

Agenda

- Opening Remarks and TEMY Award
 - Derek Chow, Deputy Director for HDOT Harbors Division
- HDOT Compliance Audit
 - Joy Zhang, Interim Environmental Section Head
- Stormwater Awareness Training Part 1
 - Chelsea Iannaccio, EnviroServices & Training Center, LLC
- Stormwater Awareness Training Part 2
 - Sari Kwan, EnviroServices & Training Center, LLC

Break

- Stormwater Awareness Training Part 3
 - Sari Kwan, EnviroServices & Training Center, LLC
- Guest Speaker
 - Trista McKenzie, Department of Earth Sciences, University of Hawai'i at Mānoa
- Training Questionnaire and Evaluation



Opening Remarks & TEMY Award

Derek Chow

Deputy Director for HDOT Harbors Division

Honorable Mentions

2019 TEMY Award

Hawaii Stevedores, Inc.

Hawaiian Cement

The Gas Company, LLC

Sea Engineering, Inc.

Marisco, Ltd.



2019 Tenant Environmental Manager of the Year

Congratulations to

Pacific Environmental Corporation

HDOT Harbors Division Compliance Audit

Joy Zhang

Interim Environmental Section Head,
HDOT Harbors Division



HDOT Compliance Audit

- Required by 2014 Consent Decree
- Covers Airports, Harbors, and Highways
- Program Element Audit Reports (PEAR)
- ENV Consultant: Kennedy/Jenks Consultants



Audit Schedule

- 1. Post-Construction / Permanent Best Management Practices
- 2. Construction Site Runoff Control
- 3. Public Outreach / Public Involvement
- 4. Illicit Discharge Detection and Elimination (IDDE) Program Element and Industrial Commercial Activities/Tenant (I/C) Program
- 5. Pollution Prevention / Good Housekeeping Program
- 6. Staffing, Funding, Organizational Structure, Availability of Resources, and Storm Water Program Sustainability

	2017													2018										2019											2020				
PEAR	JAN	FEB	MAR	APR	MAY	NOr	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	NON	JUL	AUG	SEP	ОСТ	NOV	DEC	JAN	FEB	MAR	APR	MAY	NOS	JUL	AUG	SEP	ОСТ	NOV	DEC	JAN		MAR
1																																							
2																																							
3																																							
4																																							
5																																							
6																																							

Harbors Findings from PEAR 1-4

- PEAR 1: One Potential Violation and Four Deficiencies
- PEAR 2: No Major Findings
- PEAR 3: One Potential Violation and Two Deficiencies
- PEAR 4: No Major Findings

PEAR 5: Pollution Prevention / Good Housekeeping Program

March 2019 – September 2019

Stormwater Awareness Training Part 1

Chelsea Iannaccio

EnviroServices & Training Center, LLC



Regulatory Requirements: Consent Decree

November 2014: Harbors Division entered into a Consent Decree with DOJ/EPA/DOH

Consent Decree available on Harbors website:

http://hidot.hawaii.gov/harbors/files/2013/01/Consent-Decree.pdf

- Stormwater compliance with:
 - Clean Water Act
 - National Pollutant Discharge Elimination System (NPDES)
 Permits

Permit Requirements

- Clean Water Act (CWA) of 1972
 - Goal: Keep waters of United States swimmable and fishable
- Section 402: National Pollutant Discharge Elimination System (NPDES)
 - Permitting system to minimize the discharge of pollutants in stormwater discharge (40 CFR 122)

Harbors Permit Requirements

- HDOH issued two general permits (HAR 11-55 Appendix K) to HDOT Harbors authorizing the discharges of stormwater and certain non-stormwater discharges from Harbor's Small MS4s
 - Honolulu Harbor permit no. HI 03KB482
 - Kalaeloa Barbers Point Harbor permit HI 03KB488

HAR 11-55 Appendix K lists allowable discharges under these permits



Allowable Non-Stormwater Discharges

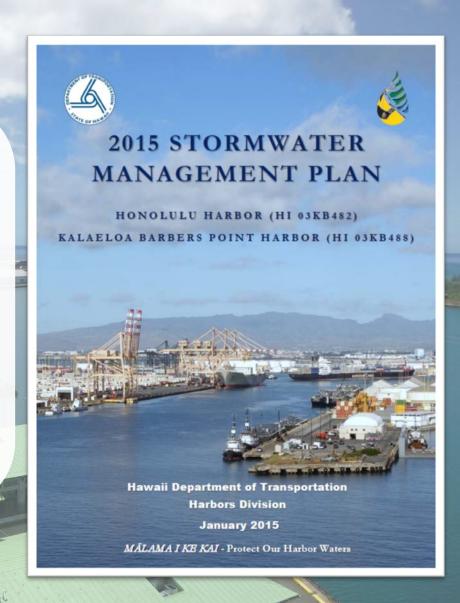
- Daily Operations
 - Water line flushing
 - Uncontaminated AC Condensate
 - Landscape irrigation
 - Discharges from potable water sources and foundation drains
 - Water from crawl space pumps and footing drains
- Groundwater (uncontaminated)
- Natural Origin
 - Springs
 - Diverted stream flows
- Emergencies
 - Discharge from fire fighting activities

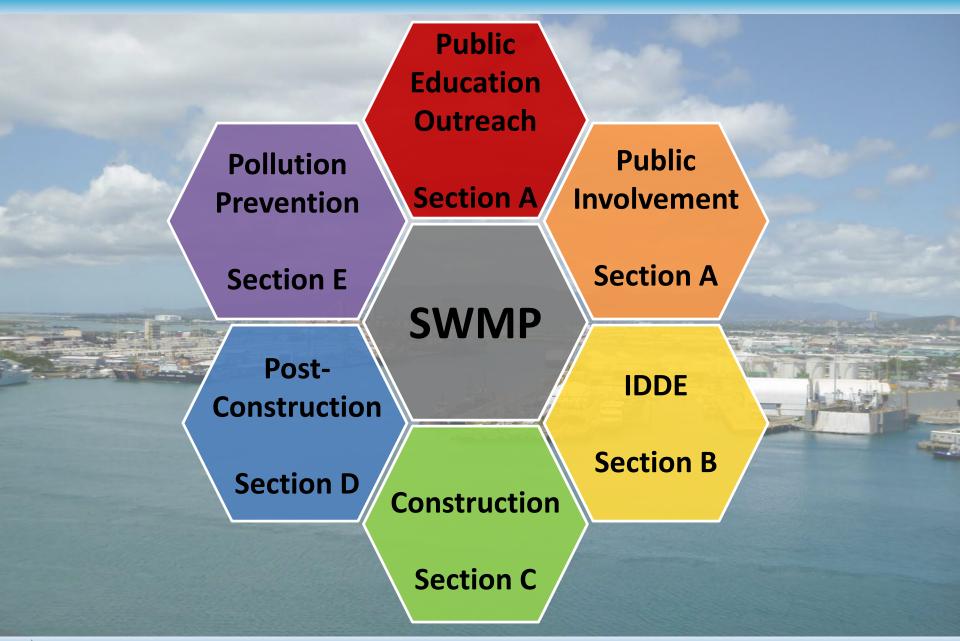


Harbors Permit Requirements

- Implementation of SWMP for MS4s at Honolulu and Kalaeloa Barbers Point Harbors
- SWMP currently being revised

http://hidot.hawaii.gov/harbors/files/2013/01/Final-SWMP-150325.pdf





Stormwater Awareness Training Part 2

Sari Kwan

EnviroServices & Training Center, LLC



Municipal Separate Storm Sewer System (MS4)

Publicly-owned conveyance or systems of conveyances (including but not limited to streets, ditches, catch basins, curbs, gutters, and storm drains) that is designed or used for collecting or conveying stormwater and discharges to surface waters.



Storm Drain System

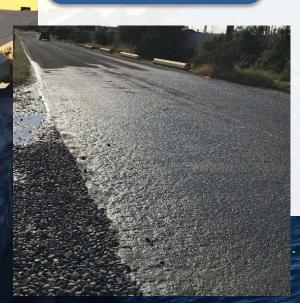
Stormwater picks up debris, chemicals, sediment and other pollutants.



Stormwater flows into a storm sewer system.



Stormwater eventually drains to the ocean through outfalls, with no treatment.

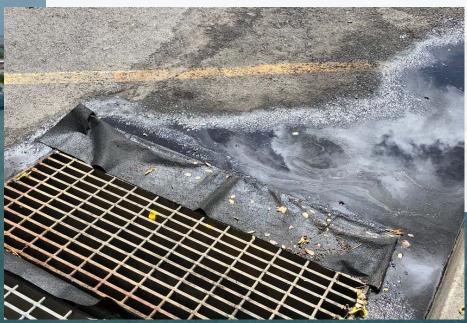






Pollutants of Concern

Pollutant – Any type of material or waste that degrades water quality, public health, the environment or the beneficial uses of receiving waters.





Pollutants of Concern

- Sediment
- Nutrients (leaves, trash, etc.)
- Bacteria and other pathogens
- Debris and garbage
- Chemicals and Hydrocarbons (insecticides, pesticides, paints, solvents, oil, automobile fluids)
- Metals (zinc, iron, aluminum)
- Polluted drinking water source







Tenant Stormwater Compliance Inspections

Final Harbors Tenant Inspection Manual



State of Hawaii Department of Transportation Harbors Division 79 South Nimitz Highway Honolulu Hawaii 96813-5898

August 2014

Version 9.0

PROTECT OUR OCEAN WATER - MĀLAMA I KE KAI

http://hidot.hawaii.gov/harbors/files/2013/01/2014-Tenant-Inspection-Manual_Final1.pdf

The EPA and HDOH can conduct an unannounced inspection at any time.

Be Prepared!

Let's Work Together!

Tenant Stormwater Compliance Inspection

Purpose:

- Discuss how to reduce pollutants on-site
- Share relevant information between Harbors personnel and tenants

A tenant's inspection frequency is based on their risk ranking:

- **High risk** (Score > 16): Every 6 months
- Medium risk (Score = 6 to 16): Once per year
- Low risk (Score ≤ 5): Every 5 years



Tenant Stormwater Compliance Inspections

General Inspection Items

- Paperwork (permits, plans, training logs, etc.)
- Site walk evaluating stormwater-compliant Best Management Practices (BMPs)
 - Storage and Handling (petroleum, waste, chemicals)
 - Labeling
 - Fueling
 - Washing
 - Maintenance General Housekeeping
 - Spill Response







Stormwater Awareness Training Part 3

Sari Kwan

EnviroServices & Training Center, LLC



Best Management Practices (BMPs)

What is a BMP?

- Structural device or system
- Operational or procedural practice
 - BMPs are specific to a facility's operation

Where are BMPs found?

- Facility SWPCP or BMP Plan
- HDOT Harbors Division Tenant Inspection Manual
- Harbors Stormwater Management Website
- EPA BMP Menu



Common BMPs

- Good Housekeeping
- Storm Drain Inlet Protection
- Vehicle and Equipment Washing
- Vehicle and Equipment Fueling
- Material Delivery and Handling
- Solid and Hazardous Waste Management
- Outdoor Material Storage
- Building and Remodeling
- Building Power Washing
- Sidewalk and Walkway Power Washing





- Unlabeled
- Stored outside without secondary containment (this is an issue if the drum contains liquid)



 Properly labeled with contents



Overflowing trash bin



Trash bins covered when not in use



- Staining observed
- Facility should implement proper BMPs to prevent staining and should remove stains



 Utilizing a containment device, however the leak expands larger than the device





- Place spill kits in high risk areas
- Properly label spill kits



Storm Drain Inlet Protection



- Witches hat falling into inlet
- BMP needs replacement



- Properly overlapping filter sock
- Parking not allowed over storm drain

Vehicle and Equipment Washing



- Washing must be approved by Harbors
- Wash water must be contained



Vehicle and Equipment Fueling



- Fuel in a contained area when practicable
- Protect storm drains during fueling



Solid and Hazardous Waste Management



- Designate an area for hazardous waste accumulation
- Store in a secured area to protect from damage
- Store under cover and within secondary containment







• Store under cover to protect from the rain or sun



Spill Response



 Contain the spill, stop the source, clean up and properly dispose of absorbent material

Hazardous Waste Requirements and Regulations

- RCRA and HAR 11-260
- Record the quantities generated each month. Know your generator status!
- Have records available for inspectors

Label and store drums properly!



Universal Waste Requirements & Regulations

- HAR 11-273
- Examples
 - Fluorescent lamps
 - Batteries
 - Anything with mercury
- Label container and include accumulation start date
- Dispose within one (1) year

ACCUMULATION START DATE _



Correcting Deficiencies

Inspection Report includes:

- 1. Checklist
- 2. Updated risk ranking
- 3. Photo log
- 4. Findings
 - Violations (Class I and Class II)
 - Tenants have 30 days to follow up with findings
 - Photos appropriate for documenting corrective actions
 - Extensions

No.	Inspection Item	Yes	No	N/A	Remarks	
	Storage					
1	SPCC Compliance: Facility with an aggregate shell capacity of 1,320					
	gallons or more of petroleum products.			Х		
2	AST Containment: ASTs are situated over an impervious surface, have					
_	adequate secondary containment and integrity protection, and containment			х		
	drain valves are kept locked.					
3	AST Overflow Protection: Bulk product ASTs are equipped with overflow					_
	protection alarms or automatic shutdown pumps.			Х		
4	AST Malfunction: Visible piping, tanks, and hoses in good condition (e.g.,					_
	no exhibit signs of leakage, wear, or malfunction).			Х		
5	Oily Equipment: Oily or leaking equipment is stored under cover or with drip					
-	pans. Drip pans are cleaned regularly.	Х				
6	Storm Water Management: Storm water accumulation in secondary					_
ŭ	containment is minimized, managed, properly disposed of, and logged.			x		
	dontainment to minimized, managed, property disposed of, and legged.			^		
7	Salvaged Equipment/Vehicle: Fluids and batteries are removed from					Ī
	salvaged equipment/vehicle before storage.		X			
8	Outdoor Material Storage: Outdoor storage areas have coverings that				Metal parts should	ĺ
	prevent contact of these items with storm water. Materials are kept above		x		covered until they	
	the ground higher than the level of runoff.				disposed of.	
9	Labeling: Containers are properly labeled.				Label empty drums and	d
	Easterning. Commission and property labored.		X		spill kit.	
10	Compatibility: Containers are stored in an organized manner, compatible				Same as above.	ĺ
	with other stored materials, properly labeled, and not stored past allowable		×		Table and the control of the control	
	holding times.		^			
11	EPCRA: The facility is required to report chemical inventory (Tier II) and/or					
	Toxic Release Inventory (TRI) report.			Х		
	Fueling					
12	Fueling BMPs: Fueling area engineering controls and BMPs are effective in					
12				Х		
12	preventing storm water run on/off.					
13	Fueling Inspections: Equipment in fueling areas is in good condition (e.g.,			x		
	do not exhibit signs of leakage, wear, or malfunction). An inspection log is			^		
	available for inspection.		_	_		
	Washing					
14	Vessel/Vehicle/Equipment Washing: Vehicle or equipment washing is			х		
	conducted with approval from HDOT Harbors.					
15	Hand Washing: Hand or dish washing is conducted over a sink that is	x				
	plumbed to sanitary sewer or is disposed of appropriately.					
	Vessel/Vehicle/Equipment Maintenance					
16	Vessel/Vehicle/Equipment Maintenance Area: Maintenance is conducted					
	regularly in a designated area, preferably covered or away from storm	X				
	drains.					
17	Preventive Maintenance: Preventive maintenance is performed on vehicles					
	and equipment to prevent leaks. Vehicle and equipment are monitored	Х				
	periodically for leaks and drip pans are used.					
18	Maintenance Logs: Records are kept.		Х			Ī
19	Parts Washer: Parts washer fluid is disposed appropriately with an	x				
	authorized disposal contractor.	X				
	Material Handling					Ī
20	Material Handling Area: Loading areas are free of stains and pavement is					ĺ
20	in good condition that would indicate good material handling practices.	Х				
	31					
	Spill Response					
21	Spills and Stains are cleaned thoroughly.	Х				
22	Spill Kits are kept in all high risk areas and are refilled as needed.	X				_
	Spill Recording: Records are kept in the SWPCP or SPCC.			Х		_

1 of 2 HDOT HAR-EE Form SWCTI_Checklist (



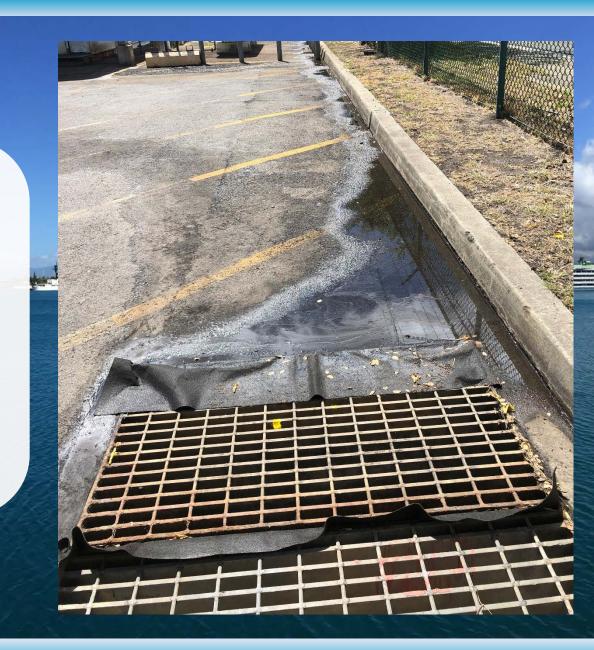
Escalating Enforcement

An environmental violation may lead to penalties

- 1. Oral or Verbal Warning
- 2. Written Warning (Inspection Report + Letter)
- 3. Notice of Apparent Violation
- 4. Notice of Finding of Violation and Order
- 5. Termination of Lease / Revocable Permit

What is an Illicit Discharge?

Any non-stormwater discharge that poses a risk to the environment.











Spill Kit Training | 7 Steps To Using A Spill Kit



Play (k)



Scroll for details





Illicit Discharge and Spill Reporting

Harbor Traffic Control Unit (24/7): 808-587-2076

Harbors Environmental Hotline: 808-587-1962

What to report:

- Location of incident, date and time
- Description of incident
- Responsible party & cause of incident
- Type of media that received the discharge



- Tenant construction projects need approval from Harbors and must obtain all necessary permits
- Harbors reviews submitted plan to ensure construction site BMPs meet Harbors program requirements
- Harbors inspects non-exempt project sites
- Tenant is ultimately responsible for the project



Construction Plan Review and Approval Requirements

Notification Form for projects less than one acre

OR

- Construction Design Review Checklist
- Completed NPDES application
- Construction BMP plan sheet and details
- Stormwater Pollution Prevention Plan (SWPPP)



Initial Inspection

- Ensure BMPs are installed properly
- Deficiencies must be corrected prior to start of construction work

Regular Inspections

- October April (Wet Season): Every 2 weeks
- May September (Dry Season): Every 2 months
- Inspectors provide contractor with report w/in 5 calendar days



Final Inspection

- When all the following conditions are met:
 - Construction is inactive
 - Exposed soil has been stabilized
 - Remaining activities have minimal impact on stormwater runoff
- Document the conditions are met
- Ensure permanent BMPs are properly installed, if applicable
- Deficiencies must be corrected



Post-Construction BMPs

Projects that result in land disturbance of 1 acre or more (regulated projects) <u>must</u> implement post construction BMPs.

- Low Impact Development (LID)
 - Goal: Keep stormwater on-site and treat it as a resource instead of a waste
- Source Control
 - Goal: Keep potential pollutants from coming into contact with stormwater
- Treatment Control
 - Goal: Remove pollutants from stormwater runoff.

Resources and Contacts

Harbors Stormwater Website:

http://hidot.hawaii.gov/harbors/malamaikeawakai/

Harbors Division Environmental Contacts:

- Report Suspected Illicit Discharge: 587-2076 (Harbor Traffic Control) or 587-1960 (Environmental Hotline)
- Joy Zhang, P.E.: 587-1960, ying.j.zhang@hawaii.gov
- Michele Freitas: 587-1976, michele.gn.freitas@hawaii.gov
- Mitchell Martello: 587-1969, mitchell.a.martello@hawaii.gov

Harbors Division Property Management Contacts:

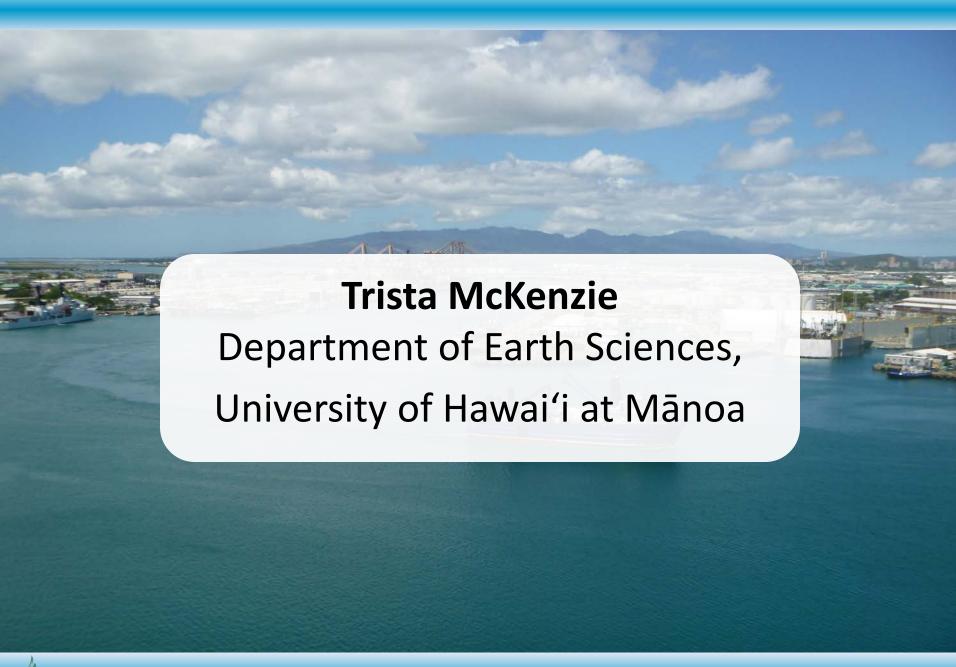
- Joni Savusa, 587-1944, joni.savusa@hawaii.gov
- Eric Leong, 587-1943, eric.leong@hawaii.gov
- Olivia Pham, 587-1942, olivia.n.pham@hawaii.gov



Prevent stormwater pollution!

- Consider stormwater impacts from your daily operations
- Practice Good Housekeeping measures
- Implement Source Control BMPs
- Respond to spills promptly
- Report illicit discharges and spills









"Mālama i ke awa kai" - Protect Our Harbor Waters

2019 HDOT Harbors Tenant Training Questionnaire



Name: _____ Date: _____

- 1. An illicit discharge is:
 - a. Condensate from AC system
 - Rain water runoff
 - c. A non-stormwater discharge that poses a risk to the environment
 - d. None of the above
- 2. Which of the following are not permitted to be discharged into the storm drain?
 - a. Equipment washing water
 - b. Fish entrails and spilled chemicals
 - c. Petroleum and paint products
 - d. All of the above
- 3. What is required when an illicit discharge is suspected at your harbor?
 - a. If on Oahu, call Harbor Traffic Control Unit at (808) 587-2076
 - Call Harbors Environmental Hotline at (808) 587-1962
 - c. None of your business
 - d. a or b
- The picture below shows a good example of a BMP because:
 - a. The equipment is stored outdoors
 - Drip protection is placed under oil-containing equipment and is not oversaturated
 - c. The drip protection needs replacement
 - d. None of the above



- In the State of Hawaii, anything that enters a storm drain inlet will end up in the ocean without treatment.
 - a. True
 - b. False
- 6. You can help to reduce nutrient pollution by:
 - a. Cutting down fertilizer and pesticide use
 - Using phosphate-free detergents, soaps, and cleaners
 - c. Properly disposing of landscaping debris
 - d. All of the above
- 7. Which of the following are good examples of BMPs?
 - a. Wash equipment over storm drains
 - Keep trash bins open all day
 - Place spill kits in high risk areas
 - d. All of the above
- Low impact development is a type of postconstruction BMP.
 - a. True
 - b. False
- The first step of spill response is to:
 - a. Complete the required report
 - b. Assess the risk
 - c. Confine the spill
 - d. Stop the source
 - e. Select PPE
- An environmental violation may lead to criminal penalties.
 - a. True
 - b. False

Please provide your comments here:





