pollutants associated with operation, maintenance, and repair activities from impacting soil or groundwater, or from entering the DOTA MS4, drainage system, or State waters.

DISCLAIMER

The information presented in this Manual was taken from available and most recent sources deemed to be representative of the acceptable BMPs and stormwater runoff control measures. This Manual has been prepared as a reference guideline, however, due to site-specific conditions, the selection of the BMPs must be used in conjunction with the best professional judgment and sound engineering principles to assure proper function and performance of the BMPs contained herein. The most stringent BMPs should be chosen and used when referring to facility SWPPPs or other regulations such as EPA's SPCC. The author does not guarantee the accuracy or completeness of this document and will not assume any liability or responsibility for the use of, or for any damages resulting from the use of any information contained herein. Application of BMPs should comply with applicable Federal, State, and county regulations.

BEST MANAGEMENT PRACTICES

1.0 GOOD HOUSEKEEPING PRACTICES

DESCRIPTION

Good housekeeping BMPs are intended to maintain a clean and safe working environment, and reduce the potential for pollutants to come into contact with soil, groundwater, or from entering the DOTA MS4, drainage system, or State waters.

LIMITATIONS

There are no major limitations to the implementation of these BMPs.

PRACTICE	
1.1	DO NOT overfill dumpsters or leave trash outside of containers. Ensure that materials are properly placed in dumpsters and that dumpsters do not leak to avoid discharging contents into stormwater runoff. Use leak-proof dumpsters and keep them covered when not in use. If dumpsters are damaged, severely rusting (i.e., creating metal chips), delivered without lids, or leaking, implement BMPs to prevent and/or contain metal chips and/or discharges until dumpsters can be repaired or replaced.
1.2	Remove and properly dispose of debris and trash from all areas daily. Keep areas exposed to stormwater free of waste, garbage, and floatable debris to prevent these materials from being discharged into stormwater and transported off-site.
1.3	Schedule regular pickup and disposal of garbage and waste materials.
1.4	Dry sweep or vacuum all areas to prevent tracking and drag-out of materials. DO NOT hose down facility floors or outside areas unless a collection method and/or treatment device is implemented to contain wash water. Collection methods and treatment devices may include discharging to an OWS, discharging to an evaporation pond, discharging to a vegetated sump or depression, or collecting with a vac-truck. Properly dispose of collected wash water and dry material to prevent potential impacts to stormwater.
1.5	Place spill kits in easily accessible areas and keep them stocked, especially in areas where equipment/vehicle/aircraft leaks might occur and in areas where activities take place that have the potential to discharge (i.e., fueling operations, repairs, maintenance, hazardous material or petroleum storage areas, etc.). If activities are conducted in areas that pose a potential threat for non-stormwater discharges to impact soil, groundwater, or enter the DOTA MS4, drainage system, or State waters, such as fueling activities, it may be necessary to include drain mats or other preventative devices within spill kits to prevent such discharges.
1.6	Clean up spills and leaks promptly using dry methods such as rags or absorbent material to prevent pollutants from comingling with stormwater and being transported off-site. Properly dispose of spent cleaning materials. Disposal of hazardous spilled substances and spent cleanup materials shall be in accordance with the BMPs outlined in the Waste Storage and Disposal section of this Manual as well as applicable rules and regulations.
1.7	Perform PBMP inspections, at a minimum annually, and perform maintenance as required. Document and maintain records of all PBMP inspections and maintenance. Refer to the PBMPs Inspection & Maintenance Fact Sheet for more information.

PRACTICE (continued)	
1.8	Identify DOTA MS4 structures, drainage system, or State waters in each work area and prevent non-stormwater discharges into them.
1.9	Vehicles and equipment should be parked in designated areas, away from DOTA MS4 structures, drainage system, or State waters. If parking occurs on permeable areas, ensure that vehicles are not leaking.
1.10	Inspect storm drain inlets regularly for sediment build-up or debris accumulation. If the build-up and/or accumulation is not a result of tenant activity, notify AIR-EE of the storm drain structure(s) that require cleaning. Otherwise, it is the tenant's responsibility to ensure that all storm drain inlets and catch basins are maintained within their space(s).
1.11	Inspect and maintain tenant-installed BMPs (e.g., drain guards, inlet inserts, catch basin inserts, biosocks, etc.). Report abandoned or unmaintained DOTA-installed BMPs to AIR-EE.
1.12	Divert, infiltrate, reuse, contain, or otherwise reduce stormwater runoff to minimize the discharge of pollutants.
1.13	Perform daily facility inspections to verify that good housekeeping practices are being followed by facility personnel. Keep a daily log for drip pans in use outdoors.
1.14	Maintain records of all permits and plans as well as all required documentation for a minimum of five years, or per the permit/regulation.
1.15	At a minimum, one person from each facility must complete the annual Environmental Compliance Program Training video and survey. This training covers BMPs listed in this Manual. If only one person completed the training, they will be responsible for training other employees as necessary and keep a roster of all personnel trained. Please view the video and take the survey found on the DOTA website here or with the QR code below.
1.16	Identify all chemical substances used in maintenance activities, compile SDSs for hazardous chemicals, and store SDSs where chemicals are used in an accessible location for employees. SDSs provide both workers and emergency responders with the proper procedures for handling hazardous substances and identify potential threats to personal health and the environment. It is recommended to keep compiled SDSs within or attached to spill kits for employees to easily reference in the event of a spill.
1.17	Storm drain inlets and other drainage features that have been assigned to the tenant must be inspected, at minimum, annually. Perform routine inspections as needed and maintain inspection and maintenance records.

2.0 AIRCRAFT, VEHICLE, AND EQUIPMENT MAINTENANCE AND REPAIR

DESCRIPTION

Routine maintenance on aircraft, vehicles, and equipment must be performed for proper operation and to prevent leaks and spills. Additionally, emergency maintenance of aircraft and equipment outside of tenant spaces may be required. Maintenance and repair activities may include fluids removal, engine and parts cleaning, and/or tire repair and replacement. These activities present a potentially significant source of contaminants due to the harmful materials used and the waste generated.

LIMITATIONS

Only emergency repair may be conducted in the common use areas of the AOA. All other maintenance and repair activities must be conducted in appropriate areas of the tenant facility following proper BMPs.

