Section A

Stormwater Management Program Overview
Public Education and Outreach Program
Public Involvement/Participation Program

Stormwater Management Plan
Honolulu Harbor
and Kalaeloa Barbers Point Harbor

Prepared for:
State of Hawaii
Department of Transportation
Harbors Division

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1.0   INTRODUCTION

1.1   BACKGROUND

Hawaii's residents and businesses are heavily dependent on ocean commerce for their everyday needs. Eighty percent of all consumer goods, including food and fuel, are imported to the State of Hawaii, with 98 percent of these goods received and processed through its commercial ports. The delivery of goods via ocean transportation supports every facet of Hawaii's economy, including tourism, construction, national defense, agriculture, and all other industries.

Hawaii's commercial harbors operate as a "hub and spoke" system where all imported goods destined for the Neighbor Islands are first received at the state's main port-of-entry, Honolulu Harbor, located on the south shore of the Island of Oahu, before being redirected with tug-and-barge operations to any of the other commercial ports in the State.

Honolulu Harbor is one of the largest container handling ports in the United States (US) with over eight million short tons of cargo handled annually. Honolulu Harbor provides facilities for passenger, excursion, research and fishing vessels and supports numerous tenants engaged in commercial fishing and other maritime-related activities.

Kalaeloa Barbers Point Harbor (KBPH), also located on the south shore of Oahu, is approximately 21 miles west of Honolulu Harbor. It is the most recently constructed Hawaii commercial harbor and primarily handles liquid such as petroleum products and dry-bulk cargos such as coal, cement and scrap metal, along with lesser amounts of miscellaneous general cargo and containers. Commercial ship maintenance and repair facilities are also located there.

Honolulu Harbor and KBPH located on Oahu, Hawaii, are properties owned by the State of Hawaii Department of Transportation (HDOT) Harbors Division (hereinafter referred to as the "Harbors") along with the other eight commercial harbors serving the outer islands of Hawaii, Kauai, Maui, Molokai and Lanai.

Stormwater flowing over Harbors property into storm drains enters the small municipal separate storm sewer systems (MS4) at each harbor, which empties directly into the harbor waters. Honolulu Harbor and KBPH are subject to the requirements under the National Pollutant Discharge Elimination System (NPDES) regulations (40 Code of Federal Regulations [CFR] 122), which is regulated by the U.S. Environmental Protection Agency (USEPA) as they are in urbanized areas. In the State of Hawaii, the corresponding administrative management has been delegated to the State of Hawaii Department of Health (HDOH) Clean Water Branch (CWB).

Stormwater and certain non-stormwater discharges entering Honolulu Harbor and KBPH are regulated via two separate Notices of General Permit Coverage (NGPCs) (File Numbers HI 03KB482 and HI 03KB488, respectively). Harbors needs to comply to the NGPC under Hawaii Administrative Rules (HAR) Chapter 11-55 Appendices A and K, and HAR Sections 11-55-34.04(a), 11-55-34.07, 11-55-34.11, 1-55-34.12, and any other applicable Sections of HAR Chapters 11-55.

NGPCs for these two storm drainage systems were granted by the HDOH in two letters dated May 19, 2003. Coverage for both harbors was extended through HDOH administrative extension

dated December 9, 2013 and December 2, 2016, at which time HDOH renewed NGPCs for both Harbors.

Despite Harbors' efforts to comply with the NGPCs, the USEPA initiated regulatory actions to increase awareness, improve the stormwater program, and to ensure compliance. On November 5, 2014, HDOT entered into a Consent Decree (CD), which requires Harbors to comply with the Clean Water Act (CWA) by meeting specific requirements. These ongoing requirements, along with the applicable requirements set forth by the NGPC, have been integrated into Harbors Stormwater Management Plan (SWMP).

1.2 PURPOSE AND UPDATE

The purpose of the SWMP is to support Harbors' vital ocean commerce role by ensuring that applicable environmental protection requirements are met at both Honolulu Harbor and KBPH in accordance with the requirements of the NGPCs and CD set forth for both harbors. The SWMP is intended to define specific actions, metrics, milestones, timelines, roles, and responsibilities across Harbors offices. The SWMP utilizes the six minimum control measures established by the USEPA and required by HAR 11-55 Appendix K.

The SWMP has been updated to reflect the more practical and effective control measure activities which have been implemented in place since 2015 to be consistent with the overall goals of the program. A copy of this SWMP is available on the Harbors storm water management website at http://hidot.hawaii.gov/harbors/malamaikeawakai/.

1.3 DOCUMENT FORMAT

The format of this SWMP was adopted to follow the six minimum control measures while improving readability for Harbors personnel and regulators. Each minimum control measure and the goals associated with it are discussed separately. The discussion identifies the minimum control measure, a rationale for each measure, a schedule for implementation including measurable goals, milestones, and strategies for implementing relevant Best Management Practices (BMPs).

In order to assess progress for each minimum control measure, the SWMP contains BMP tables in Section A.2 that track activities either occurring or be implemented in the future. Each BMP activity is assigned a specific evaluation indicator, milestone, time frame/due date, and responsible party. These performance metrics will be assessed in an Annual Compliance Report (ACR) to provide a detailed accounting of SWMP accomplishments.

Following each major section in Section A.2, a checklist has been provided to clearly summarize Harbors compliance with specific requirements of the NGPC and the CD. The compliance checklist includes the SWMP section or item, the origin of the requirement, a summary of the requirement, and a checkbox indicating whether or not the item has been completed.

The format of the SWMP is outlined below:

A. Section 2.0 - Stormwater Management Program Overview

    a. Includes a brief introduction of each minimum control measure,

    b. BMP Tables, and

    c. Compliance Checklists for each section.

  Section 3.0 - Public Education and Outreach Program

  Section 4.0 – Public Involvement/Participation Program

B. Illicit Discharge Detection and Elimination (IDDE) Program

    a. Tenant Inspection Program (TIP)

    b. Outfall Reconnaissance Inventory and Inspection Program (ORIIP)

    c. Site Assessment Program

    d. Enforcement Response Program (ERP)

C. Construction Site Runoff Control Program (CSRCP)

D. Post-Construction Stormwater Management Program

E. Pollution Prevention and Good Housekeeping Program

    a. Storm Sewer System Operation & Maintenance (SSS O&M) Program

1.4 AUTHORIZATION AND LIMITATIONS

In compliance with the CWA, as amended; Chapter 342D, Hawaii Revised Statutes (HRS); and Chapters 11-54 and 11-55, HAR, State of Hawaii, Harbors is authorized to discharge stormwater runoff and certain non-stormwater discharges identified in the NGPCs.

The NGPCs require that Harbors effectively prohibit non-stormwater discharges through its system into State waters. The following non-stomwater discharges may be discharged into Harbors small MS4 without an NPDES permit, provided that such discharge will not contain pollutants in accounts that will cause or contribute to a violation of an applicable water quality standard.

1. Water line flushing;

2. Landscape irrigation;

3. Diverted stream flows;

4. Rising ground waters;

5. Uncontaminated ground water infiltration as defined in 40 CFR §35.2005(20);

6. Uncontaminated pumped ground water;

7. Discharges from potable water sources and foundation drains;

8. Air conditioning condensate;

9. Irrigation water;

10. Springs;

11. Water from crawl space pumps and footing drains;

12. Lawn watering runoff;

13. Water from individual residential car washing;

14. Flows from riparian habitats and wetlands;

15. Dechlorinated swimming pool discharges;

16. Residual street wash water; and

17. Discharges or flows from firefighting activities.

In addition, this SWMP has identified major sources of potential pollutants under Harbors jurisdiction and included the implementation of appropriate pollution prevention measures to reduce such discharge from entering the Harbors small MS4.

1.5   ROLES AND RESPONSIBILITIES

The Director of Transportation is responsible for the care and control of the commercial harbors and homesteads. The Director confers responsibility to each manager, supervisor, and employee to balance the industrial and commercial activities at Honolulu Harbor and KBPH with environmental compliance and the need to be good, steadfast environmental stewards of Harbors land and waters. The Director's Environmental Policy Statement is:

> *It is the policy of the Hawaii Department of Transportation to manage our facilities and programs in a manner that protects the environment, the safety of our employees, and the public health, while fulfilling our mission to deliver and operate a safe and effective statewide multi-modal transportation system.*

As stewards, Harbors are responsible for the following three objectives:

✓ Train Harbors employees and tenants to observe, educate, report, and assist with enforcing BMPs in and around the Harbors communities educate tenants on "Dump No Waste" in storm drainage system;

✓ Prevent and mitigate oil, debris, silt, and other potential pollutants from entering our ocean waters by implementing BMPs; and

✓ Encourage voluntary compliance and support enforcement actions, when necessary, to correct behavior.

The stormwater management team organization is shown in Figure 1-1. The responsibilities of key roles as they are related to stormwater management are described in Table 1-1.

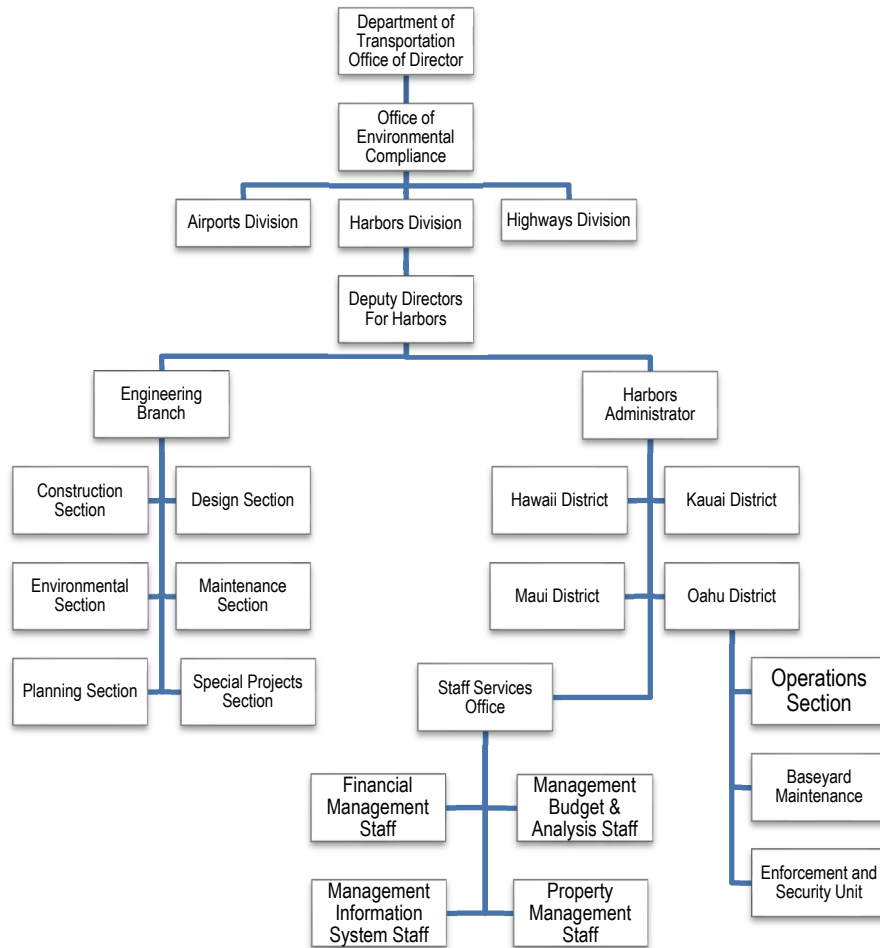**Figure 1-1   Harbors Administrative Organizational Chart**