PRACTICE	
2.1	Maintain aircraft, vehicles, and equipment and keep in proper operating condition. Inspect aircraft, vehicles, and equipment periodically for leaks and immediately implement appropriate leak protection measures if a leak is observed, and repair as soon as possible. Leak protection measures, such as drip pans, are not intended for long term use and should only be used temporarily. When drip pans are used outside, a daily log must be kept ensuring drip pans are cleaned daily and prior to rain storms to prevent overfilling.
2.2	Perform aircraft, vehicle, and equipment maintenance and repair activities indoors or under cover whenever possible and ensure that all maintenance and repair activities (those which involve liquids, grease, or other types of potential pollutants) are conducted away from permeable ground surfaces, the DOTA MS4, drainage system or State waters. If emergency maintenance is conducted within the common use areas of the AOA or outdoors, BMPs must be in place. Perform an area inspection and clean up after maintenance is conducted. Note: Testing fuel (e.g., during helicopter operations) or topping off oils in aircraft is considered part of normal aircraft operation, not "maintenance or repair." However, appropriate BMPs must still be implemented to prevent spills or overfilling.
2.3	Store damaged and/or leaking aircraft, vehicles, and equipment indoors whenever possible. When a drip or leak is identified, use drip protective measures to prevent contact with ground (indoors or outdoors). If a drip pan is used outdoors, clean the drip pan regularly to prevent overflow, especially during rain events, which shall be documented in a daily log. DO NOT leave leaking aircraft, vehicles, and equipment parked within the common use areas of the AOA overnight.
2.4	Remove fluids and batteries from damaged and/or salvage aircraft, vehicles, or equipment before storage. Store damaged and/or salvage aircraft, vehicles, or equipment under cover, if feasible, until repair or disposal. Inspect, at least monthly, for signs of deterioration.
2.5	Use drip pans, tarps, or other liquid containment measures whenever fluids are being removed to capture releases and prevent stormwater pollution. Clean the drip pans, tarps, or liquid containment measures before they are full and properly dispose of the contents.
2.6	Prior to fluids transfer, closely examine the container(s) to be used for transfer. Carefully transfer fluids over pavement or concrete surface using a funnel or nozzle to a designated storage container as soon as possible. Ensure spill kit materials are easily accessible in case of a spill.

PRACTICE (continued)	
2.7	Store used, cracked, or damaged batteries upright, under cover, and within secondary containment measures.
2.8	Store drums with capacity of 25 gallons and above containing liquid materials and waste indoors or under cover and within secondary containment. Store smaller containers of liquid materials and waste indoors. If not indoors, store under cover and within secondary containment.
2.9	Properly empty and clean drip protection measures (i.e., drip pans) regularly and ensure all containers at the facility are properly covered and closed when not in use. If using drip pans outside, a daily log is required to be kept to ensure overfilling of drip pans does not occur and that drip pans are cleaned regularly prior to rain events.
2.10	Store drain protection materials, such as impermeable berms or drain mats, nearby to protect storm drain inlets in the event of a spill.
2.11	Designate areas for parts cleaning. Allow parts to drain over solvent tank or drip pan. DO NOT wash or rinse parts outdoors and do not allow solvent to drip or spill onto the floor. Remove any parts that are dipped in liquid slowly to avoid spills. Provide secondary containment for drums of solvent with capacity of 25 gallons and above and ensure parts washers are properly labeled.
2.12	Use dry methods such as dry sweeping, vacuuming, or wiping with rags or absorbent materials to clean all maintenance areas and properly dispose of collected materials and spent cleaning materials. Never wet wash maintenance areas that direct wash water to the storm drain system.
2.13	Dispose of liquid wastes properly. DO NOT pour liquid waste into floor drains, sinks, outdoor storm drain inlets, or other drainage structures or sewer connections.
2.14	Maintain stocked spill kits throughout the facility, especially in maintenance, and fueling areas, to prevent discharges to the soil, groundwater, or DOTA MS4, drainage system, or State waters in the event of a spill. Refer to the BMPs in the Spill and Leak Prevention and Response section of this Manual.
2.15	Ensure that the PBMPs installed at the tenant facility for stormwater management, such as OWSs, storm drain inlet inserts, etc., are operating as designed. Conduct inspections, maintenance, and/or repairs as needed. At minimum, annual inspections of PBMPs are required and must be provided to AIR-EE inspectors or their environmental consultants upon request.
2.16	Inspect maintenance areas regularly for proper implementation of BMPs. Drip pans located outside must be inspected, at minimum, daily. When liquid is present in drip pans, it must be properly removed and disposed of. Daily inspections must be documented in a daily log and must be provided to AIR-EE inspectors or their environmental consultants upon request. (Note: Tenant may use products, such as drip protection that captures oil and allows water to flow through. Since these types of protection allow stormwater to flow through, they do not require daily logs, but should be inspected and replaced as needed.)
2.17	Conduct employee training, as described under the Good Housekeeping Practices section of this Manual, at a minimum annually, or as required.

3.0 AIRCRAFT, VEHICLE, AND EQUIPMENT BODY REPAIR

DESCRIPTION

Body repair for aircraft, vehicles, and equipment may only be conducted in approved paint booths, auto repair shops, or auto body shops. Body repair activities may include sanding, painting, welding, washing, and floor cleaning. The materials and waste generated by these activities have the potential to release pollutants such as oil and grease, organics, heavy metals, toxic chemicals, and paints to stormwater and impact soil and air.

LIMITATIONS

The fire code does not allow sanding and painting activities, unless conducted within an approved paint booth, auto repair shop, or auto body shop. Prior to conducting these activities tenants must receive permission from ARFF.

PRACTICE	
3.1	Perform all body repair activities indoors or under cover and within an approved paint booth, auto repair shop, or auto body shop.
3.2	Utilize plastic barriers or tarpaulins during blasting or painting operations to contain debris.
3.3	Sweep, vacuum, or use other dry cleanup methods routinely to pick up dust from dry sanding of primer, metal, or body filler. Keep airborne dust to a minimum by using vacuum attachments on sanding equipment whenever possible or utilize a paint booth. Make extra efforts to thoroughly sweep or vacuum dust prior to mopping.
3.4	Clean up wet sanding drips with rags or absorbent materials and let them drip dry, sweep or vacuum up the dust, mop the area and dispose of the mop water properly. Disposal of hazardous spilled material and spent cleanup materials shall be in accordance with the BMPs outlined in the Waste Storage and Disposal section of this Manual as well as applicable rules and regulations.
3.5	Use solvents and coatings with low VOC content, where possible. Use high-transfer efficiency coating techniques such as brushing and rolling to reduce overspray and solvent emissions.
3.6	Mix paints and solvents in designated areas indoors or under cover away from pervious surfaces and storm drain inlets.
3.7	Establish and implement effective inventory control to reduce paint waste, including tracking date received and expiration dates.
3.8	Conduct all priming and painting activities only in approved paint booths. Uncontained spray-painting activities and painting outside or inside of hangars is prohibited and may be a violation of the fire code.
3.9	DO NOT use water to control overspray or dust in paint booths, unless the water evaporates in the booth.
3.10	Store waste paint, solvents, and rags in covered, labeled containers to prevent evaporation to the atmosphere.
3.11	Wash water-based and latex paint brushes, rollers, and other equipment in utility sinks or other locations where wash water is properly contained and disposed.

PRACTICE (continued)	
3.12	DO NOT clean out brushes, rinse paint containers, or wash paint equipment onto the exposed ground, street, gutter, or into the DOTA MS4, drainage system, or State waters. “Paint out” brushes as much as possible.
3.13	Properly segregate and label waste paints for disposal in accordance with the BMPs outlined in the Waste Storage and Disposal section of this Manual as well as applicable rules and regulations. Note: oil-based paints are considered hazardous waste per DOH SHWB.
3.14	Conduct employee training, as described under the Good Housekeeping Practices section of this Manual, at a minimum annually, or as required.

4.0 AIRCRAFT, VEHICLE, AND EQUIPMENT WASHING

DESCRIPTION

Routine washing of aircraft, vehicles, and equipment shall be conducted only at designated wash racks or wash areas. Designated wash racks or wash areas are located inside a building where wash water can be contained and properly disposed of or those that DOTA has designated by demarcation and/or signage where wash water will infiltrate into vegetation, or discharge through treatment devices into evaporation ponds, infiltration basins, or connected to sewer. Proper disposal methods include discharge to an OWS that drains to the sanitary sewer system, discharging to an evaporation pond and properly disposing of dried materials, or collecting with a vac-truck for proper disposal. Wash water may contain oils, greases, heavy metals, sediments, soaps, and other pollutants that pose a threat to the DOTA MS4, drainage system, or State waters.

LIMITATIONS

Aircraft, vehicles, and equipment washing shall ONLY be conducted at designated wash racks or wash areas.

PRACTICE	
4.1	Keep aircraft, vehicles, and equipment clean and in good operating condition. Aircraft, vehicle, and equipment washing activities are NOT permitted in the common use areas of the AOA, unless at DOTA designated wash racks/areas.
4.2	Ensure tenant installed wash racks or DOTA approved wash areas on tenant spaces are either located in an area where wash water can be contained and properly disposed of, directed to the sanitary sewer system, or in special circumstances where various criteria can be met, a designated area that AIR-EE has approved in writing.
4.3	Use biodegradable soaps and detergents that meet EPA's Safer Choice Standard. Please refer to the following link to verify if the product you are using meets this standard: https://www.epa.gov/saferchoice/products.
4.4	Where applicable, use dry methods to wash aircraft, vehicles, and equipment.
4.5	Conduct OWS maintenance in accordance with the BMPs outlined in the Waste Storage and Disposal section of this Manual.
4.6	Ensure OWSs within the tenant space(s) have all applicable permits.
4.7	Prohibit washing of personal vehicles.
4.8	Ensure BMPs are implemented while washing at wash racks or DOTA approved wash areas at the tenant facility.
4.9	Always use the minimum amount of water and soap needed for all washing activities and avoid overspraying.
4.10	Conduct employee training, as described under the Good Housekeeping Practices section of this Manual, at a minimum annually, or as required.

5.0 AIRCRAFT, VEHICLE, AND EQUIPMENT FUELING

DESCRIPTION

During fueling of aircraft, vehicles, and equipment, there is the potential for leaked or spilled fuel to contaminate soil, groundwater, and/or stormwater.

LIMITATIONS

Fueling of aircraft, vehicles, and equipment shall ONLY be conducted outside.

PRACTICE	
5.1	All fueling activities should be performed on impermeable surfaces, away from storm drain inlets (use drain mats if near an inlet), DOTA MS4, drainage system, or State waters.
5.2	DO NOT top off when fueling.
5.3	During tank filling operations from MSTs, such as mobile refuelers, bowsers, and other portable tanks, engage the interlocking brake system and/or chock the wheels of the receiving vehicle to avoid movement. Deploy traffic safety cones or warning signs for safe fueling operations.
5.4	DOTA mandates that mobile refuelers and MSTs (including tanks on trailers where approved) be parked on space under a lease agreement or revocable permit when parking unattended or overnight.
5.5	Secondary containment is required for MSTs (including tanks on trailers where approved) that meet the following conditions: 500-gallon capacity or larger; Have fittings, valves, connectors, and/or fuel sumps situated on the bottom or sides of the tank; Have the potential to contain product when unattended or overnight.
5.6	Ensure that containment devices or diversion measures (e.g., storm drain cover, Safe Drain, etc.) are properly implemented during fuel transfer to ASTs and USTs. Continuously monitor the fuel transfer of ASTs and USTs. If containment devices or diversion measures contain accumulated product, properly remove product according to content specific environmental regulations.
5.7	DO NOT hose off fueling areas.
5.8	Post proper fueling and cleanup instructions in fueling areas.
5.9	Use only dry absorbents or other dry cleanup materials to contain spills. Promptly clean spills with rags or absorbent material, and properly dispose of cleaning materials. For large spills, contact spill response personnel immediately. Refer to the BMPs in the Spill and Leak Prevention and Response section of this Manual. Dispose of hazardous spilled material and spent cleanup materials in accordance with the BMPs outlines in the Waste Storage and Disposal section of this Manual as well as applicable rules and regulations.

PRACTICE (continued)	
5.10	Maintain an adequate supply of spill kits and spill control equipment near fueling areas to prevent pollutant discharge to soil, groundwater, or the DOTA MS4, drainage system, and State waters in the event of a spill. Equip fuel trucks and MSTs with spill cleanup kits. Each spill kit should include, at a minimum, loose absorbent material or absorbent pads, a broom, and a pan or shop vac to pick up used spill cleanup materials. Additional suggested materials include absorbent booms, drain mats, plugs, or other devices to immediately stop and prevent spills from coming into contact with permeable ground, or entering DOTA MS4, drainage system, or State waters.
5.11	Develop and implement an SPCC Plan, if required, based on facility oil storage and operations. Ensure the SPCC Plan is updated at the required frequency and when storage capacity and/or changes to the facility are made in accordance with the SPCC rule. Conduct inspections and training per SPCC Plan requirements at the required frequency.
5.12	Train all personnel who handle fuels, oil, and hazardous material on proper operations, as well as spill response and reporting procedures at a minimum annually, or as required. Refer to the BMPs in the Spill and Leak Prevention and Response section of this Manual.
5.13	Dispose of waste resulting from fuel tests and water collected in fuel tanks and hydrant sumps in accordance with applicable rules and regulations.
5.14	Confirm satisfactory operation of leak detection systems and/or pipeline monitoring systems, where installed.

PRACTICE (continued)	
5.15	The tenant and/or their fueling contractors must conduct the following checks regularly in addition to their operational procedures. If the following checks fail, immediately repair or replace defective parts or remove from service until repaired or replaced. <u>Fuel Storage Tanks</u>: • Check the general condition of fuel storage tanks for safety defects, damage, corrosion, leaks, and appearance. • Check the condition of all fuel hoses and dispensing nozzles for wear. • Check piping systems (e.g., pipes, pumps, flanges, couplings, hoses, and valves, etc.) for failure, cracks, and leaks. • Check for appropriate monitoring via liquid level indicators or gauges, overfill protection with alarms, and/or leak detection systems. • Check that automatic shut off controls on fuel dispensing nozzles are in working condition. • Check that bollards/posts surrounding the fuel pumps and tanks are in good condition to prevent collisions during vehicle ingress and egress. <u>Tank Truck or Fueling Vehicle Checks</u>: • Check the general condition of tank trucks or fueling vehicles for safety defects, equipment damage, fuel leaks, and appearance. • Check the operation of deadman controls, brakes, and/or safety interlock systems. • Check the condition of all fuel hoses, swivels, and dispensing nozzles for wear. • Check the general condition of grounding reels, cables, clamps, and lift platforms. • Verify that fire extinguishers are properly placed with unobstructed access. • Verify the satisfactory operation of the emergency shutdown system. <u>Hydrant System Checks</u>: • Check the hydrant valve pits for fuel leaks, liquid level, and cleanliness. • Check the hydrant valve and components for visual deficiencies. • Ensure all emergency fuel shutdown stations have clear access and check if the locator lights are working properly. • Verify the satisfactory operation of the emergency shutdown system. • Report abnormal pressure/flow recordings in charts because this may indicate leaks. • Check the isolation valve pits that control the distribution of fuel, for emergency access, lid condition, fuel leaks, and electrical components.

6.0 FERTILIZER AND PESTICIDE STORAGE AND APPLICATION

DESCRIPTION

Fertilizer and pesticide applications may be conducted by tenant facility personnel or a hired contractor to maintain landscaping or to eliminate pests at their facility. Improper use of pesticides and fertilizers can lead to contamination in soil, groundwater, surface water and stormwater. Pesticides are defined as chemicals used to kill pest animals or plants (e.g., insecticides, herbicides, fungicides, and rodenticides). They are typically used to control the growth of weeds or other undesirable vegetation or to control infestations of insects/rodents and prevent the spread of diseases.

LIMITATIONS

Fertilizer and pesticide applications should not be conducted during inclement weather (i.e., wind or rain) or applied within six feet of a waterway or on slopes greater than a three to one ratio.

PRACTICE	
6.1	Store fertilizers and pesticides in accordance with the container's label and Material Storage BMPs in this Manual to minimize potential contact with stormwater runoff.
6.2	Periodically check the condition of containers. Look for leaking or corroded containers, crystallization on covers or bases of containers, or discolored labels. Dispose waste containers properly in accordance with the SDS or BMPs outlined in the Waste Storage and Disposal section of this Manual.
6.3	Use fertilizers and pesticides only where needed in amounts or rates per the manufacturer's recommendations; DO NOT over apply. Calibrate equipment regularly for proper application and loading rates.
6.4	Use natural or organic alternatives, if possible.
6.5	Ensure that any application is a minimum of six feet away from the DOTA MS4, drainage system, and State waters.
6.6	DO NOT apply fertilizers or pesticides before or during rainfall or high winds or on slopes greater than a three to one ratio.
6.7	Transfer or mix fertilizers and pesticides above an impervious surface or container; clean up spills immediately.
6.8	Follow all rules and laws, refer to the Hawaii Department of Agriculture, Plant Industry Division, Pesticide Branch for more information on the following: HRS, Administrative Rules, Chapter 66; HRS, Hawaii Pesticide Law, Chapter 149A; Senate Bill 3095; and Act 45 (2018).
6.9	Conduct employee training, as described under the Good Housekeeping Practices section of this Manual, at a minimum annually, or as required.

7.0 CONTAINER AND MATERIAL STORAGE AND HANDLING

DESCRIPTION

A variety of products and materials that may adversely affect water quality may be stored at tenant facilities or with approval in common use areas of the AOA. Tenants and airport users must minimize the exposure of such products and materials, minimize hazardous materials used on-site, and provide training to employees on the proper handling and use of materials.

LIMITATIONS

Materials and waste cannot be stored in the common use areas of the AOA without approval from the AOC/AOM/Security.

PRACTICE	
7.1	Store materials (e.g., tires, metals, etc.) indoors or in covered areas wherever practical. Store materials in their original or appropriate containers as recommended by the manufacturer.
7.2	Whenever possible, outdoor storage areas should be situated away from areas prone to flooding and in a location where they will not be accidentally damaged by equipment or vehicles. When storing non-liquid materials (e.g., tires, metals, etc.) outdoors, place off the ground on top of dunnage to minimize contact with stormwater runoff/run-on. Cover materials with a tarp when storing outdoors, whenever practical, to prevent pollutants from leaching into stormwater or mixing with stormwater runoff.
7.3	Single-walled liquid storage containers (except water) with capacity of 25 gallons or above and used batteries shall be stored indoors or under cover, and within secondary containment measures. Liquid accumulation in secondary containment measures should be minimized, managed, and disposed of properly.
7.4	Liquid containers with capacity less than 25 gallons shall be stored indoors or under cover within secondary containment measures. Liquid accumulation in secondary containment measures should be minimized, managed, and disposed of properly.
7.5	Store reactive, ignitable, or flammable materials in compliance with Federal, State, and county regulations. Store small containers of flammable materials within flammable storage lockers.
7.6	Ensure that all liquid containers are closed, secured to prevent movement, stored neatly and away from high traffic areas (if possible) to avoid accidental spills, and properly labeled.
7.7	Ensure that all empty containers are properly labeled as “empty” when stored on-site. If storage includes multiple containers that frequently go between empty and with liquids, an option is designating empty and non-empty storage areas with signage. For example, empty gas cans can be stored on a designated shelf/area with a sign stating “empty gasoline cans” and in a second designated shelf/area with a sign stating “gasoline.” The containers can then be moved between the two designated areas depending on if empty or not.
7.8	Inspect storage areas regularly. Look for leaking or corroded containers, chemical discoloration, or other changes in the containers or contents that may indicate a potentially hazardous condition or chemical deterioration.

PRACTICE (continued)	
7.9	Maintain an accurate and organized inventory of stored supplies and materials used in the maintenance areas. Compile an inventory of SDSs for all chemicals and maintain them in an accessible location for employees. Periodically review the inventory and properly dispose of materials that are expired or no longer used. Follow manufacturer's instructions regarding uses, protective equipment, ventilation, flammability, and mixing of chemicals.
7.10	Only purchase and store needed quantities of hazardous materials and use less hazardous alternative materials where possible. Properly dispose of any unusable material, such as dried out paint.
7.11	ASTs and MSTs shall be kept in good condition (i.e., free of damage with no signs of failure) to prevent potential spills or releases and should be properly labeled. Single-walled ASTs and MSTs must be stored within secondary containment and meet DOTA standards. If possible, a canopy or cover should be installed over ASTs used for fueling or transfer of products.
7.12	Maintain spill kits where spills may occur (e.g., liquid material storage areas, fueling areas, etc.) or where a rapid response can be made. Spill kits should be stocked in accordance with the BMPs in the Good Housekeeping Practices section; Aircraft, Vehicle, and Equipment Maintenance and Repair section; and Aircraft, Vehicle, and Equipment Fueling section of this Manual.
7.13	Use absorbent materials to contain spills where appropriate. Promptly clean spills with rags or absorbent material, and properly dispose of used spill cleanup materials. Disposal of hazardous spilled material and spent cleanup materials should be in accordance with the BMPs outlined in the Waste Storage and Disposal section of this Manual. For spill response procedures, refer to the BMPs in the Spill and Leak Prevention and Response section of this Manual.
7.14	Recycle anti-freeze, used oil, solvents, windshield washer fluid, batteries, degreasers, paints, thinners, etc., as appropriate.
7.15	Develop and implement an SPCC Plan, if required, based on facility oil storage and operations. Ensure the SPCC Plan is updated at the required frequency or if storage capacity and/or changes to facility are made in accordance with the SPCC rule. Conduct inspections and training per SPCC Plan requirements at the required frequency.
7.16	Maintain an accurate and organized inventory of stored supplies and materials used in the maintenance areas. Compile an inventory of SDSs for all chemicals and maintain them in an accessible location for employees. Periodically review the inventory and properly dispose of materials that are expired or no longer used. Follow manufacturer's instructions regarding uses, protective equipment, ventilation, flammability, and mixing of chemicals.
7.17	Conduct employee training, as described under the Good Housekeeping Practices section of this Manual, at a minimum annually, or as required. Train all employees who work in areas where industrial materials or activities are exposed to stormwater.

8.0 WASTE STORAGE AND DISPOSAL

DESCRIPTION

Various airport/tenant operations include storage, handling, and removal of waste products, such as universal waste, hazardous waste, used batteries, used oil, used paint, used tires, etc. Improper handling of waste may result in contaminants impacting soil, groundwater, and stormwater runoff. The potential for discharge of these pollutants can be reduced by using proper waste storage, handling, and disposal techniques, as well as reducing the waste generation through reuse and recycling.

Wastes generated from tenant activities that may pose a threat to stormwater include, but are not limited to, oil-based paints, solvents, thinners, petroleum products, used batteries, anti-freeze, light ballasts, and other chemicals. Waste material categorized as hazardous waste, universal waste, and/or used oil must be managed properly as required by Federal and State regulations.

Hazardous wastes are divided into listed wastes, characteristic wastes, universal wastes, and mixed wastes. Universal waste includes batteries, some pesticides, mercury containing equipment (mercury thermostats), and bulbs (lamps and light ballasts). It is the responsibility of the hazardous waste generator to make a hazardous waste determination and dispose of the waste properly.

LIMITATIONS

All hazardous waste shall be disposed of by a certified hazardous waste hauler.

PRACTICE	
8.1	Use the entire product before disposing of the container. Minimize use of hazardous materials on-site. Use less hazardous, alternative materials, where possible.
8.2	DO NOT remove the original product label; it contains important safety and disposal information. If a container is empty, label as such, or properly dispose of it.
8.3	Maintain good integrity of all liquid waste storage containers (e.g., used oils, hydraulic fluids, spent solvents, waste aircraft fuel). Inspect containers regularly and transfer waste from damaged containers into proper containers that are intact and ensure new containers are properly labeled.
8.4	Identify, list, and maintain an inventory of all chemical substances present in the facility. Compile an inventory of SDSs for all chemical substances and maintain them in an accessible location for employees.
8.5	Only purchase and store needed quantities of hazardous materials.
8.6	Water-based paint containers should be thoroughly dried and properly disposed of in dumpsters. Dispose of excess oil-based paints and sludge as hazardous waste.
8.7	Designate an indoor or covered area for hazardous waste and used oil collection.
8.8	Liquid waste should be stored in secure, closed containers, and protected from damage. Store liquid waste containers within secondary containment measures.
8.9	Label hazardous waste containers clearly with the words “Hazardous Waste” and the date when the hazardous waste accumulation began. Allowed on-site accumulation time is determined by your hazardous waste generator status (LQG, SQG, or VSQG).
8.10	DO NOT mix wastes; this may cause chemical reactions, make recycling impossible, and complicate disposal.

PRACTICE (continued)	
8.11	Arrange for regular hazardous waste collection before containers reach capacity and as required by hazardous waste generator status.
8.12	Ensure that hazardous waste is collected, removed, and disposed of only at authorized disposal sites by an approved hazardous waste hauler. DO NOT discard hazardous waste into dumpsters. Maintain disposal manifests for a minimum of three years.
8.13	Recycle any useful waste such as used oil, spent solvents, used batteries, scrap metal, used oil filters, etc. Filter and re-use thinners and solvents, whenever possible.
8.14	Store used oil in appropriate closed containers. Label containers clearly with the words "Used Oil," and provide secondary containment for containers with capacity of 25 gallons or above. Only dispose of used oil in used oil containers. Disposing of other liquids into used oil, such as brake or steering fluids, will contaminate used oil making it hazardous waste, which is far more costly to remove with fewer removal options.
8.15	Store universal waste in appropriate containers, indoors or under cover, and label containers clearly with the words "Universal Waste," the material (e.g., "lamps," "batteries," "pesticides," "mercury containing equipment," "mercury thermostat," etc.), and the accumulation start date. Universal waste can be stored for one year starting from the date the universal waste was generated.
8.16	Store used batteries indoors or under cover and within secondary containment.
8.17	Store used tires and rusted metal under cover and off the ground, if practicable, or indoors prior to disposal.
8.18	Place spill kits where they are readily accessible.
8.19	If containers leak or spill, clean up immediately; follow the BMPs in the Spill and Leak Prevention and Response section of this Manual.
8.20	At a minimum, OWSs must be inspected annually and cleaned to remove accumulated oil, grease, floating debris, and sediment in order to maintain proper operation and removal efficiency. Removed materials must be disposed of properly.
8.21	Conduct employee training, as described under the Good Housekeeping Practices section of this Manual, at a minimum annually, or as required. Train employees on proper waste control and disposal procedures as well as spill prevention and control.
8.22	Keep all pertinent records on file for a minimum of three years, and easily accessible pertaining to removal of waste, such as invoices, waste manifests, testing results for liquids (if applicable), and training records.

9.0 SPILL AND LEAK PREVENTION AND RESPONSE

DESCRIPTION

Small spills or leaks of oil (less than 25 gallons) can be cleaned up using absorbent materials or other acceptable practices as long as they are cleaned up within 72 hours and do not threaten ground or surface waters. All spills or leaks must be reported to Airport personnel according to the *Spill Reporting Fact Sheet* for each specific DOTA airport. Daily inspections of the facility shall be conducted to identify any small spills or leaks, which shall be addressed and properly cleaned immediately.

In the event of a large or uncontrolled release, the owner or manager of the facility shall act as the EC. Tenant employees shall follow the BMPs listed below.

LIMITATIONS

There are no major limitations to the implementation of these BMPs.

PRACTICE	
9.1	Immediately Stop Work in the event of a spill and initiate spill cleanup procedures, if it can be safely accomplished.
9.2	Determine the source of the release and any hazards present, notifying employees in the vicinity and keeping non-essential employees and visitors away from the spill area. Attempt to turn off the source of the spill, if it can be safely accomplished. If the spill originates from a fuel delivery truck or from an AST fill port, alert the truck operator to stop fuel delivery.
9.3	Eliminate all possible sources of ignition/detonation such as vehicle engines, welding and grinding operations, and smoking.
9.4	Remove or isolate ignitable and incompatible materials from the area of the release, if it can be safely accomplished.
9.5	Notify Airport Personnel, (ARFF, Code 22, Dispatch, Duty Manager, etc.) according to the *Spill Reporting Fact Sheet* for the airport. This can be found on the environmental webpage (http://hidot.hawaii.gov/airports/doing-business/engineering/environmental/) under the applicable airport. *All spills and leaks must also be reported to AIR-EE via the web link (https://veoci.com/v/p/form/7jnuujn8aswb) or via the QR Code:
9.6	Prevent vehicles and equipment from driving through the spill area.
9.7	Protect qualified personnel with appropriate PPE, as required by the SDS, when responding to spills.

PRACTICE (continued)	
9.8	Confine the spill to prevent further migration using drainage diversion practices and controls, including, but not limited to: 1. Dike and/or berm the area downgrade from the spill using absorbent booms, sand, soil, or other inert material; 2. Protect storm drains with drain covers, plastic cover materials, rubber mats, absorbent booms, and/or sandbags; 3. Divert chemicals from entering DOTA MS4, drainage system, and State waters; 4. Implement retention techniques such as temporary lined pits; 5. Clean the spill with granular absorbent material, absorbent pads; booms; and/or rags. Do not apply absorbent material and leave overnight as it makes the spill harder to clean.
9.9	Clean and properly dispose of the accumulated product resulting from the release. Properly collect and containerize the spilled materials, affected media, and used decontamination solutions, and transport off-site in accordance with applicable State and Federal regulations. If needed, call the spill response contractor for cleanup and removal of accumulated product resulting from the release. The contractor will remove spilled product and properly dispose of the material in accordance with applicable State and Federal regulations.
9.10	If a spill occurs to permeable ground, then impacted soil will need to be assessed and properly removed by a qualified environmental professional. All impacted soil must be laboratory tested to confirm removal of contaminants and replaced with clean material meeting pre-spill conditions. Manifests and a receiving facility agreement/acceptance documentation must be provided to AIR-EE to include in their close-out summary report.
9.11	Use the following procedures to clean stained pavement: 1. Place a berm around the stain to contain liquids generated from cleaning activities; 2. Scrub the area using a biodegradable detergent or biodegradable degreasing solution; and 3. Rinse the area while ensuring that all detergent and rinse water is collected in the bermed area and properly removed and disposed.
9.12	Implement proper decontamination procedures on vehicles, affected media, PPE, and equipment. This may include placing absorbent material on oil-stained pavement - later sweeping up, removing, and disposing of affected media (soil or loose asphalt) that contains contaminant, and/or berming the spill area and scrubbing using detergents – disposing detergent and rinse in accordance with the procedures listed below.
9.13	All used decontamination solution, disposable PPE and affected media must be properly packaged in U.S. Department of Transportation specified containers.

PRACTICE (continued)	
9.14	Immediately report spills of a certain size (volume of greater than 25 gallons of oil, or any volume not contained and remediated within 72 hours) per HAR 11-451 to DOH HEER and the NRC immediately. Comply with the DOH HEER requirements. A written report shall be provided to DOH HEER within 30 calendar days of a Reportable Quantity spill cleanup. Provide copies of the written report to DOT Airports Engineer and AIR-EE.
9.15	Conduct employee training, as described under the Good Housekeeping Practices section of this Manual, at a minimum annually, or as required.

10.0 OUTDOOR LOADING AND UNLOADING PRACTICES

DESCRIPTION

Loading and unloading activities involving cargo, HAZMAT, aircraft servicing, and waste disposal operations are conducted at common use areas of the AOA and tenant spaces. The loading and unloading of materials usually take place outside; therefore, materials spilled, leaked, or lost during these activities may collect in the soil or on other surfaces and have the potential to impact stormwater runoff.

LIMITATIONS

There are no major limitations to the implementation of these BMPs.

PRACTICE	
10.1	Perform loading and unloading operations in designated areas on impermeable ground, and away from DOTA MS4, drainage system, and State waters.
10.2	Utilize appropriate PPE when engaging in HAZMAT handling operations.
10.3	Park trucks or GSE in designated areas that have drainage controls to contain spills or leaks of materials.
10.4	Limit exposure of material to rainfall, whenever possible, such as only loading or unloading during dry weather or conducting loading and unloading operations under cover. Whenever possible, avoid staging the loading/unloading area near storm drains or cover storm drains during loading or unloading operations.
10.5	Check loading/unloading equipment regularly for leaks. Remove any faulty or leaking equipment from service.
10.6	Use drip pans underneath hose and pipe connections, access fittings, and other leak-prone spots during liquid transfer operations. Drip pans should also be used for leaking delivery trucks, where appropriate. Keep a daily log for drip pans in use outdoors.
10.7	Some loading bay areas contain trench drains, which can collect silt, trash, leaks, and other pollutants. Most of these trench drains do not contain treatment devices and should be inspected and cleaned regularly to prevent illicit discharges to DOTA MS4, drainage structures or State waters.
10.8	Conduct regular broom sweeping of the loading and unloading area.
10.9	Maintain spill kits on all petroleum storage tank trucks as well as near the loading and unloading areas. In addition, place sufficient spill kits where it will be readily accessible.
10.10	Conduct employee training, as described under the Good Housekeeping Practices section of this Manual, at a minimum annually, or as required.

11.0 TRITURATOR OPERATION PRACTICES

DESCRIPTION

The sanitary sewage and associated rinse waters produced during the servicing of aircraft lavatory facilities must be discharged to the designated DOTA triturator facility. All tenants and applicable personnel are responsible for proper disposal of waste associated with ground servicing of aircraft lavatory facilities. Tenant employees will follow each of the following steps for proper operation of the triturator facilities to minimize the risk of a wastewater spill. Please refer to the BMP signs at each airport triturator to ensure that you are following the proper procedures for that specific triturator.

Due to the potential for exposure to unknown pathogens, all wastewater spills, no matter how small, must be reported to Duty Manager/Code 22, Ramp Control, dispatch, or ARFF. In the event of a sewage spill, refer to HAR, Title 11, DOH, Chapter 62, Wastewater Systems. Additionally, all spills must be reported to AIR-EE via the on-line Spill Reporting Form at https://veoci.com/v/p/form/7jnuujn8aswb or via the QR Code below:

LIMITATIONS

There are no major limitations to the implementation of these BMPs.

PRACTICE	
11.1	Ensure the pit door is open when discharging to a triturator facility.
11.2	Position the vehicle so that the discharge pipe is centered over the pit to avoid spillage.
11.3	Some triturators may require the activation of the equipment via a start button. Verify that the triturator equipment is on prior to discharge.
11.4	DO NOT leave the vehicle unattended while waste is discharging.
11.5	Use the water hose to push clean water through the interior compartment of the vehicle. Note: the exteriors of vehicles are not allowed to be washed at the triturator units.
11.6	Upon completion, CHECK that the discharge valve is tightly closed to prevent releases. In the event of a faulty discharge valve, do not move the vehicle until the discharge valve is repaired or corrected.
11.7	When discharge is complete, move the vehicle and clean area surrounding the pit, as necessary.
11.8	Some triturators may require the deactivation of the equipment with a stop button. Verify that the triturator equipment is off prior to departure.
11.9	Observe the following warning signs to check for non-stormwater discharges: 1. Distinct odor 2. Black staining inside drainage pipe 3. Visible evidence of sanitary waste (e.g., toilet paper, gray water)

PRACTICE (continued)	
11.10	If an accidental spill occurs: Stop, Notify Airport Personnel, and Clean Up. Notify Airport Personnel in accordance with the *Spill Reporting Fact Sheet* for the airport. This can be found on the environmental webpage (http:/hidot.hawaii.gov/airports/doing-business/engineering/environmental/) under the applicable airport. Conduct cleanup in accordance with the *Triturator Fact Sheet*.
11.11	Conduct employee training, as described under the Good Housekeeping Practices section of this Manual, at a minimum annually, or as required.

REFERENCES

1. United States (U.S.) Environmental Protection Agency (EPA) Code of Federal Regulations (CFR), Title 40, Chapter I: Environmental Protection Agency

2. U.S. EPA CFR, Title 49, Transportation

3. State of Hawaii Administrative Rules (HAR), Title 11, Department of Health (DOH)

    - Chapter 54, Water Quality Standards
    - Chapter 55, Water Pollution Control
    - Chapter 58.1, Solid Waste Management Control
    - Chapter 62, Wastewater Systems
    - Chapters 260.1-279.1, Hazardous Waste Management General Provisions
    - Chapter 273, Universal Waste Management
    - Chapter 281, Underground Storage Tanks
    - Chapter 451, State Contingency Plan

4. HAR, Title 19, Department of Transportation

5. Hawaii Revised Statutes (HRS)

    - § 128, Civil Defense and Emergency Act
    - § 261, Transportation and Utilities
    - § 342, Environmental Quality

APPENDIX II
Memorandum of Understanding Between DOH and DOTA

MEMORANDUM OF UNDERSTANDING

BETWEEN

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION, AIRPORTS DIVISION
AND

CITY AND COUNTY OF HONOLULU
DEPARTMENT OF FACILITY MAINTENANCE

I. PURPOSE

The purpose of this Memorandum of Understanding (MOU) is to help the State of Hawaii Department of Transportation, Airports Division (DOTA) and the City and County of Honolulu (CCH), Department of Facility Maintenance (CCH DFM) control illicit discharges into their respective Municipal Separate Storm Sewer Systems (MS4s). This MOU defines the roles and responsibilities of DOTA and CCH DFM, who each hold respective National Pollutant Discharge Elimination System (NPDES) MS4 permits.

II. BACKGROUND

The goal of the NPDES MS4 program is to effectively prohibit non-stormwater discharges into storm sewers by use of measures to reduce the discharge of pollutants to the maximum extent practicable. MS4 permits issued by the State of Hawaii Department of Health (DOH) require DOTA and CCH DFM to prohibit certain non-stormwater discharges into their storm sewer systems by taking measures to reduce the discharge of pollutants to the maximum extent practicable. These measures include best management practices (BMPs) and engineering methods deemed appropriate for minimizing pollutant discharges.

The CC S4 interconnects with the DOTA's MS4, and Federal regulations require both DOTA and CCH to have NPDES permits for their respective MS4s on Oahu. Although not required by any regulations, DOTA and CCH FM wish to enter into an interagency agreement through this MOU on policies of inspection and enforcement of requirements for the respective NPDES permits where more than one permit is issued for the same action-activity.

This MOU outlines policies governing the MS4 interconnections and enforcements to control or minimize pollutant discharge from upstream to downstream MS4s, and eventually into state waters.

III. OBJECTIVES

The objectives of this MOU are to:

A. Support effective intergovernmental coordination between DOTA and CCH DFM.

B. Delineate the roles and responsibilities of each agency in an effort to minimize the discharge of any pollutants from the MS4s.

C. Reduce duplication of effort between DOTA and CCH.

D. Ensure accountability through judicious application of BMPs, design and engineering methods, and water quality monitoring.

IV. RESPONSIBILITIES

A. DOTA will:

1. Attend meetings with CCH DFM to exchange information and improve communication.

2. Maintain a stormwater monitoring program in conformance with DOTA NPDES MS4 permits and, upon request, provide analytical data of stormwater discharges to CCH whenever such discharges are conveyed into the CCH MS4.

3. Maintain a program to promote reports from the public of illicit discharges into the DOTA MS4 and the water quality impacts from storm sewer discharges.

4. Maintain a program to detect and eliminate illicit and improper discharges into the DOTA MS4. DOTA will be responsible for all investigations of illegal discharges that first enter DOTA facilities and flow to other systems, including CC 's S4.

5. Investigate violations and, to the extent DOTA has enforcement jurisdiction, enforce compliance with NPDES regulations to prevent illegal connections to the DOTA MS4.

6. Conduct regular maintenance of the DOTA streets, runways, taxiways and MS4.

7. Upon request by CCH, provide an inventory, location, and other available data of all MS4 outfalls that are owned, operated, and maintained by DOTA.

B. CCH DFM will:

1. Attend meetings with DOTA to exchange information and improve communication.

2. Maintain a stormwater monitoring program in conformance with the CCH NPDES MS4 permit and, upon request, provide analytical data of stormwater discharges to DOTA whenever such discharges are conveyed into the DOTA MS4.

3. Maintain a program to promote reports from the public of illicit discharges into CCH MS4s, and the water quality impacts from storm sewer discharges.

4. Maintain a program to detect and eliminate illicit and improper discharges into the CCH MS4. CCH will be responsible for all investigations of illegal discharges that first enter CCH facilities and flow to other systems, including DOTA's MS4.

5. Investigate violations and, to the extent CCH has enforcement jurisdiction, enforce compliance with the NPDES regulations to prevent illegal connections to the CCH MS4.

6. Conduct regular maintenance of CCH streets and MS4.

7. Upon request by OTA, provide an inventory, location, and other available data of all MS4 outfalls that are owned, operated, and maintained by CCH DFM.

V. OT ER PROVISIONS

A. This MOU does not alter the statutory authority of responsibilities or the respective requirements under DOTA and CCH NPDES MS4 permits. The intent of the MOU is to form a basis by which each agency achieves the aforementioned goals and objectives in a cooperative manner.

B. It is agreed that interconnections between the DOTA and CCH MS4s are not considered drain connections, and therefore do not require private drain connection licenses. Instead, this MOU serves as the agreement to interconnect storm drains between the DOTA MS4 and CCH MS4.

C. This MOU does not obligate any funds from DOTA or CCH into each other's respective MS4 permit requirements.

D. By mutual consent of DOTA and CCH, this MOU may be amended or terminated at any time. Any agency alone may terminate this MOU by giving sixty (60) days written notice to the other agency.

E. This MOU shall take effect upon signing by both DOTA and CCH.

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[Signature page to follow]

DEPARTMENT OF TRANSPORTATION
STATE OF HAWAII

By _____

Title Director of Transportation

Date Jun 24, 2020

APPROVED AS TO FORM:

Marjorie Lau
_____
Deputy Attorney General

CITY AND COUNTY OF HONOLULU

By _____

Title Director and Chief Engineer
Department of Facility Maintenance

Date Jun 24, 2020

APPROVED AS TO FORM AND LEGALITY:

_____
Deputy Corporation Counsel