Table 1-1   Roles and Responsibilities

Role	Responsibilities
HDOT Director	The program authority is maintained solely by the Director, who maintains direct oversight of all HDOT staff. The Director is responsible for the care and control of the commercial Harbors and homesteads.
Office of Environmental Compliance	Coordinates with all divisions of HDOT to achieve and maintain compliance with all environmental regulations and permits. The Office of Environmental Compliance has the authority and responsibility to oversee compliance with all environmental requirements relating to (Small) MS4 compliance. Reports to the Director.
Deputy Director for Harbors	Program authority is conferred from the Director through the Deputies who maintain direct oversight of Harbors staff.
Harbors Administrator	The stormwater program overall funding and staffing at District(s) are managed by the Harbors Administrator.
Engineering Branch (HAR-E)	Provides engineering management and stormwater program oversight in coordination with Oahu District. HAR-E is responsible for ensuring that the construction site runoff control and post-construction programs are implemented.
Engineering Branch Planning Section (HAR-EP)	Develops Harbors Master Plans, six-year capital project budget plan, and capital project biennial budget for new development and redevelopment projects.
Engineering Branch Design Section (HAR-ED)	Responsible for the preparation of construction plans and specifications for new development and redevelopment projects.
Engineering Branch Construction Section (HAR-EC)	Responsible for the implementation of construction plans and specifications for new development and redevelopment and special maintenance projects.
Engineering Branch Environmental Section (HAR-EE)	Oversees permit compliance (including this SWMP) as well as compliance with all relevant environmental regulations. HAR-EE assists with enforcement where necessary. HAR-EE consists of one supervisor, one engineer, and two staff environmental health specialists. *
Engineering Branch Maintenance Section (HAR-EM)	Responsible for the preparation of construction plans and specifications for special maintenance and repair projects.
Engineering Branch Special Projects Section (HAR-ESP)	Responsible for the preparation and implementation of construction plans and specifications for capital improvement projects.
Oahu District (HAR-O)	Honolulu Harbor and KBPH fall under the operational management and oversight of HAR-O. HAR-O is also responsible for maintaining post-construction BMPs.

Role	Responsibilities
Oahu District Operations Section (HAR-OC)	Oversees Harbor operations including vessel scheduling and berthing, monitoring of operations, street and yard sweeping, inspecting and cleaning storm drains, and trash collection and disposal. Marine Cargo Specialist (MCS) and Harbor Agent are part of HAR-OC and are responsible for conducting site patrol at their assigned piers for: damage, pier use by cargo operators, and to inspect, monitor, observe, and correct tenant activities that can potentially cause illicit discharges. MCSs and Harbor Agent also conduct routine storm drain inspections to determine if storm drain cleaning is needed.
Oahu District Baseyard Maintenance (HAR-OM)	HAR-OM personnel conduct daily maintenance functions at the piers and tenant areas in the cargo yards. In addition, HAR-OM is also responsible for sign installation and storm drainage system stenciling. HAR-OM personnel are expected to report observations of potential illicit discharges to Oahu District Harbor Traffic Unit (also known as Aloha Tower) or immediate supervisor.
Oahu District Enforcement and Security Unit (HAR-OE)	HAR-OE is responsible for conducting field patrols and enforcing relevant HAR.
Harbors Staff Services Office (HAR-S)	HAR-S advises the Harbors Administrator and furnishes functional guidance to the heads of the organizational components of Harbors.
Property Management Staff (HAR-PM)	Responsible for overseeing and enforcing the requirements of tenant leases and revocable permits including those related to the environment. Assists HAR-EE in ensuring that tenants implement proper BMPs.
Management Information Systems Staff (HAR-SI)	Responsible for maintaining and updating the Harbors computer systems and website.

* Harbors has reorganized HAR-EE to include a full time position whose duties include inspecting erosion and sediment control measures, and has the option to supplement resources and technical expertise using professional consultant services.

Table 1-2   SWMP Overview Compliance Checklist

Requirement	Relevant SWMP Section	Remarks	Requirement Included in SWMP
NGPC Section 1, Honolulu Harbor and KBPH - General Requirements	Page i	The certification required by the NGPC is superseded by CD Paragraph 9 (CD 9).	☑
NGPC Section 2, Honolulu Harbor and KBPH - Discharge Monitoring Requirements	A.1.4	The SWMP prohibits non-stormwater discharges (excluding those listed in 2.b of the NGPC).	☑
NGPC Section 3, Honolulu Harbor and KBPH - Reporting Requirements	A.1	Harbors has developed and is currently implementing and enforcing its SWMP (Sections 3.a to c, 3.f). 3.d and 3.e will be covered by the ACR.	☑
CD 9 - Certification of Reports	Section A, Page i	The SWMP has been certified in accordance with the CD.	☑
CD 10 – HDOT Organization Structure	A.1.5	The organization structure required by CD 10 has been updated and is shown in this SWMP.	☑
CD 11.a.i - Modification of SWMP Elements	A.1	The 2009 SWMP has been revised for both Honolulu Harbor and KBPH and submitted prior to Feb 3, 2015.	☑
CD 11.a.ii – Public Comment of SWMP	A.4	Public comment has been solicited per the CD. See Section A.4	☑
CD 12 – Implementation Timeline	A.1	The SWMP has been implemented no later than the close of public comment period.	☑
CD 13 – Annual Compliance Report	A.2.9	The ACR will include a qualitative SWMP implementation assessment.	☑

2.0   STORMWATER MANAGEMENT PROGRAM OVERVIEW

An effective stormwater management program approaches the issue of reducing pollutant discharges through the six minimum control measure elements shown in Figure 2-1.

Figure 2-1   Stormwater Management Program Elements

| Public Education and Outreach *Section A.3* | Public Involvement/ Participation *Section A.4* | Illicit Discharge Detection and Elimination *Section B* | Construction Site Runoff Control *Section C* | Post-Construction Stormwater Management *Section D* | Pollution Prevention & Good Housekeeping *Section E* |
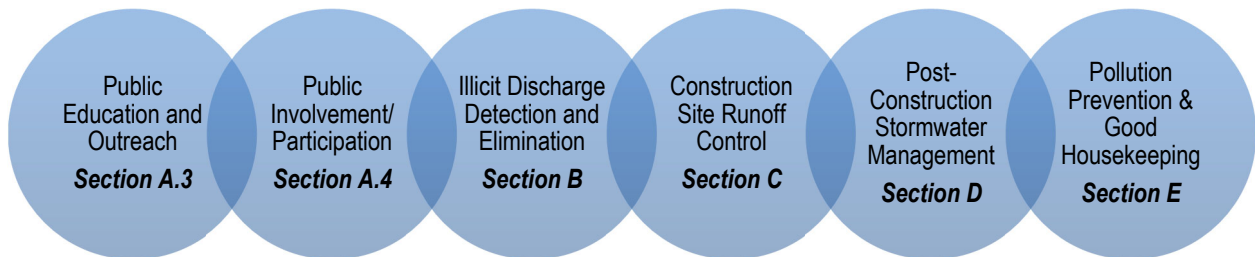
This section contains a high-level description of each of the stormwater management program elements. The relevant requirements of the NGPCs and the CD have been addressed in this SWMP in Sections A through E.

Following each section below, a BMP Table containing the specific requirement, metrics, milestones, due dates, and outputs for each activity is included. The items in this table will be reported upon in the ACR each year.

A Compliance Checklist is included following the BMP Table, which is intended to facilitate review by regulators and other stakeholders. The checklists contain each relevant requirement and a reference to the SWMP section in which the requirement is addressed.

2.1   PUBLIC EDUCATION AND OUTREACH PROGRAM

The public education element targets the users including Harbors tenants, the public and visitors to our islands, employees of Harbors, vessel operators, and general contractors performing construction within Harbors jurisdiction. The SWMP describes the plan to prevent generation of potential pollutants by providing outreach on stormwater awareness and pollution prevention, getting users involved in developing the stormwater management program, inspecting and enforcing responsible practices at construction sites and tenant properties, and requiring the implementation of long-term engineering solutions and BMPs.

Public education aims to create and promote awareness and prompt behavioral changes in the community. The responsibility of providing education and outreach to the users of the small MS4s falls under HAR-EE mainly and HAR-O would involve in implementation when necessary. This section contains an overview of The Public Education and Outreach Program, contained in Section A.3. For further details, please refer to Section A.3. The relevant BMPs and compliance checklist are summarized in BMP Table 2-1 and Table 2-1, respectively.

For education and outreach purposes, the public can be divided into four categories: the general public; Harbors tenants; vessel owners/operators; and Harbors employees, consultants, and contractors. Harbors has developed approaches to increase stormwater awareness in each of

these groups. Outreach to Harbor employees, consultants, and contracts is discussed in later sections as they relate to specific activities.

2.1.1   General Public Education and Outreach

The public education and outreach effort are centered around the awareness message *Mālama i ke awa kai* (revised in 2018 from "*Mālama i ke kai*" for a more precise Hawaiian language translation), which means *protect our harbor waters*. This message is designed to be simple, memorable, and to convey the need and importance of the stormwater pollution prevention awareness as well as to reflect our local culture. This message will be used as a branding tool and will be prominently displayed in or on: Harbors website, signage and stenciling, information given to new tenants, educational flyers, newspaper ads, and other related outreach materials. Harbors will utilize at least three forms to disseminate this awareness message including the Honolulu Star-Advertiser, web-based media, and routine inspection and investigation-driven site visit.

General Public
- Awareness message
- Newspaper ad
- Hotline
- Website
- Signage
- Stenciling

Harbors Tenants
- Updated leases and revocable permits
- Educational materials
- Annual training
- Tenant Environmental Manager of the Year or similar award
- Tenant inspections
- Investigation-driven site visit

Vessel Owners and Operators
- Educational materials
- Website
- Investigation-driven site visit

Other means of communicating and engaging the public include establishing an environmental hotline, reachable during state working hours by dialing (808) 587-1962, or 24 hours seven days a week (24/7) through the Harbors Oahu District Traffic Control Unit at (808) 587-2076, or the Harbors stormwater website (http://hidot.hawaii.gov/harbors/malamaikeawakai/). The hotline can be used to report observations of suspected illicit discharges and for general environmentally related inquiries. The website provides information about (potential) violation reporting numbers, link for public inquiry; hyperlinks to Harbors NPDES permits, SWMP, training, ACRs, main manuals and forms, BMP flyers; and links to other useful resources (such as USEPA website).

Signs have been installed that include information about illicit discharges, the stormwater awareness message, and the environmental hotline for reporting. Harbors has stenciled all storm drain inlets and open channels on Honolulu Harbor and KBPH to promote stormwater awareness and reduce non-stormwater discharges into harbor waters. Harbors will continue to stencil the storm drains at both public and restricted areas. In addition, Harbors will continue to support tenant's cleanup efforts. The locations of signs and storm drainage assets are tracked in Cityworks Asset Management System (AMS) via Geographic Information System (GIS) software to facilitate evaluation of where future signs should be placed and Harbors storm drainage system operation & maintenance (O&M).

2.1.2   Tenant Education and Outreach

Tenants are required to reduce or eliminate potential pollution in stormwater discharges and to effectively prohibit unauthorized non-stormwater discharges into the small MS4s. Harbors

includes language to this effect in new leases and tenant revocable permits (TRPs). Additionally, Harbors has developed a New Tenant Information Package, which is provided to new tenants to make them aware of Harbors stormwater requirements and understand how to identify, defer, and report illicit discharges. This New Tenant Information Package also includes the stormwater awareness message, minimum BMPs, and educational materials describing the responsibilities of the tenant and resources for obtaining additional information regarding stormwater pollution.

An inventory of all active tenant assets at Honolulu Harbor and KBPH is tracked in AMS using GIS. HAR-PM will continue to notify HAR-EE of new tenants at Honolulu Harbor and KBPH. The inventory includes tenant contact information and mailing address, which will be used by Harbors to provide tenants with educational materials and inform them of annual stormwater awareness training via mail. This inventory also includes tenant location, a description of the nature of business activities, and whether the tenant maintains coverage under the NPDES B permits issued by HDOH.

Harbors holds tenant stormwater awareness trainings annually and tracks tenants' attendance. A questionnaire is used to assess tenant knowledge on stormwater pollution prevention awareness. This questionnaire also includes a feedback section, to solicit potential improvements to the future trainings. A Tenant Environmental Manager of the Year (TEMY) or similar award is given to the nominated winning tenant environmental manager who has implemented exemplary environmental and safety practices and fosters an exceptional company environmental culture. The award provides positive incentive for tenant environmental managers and provides concrete examples of solutions that are realistic and affordable. The award is presented with a commendation letter signed by the Governor of the State of Hawaii.

The TIP is part of the IDDE program discussed in Section B; however, the TIP contains tenant outreach opportunities, which can include:

- ✓ Ensuring that tenants are aware of their environmental responsibilities;

- ✓ Providing outreach materials such as informational sheets, BMP fliers, schedules of upcoming training to tenants;

- ✓ Gathering data to be used to update outreach materials based on observations in the field; and

- ✓ Provide immediate feedback to tenants regarding successful BMPs and the ones to be implemented.

2.1.3   Vessel Operators Educational Program

Harbors' efforts towards vessels owned or operated by tenants, are focused on related operations on land. These tenants are otherwise subject to requirements of the Vessel General Permit (VGP) and small VGP (sVGP) by the USEPA and regulations of the United States Coast Guard (USCG).

MCSs usually monitor loading and unloading procedures for the large vessels at the harbor. Their duties include tracking compliance with various aspects of the process and report stormwater pollution control compliance related issues upon observing. Educational sheets developed by HAR-EE for small vessel maintenance activities are distributed by MCSs to vessel agents and owners when they receive hot work permits.

BMP Table 2-1   Public Education and Outreach

Activity	Reference	Evaluation Metric	Due Date	Responsible Party	Output
Integrate and promote the message: *Mālama i ke awa kai –* *Protect Our Harbor Waters*	CD 14.a.i SWMP A.3.1.1	Percentage of tenant outreach and training materials featuring message.	Nov 5, 2014, then annually	HAR-EE	ACR
Identify and implement no less than three forms of disseminating stormwater awareness information to tenants and the public.	CD 14.a.ii SWMP A.3.1	At least three forms of dissemination.	Annually	HAR-EE	ACR
Post stormwater pollution prevention awareness advertisement(s) in local newspaper(s) to provide outreach to the general public about stormwater pollution controls and describe Harbors efforts to protect and sustain stormwater quality.	CD 14.a.ii CD 14.a.iii SWMP A.3.1.2	Number of advertisements sponsored.	Annually	HAR-EE	ACR, local newspaper
Maintain a web-based media to disseminate stormwater awareness information.	CD 14.a.ii SWMP A.3.1.3	Number of visitors annually.	Annually	HAR-EE	ACR
Participate in the annual HDOT Protect Our Water Conference, or similar.	CD 14.a.ii SWMP A.3.1.4	Number of activities.	Annually	HAR-EE	ACR
		Number of visitors to booth.	Annually	HAR-EE	ACR
Use Suspected Illicit Discharge Reporting (SIDR) to track	SWMP A.3.1.5	Number of informational inquiries and reports received.	Annually	HAR-EE, HAR-O	ACR, SIDR

Activity	Reference	Evaluation Metric	Due Date	Responsible Party	Output
informational inquiries and reports placed to the hotline and follow-up activities.		Duration from when call is received until response.	Annually	HAR-EE, HAR-O	ACR, SIDR
Provide outreach to the general public at Honolulu Harbor and KBPH on stormwater issues via Harbors website.	CD 14.b.i SWMP A.3.1.6	Items described in Section 2.1.6 are updated efficiently.	Ongoing	HAR-EE	ACR
		Identify website pages to display stormwater awareness message.	Ongoing	HAR-EE, HAR-SI	ACR
		Link to Harbors website is prominent featured on the main HDOT website.	Ongoing	HAR-EE, HAR-SI	ACR
		Track number of visitors to Harbors stormwater management website.	Annually	HAR-EE, HAR-SI	ACR
Install signage at public areas and stencil storm drain inlets to promote stormwater pollution prevention so as to defer illicit charges into Harbors waters.	CD 14.c.i SWMP A.3.1.7	Identify and install no less than 50 signs.	November 5, 2014	HAR-EE, HAR-O	ACR
	CD 14.c.ii SWMP A.3.1.7	Percentage of storm drain inlets/open channels stenciled.	February 3, 2015	HAR-EE, HAR-O	ACR
	CD 14.c.ii SWMP A.3.1.7	Percent of stencils/labels inspected prior to the wet season. Percentage of illegible stencils rectified.	Annually	HAR-EE, HAR-O	ACR
Update tenant lease agreements, TRPs, and other materials (upon renewal) to reference or include minimum BMPs and require their implementation.	CD 14.d.ii SWMP A.3.2.1	Percent of new/renewed tenants with modified language in their leases or TRPs.	Ongoing	HAR-PM, HAR-O, and HAR-EE	ACR, leases and TRPs
Update the New Tenant Information Package when	CD 14.h.i SWMP A.3.2.1	New Tenant Information Package developed and updated.	Ongoing	HAR-EE	ACR, New Tenant

Activity	Reference	Evaluation Metric	Due Date	Responsible Party	Output
necessary, to ensure new tenants are aware of stormwater requirements.					Information Package
Maintain an electronic tenant inventory and update in accordance with the TIM.	CD 14.e.i SWMP A.3.2.2 TIM	Percentage of tenants updated information listed in the electronic inventory based on the most recent inspection.	Ongoing	HAR-EE, HAR-PM	ACR
Develop a comprehensive list of BMP fact sheets covering common tenant activities.	CD 14.d.i SWMP A.3.2.3	Comprehensive set of BMP fact sheets developed and posted on Harbors website.	Ongoing	HAR-EE	SWMP, ACR
Provide educational outreach to tenants, including educational mailers/emails and training workshops to proactively mitigate activities that could result in pollution.	CD 14.g.i SWMP A.3.2.3-4	Twice per year, distribute educational materials to tenants that include requirements listed in A.3.2.3.	Annually	HAR-EE	ACR
	CD 14.a.ii.1 SWMP A.3.2.4	At least 80% of attended the annual training.	Annually	HAR-EE	ACR
	SWMP A.3.2.4	Percentage of positive feedback received.	Annually	HAR-EE	ACR
	CD 14.f.i, 14.f.ii SWMP A.3.2.4	At least 60 percentage of tenants responded to the questionnaire.	Annually	HAR-EE	ACR
	CD 14.f.ii SWMP A.3.2.4	Training materials updated to address most frequently missed question(s) from previous year.	Annually	HAR-EE	ACR
Develop and distribute information sheets with recommended BMPs for Vessel Operators.	SWMP A.3.3.1	Continue to distribute BMP fact sheets for vessel operators when necessary.	Ongoing	HAR-O, HAR-EE	Harbors website

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Table 2-1   Public Education and Outreach Compliance Checklist

Requirement	Relevant SWMP Section	Remarks	Requirement Included in SWMP
NGPC Section 3.a	A.3	Harbors Public Education and Outreach Program is contained in this SWMP.	☑
CD 14.a.i	A.3.1.1	Harbors has developed a stormwater awareness message, *Mālama i ke awa kai*, and implementation strategy. The message was revised in 2018 from "*Mālama i ke awa kai*" for a more precise Hawaiian language translation of "protect our harbor waters."	☑
CD 14.a.ii	A.3.1.1	Harbors will disseminate stormwater pollution prevention awareness message through a local newspaper, web-based media, and volunteer activities.	☑
CD 14.a.ii.1	A.3.2.4	Harbors will continue to hold its annual stormwater pollution prevention awareness training and use tenant risk ranking as incentive to achieve 80% attendance.	☑
CD 14.a.iii	A.3.1.2	Harbors will place an ad in a local newspaper once per year describing its stormwater pollution prevention efforts.	☑
CD 14.b.i	A.3.1.6	Harbors will update its website to contain the items listed in the CD and prominently display the stormwater pollution prevention awareness message.	☑
CD 14.b.ii	A.3.1.6	The HDOT division websites will be linked to each other.	☑
CD 14.b.iii	A.3.1.6	The HDOT website will feature a prominent link to the HDOT Harbors website. The number of visitors will be tracked.	☑
CD 14.c.i	A.3.1.7	Harbors has identified 50 locations for sign placement and completed the installation by February 3, 2015.	☑
CD 14.c.ii	A.3.1.7	Harbors has stenciled all storm drain inlets by February 3, 2015 and is currently on a recurring inspection and re-stenciling schedule.	☑

Requirement	Relevant SWMP Section	Remarks	Requirement Included in SWMP
CD 14.d.i	A.3.2.3	BMP fact sheets for common tenant activities have been developed.	☑
CD 14.d.ii	A.3.2.1	Following renewal, tenant lease agreements and TRPs have been updated to require the implementation of minimum BMPs when applicable.	☑
CD 14.d.iii	A.3.3.1	A BMP fact sheet for small Vessel Operators has been developed and is available on the Harbors website.	☑
CD 14.e.i	A.3.2.2	Harbors maintains an electronic inventory of tenants using Cityworks AMS, which is integrated with GIS.	☑
CD 14.f.i	A.3.2.4	Harbors mails and distributes during the annual training a tenant questionnaire to assess their knowledge on stormwater pollution prevention awareness.	☑
CD 14.f.ii	A.3.2.4	Harbors uses the results of the questionnaire to update training materials. Harbors uses its best efforts to ensure at least 60% of tenants respond to survey. The results are included in the next ACR following the training.	☑
CD 14.g.i	A.3.2.3-4	Harbors provides educational materials to tenants at least twice per calendar year.	☑
CD 14.h.i	A3.2.1	Harbors has developed a New Tenant Information Package.	☑

2.2   PUBLIC INVOLVEMENT/PARTICIPATION PROGRAM

Public involvement brings the public into the development, implementation and review of a MS4's stormwater management program. Harbors will follow the permit requirement and involve the public in developing its SWMP to raise consciousness of water quality issues, to create a sense of responsibility for water quality protection, and to lessen the likelihood that members of the public will commit actions that may lead to water quality degradation.

The copy of SWMP is posted on Harbors website. Upon completion of major modifications to the SWMP, a notice would be published in the *Honolulu Star-Advertiser* to advise the public of its availability for commenting. All received comments will be tracked and incorporated in the final SWMP as appropriate and implemented where necessary. The relevant compliance checklist is summarized in Table 2-2.

Table 2-2   Public Involvement/Participation Compliance Checklist

Requirement	Relevant SWMP Section	Remarks	Requirement Included in SWMP
NGPC Section 3.a	A.4	Harbors Public Involvement/Participation Program is contained in this SWMP.	☑
CD 11.a.i	A.4	The 2015 SWMP was provided to USEPA and HDOH on February 2, 2015.	☑
CD 11.a.ii	A.4	The 2015 SWMP was posted to the Harbors website on February 3, 2015, and the related public notice regarding its availability for review and comment was also posted on a local newspaper on the same day to assist in soliciting comments from both general public, users, and tenants. No comments were received at the time.	☑

2.3   ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM

The purpose of Harbors IDDE Program is to identify and eliminate illicit discharges and spills to the small MS4s at Honolulu Harbor and KBPH. It is comprised of three major components: the TIP, the ORIIP, and Site Assessment, as shown in Figure 2-2. The three programs shown below are three approaches to reducing potential pollutants from entering harbor waters.

Harbors has created an improved definition of illicit discharge to be used in the IDDE Program and for education and outreach program. An illicit discharge is defined as: *Any non-stormwater discharge that poses a risk to the environment.*

Figure 2-2   IDDE Program Organization

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        ┌──────────────────────────────────────────────────────────┐
        │  Illicit Discharge Detection and Elimination Program       │
        └──────────────────────────────────────────────────────────┘
              │                      │                      │
  ┌───────────────────────┐ ┌──────────────────┐ ┌──────────────────────┐
  │ Tenant Inspection     │ │ Outfall          │ │ Site Assessment      │
  │ Program               │ │ Reconnaissance   │ │ Program              │
  │                       │ │ Inventory &      │ │                      │
  │                       │ │ Inspection       │ │                      │
  │                       │ │ Program          │ │                      │
  └───────────────────────┘ └──────────────────┘ └──────────────────────┘
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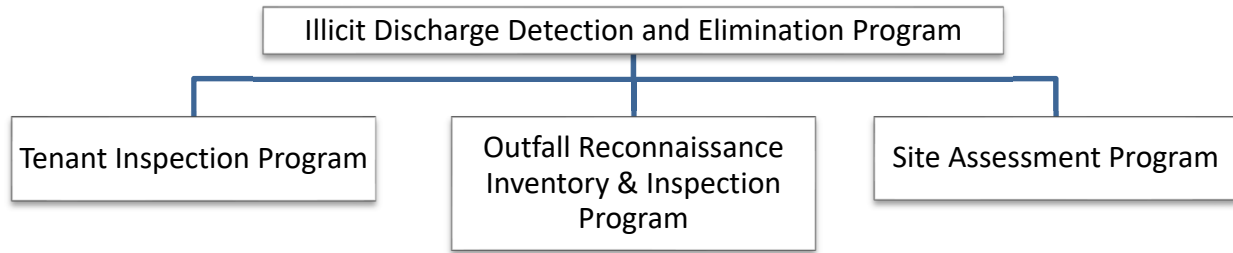
2.3.1   Tenant Inspection Program

The TIP, as described in the Tenant Inspection Manual (TIM), involves recurring inspections of tenant facilities with frequencies determined by the relative risks associated with each tenant facility. This tenant inspection process is mostly preventive in nature in that, it helps in identifing potential sources of pollutants from materials stored on-site or operations conducted on-site, and evaluates BMPs and facility layouts to determine if they are effective at eliminating illicit discharges before they happen. The six types of inspections include:

- ✓ Initial Site Inspection/New Tenant Inspection;
- ✓ Routine Tenant Inspection;
- ✓ Reconnaissance Inspection;
- ✓ Final Site Inspection;
- ✓ Follow-up Inspection; and
- ✓ Investigation Inspection.

HAR-EE is responsible for implementing the TIP. Further information on this program can be found in Section B.2.

2.3.2   Outfall Reconnaissance Inventory and Inspection Program

The ORIIP consists of conducting inspections during dry weather and wet weather conditions to provide observation of the structural conditions of the outfalls, and to determine if illicit discharges are occurring and if existing BMPs are sufficient. Further information on this program can be found in Section B.3.

During dry weather inspections, illicit discharges is usually observed from the ocean side as no stormwater should be discharging from the outfalls at the time. When flows are observed, ORIIP personnel will attempt to determine the source of the flow with a quick visual inspection. If further investigation is needed, HAR-EE will follow up, identify the source, and contact the responsible party and appropriate regulatory agency when necessary.

Wet weather inspections are conducted from the land-side, which would allow inspectors to observe outfall flow and sheet flow from the pier edge. Inspectors evaluate the quality of the

flow, looking for oil sheen, discoloration, trash and debris, and other indicators that BMPs are not functioning correctly.

The results of both types of inspections are recorded and managed in Harbors AMS. The ORIIP includes an inventory of all outfalls at Honolulu Harbor and KBPH that is updated following each inspection event. The data collected during inspections help create a more complete list of the potential illicit discharges.

2.3.3   Site Assessment Program

HAR-O and HAR-EE are responsible for the third component of the IDDE program which is Site Assessment (i.e., harbor patrol), and it is carried out by Marine Cargo Specialists and Harbor Police. Upon observation, a suspected illicit discharge would be reported to HAR-EE. High risk areas will be inspected in accordance with the TIP and ORIIP in order to identify and eliminate active illicit discharges, to increase the field presence of Harbors personnel and thus deter illicit discharges, and to identify areas that would benefit from the installation of signs. If violations are identified during Site Assessment, Harbors will initiate enforcement in accordance with the appropriate enforcement process including the ERP (see Attachment 4 of Section B), if necessary.

Harbors will also provide outreach activities during Site Assessments such as distributing BMP fliers or fact sheets, a schedule of upcoming trainings, or other materials.

2.3.4   Enforcement

One of the primary objectives of Harbors environmental enforcement program is to ensure tenants comply with the environmental regulations, lease agreements, and/or TRPs; correct any potential violation(s); and require tenants to operate their facilities in accordance with Harbors environmental policy, SWMP, and applicable BMPs. The full scope of Harbors enforcement program is described in the ERP.

Harbors has entered into a Memorandum of Agreement (MOA) with HDOH CWB for the purpose of coordinating enforcement actions against violators of water quality standards in HAR 11-54. With this MOA in place, the ERP will be more effective at deterring tenants and the public from taking actions that could allow illicit discharges to enter the harbor waters.

2.3.5   Employee Training

Harbors requires all Harbors employees with IDDE responsibilities to attend an annual IDDE training to get refreshed with the fundamentals of environmental stewardship and associated responsibilities. Employees with specific tenant inspection or ORIIP responsibilities will be provided appropriate training focusing on the TIM and ORIIP, respectively.

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BMP Table 2-2   Illicit Discharge Detection and Elimination

Activity	Reference	Evaluation Metric	Due Date	Responsible Party	Output
Harbors will inspect all regulated tenants at frequencies based on their environmental risk.	CD 14.h.ii TIM Section 2	Percentage of new tenants having initial/new tenant inspection completed.	Within three months	HAR-EE	ACR
	CD 16.e.i TIM Section 4.3	Percentage of tenants having risk ranking updated per the TIM.	Annually	HAR-EE	ACR; database
	SWMP B.2 - TIM	Percentage of follow-up inspections completed within 7 days upon discovery.	Annually	HAR-EE	ACR; database
	CD 16.e.iii	Percentage of follow-up inspections completed within 30 days of a reconnaissance inspection identifying a substantive change to a facility's operation, size, or activities.	Annually	HAR-EE	ACR; database
	SWMP B.2 - TIM	Percentage of investigative inspections performed by next working day.	Annually	HAR-EE	ACR; database
Harbors will manage an outfall database that will track locations of outfalls and previous inspections in order to create a more complete picture of potential illicit discharges.	CD 16.c.i SWMP B.3 - ORIIP Section 2.0 and 3.0	Re-prioritize all outfalls.	Annually	HAR-EE	ACR; database
		Inspect all outfalls ranked Unlikely during dry weather.	Biennially	HAR-EE	ACR; database
		Inspect all outfalls ranked Potential, Suspect, and Obvious during dry weather.	Annually	HAR-EE	ACR; database
		Inspect outfalls at "high risk" area during wet weather.	Annually	HAR-EE	ACR; database

Activity	Reference	Evaluation Metric	Due Date	Responsible Party	Output
	CD 16.c.ii CD16.d SWMP B.3 - ORIIP Section 3.3 and 3.4	Percentage of illicit discharges identified during both dry and wet weather inspections properly addressed.	Annually	HAR-EE	ACR; database
Perform site assessments to identify active or recent illicit discharges and increase the field presence of Harbors personnel.	CD 16.b.i CD 16.b.iii SWMP B.4	Percentage of identified suspected illicit discharge tracked. Respond to violations in accordance with the ERP.	Annually	HAR-O, HAR-EE	ACR; database
Identify areas that would benefit from signs.	CD 16.b.ii SWMP B.4	Identify additional areas in need of sign.	Ongoing	HAR-EE, HAR-O	ACR
Provide effective educational materials to employees to increase their knowledge of Harbors stormwater pollution prevention program.	CD 15.a.ii SWMP B.6.1	Provide information about stormwater pollution prevention to all Harbors employees.	Annually	HAR-EE	ACR
	CD 15.a.i SWMP B.6.1	At least 80% of Harbors employees responding to stormwater awareness and pollution prevention survey.	Annually	HAR-EE	ACR
	CD 15.b.i SWMP B.6.1	Provide IDDE training to all Marine Cargo Specialists, Harbor Police, and Grounds Supervisors.	Annually	HAR-EE and HAR-O	ACR
	CD 15.b.ii SWMP B.6.2	Provide training to staff whose job duties include implementing the TIP, as specified in the TIM.	Annually	HAR-EE	ACR
	CD 15.b.iii SWMP B.6.3	Provide training to staff whose job duties include implementing the ORIIP, as specified in the ORIIP manual.	Annually	HAR-EE	ACR

Table 2-3   Illicit Discharge Detection and Elimination Compliance Checklist

Requirement	Relevant SWMP Section	Remarks	Requirement Included in SWMP
NGPC Section 3.a	B	Harbors Illicit Discharge Detection and Elimination Program is contained in this SWMP.	☑
CD 14.h.ii	B.2	Inspections of new tenants are conducted as described in the TIM.	☑
CD 15.a.i	B.6.1	Harbors surveys the employees to assess their knowledge regarding stormwater awareness and pollution prevention.	☑
CD 15.a.ii	B.6.1	Harbors provides stormwater pollution prevention information to all employees.	☑
CD 15.b.i	B.2, B.3, B.6	Harbors conducts the IDDE program in accordance with the TIP, Section B.2, and ORIIP, Section B.3. Harbors trains Marine Cargo Specialists and Ground Supervisors per Section B.6.	☑
CD 15.b.ii	B.6.2	Training is provided to staff responsible for the TIP implementation.	☑
CD 15.b.iii	B.6.3	Training is provided to staff responsible for the ORIIP implementation.	☑
CD 16.a	B.1.1	An improved definition of "illicit discharge" and examples have been developed and are included in the SWMP.	☑
CD 16.b.i	B.4	Site Assessments are conducted in accordance with the TIM and ORIIP.	☑
CD 16.b.ii	B.4	Outreach materials are provided during Site Assessments.	☑
CD 16.b.iii	B.4	Harbors will respond to violations identified during Site Assessments in accordance with the ERP.	☑
CD 16.c.i	B.3	Harbors has implemented the ORIIP to identify illicit discharges, assess BMP performance, and assess system integrity.	☑
CD 16.c.i.2	ORIIP	Wet weather inspections are conducted in accordance with the ORIIP.	☑

Requirement	Relevant SWMP Section	Remarks	Requirement Included in SWMP
CD 16.c.ii	TIM, ORIIP, ERP	Records of all dry and wet weather observations and investigations are recorded.	☑
CD 16.d	ORIIP	Harbors conducts source identification in accordance with the ORIIP.	☑
CD 16.e.i	TIM Sections 2, 4.3	Harbors will implement inspections and update risk rankings per the TIM.	☑
CD 16.e.ii	TIM Section 4.3, ERP	Harbors inspects tenants at appropriate frequencies per the TIM and conducts enforcement per the ERP.	☑
CD 16.e.ii.1	TIM Attachment 10	Harbors provides outreach to tenants during inspections, as needed.	☑
CD 16.e.iii	TIM Section 2.0	Triggered follow-up inspections are completed within 30 days of a reconnaissance inspection to update tenant risk ranking.	☑
CD 18.g.ii	ERP	Harbors undertakes enforcement action in accordance to the ERP, as appropriate.	☑
CD 19	B.5 ERP	Harbors has implemented the ERP and included it in this SWMP.	☑
CD 19.a	ERP	Harbors will obtain compliance and deter non-compliance by utilizing the full extent of Harbors authority, including the authority to issue civil fines and incorporating Class I and Class II violations.	☑
CD 19.a.i.1	ERP	Harbors has incorporated the definition of a Class I violation.	☑
CD 19.a.i.2	ERP	Harbors has incorporated the definition of a Class II violation.	☑
CD 19.b	B.5.1	HDOT has entered into a MOA with HDOH to refer violations for escalated enforcement.	☑

2.4   CONSTRUCTION SITE STORMWATER RUNOFF CONTROL PROGRAM

The Harbors CSRCP is an element of the Harbors stormwater management program that seeks to limit the negative impacts of active construction sites on the stormwater conveyance systems and receiving water bodies. The CSRCP document, which details the program, is included in Section C. Post-Construction Stormwater Management Program has been developed to be complementary to the CSRCP and is included in Section D.

All construction projects at Honolulu Harbor and KBPH are subject to the CSRCP including documented project review and construction site runoff control BMP inspection requirements, unless explicitly exempted under the following conditions, based on the assumption that they do not impact the storm drainage system and disturb less than one acre of land.

The following list of exempt projects would be subject to IDDE program:

- ✓ Minor land disturbance activities performed by a property owner or employee on a single lot (such as minor landscaping activities and interior improvements);
- ✓ Post, pole, sign, and fencing installation;
- ✓ Utility repair work;
- ✓ Parking lot, driveway, and other paved surface repair; and
- ✓ Repair and maintenance activities.

Harbors oversight of non-exempt construction projects is divided into two main categories: Harbors construction projects and tenant improvement projects. Each category is managed through a process of design review, inspections, and enforcement. Although the process is similar, the specific procedures and responsible parties vary between programs.

Harbors has adopted the City and County of Honolulu (CCH) BMP Manual for Construction Sites as a field manual to guide both Harbors construction projects and tenant improvement projects. The CCH BMP Manual for Construction Sites can be accessed at the following link: https://www.honolulu.gov/rep/site/dfmswq/library/BMP_manual_2011-11.pdf

2.4.1   Training

Training will be provided to Harbors staff, contractors, and consultants who have primary construction site stormwater management responsibilities. The training will provide a detailed review of stormwater pollution prevention concepts and practices, and a discussion of the procedures and protocols of the Harbors CSRCP.

Harbors provides outreach to construction contractors and consultants to raise their awareness and understanding of the issues and causes of stormwater pollution and to explain their responsibilities. This outreach is conducted through informational exchanges between the Harbors Project Manager, Project Engineer, Construction Manager, and their contractors.

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BMP Table 2-3　　　　**Construction Site Runoff Control Plan**

Activity	Reference	Evaluation Metric	Due Date	Responsible Party	Output
Harbors will maintain oversight of all non-exempt Harbors construction projects for compliance with the CSRCP.	CD 17.b.iv SWMP C – CSRCP	Percentage of applicable construction projects reviewed using the *Construction Site Design Review Checklist.*	Ongoing	HAR-E, HAR-EE	ACR
	SWMP C - CSRCP	Percentage of non-exempt projects less than one acre that submitted *HAR-EE Form SD<1_NF.*	Ongoing	HAR-E, HAR-EE	ACR
	SWMP C - CSRCP	Percentage of contractor SWPPPs, NOI, and discharge permit applications reviewed.	Ongoing	HAR-E, HAR-EE	ACR
	CD 17.b.i SWMP C - CSRCP	Percentage of construction site inspection records into database.	Ongoing	HAR-E	ACR
Harbors will maintain oversight of all non-exempt tenant construction projects for compliance with the CSRCP.	CD 17.b.i CD 17.b.iv SWMP C - CSRCP	Percentage of applicable construction projects reviewed for necessary BMPs.	Ongoing	HAR-PM, HAR-EE	ACR
	SWMP C - CSRCP	Percentage of non-exempted projects less than one acre that submitted *HAR-EE Form SD<1_NF.*	Ongoing	HAR-PM, HAR-EE	ACR
	CD 17.b.i SWMP C - CSRCP	Percentage of tenant site inspection records entered into database.	Ongoing	HAR-PM, HAR-EE	ACR
Ensure illicit discharges from Harbors construction projects and tenant improvement projects are	CD 17.b.i SWMP C - CSRCP Sections 3.4, 4.4	Percentage of completed enforcement actions recorded in construction project database.	Ongoing	HAR-EE	ACR

Activity	Reference	Evaluation Metric	Due Date	Responsible Party	Output
deferred or eliminated through inspection and enforcement.					
Provide training and resources for Harbors employees, consultants, tenants, and construction contractors regarding construction BMPs.	SWMP C - CSRCP Section 6	Provide contractors with *CSRCP Manual* via Harbors Storm Water Management website.	Ongoing	HAR-E and HAR-EE	ACR
	CD 15.c.i SWMP C - CSRCP Section 5.1	Provide training to personnel whose primary job duties related to implementing the CSRCP.	Annually	HAR-E and HAR-EE	ACR
	SWMP C - CSRCP Section 5	Update training materials to reflect information about most frequently missed question(s) from the past year.	Annually	HAR-EE	ACR
	SWMP C - CSRCP Section 5.2	At least 80% of attendees providing positive feedback about training.	Annually	HAR-EE	ACR

Table 2-4   Construction Site Runoff Control Program Compliance Checklist

Requirement	Relevant SWMP Section	Remarks	Requirement Included in SWMP
NGPC Section 3.a	C	Harbors Construction Site Runoff Control Program is contained in this SWMP.	☑
CD 15.c.i	CSRCP Section 5	Harbors will provide training to staff and consultants whose primary job duties are related to implementing the CSRCP.	☑
CD 17	C	Harbors will implement the CSRCP.	☑
CD 17.a	CSRCP Section 8	The use of the *City and County of Honolulu Stormwater BMP Manual for Construction* is required for all construction sites and paving projects where applicable.	☑
CD 17.a.i	A.2.4	The Harbors website lists the above BMP Field Manual, the Construction Plan Review Checklist, construction specifications, and permit applications for connection and/or discharge.	☑
CD 17.a.ii	CSRCP Section 8	All Oahu construction sites under Harbors jurisdiction are required to comply with the above BMP Field Manual.	☑
CD 17.b.i	CSRCP Section 3.4, 4.4	Inspections and enforcement actions for all active construction sites are kept in an electronic database. The database will be compatible with the AMS.	☑
CD 17.b.ii	A.1.5	A full-time position has been assigned whose duties include erosion and sediment control inspection.	☑
CD 17.b.iii	A.1.5	HAR-EE has been reorganized for an additional full-time position, as well as utilizes a professional consultant service.	☑
CD 17.b.iv	CSRCP Sections 3, 4	The position designated to inspect erosion and sediment controls, reviews BMPs. Harbors inspects every construction site per the CSRCP.	☑
CD 17.b.v	CSRCP Section 7, ERP	Harbors will undertake enforcement actions per the ERP.	☑

2.5   POST-CONSTRUCTION STORMWATER MANAGEMENT PROGRAM

Post-Construction BMPs address stormwater runoff after construction activities have concluded and the project improvements have been accepted. Harbors has developed a *Post-Construction Stormwater Management in New Development and Redevelopment Program Manual* for use by staff tasked with reviewing Harbors capital improvement projects and tenant improvement projects, construction oversight, and ongoing inspection and maintenance of post-construction BMPs. It is also available for reference purposes by the development community including engineers and architects tasked with creating and submitting construction plans for approval. The program manual is included in Section D and is summarized in this section.   This program is intended to be complementary to the Harbors CSRCP (see Section C).

New development and redevelopment projects that result in a land disturbance of one acre or more are considered regulated projects and therefore, are subject to this program. All regulated projects must implement post-construction BMPs unless being exempted (assuming that it poses minimal risk of stormwater pollution) including, but not limited to:

- ✓ Maintenance activities such as top-layer grinding, repaving (where all pavement is not removed) and reconfiguring surface parking lots;

- ✓ Reroofing;

- ✓ Interior remodeling and improvement;

- ✓ Routine maintenance to maintain original line and grade, hydraulic capacity, or original purpose of facility;

- ✓ Trenching and resurfacing associated with utility work;

- ✓ Replacement of damaged pavement; and

- ✓ Emergency construction activities required to immediately protect public health and safety.

These regulated projects are divided into two main categories: Harbors capital improvement projects and tenant improvement projects. Each of these categories is managed through a process of design, construction inspections, long-term maintenance, and enforcement. Although the process is similar, the specific procedures and responsible parties vary between programs.

2.5.1   Training

Appropriate Harbors staff whose primary job duties are related to implementing post-construction BMPs will be trained to have a clear understanding of their responsibilities. The post-construction BMPs training will consist of overall program goals and implementation.

2.5.2   Retrofit of Construction Projects

Harbors is on schedule to conduct post-construction BMP retrofit project, as specified in the 2014 CD. Following the retrofit study approval, Harbors has started the construction of retrofitting of the three highest ranked projects in June 2021. It is anticipated that this retrofit project would be completed in 2022.

BMP Table 2-4   Post-Construction Stormwater Management Program

Activity	Reference	Evaluation Metric	Due Date	Responsible Party	Output
Provide training and resources for Harbors employees, consultants, and contractors regarding Post-Construction BMPs.	CD 15.d.i SWMP E - Post-Construction Program Manual Section 7	Percentage of personnel whose primary job duties are related to implementing the Post-Construction BMP program have received training.	Ongoing	HAR-E, HAR-EE	ACR
Evaluate the feasibility of retrofitting all projects on the inventory with adequate Post-Construction BMPs.	CD 18.a.iv SWMP 2.5.1	Three top ranked projects in Retrofit Study inventory having started construction.	6/18/2021	HAR-E	ACR
Harbors will manage all Harbors capital projects that disturb one acre or more of land for compliance with the Post-Construction Stormwater Management Program.	CD 18.b.i	Percentage of regulated projects reviewed in design phase for necessary BMPs using the *Post-Construction BMP Plan Checklist.*	Ongoing	HAR-E, HAR-EE	ACR
	CD 18.f.i	Percentage of projects for which O&M Plans have been reviewed.	Ongoing	HAR-EE	ACR
	CD 18.e SWMP E - Post-Construction Program Manual Sections 1.1, 5.4	Percentage of Post-Construction BMP inspections records entered in a database in a format compatible with GIS.	Ongoing	HAR-E, HAR-EE	ACR, database
Harbors will manage all tenant improvement projects for compliance with the Post-Construction Stormwater Management Program.	CD 18.b.i	Percentage of regulated tenant projects reviewed in design phase for necessary BMPs using the *Post-Construction BMP Plan Checklist.*	Annually	HAR-E, HAR-EE	ACR
	CD 18.f.ii	Percentage of tenant facilities with permanent BMPs that have an	Annually	HAR-EE, HAR-PM	ACR

Activity	Reference	Evaluation Metric	Due Date	Responsible Party	Output
		updated revocable permit or lease language requiring the implementation of the operation and maintenance plan.			
	CD 18.f.ii	Percentage of projects for requiring annual Post-Construction BMP inspections were conducted by tenants and reported to Harbors.	Annually	HAR-EE, HAR-PM	ACR
	CD 18.d, CD 18.g.i	Percentage of Post-Construction BMP inspections conducted by Harbors, including those conducted during regular tenant inspections.	Annually	HAR-EE	ACR
Ensure illicit discharges from improperly managed Post-Construction BMPs are mitigated by inspection and enforcement.	CD 18.g.ii	Percentage of enforcement actions recorded in project database.	Annually	HAR-EE	ACR

Table 2-5   Post-Construction Stormwater Management Compliance Checklist

Requirement	Relevant SWMP Section	Remarks	Requirement Included in SWMP
NGPC Section 3.a	D	Harbors Post-Construction Stormwater Management in New Development and Redevelopment Program is contained in this SWMP.	☑
CD 15.d.i	Post-Construction Program Manual Section 7	Harbors will provide training to all staff whose primary job duties are related to implementing the Post-Construction Stormwater Management Program.	☑
CD 18.a.i	Post-Construction Program Manual Section 5.4	Harbors has created an inventory of New Development and Redevelopment Projects that have been constructed since May 19, 2003.	☑
CD 18.a.ii	Post-Construction Program Manual Section 5.4	The inventory includes the attributes listed in the CD.	☑
CD 18.a.iii	A.2.5.2	Harbors has evaluated the feasibility of retrofitting all projects on the inventory with Post-Construction BMPs. The final feasibility study has been submitted to USEAP and HDOH and approved in June 2017.	☑
CD 18.a.iv	A.2.5.2	The plan for starting construction on the three highest ranked Post-Construction BMP retrofits is included in the SWMP.	☑
CD 18.b.i	Post-Construction Program Manual	Harbors now requires all New Development and Redevelopment Projects to comply with the Post-Construction Stormwater Management Program.	☑
CD 18.c	Post-Construction Program Manual	Harbors has adopted technical standards that govern the selection, installation, and maintenance of post-construction control measures.	☑
CD 18.d	Post-Construction Program Manual	Harbors has an inspection program for New Development and Redevelopment Projects.	☑

Requirement	Relevant SWMP Section	Remarks	Requirement Included in SWMP
CD 18.e	Post-Construction Program Manual	A tracking database compatible with GIS has been implemented.	☑
CD 18.f.i	Post-Construction Program Manual	Harbors verifies that regulated New Development and Redevelopment projects have an O&M Plan, monitoring plan where applicable, and a process for verification of ongoing maintenance of installed controls.	☑
CD 18.f.ii	Post-Construction Program Manual	Written conditions are placed in the TRPs or lease agreements upon renewal, which require Tenants to assume responsibility for the implementation of the O&M Plan including an annual inspection.	☑
CD 18.g.i	Post-Construction Program Manual	Harbors conducts an annual inspection of all Post-Construction BMP measures to determine if controls and BMPs are in place, working properly, and if the O&M plan has been successfully implemented.	☑
CD 18.g.ii	Post-Construction Program Manual	Harbors will undertake enforcement action in accordance with the ERP, as appropriate.	☑

2.6 POLLUTION PREVENTION AND GOOD HOUSEKEEPING PROGRAM

Harbors Pollution Prevention and Good Housekeeping Program includes a Storm Sewer Operation & Maintenance (SSS O&M) Program, general maintenance and housekeeping practices, and reviews and on-site inspections of wash areas, dry wells, and infiltration sinks. Harbors employees are trained in these areas in order to minimize the generation of potential pollutants that could impact water quality. The Pollution Prevention and Good Housekeeping Program is included in Section E.

2.6.1 Maintenance and Housekeeping

Maintenance activities at Harbors facilities include emptying and maintaining dumpsters, removing and disposing of discarded objects, machinery or equipment, repair of public facilities, using fertilizer and herbicide in a responsible manner, and cleaning of stains, spills, and oil spots.

An essential task of Harbors maintenance is sweeping common areas, streets, and select tenant facilities. Pollutants are therefore prevented from entering the storm drain system by regular sweeping, performed by HAR-O.

Waste from drop off areas, illegal dumping, and sweeping activities are disposed of with the appropriate waste contractors. The destination of each type of waste is reported in the ACR.

2.6.2 Review and Inspection of Wash Areas, Dry Wells, and Infiltration Sinks

Washing activities are crucial to the business operations of some tenants. Harbors requires tenants to formally submit applications to perform permitted washing activities. Authorization may be provided in a formal letter of approval once certain conditions are met. Unpermitted washing practices under Harbors jurisdiction are prohibited.

Similarly, dry wells and sinks are potential pathway allowing pollutants on the ground surface to migrate into the nearest storm drain during the next rain event. Tenants will be prohibited from using unapproved sinks until Harbors verifies that the sinks do not create a potential hazard to receiving waters. Harbors may issue a formal letter of approval once certain conditions are met.

2.6.3 Training

Harbors will provide annual stormwater awareness training to tenants covering pollution prevention and good housekeeping practices. Harbors will also provide outreach to all employees about its stormwater pollution prevention program on an annual basis. In addition, Harbors will provide annual IDDE training to employees including Harbor Police, Marine Cargo Specialists, and Grounds Supervisors. Slides depicting examples of proper and improper BMPs will be presented to illustrate acceptable procedures.

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BMP Table 2-5   **Pollution Prevention and Good Housekeeping**

Activity	Reference	Evaluation Metric	Due Date	Responsible Party	Output
Ensure the small MS4 conveys water to the harbor without obstructions or adding pollutants by performing initial and recurring cleaning.	CD 20	Percentage accessible features specified by SSS O&M Plan that were cleaned.	Annually	HAR-O	ACR
	CD 20.c	Percentage of feature inspections recorded in database.	Annually	HAR-O and HAR-EE	ACR
	CD 20.d.i	Percentage of hot spots identified for which BMPs were implemented or modified.	Ongoing	HAR-O and HAR-EE	ACR
Designate appropriate drainage system maintenance and perform maintenance according to inspection results.	CD 20.d	Percentage of accessible drainage features that have been cleaned.	Once every five years after initial cleaning	HAR-O	ACR
Review applications related to washing activities.	SWMP E.3.1	Percentage of washing activities found that have submitted applications for approval.	Ongoing	HAR-EE	ACR
Review applications for dry wells and infiltration sinks.	SWMP E.3.2	Percentage of submitted applications for dry wells and sinks that were reviewed.	Ongoing	HAR-EE	ACR
Provide general instructions for Pollution Prevention and Housekeeping to tenants.	SWMP A.3.2	Percentage of tenants provided with educational materials.	Ongoing	HAR-EE	ACR
Provide training/outreach to employees on Pollution Prevention, IDDE, and Housekeeping Practices.	SWMP B.6.1	At least 80% of employees response to the survey.	Annually	HAR-EE	ACR

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Table 2-6   Pollution Prevention and Good Housekeeping Compliance Checklist

Requirement	Relevant SWMP Section	Remarks	Requirement Included in SWMP
NGPC Section 3.a	E	Harbors Pollution Prevention and Good Housekeeping is contained in this SWMP.	☑
CD 20	SSS O&M Plan	Harbors submitted the SSS O&M Plan within 30 days of CD entry and revised version, which has been approved by USEPA in April 2017.	☑
CD 20.a	SSS O&M Plan Appendix 1	Harbors has created and submitted a comprehensive storm sewer system map that identifies all Harbors assets. The map and the associated GIS provide foundation data for the Cityworks-powered AMS.	☑
CD 20.b	A.2.7	The AMS went live on November 16, 2015. it has been fully implemented by December 31, 2015 or within 180 days of completion of the Storm Sewer System Mapping.	☑
CD 20.c	SSS O&M Plan	Harbors will conduct physical inspections of the storm sewer systems and areas where Harbor Property discharges directly into the harbors or their tributaries and are at risk for flooding.	☑
CD 20.d	SSS O&M Plan	The approved SSS O&M Plan includes a cleaning schedule for the storm sewer systems.	☑
CD 20.d.i	SSS O&M Plan	Harbors has specified hot spots in the cleaning schedule and implement appropriate BMPs, including more frequent cleaning and maintenance.	☑
CD 20.d.ii	SSS O&M Plan	Harbors requires the tenant to develop and implement a schedule for routine cleaning of rail tracks at KBPH.	☑

2.7   ASSET MANAGEMENT SYSTEM

With the assistance of the United States Maritime Administration (MARAD) and the United States Army Corps of Engineers (USACE), Harbors has introduced an AMS integrated with its GIS. This AMS not only has access to a complete inventory of the stormwater infrastructure features, but also has capabilities to schedule recurring inspections, stenciling and cleaning activities, other maintenance, as well as assist with small MS4 project planning, design and construction. The AMS will generate and track work orders for inspection, stenciling, cleaning, and other maintenance and assist Harbors with the execution and prioritization of capital improvement projects.

2.8   SWMP REVISIONS

As required by the NGPCs, the SWMP will be revised if any discharge limitation or water quality standards established in HAR Chapter 11-54-04 for marine waters are exceeded. The revisions shall include BMPs and/or other measures to reduce the amount of pollutants found to be in exceedance from entering State waters.

As Harbors SWMP has progressed over the years, some of the previous metrics became outmoded. As part of the documentation improvement, this SWMP is revised to include the updated evaluation metrics, which would reflect the maturity of the program.

2.9   ANNUAL COMPLIANCE REPORT AND EFFECTIVENESS EVALUATION

HAR Chapter 11-55 Appendix K Part 9(a) requires the submittal of an ACR to HDOH by January 28th of the following year. The ACR will include:

- ✓ Status of compliance with conditions of both Honolulu Harbor and KBPH permits;

- ✓ Assessment of the SWMP, including progress towards implementing each minimum control measure;

- ✓ Modifications made to the SWMP and implementation schedule during that calendar year, including justification;

- ✓ Summary of the stormwater activities planned to be undertaken during the next calendar year; and

- ✓ Major modifications made to the small MS4, including, but not limited to, addition and removal of outfalls, drainage lines, and treatment facilities.

Furthermore, in accordance with paragraph 13 of the CD, a qualitative SWMP implementation assessment needs to be included in the ACR due after November 5, 2014, that will include:

- ✓ Whether implementation timelines have been met ;

- ✓ Whether metrics tracked by Harbors are effective in measuring specific activities;

- ✓ Whether specific activities have been effective in reducing the discharge of pollutants from the small MS4s ;

✓ Water quality monitoring data, where available;

✓ Where monitoring data is not available, an evaluation of the need for water quality monitoring in determining SWMP effectiveness ;

✓ A budget broken down by major components of the SWMP; and,

✓ a discussion of changes to the SWMP to incorporate new activities, modify existing activities, or reflect changes to the small MS4s .

Except as otherwise provided expressly, all reports or other document submitted pursuant to the 2014 CD, will be certified by a Responsible Officer of HDOT and shall include the following certification:

"I certify under penalty of law that I have examined and am familiar with the information submitted in this document and all attachments and that this document and its attachments were prepared either by me personally or under my direction or supervision in a manner designed to ensure that qualified and knowledgeable personnel properly gather and present the information contained therein. I further certify, based on my personal knowledge or on my inquiry of those individuals immediately responsible for obtaining the information, that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowingly and willfully submitting a materially false statement."

3.0 PUBLIC EDUCATION AND OUTREACH PROGRAM

3.1 GENERAL PUBLIC EDUCATION AND OUTREACH

Public education aims to create awareness and prompt proactive and positive behavioral changes in the community. Infused with information, the public will be less likely to contribute to stormwater pollution as they will be able to make informed choices. Educating the public with this knowledge and contact information for appropriate authorities will increase the likelihood that a violation or accidental release will be reported, and therefore be addressed promptly. The responsibility of providing education and outreach to public, tenant, and users of the small MS4 falls under HAR-EE and HAR-O. This section describes the activities pursued by Harbors to educate the public about stormwater compliance.

Harbors has identified the Honolulu Star-Advertiser, web-based media, and inspection activities as three main forms of disseminating stormwater awareness information to tenants and the public. Other options for dissemination may include workshops, public presentations, brochures, trade shows, expos, advertisements through various media, volunteer opportunities, and multi-agency events.

3.1.1 Stormwater Awareness Message

Harbors has developed the message, *Mālama i ke kai – Protect our Harbor Waters*, which conveys the importance of stormwater awareness. This message promotes responsible environmental behavior in order to protect the harbor waters for *our own use, for the local economy, and for the ultimate goal of environmental protection*. Harbors will integrate and promote this awareness by prominently displaying this message on all printed and electronic communication with tenants, staff, and the public during trainings.

3.1.2 Public Awareness Ads through a Local Newspaper

An annual public awareness advertisement will be posted in the local newspaper, the *Honolulu Star-Advertiser*, or other similar prevailing newspaper/magazine to educate the general public on stormwater pollution prevention. The message will be focused on a topic that Harbors has identified as one that requires further dissemination.

The advertisement will also describe Harbors efforts to protect and sustain stormwater quality, and to work with other agencies, volunteers, and community organizations regarding stormwater pollution prevention awareness. It also includes contact numbers for the public to report suspected illicit discharge. The advertisement will prominently display Harbors stormwater awareness message.

3.1.3 Public Awareness through Social Media

Social media is an instantaneous method of disseminating information that is increasingly growing in use and popularity. Harbors uses its web-based media to post stormwater awareness information.

3.1.4   Volunteer Activities

Outreach efforts will focus on supporting volunteering activities organized by Harbors tenants and general public to foster a sense of responsibility towards Honolulu Harbor and KBPH, when condition permits. In the past, Harbors has participated in an annual trash pick-up and stenciling event called the *Great American Cleanup*, led by one of Harbors tenants*.* As part of this activity, valuable data were collected about the origins and type of trash picked up during the activity, which was used in the public awareness advertisement described in Section A.3.1.2. Other tenant-led volunteer activities include *Get the Drift and Bag It* and *Adopt-A-Harbor*. Since the onset of Coronavirus Disease 2019 (COVID-19), majority of these volunteer activities have been suspended out of an abundance caution for the health and safety of local communities.

3.1.5   Stormwater Hotline

Harbors has maintained a hotline for stormwater information and suspected illicit discharge reporting since October 22, 2009. The hotline is reachable by dialing (808) 587-1962, a direct line to HAR-EE. HAR-EE maintains records of calls, follow-up inspection (if any) and findings, enforcement actions taken, and resolutions filed using the SIDR form. A blank copy of this form is included in the TIM (Section B). SIDT form entries are compiled into the AMS, which is maintained on the state server. The public may also call the Traffic Control Unit at (808) 587-2076, which is reachable 24 hours a day, 7 days a week.

3.1.6   Harbors Division Website

The Harbors stormwater website provides information about water quality issues, emergency reporting numbers, and links to useful sections of the USEPA website. The website is also reachable via a prominent link on the HDOT, HDOT Airports, and HDOT Highways websites. The website will include at least the links to:

- ✓ its NPDES permits and the 2014 Consent Decree and ACRs;
- ✓ This SWMP, the past versions, and program manuals;
- ✓ Tenant stormwater training materials;
- ✓ Tenant Inspection forms and risk ranking criteria;
- ✓ Tenant recognition award information
- ✓ Construction and Post-Construction training materials;
- ✓ Construction and Post-Construction Programs documents and forms;
- ✓ BMP fliers and other BMP resources appropriate for various types of tenants, including minimum BMPs;
- ✓ Spill prevention control and countermeasures guidance;
- ✓ Contacts for reporting stormwater violations to CCH, Harbors, HDOH, and USCG; and
- ✓ USEPA's and the CCH stormwater websites.

The website prominently displays Harbors stormwater awareness message. The website is accessed at http://hidot.hawaii.gov/harbors/malamaikeawakai/. Harbors tracks the number of visits to the website to measure its effectiveness in disseminating information.

3.1.7   Signage and Stenciling

Harbors has installed signs that prohibit dumping or discarding pollutants at approximately 50 suitable locations on Harbors property on Island of Oahu. Suitable areas include visible public locations, high traffic tenant areas or areas with a history of illicit discharges, and locations at wharfs and piers. The signs also include information about illicit discharges, the Harbors stormwater awareness message, and the stormwater hotline for reporting stormwater issues. The selected locations are shown on the Figures in Attachment 1.

Harbors has stenciled all inlets and open channels at Honolulu Harbor and KBPH to promote stormwater awareness and to defer illicit discharges from entering harbor waters. Hi-visibility placards are installed on curbs in public areas, and metal medallions are usually installed on grates or where the placards are not feasible. Harbors tracks the locations of existing and newly installed stencils/signage in AMS (integrated with GIS). The installation of signage and stenciling is a preventive approach to mitigating pollution; if areas are identified with frequent public dumping, installation at these additional locations will be evaluated.

Harbors inspects the legibility of the stencil or labels nearest each inlet prior to the wet season every year, records all inlets with illegible stencils, and re-stencils or re-labels the inlet 60 days after the inspection.

3.2   TENANT EDUCATION AND OUTREACH

Harbors requires tenants to reduce pollution in stormwater discharges and to effectively prohibit unauthorized non-stormwater discharges into the small MS4s through its tenant lease agreements and TRP, which are in the TIM.

3.2.1   New Tenants

All new tenant leases and TRPs will reference the minimum BMPs (Section A.3.2.3) and require their implementation and maintenance. New tenants will be provided with a New Tenant Information Package, contained within the TIM to ensure that they are aware of the stormwater requirements in the tenant lease agreements and TRPs, apply required BMPs based on activities at the site, and understand how to identify and report illicit discharges. The New Tenant Information Package includes the stormwater awareness message, information on minimum BMPs, and educational materials describing the responsibilities of the Tenant and resources for obtaining additional information regarding stormwater pollution prevention.

3.2.2   Enhanced Tenant Inventory

An electronic inventory of tenants at Honolulu Harbor and KBPH is kept on file at AMS (integrated with GIS), containing information specified in the TIM. This tenant inventory has been continuously updated. A listing of current tenants at the Honolulu Harbor and KBPH and their facility locations will be provided in the ACR.

3.2.3   Distribution of Educational Materials and Minimum BMPs to Tenants

Harbors has been distributing educational materials and notifications for tenant training since 2009 through mail as a proactive measure to mitigate tenant activities that cause pollution. Harbors will continue to update educational materials as problem areas are identified. Educational materials are distributed at least twice per year to tenants by mail, at the Annual Tenant Stormwater Awareness Training, or during tenant inspections. The materials include:

- ✓ A brief description of responsibilities of the Harbor Tenants on stormwater pollution prevention;

- ✓ Fact sheets and/or brochures describing Harbors endorsed minimum BMPs;

- ✓ Where applicable, a description of where lease, TRP, tariff and/or wharfage provisions related to stormwater management can be found;

- ✓ The purpose, scope, and potential ramifications of Harbors recurring inspections and the availability of the TIM for tenant;

- ✓ A concise and readily understandable definition of illicit discharges as well as procedures for reporting illicit discharges via the Harbors stormwater hotline; and

- ✓ Resources for obtaining additional information regarding stormwater pollution prevention.

Below is a comprehensive list of minimum BMPs for common tenant activities that Harbors has developed, which are available on the Harbors website and in the TIM.

Tenant Minimum BMPS:

- ✓ Vehicle and Equipment Washing;

- ✓ Vehicle and Equipment Fueling;

- ✓ Material Storage;

- ✓ Common Businesses;

- ✓ Solid and Hazardous Waste Management;

- ✓ Material Delivery and Handling;

- ✓ Building and Remodeling;

- ✓ Vehicle/Vessel Maintenance Activities;

- ✓ Building Power Washing;

- ✓ Sidewalk and Walkway Power Washing; and

- ✓ Storm Drain Inlet Protection.

3.2.4   Annual Tenant Stormwater Pollution Prevention Awareness Training

Harbors holds tenant stormwater pollution prevention awareness trainings annually, and tracks whether or not tenants attend and uses its best effort to ensure that at least 80% of tenants attend this training. Failure to attend training will impact a Tenant's risk ranking.

This annual training usually includes a discussion on issues related to stormwater pollution awareness including regulatory background, NPDES program requirements, allowable discharges by permit, IDDE program, construction site run-off control, post construction stormwater management, stormwater drainage system protection, fueling activities, waste management, spill prevention and response, recommended BMPs, common sources of stormwater pollution, potential illicit discharges from common operations, pollution prevention and good housekeeping, tenant inspections, ERP, and other environmental compliance measures applicable to Harbors.

The questionnaire and survey will be used to assess tenant knowledge regarding stormwater awareness and received feedback will be used to evaluate and improve the next training. It will be provided to all tenants and distributed at in-person tenant training events. A sample questionnaire and survey are included in Attachment 2.

The presentation, tenant attendance record, and the results of both the completed questionnaire and the training evaluation will be recorded and included in the ACR. Harbors will evaluate the effectiveness of the training, as well as the overall tenant outreach effort, and make improvements including revisions to the presentation to reinforce subject areas that are not well understood by tenants.

Since 2011, Harbors has set up a TEMY award program to recognize the tenant environmental manager who has implemented exemplary environmental and safety practices and fosters an exceptional company environmental culture.   The award provides positive incentive for tenant environmental managers to create positive change within their organizations. Not only does it create positive reinforcement for the organization and individual receiving the award, it also demonstrates to the other tenants that positive change is achievable and provides concrete examples of solutions that are realistic and affordable for other tenants to reference. The award is presented with a letter that is signed by the Governor of the State of Hawaii. The criteria used to assess potential TEMY award recipients are provided in the list below:

- ✓ Did the tenant manager or representative attend the stormwater training?

- ✓ Did the tenant manager or representative respond quickly to identified deficiencies from the inspection report?

- ✓ Was the tenant manager or representative easy to work with and courteous during the inspections?

- ✓ Did the tenant manager or representative implement additional BMPs above and beyond what was required?

- ✓ Did the tenant manager or representative have all the necessary documents onsite for review during the inspection and were they current?

✓ Are there significant improvements from previous inspection?

✓ Does the tenant manager or representative have sufficient influence and budget to implement changes?

✓ Does the tenant environmental manager or representative provide Stormwater Awareness or Environmental Training for all employees (i.e. Review BMP Fliers)?

✓ Has the tenant manager or representative taken steps to reduce the environmental risk of the activities of the company?

✓ Has any enforcement letter (from EPA, HDOH, or HDOT) been issued to this tenant in the past three years?

✓ Has the tenant support and/or participate in any local volunteering cleanup or community event? Any special effort on sustainability (e.g., zero runoff)?

3.2.5   Outreach through Tenant Inspection Program

The TIP was developed as a component within the Harbors stormwater management program designed to eliminate polluted discharges to its small MS4s and State waters from Harbors tenants. It is one of three parts of the greater IDDE program (further discussed in Section B). The TIM is for use by HAR-EE and others associated with the TIP and contains training requirements and field implementation and enforcement procedures for Harbors staff.   The inspection program, in place since 2009 as part of the IDDE program, will continue to be yet another opportunity to provide outreach to tenants. Outreach efforts during inspections include:

✓ Ensuring that tenants are aware of their environmental responsibilities;

✓ Providing outreach materials such as informational sheets, BMP fliers, schedules of upcoming training to tenants;

✓ Gathering data to be used to update outreach materials; and

✓ Provide immediate feedback to tenants regarding successful BMPs and BMPs that should be implemented.

The most up-to-date risk designation of each tenant determines the frequency of routine tenant inspections. Detailed information is provided in Section 4.3 of the TIM. Harbors will respond to violations observed during these inspections in accordance with the ERP.

3.3   VESSEL OPERATORS EDUCATIONAL PROGRAM

Harbors tenants owning, or operating vessels may be subject to requirements of the VGP and sVGP regulated by the USEPA. In addition, any vessel maintenance, repair, washing, and fueling activities must be conducted following USCG regulations. Harbors outreach efforts are focused toward vessel operations conducted on land.

MCSs monitor loading and unloading for the major vessels in the Harbor. Their duties include tracking compliance with various aspects of the process including suspected illicit discharge reporting.

3.3.1   Distribution of Educational Materials to Vessel Operators

Information sheets describing recommended BMPs for vessel operators have been developed. The *BMP for Small Vessel Maintenance Activities* information sheet is available on the Harbors website and is distributed to vessel agents and owners when they receive hot work permits.

4.0   PUBLIC INVOLVEMENT/PARTICIPATION

Public participation is intended to raise public consciousness of water quality issues, to create a sense of responsibility for water quality protection, and to lessen the likelihood that members of the public will commit actions that may lead to water quality degradation.

Public awareness of stormwater quality issues is targeted to solicit comment by informed members, which may lead to a better and more effective plan and implementation. Harbors has been implementing public involvement and participation during the previous NGPC term by posting the SWMP to the Harbors website and notifying tenants during training.

Concurrent with its submittal to HDOH and USEPA, Harbors has posted the modified SWMP for both Honolulu Harbor and KBPH on its website by February 3, 2015. At the time, Harbors solicited public comment via advertisement in the *Honolulu Star-Advertiser*. The advertisement included a schedule for the receipt of comments not to exceed 45 days in the advertisement. Received comments have been tracked and changes have been incorporated into the modified SWMP as appropriate. Moving forward, Harbors will continue to use website, local media, or other prevailing broadcasting method to solicitate public comments.

5.0   REFERENCES

CCH 2011, *Storm Water Best Management Practice Manual, Construction*, November 2011.

CCH 2017, *Storm Water BMP Guide for New and Redevelopment*, July 2017.

HAR 11-55 Appendix K, *National Pollutant Discharge Elimination System General Permit Authorizing Discharges of Storm Water and Certain Non-Storm Water Discharges from Small Municipal Separate Storm Sewer Systems*, December 6, 2013.

HAR 11-55, *Water Pollution Control*, October 22, 2021

HAR 19-41 to 19-44, Hawaii Administrative Rules of the HDOT Harbors Division.

HRS 266-15, *Violation of rules; penalty*, Hawaii Revised Statutes for Harbors.
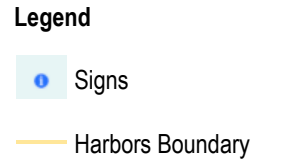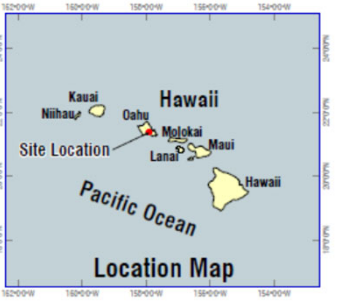
USEPA 2012, *National Menu of Best Management Practices for Stormwater* available at https://www.epa.gov/npdes/national-menu-best-management-practices-bmps-stormwater.

ATTACHMENT 1
SIGN LOCATIONS

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Legend

Signs

Harbors Boundary

Pollution Prevention Sign Location
Honolulu Harbor

Location Map

Hawaii

Kauai
Niihau
Oahu
Site Location
Molokai
Lanai
Maui
Hawaii

Pacific Ocean

X: -17574136.349, Y: 2430866.568

**Pollution Prevention Sign Location
Kalaeloa Barbers Point Harbor**

ATTACHMENT 2
TENANT QUESTIONNAIRE

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HDOT Harbors Tenant Training Questionnaire

Name: _____ Company: _____ Date: _____

1. What is the definition of an illicit discharge?
   a. A non-stormwater discharge that poses a risk to the environment
   b. Condensate from AC system
   c. Rain water runoff
   d. An unpermitted charge from a credit card

2. Which of the following is the phone number you can report to, when a suspected illicit discharge is observed at Honolulu Harbor or Kalaeloa Barbers Point Harbor?
   a. (808) 587-1962
   b. (808) 587-2076
   c. a or b
   d. Do not care

3. Which of the following should not be discharged into the storm drain or harbor water?
   a. Fish entrails
   b. Hazardous chemicals
   c. Petroleum and paint products
   d. All of the above

4. The first step of spill response is to
   a. None of my business
   b. Assess the risk
   c. Stop the source
   d. Clean up

5. Which of the following is considered a good example of Best Management Practice?
   a. Promptly responding to a spill or leak
   b. Maintain equipment on a timely basis
   c. Provide adequate secondary containment to a container with size of 55-gallon or larger

   d. All of the above

6. Which of the following are considered Pollutants of Concerns?
   a. Metals (zinc, iron, aluminum)
   b. Chemicals and hydrocarbons
   c. Debris and garbage
   d. All of the above

7. True of false? An environmental violation may lead to criminal penalties.
   a. True
   b. False

8. True or false? The environmental goals include protecting clean water and healthy reefs, and ensuring a sustainable environment is in place for us and our future generations to come.
   a. True
   b. False

9. Which of the following are allowed to be discharged into the storm drain?
   a. Gasoline, diesel, used oil and paints
   b. Unpolluted A/C condensate water
   c. Rainwater
   d. b and c

10. Which of the following is the official Harbors stormwater awareness message?
    a. Reduce, Reuse, and Recycle
    b. Only rain in the drain
    c. Malama I ke awa kai – Protect our harbor waters
    d. None of the above

Please provide your comments here: