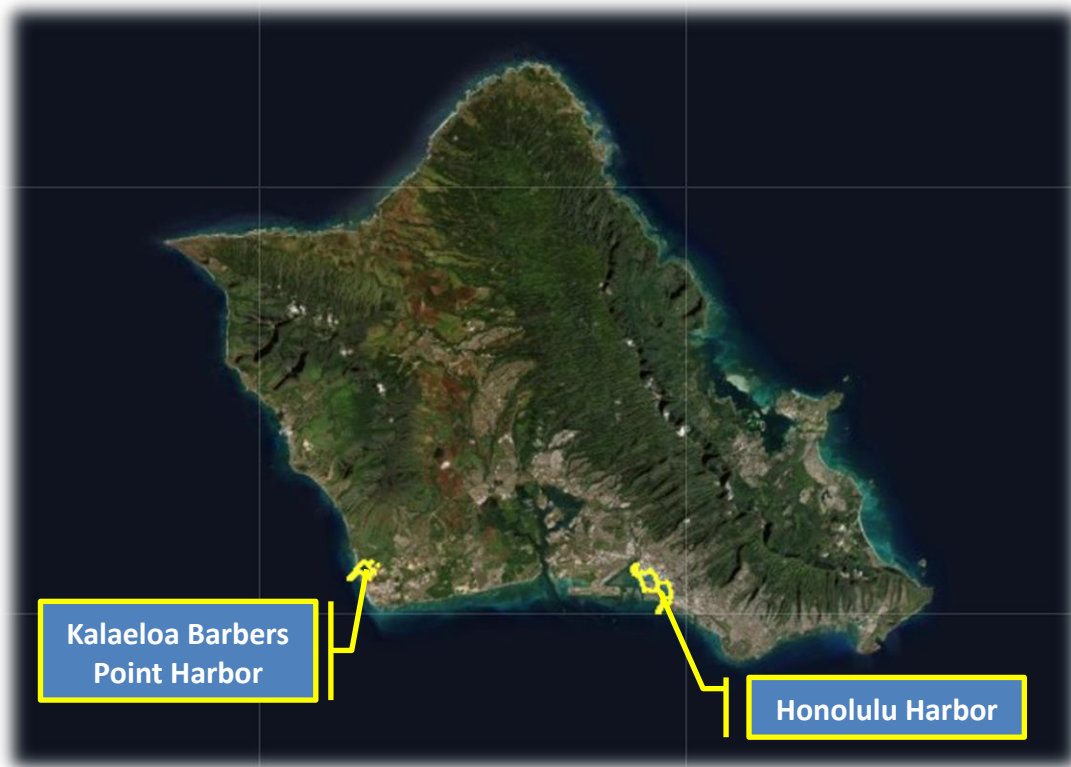


State of Hawaii Department of Transportation  
Harbors Stormwater Compliance

# 2024 ANNUAL REPORT

HONOLULU HARBOR (HI22KG710)

KALAELOA BARBERS POINT HARBOR (HI22KG709)



January 28, 2025



***MĀLAMA I KE AWA KAI - Protect Our Harbor Waters***

# 2024 Annual Report

**Honolulu Harbor (HI22KG710)**  
**Kalaeloā Barbers Point Harbor (HI22KG709)**

Prepared For:  
State of Hawaii Department of Transportation  
Harbors Engineering Branch Environmental Section  
79 South Nimitz Highway  
Honolulu, Hawaii 96813



Prepared By:  
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January 2025

### Certification Page

*"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and believe, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowingly violations."*



Jan 23, 2025

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Signature

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Date

Printed Name: NIKO G. SALVADOR

Title: HDOT Harbors Engineering Program Manager

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## LIST OF ACRONYMS AND ABBREVIATIONS

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AG	Attorney General
AR	Annual Report
AMS	Asset Management System
BMP	Best Management Practice
CCH	City and County of Honolulu
CIP	Capital Improvement Project
CSRCP	Construction Site Runoff Control Program
CWA	Clean Water Act
CWB	Clean Water Branch
DPP	Department of Planning and Permitting
ERP	Enforcement Response Plan
ENV	Department of Transportation Office of Environmental Compliance
GIS	Geographic Information System
HAR	Hawaii Administrative Rules
HAR-E	Harbors Engineering Branch
HAR-EE	Harbors Engineering Branch Environmental Section
HAR-EP	Harbors Engineering Branch Planning Section
HAR-ESRM	Harbors Engineering Branch System Resource Management Section
HAR-O	Harbors Oahu District
HAR-PM	Harbors Property Management Staff
HAR-S	Harbors Staff Services Office
HAR-SI	Harbors Management Information Systems Staff
HDOH	State of Hawaii Department of Health
HDOT	State of Hawaii Department of Transportation
HRS	Hawaii Revised Statutes
IDDE	Illicit Discharge Detection and Elimination
IWDP	Industrial Wastewater Discharge Permit
KBPH	Kalaeloa Barbers Point Harbor
MCM	Minimum Control Measure
MS4	Municipal Separate Storm Sewer System

NGPC	Notice of General Permit Coverage
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
O&M	Operations & Maintenance
ORIIP	Outfall Reconnaissance Inventory and Inspection Program
P2/GH	Pollution Prevention and Good Housekeeping
POW	Protect Our Water
ROE	Right-of-Entry
SIDR	Suspected Illicit Discharge Reporting
SSS O&MP	Storm Sewer System Operations & Maintenance Program
SWMP	Stormwater Management Plan
TIM	Harbors Tenant Inspection Manual
TIP	Tenant Inspection Program
TRP	Tenant Revocable Permit
USEPA	United States Environmental Protection Agency

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## TABLE OF CONTENTS

<b>1.0</b>	<b>EXECUTIVE SUMMARY .....</b>	<b>7</b>
<b>2.0</b>	<b>GENERAL NPDES PERMIT INFORMATION.....</b>	<b>8</b>
2.1	PERMIT COMPLIANCE ASSISTANCE.....	9
2.2	STORMWATER MANAGEMENT PLAN .....	10
<b>3.0</b>	<b>NPDES PERMIT .....</b>	<b>11</b>
3.1	SWMP MODIFICATION .....	11
3.2	SWMP CORE PROGRESS EVALUATION.....	12
3.1	PROGRAM EFFECTIVENESS.....	13
3.2	CHALLENGES AND PROPOSED MODIFICATIONS FOR 2024 .....	13
3.3	WATER QUALITY MONITORING DATA .....	14
3.4	STORMWATER MESSAGES .....	14
<b>4.0</b>	<b>STORMWATER MINIMUM CONTROL MEASURES .....</b>	<b>16</b>
4.1	PUBLIC EDUCATION AND OUTREACH .....	16
4.2	ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM .....	25
4.3	CONSTRUCTION SITE STORMWATER RUNOFF CONTROL.....	29
4.4	POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT .....	32
4.5	POLLUTION PREVENTION AND GOOD HOUSEKEEPING .....	37
<b>5.0</b>	<b>PROGRAM OUTPUTS AND ACCOMPLISHMENTS .....</b>	<b>39</b>
5.1	MS4 PROGRAM EXPENSES .....	39
5.2	EDUCATION, INVOLVEMENT, AND TRAINING.....	41
5.3	LEGAL/REGULATORY .....	44
5.4	MAPPING AND ILLICIT DISCHARGES.....	44
5.5	HARBORS TENANTS .....	46
5.6	CONSTRUCTION.....	48
5.7	POST-CONSTRUCTION STORMWATER MANAGEMENT .....	50
5.8	OPERATIONS AND MAINTENANCE.....	51
<b>6.0</b>	<b>CONCLUSION .....</b>	<b>54</b>

---

## LIST OF TABLES

Table 1. NPDES Permit Compliance Assistance .....	9-10
Table 2. Status of NPDES Permit Compliance .....	11
Table 3. Status of BMPs .....	13
Table 4. Public Education and Outreach.....	16-23
Table 5. Illicit Discharge Detection and Elimination Program .....	24-28
Table 6. Construction Site Stormwater Runoff Control.....	29-31
Table 7. Post-Construction Stormwater Management.....	32-35
Table 8. Pollution Prevention and Good Housekeeping.....	36-37
Table 9. MS4 Program Expenses.....	38
Table 10. Education, Involvement, and Training .....	41
Table 11. Legal and Regulatory.....	43
Table 12. Mapping and Illicit Discharges .....	44
Table 13. Harbors Tenants .....	46
Table 14. Construction.....	48
Table 15. Post-Construction Stormwater Management .....	50
Table 16. Operations and Maintenance .....	50-51

## LIST OF FIGURES

Figure 1. 2022 SWMP.....	13
Figure 2. Pollution Prevention Sign.....	14
Figure 3. 2023 Program Expenditures .....	39
Figure 4. Program Expenditures from 2015-2023 .....	40
Figure 5. Number of People Trained from 2015-2023 .....	42
Figure 6. Illicit Discharge Investigations from 2015-2023 .....	45
Figure 7. 2023 Tenant Risk Ranking Distribution.....	47
Figure 8. Construction Inspections and Enforcement from 2015-2023 .....	49
Figure 9. MS4 Maintenance and Debris Removal from 2015-2023 .....	52

## LIST OF ATTACHMENTS

Attachment 1.	Outreach Handouts
Attachment 2.	Tenant Training
Attachment 3.	Construction and Post-Construction Training
Attachment 4.	Harbors Employee Training
Attachment 5.	Illicit Discharge Detection Elimination Training
Attachment 6.	Inspector Training
Attachment 7.	Tenant Inventory, Risk Rank, and Inspection Summary
Attachment 8.	Wet Weather Outfall Reconnaissance Report
Attachment 9.	Illicit Discharge Investigations



- Attachment 10. Construction Project Inventory and Inspection Summary
- Attachment 11. Reviewed Construction and Post-Construction Projects
- Attachment 12. Kalaeloa Barbers Point Harbor Stockpile Inspection Report
- Attachment 13. MS4 and Permanent BMP Inspection Log
- Attachment 14. Storm Drain Inspection and Cleaning
- Attachment 15. Street Sweeper Log
- Attachment 16. 2022 Harbors Stormwater Management Plan

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## CONTACT PHONE NUMBERS

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### **State of Hawaii Department of Transportation**

Harbors Environmental Hotline	808-587-1962
Harbor Traffic Control Unit (available 24 hours)	808-587-2076

### **State of Hawaii Department of Health**

Clean Water Branch	808-586-4309
Hazard Evaluation & Emergency Response Office	808-586-4249
Solid and Hazardous Waste Branch	808-586-4226

### **City and County of Honolulu**

Environmental Concern Line	808-768-3300
Storm Drain Permit Connection	808-768-8106
Industrial Discharges to Sanitary Sewer	808-768-8210
Sanitary Sewer Spills/Trouble	808-768-7272

United States Coast Guard Marine Safety Office	808-535-3222
United States Environmental Protection Agency, Region 9	415-947-8000

## 1.0 EXECUTIVE SUMMARY

This report summarizes performance metrics, accomplishments, and compliance with the 2024 State of Hawaii Department of Transportation (HDOT), Harbors Stormwater Management Plan (SWMP), Hawaii Administrative Rules (HAR) 11-55, Appendix K requirements for the Honolulu Harbor and Kalaeloa Barbers Point Harbor (KBPH) on Island of Oahu, State of Hawaii.

The State of Hawaii Department of Health (HDOH), Clean Water Branch (CWB) is reviewing the HDOT Harbors (hereinafter referred to as “Harbors”) two Notice of General Permit Coverages (NGPC) under HAR 11-55, Appendix K for their Small Municipal Separate Storm Sewer Systems (MS4s) submissions. The new permit file numbers HI22KG710 (formerly HI 03KB482) for Honolulu Harbor and HI22KG709 (formerly HI 03KB488) for KBPH authorize discharges of stormwater and certain non-stormwater discharges to the adjacent receiving waters.

The six minimum control measures (MCM) in the updated Harbors stormwater program have been determined to be effective in reducing the discharge of pollutants in stormwater. The small MS4 cleaning and street sweeping programs continue to prevent debris from entering adjacent receiving waters. The persistent training/outreach and inspection programs continue to promote and help Harbors employees, tenants, consultants, contractors, and general public with the following.

- Identify areas that could potentially generate illicit discharges and implement proper Best Management Practices (BMPs) to minimize or prevent such incidents from occurring.
- Identify and properly report a suspected illicit discharge, and properly manage potential pollutants at their source to minimize negative impacts to the surrounding environment.

## 2.0 GENERAL NPDES PERMIT INFORMATION

### State of Hawaii NPDES Program Permit Numbers:

Honolulu Harbor: HI22KG710 (formerly HI 03KB482)  
Kalaeloa Barbers Point Harbor: HI22KG709 (formerly HI 03KB488)

Annual Report for Permit Year: 3

Reporting Period: January 1, 2024 – December 31, 2024

### Permittee (Owner/Operator) Details:

Organization: State of Hawaii  
Department of Transportation

Mailing Address: State of Hawaii, Department of Transportation  
869 Punchbowl Street  
Honolulu, HI 96813-5097

Authorized Representative: Edwin H. Sniffen

Title: Director of Transportation

Telephone Number: 808-587-2150

Email: [edwin.h.sniffen@hawaii.gov](mailto:edwin.h.sniffen@hawaii.gov)

### Recipients:

Director of Health  
Clean Water Branch  
Environmental Management Division  
State of Hawaii Department of Health  
P.O. Box 3378  
Honolulu, HI 96801-3378

### Prepared By:

Company: EnviroServices & Training Center, LLC

Address: 505 Ward Avenue, Suite 202  
Honolulu, HI 96814

Phone: 808-839-7222

On March 7, 2003, Harbors filed a Notice of Intent (NOI) for both Honolulu Harbor and KBPH for the Small MS4s on the Island of Oahu. NGPCs for these two storm drainage systems were initially 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. The revised HAR 11-55 Appendix K was promulgated by HDOH on January 15, 2022. In response, Harbors updated the SWMP and submitted with new NOIs on May 11, 2022 to obtain coverage under the revised NGPC, which were granted by the HDOH in two letters dated March 14, 2023.

The general permit requires the permittee to:

1. Submit a SWMP within 120 calendar days of the date of the NGPC.
2. Develop, implement, and enforce the SWMP designed to reduce the discharge of pollutants from their Small MS4 through BMPs for each minimum control measure with measurable goals in order to protect adjacent harbor water quality.
3. Submit a new NOI with filing fee and obtain a new NGPC for any significant changes to the information submitted in the NOI. This NGPC cannot be modified.
4. Submit the annual report (AR) by January 28 of the following year in accordance with HAR 11-55, Appendix K to the HDOH CWB.
5. Comply with the standard conditions as specified in Appendix A of HAR 11-55, where applicable.

This document fulfills the Harbors requirement to submit an AR for the 2022 SWMP prior to the deadline of January 28, 2025.

## 2.1 PERMIT COMPLIANCE ASSISTANCE

The permittee relies on the entities listed in Table 1 to satisfy some of its National Pollutants Discharge Elimination System (NPDES) permit obligations.

**Table 1. NPDES Permit Compliance Assistance**

Role	Responsibilities
State of Hawaii Department of the Attorney General (AG)	<ul style="list-style-type: none"> <li>• Makes changes to related Hawaii Revised Statutes (HRS) and HAR when necessary.</li> <li>• Serves as primary interface with United States Environmental Protection Agency (USEPA) Region 9 when necessary.</li> <li>• Provides legal authority and support to the approved Enforcement Response Plan (ERP).</li> </ul>
State of Hawaii Department of Transportation Office of Environmental Compliance (ENV)	<ul style="list-style-type: none"> <li>• Ensure HDOT complies with all federal, state, and local environmental regulations and permit, relating to MS4 compliance.</li> </ul>

**Table 1. NPDES Permit Compliance Assistance**

Role	Responsibilities
City & County of Honolulu (CCH) Department of Planning & Permitting (DPP) Site Development Division Wastewater Branch	<ul style="list-style-type: none"> <li>• Authorizes and tracks drainage connections to its sanitary sewer system through Industrial Wastewater Discharge Permit (IWDP).</li> </ul>
Construction Managers (Various Firms)	<ul style="list-style-type: none"> <li>• Conducts construction inspections.</li> <li>• Ensures construction sites comply with applicable environmental regulations.</li> </ul>
Design Consultants (Various Firms)	<ul style="list-style-type: none"> <li>• Incorporates stormwater management program requirements in applicable Harbors facilities design projects.</li> </ul>
Harbors Oahu District (HAR-O)	<ul style="list-style-type: none"> <li>• Implements the Storm Sewer System Operations and Maintenance Program (SSS O&amp;MP).</li> <li>• Use <i>Cityworks</i> to keep track of relevant activities.</li> <li>• Provides suggestions to improve the program, including purchasing new equipment.</li> <li>• Participates in and assists with enforcement.</li> </ul>
EnviroServices & Training Center, LLC	<ul style="list-style-type: none"> <li>• Assists Harbors with:               <ul style="list-style-type: none"> <li>○ Providing information to the public.</li> <li>○ Tenant outreach and education.</li> <li>○ Employee and contractor training.</li> <li>○ Environmental inspections.</li> </ul> </li> <li>• Reporting requirements of the Small MS4 NPDES permits, and other environmental regulations.</li> </ul>
Element Environmental, LLC	<ul style="list-style-type: none"> <li>• Assists Harbors in meeting the environmentally related civil engineering and reporting requirements (if any), and other environmentally related investigations.</li> </ul>
Insight Public Sector, Azteca <i>Cityworks</i> , and Woolpert, Inc.	<ul style="list-style-type: none"> <li>• Assists Harbors with installing, configuring, testing, and deploying its <i>Cityworks</i>® Powered asset management system (AMS) and providing ongoing licensing and software support services.</li> </ul>

This AR will be submitted to the HDOH CWB.

## 2.2 STORMWATER MANAGEMENT PLAN

Revisions were made to the SWMP since the initial NOIs. The most recent version of the SWMP was updated and submitted in 2022 in compliance with NPDES permits.

### 3.0 NPDES PERMIT

Table 2 provides a summary of Harbors NPDES permit conditions and compliance actions.

<b>Table 2. Status of NPDES Permit Compliance</b>			
Description	Yes	No	Explanation
Permittee is in compliance with NPDES permits.	✓		<ul style="list-style-type: none"> <li>Harbors stormwater program continued to strive in meeting the six MCMs of MS4 NPDES Appendix K permits for both the Honolulu Harbor and KBPH.</li> <li>Harbors has met permit requirements and is continuously working on improving existing programs.</li> </ul>
Permittee has met all conditions of the 2022 SWMP.	✓		<ul style="list-style-type: none"> <li>Harbors has met all conditions of the 2022 SWMP.</li> <li>Although one follow-up and related inspection to low-risk tenant reconnaissance was delayed, it was completed in 2024.</li> </ul>
Permittee is currently in compliance with record-keeping and reporting requirements.	✓		<ul style="list-style-type: none"> <li>Harbors has adequately retained required records.</li> <li>Harbors is currently using its AMS to manage its stormwater program work processes and related record-keeping in conjunction with its geographic information system (GIS) maps.</li> </ul>

### 3.1 SWMP MODIFICATION

This section includes the revisions made to the SWMP during the reporting period as required by HAR 11-55 Appendix K. The SWMP was updated in 2022 to reflect 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. The updated SWMP was provided in the NOI submittals for the NGPC Appendix K. No further modifications were made to this SWMP. A copy of this SWMP was available on the Harbors stormwater website at <http://hidot.hawaii.gov/harbors/malamaikeawakai/>.

Ongoing program evaluation may prompt instant procedural adjustment to maintain and improve implementation efficacy. These adjustments will be tracked in the ARs and eventually reflected in the future SWMP updates.

### **3.2 SWMP CORE PROGRESS EVALUATION**

Harbors continued to work with consultants to meet the requirements of the updated 2022 SWMP. Management continued their involvement to ensure proper implementation of the program.

The Harbors education and outreach program is designed for its employees, tenants, consultants, contractors, and the public. The program increases the general awareness of impacts that different activities may have on stormwater runoff, and how BMPs, and post-construction BMPs can help minimize or mitigate those impacts.

In 2024, the live trainings were conducted virtually, in-person, and in combination of online video option. The Harbors Annual Stormwater Pollution Prevention Awareness Training for tenants was provided via two virtual training sessions (on July 18 and September 6, 2024) and one online video through YouTube. Tenants were notified via email or certified letter to attend the training and to provide a completed survey to Harbors Engineering Branch Environmental Section (HAR-EE) as proof of completion. In addition, Harbors continued its inspections of high, medium, and low risk tenants in 2024 and provided outreach and education before, during, and after the site visits whenever necessary.

Harbors continued to implement the Construction Site Runoff Control Program (CSRCP). In 2024, Harbors Engineering Branch (HAR-E) and associated consultants and contractors whose primary job duties are related to implementing this program were invited to attend Harbors construction and post-construction training, which was conducted in-person during the HDOT Protect Our Water (POW) conference and via an online video on YouTube. This POW conference mainly focused on stormwater pollution prevention development; proper installation, maintenance, and inspection of construction BMPs; and review of updated policies, rules, and procedures. HAR-EE continued to review and evaluate all projects from design through construction phases, as well as coordinate and inspect regulated construction sites.

HAR-O continued its work on pollution prevention and good housekeeping (P2/GH). Two rounds of semi-annual and four rounds of quarterly screening inspections were conducted for all accessible and hot spot storm drain inlets and trench drains in 2024, respectively. Follow-up stenciling and comprehensive cleaning were performed at all drain inlets and trench drains identified as requiring further attention by the screening inspectors. In addition, storm drains and trench drains on the five-year cleaning schedule were also cleaned.

Harbors continued to use GIS-centric AMS for recordkeeping, work flow, and data management. The AMS related outreach and training efforts were continued in 2024. Based on the actual demand and audience attendance in the past few years, Harbors adjusted the AMS/GIS workshop frequency to an annual basis and conducted it on October 23, 2024. Harbors Marine Cargo Specialists and Ground Maintenance crews continue to actively use AMS on computer and/or mobile devices to document work results and to report environmental issues found.



### 3.1 PROGRAM EFFECTIVENESS

Harbors has determined that the majority of the selected BMPs are appropriate to reduce the discharge of potential pollutants in the stormwater. The metrics detailed in Section 5 of this report were effective at tracking Harbors stormwater compliance in 2024.

Table 3 below summarizes data regarding progress to reduce the discharge of potential pollutants.

<b>Table 3. Status of BMPs</b>				
<b>MCM <sup>1</sup> Description</b>	<b>BMP Applied <sup>2</sup></b>	<b>Parameter</b>	<b>Quantity</b>	<b>Does BMP Demonstrate a Direct Reduction in Pollutants?</b>
P2/GH	MS4 Cleaning	Debris	228.7 cu ft	Yes – pollutants would otherwise remain in MS4
P2/GH	Street Sweeping	Debris	108.52 tons	Yes – pollutants would otherwise discharge to the MS4
IDDE	Elimination of illicit discharges to MS4	Investigations related to MS4 discharges	26	Yes – illicit discharges reduced or eliminated
	Elimination of direct discharges to Harbor waters (non-MS4 discharges)	Investigations related to non-MS4 discharges	26	Yes – illicit discharges reduced
Notes				
<sup>1</sup> MCM = Minimum Control Measure				
<sup>2</sup> Response Action on MCM/resultant outcome				

### 3.2 CHALLENGES AND PROPOSED MODIFICATIONS FOR 2024

The SWMP was updated in 2022 to account for the revised HAR 11-55 Appendix K. Harbors will continue to evaluate program efficiency and update the SWMP as needed.

Started in July 2024, based on the feedback received from HAR-O, in-house storm drainage system inspection and cleaning procedure was adjusted to improve program implementation efficacy. For drains fitted with Witch's hat, it is no longer a trigger for automatic cleaning work order. These drains are still subject to the five-year cleaning requirements. This procedural change will be reflected in the upcoming SWMP modification.

### 3.3 WATER QUALITY MONITORING DATA

Regular Operation and Maintenance (O&M) of these permanent BMPs continued in 2024 to keep up their pollutant removal effectiveness. Based on the discussion of program effectiveness in Section 5, Harbors has assessed that water quality monitoring is not necessary at this time.

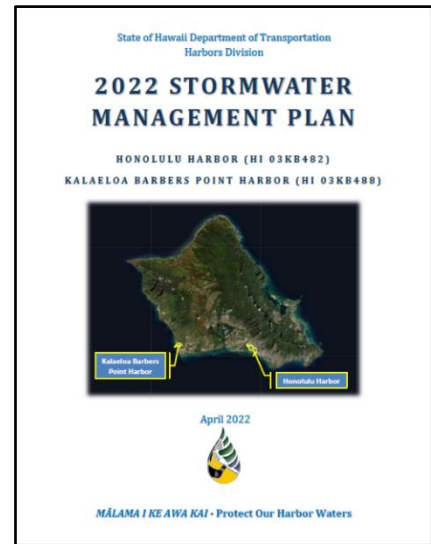


Figure 1. 2022 SWMP

### 3.4 STORMWATER MESSAGES



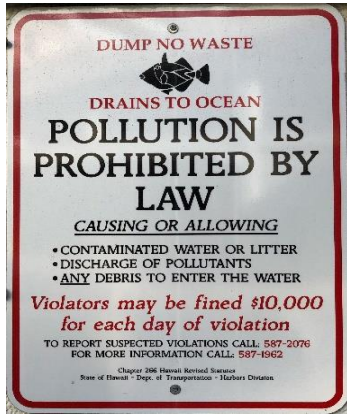
**PROTECT OUR  
HARBOR  
WATERS**

*Mālama I Ke Awa Kai*

HAR-EE continues to exercise best available efforts to prominently display the stormwater pollution prevention awareness message “*Mālama I Ke Awa Kai, Protect Our Harbor Waters,*” in all printed and electronic communication with tenants and during employee, tenant, consultant, construction contractor, or public trainings. To enhance the visibility, Harbors has continued the use of a stormwater pollution prevention awareness logo consisting of the awareness message and a raindrop fish to promote responsible environmental behavior and to protect harbor waters.



Additionally, to increase stormwater pollution prevention awareness, stainless steel medallions have been installed next to storm drain inlets and other storm conveyance structures to remind Harbors employees, tenants, users, and the public that all drains lead to the ocean. The medallions are replaced as needed.



Signs installed at visible public areas include information about illicit discharges and the phone numbers (including stormwater hotline) for reporting. Currently, HAR-EE has been assessing and inspecting these signs biennially.

**Figure 2. Pollution Prevention Sign**

## 4.0 STORMWATER MINIMUM CONTROL MEASURES

Harbors small MS4 permits are regulated by HAR 11-55, Appendix K, which requires all permittees to develop, implement, and enforce a SWMP designed to reduce the discharge of pollutants to the small MS4 system via BMPs for each minimum control measure, to protect water quality, and satisfy the water quality requirements of the Clean Water Act (CWA). HAR 11-55 requires a SWMP to include the following six MCMs with implementation dates and rationales for each measure.

1. Public Education and Outreach;
2. Public Involvement and Participation;
3. Illicit Discharge Detection and Elimination (IDDE);
4. Construction Site Runoff Control;
5. Post-Construction Stormwater Management in New Development and Re-Development; and,
6. Pollution Prevention and Good Housekeeping.

Appendix K of HAR 11-55 also requires the permittee to develop “measurable goals” to gauge permit compliance and program effectiveness for each MCM identified above. The permittee shall select measurable goals using an integrated approach that fully addresses the requirements and intent of the MCM.

This section details how Harbors has met the six requirements and measurable goals.



### 4.1 PUBLIC EDUCATION AND OUTREACH

HAR 11-55 Appendix K, requires the small MS4 permittee to provide public education and outreach. This public education program provides educational materials to users of the permittee’s small MS4 and outreach activities emphasizing the following:



- A. Impacts of stormwater discharges on water bodies;
- B. Hazards associated with illicit discharges; and
- C. Measures that users of the permittee’s small MS4 can take to reduce pollutants in stormwater runoff, including, but not limited to, minimizing fertilizer application, and practicing proper storage and disposal of chemicals and wastes

Table 4 provides a summary describing Harbors public outreach and education program, including the MCM, milestones, BMP goals, and planned activities.



**Table 4. Public Education and Outreach**

MCM/BMP Description	Responsible Party	Evaluation Metric	BMP Start Date	Permit Year 3 Milestones/Progress on Goal(s)	Completed in 2024?	New or Revised Goal	Activities Planned in 2025
SWMP A.3.1.1 Integrate and promote the message: <i>Mālama i ke awa kai – Protect Our Harbor Waters</i>	HAR-EE	Percentage of tenant outreach and training materials featuring message.	1/1/22	HAR-EE continues to exercise the best efforts to display the stormwater pollution prevention awareness message " <i>Mālama I Ke Awa Kai - Protect Our Harbor Waters</i> " in all printed and electronic communication with tenants and during staff, tenant, or public trainings.		N/A	Continue to integrate message into all printed and electronic communication.
SWMP A.3.1 Continue to provide and disseminate stormwater awareness information to tenants and the public.	HAR-EE	Number of stormwater awareness information provided to tenants and public.	1/1/22	The stormwater message and logo has been included in at least five forms of information: <ul style="list-style-type: none"> <li>• Documents (SWMP, AR).</li> <li>• BMP Handouts</li> <li>• Construction and Post-Construction Brochures</li> <li>• New Tenant Welcome Brochure</li> <li>• Tenant Training Notice</li> <li>• Training Presentations (Tenant, Construction and Post-Construction, and IDDE)</li> </ul>		N/A	Continue to include message wherever beneficial.



**Table 4. Public Education and Outreach**

MCM/BMP Description	Responsible Party	Evaluation Metric	BMP Start Date	Permit Year 3 Milestones/Progress on Goal(s)	Completed in 2024?	New or Revised Goal	Activities Planned in 2025
SWMP A.3.1.2 Maintain a web-based media to disseminate stormwater awareness information.	HAR-EE / HAR-SI	Number of visitors annually.	1/1/22	<ul style="list-style-type: none"> <li>Harbors received a total of roughly 101 unique page views in 2024.</li> </ul>		N/A	Continue to track web page views.
SWMP A.3.2 Provide educational outreach to tenants to proactively mitigate activities that could result in pollution.	HAR-EE	Distribute educational materials to tenants that include requirements listed in A.3.2.3.  Track percentage of tenants who attended the annual training.	1/1/22	<ul style="list-style-type: none"> <li>A virtual training in addition to the online stormwater training video was implemented in lieu of the live training sessions. The video was made available to tenants in January 2024 on YouTube and the virtual training was conducted on July 18, 2024 and September 6, 2024.</li> <li>89.0% of tenants attended this training (Attachment 2d &amp; 2e).</li> </ul>		N/A	Continue the efforts and increase the training participation rate through individual calls, visits, email reminder, etc.

**Table 4. Public Education and Outreach**



MCM/BMP Description	Responsible Party	Evaluation Metric	BMP Start Date	Permit Year 3 Milestones/Progress on Goal(s)	Completed in 2024?	New or Revised Goal	Activities Planned in 2025
SWMP A.3.1.4 Use Suspected Illicit Discharge Reporting (SIDR) to track informational inquiries and reports placed to the hotline and follow-up activities.	HAR-EE / HAR-SI	Number of informational inquiries and reports received.  Duration from when call is received until response.	1/1/22	All inquiries were responded to within 24 hours or as soon as practical.		N/A	Continue to track the number of informational reports received. Continue to distribute SIDR pocket guides for HAR-O & HAR-E use when necessary.
SWMP A.3.1.5 Provide outreach to the general public at Honolulu Harbor and KBPH on stormwater issues via Harbors website.	HAR-EE / HAR-SI	Items described in Section 2.1.6 are updated efficiently.  Identify website pages to display stormwater awareness message.  Link to Harbors website is prominently featured on the main HDOT website.	1/1/22	The web page has been updated throughout 2024. <a href="http://hidot.Hawaii.gov/HDOT-Harbors/malamaikeawakai/">(http://hidot.Hawaii.gov/HDOT-Harbors/malamaikeawakai/)</a> .  The links to the other HDOT websites are included on the Harbors web page.		N/A	Continue to promote web page through trainings and material handouts.

**Table 4. Public Education and Outreach**



MCM/BMP Description	Responsible Party	Evaluation Metric	BMP Start Date	Permit Year 3 Milestones/Progress on Goal(s)	Completed in 2024?	New or Revised Goal	Activities Planned in 2025
SWMP A.3.1.6 Continue to maintain signage at public areas and stencil storm drain inlets to promote stormwater pollution prevention to deter illicit charges into Harbors waters.	HAR-EE / HAR-O	Inspect and maintain signage.  Inspect stencils/labels prior to the wet season. Percentage of illegible stencils rectified.	1/1/22	<ul style="list-style-type: none"> <li>A total of 83 P2 signs at Honolulu Harbor and Kalaeloa Barbers Point Harbor were inspected in 2024. 75 of them passed inspection, 8 will be repaired/replaced in 2025.</li> <li>100% of accessible storm drain inlets and trench drains were stenciled.</li> <li>In 2024, a total of 7 drain inlets required re-stenciling or replacing.</li> </ul>		N/A	Evaluate the need for additional signs. Replace and repair missing or damaged signs. Continue the biennial P2 Sign Inspections.
SWMP A.3.2.3. Continue to maintain a comprehensive list of BMP handouts covering common tenant activities.	HAR-EE	Comprehensive set of BMP handouts developed and posted on Harbors website.	1/1/22	<p>A list of updated tenant BMPs is available on the Harbors web page:</p> <ul style="list-style-type: none"> <li><a href="http://hidot.Hawaii.gov/HDO T-Harbors/malamaikewakai/">http://hidot.Hawaii.gov/HDO T-Harbors/malamaikewakai/</a></li> </ul>		N/A	Update and distribute BMP handouts as necessary.




**Table 4. Public Education and Outreach**

MCM/BMP Description	Responsible Party	Evaluation Metric	BMP Start Date	Permit Year 3 Milestones/Progress on Goal(s)	Completed in 2024?	New or Revised Goal	Activities Planned in 2025
SWMP A.3.2.1. Update tenant lease agreements, Tenant Revocable Permits (TRPs), and other materials (upon renewal) to reference or include minimum BMPs and require their implementation.	HAR-PM / HAR-O / HAR-EE	Percent of new/renewed tenants with modified language in their leases or TRPs.	1/1/22	<ul style="list-style-type: none"> <li>100% of new/renewed tenant leases and revocable permits have incorporated the updated language.</li> </ul>		N/A	Continue to use the new format.
SWMP A.3.3.1 Disseminate information sheets with recommended BMPs for Vessel Operators.	HAR-O / HAR-EE	Continue to distribute BMP fact sheets for vessel operators when necessary.	1/1/22	<ul style="list-style-type: none"> <li>A BMP flier is available on the Harbors web page titled "BMPs for Small Vessel Maintenance Activities."</li> <li>Harbors will continue to work on translating this BMP into other foreign languages as necessary, to provide outreach to non-English speaking users.</li> </ul>		N/A	Distribute updated flyers. Continue to evaluate and translate this BMP into foreign languages, as necessary.



**Table 4. Public Education and Outreach**

MCM/BMP Description	Responsible Party	Evaluation Metric	BMP Start Date	Permit Year 3 Milestones/Progress on Goal(s)	Completed in 2024?	New or Revised Goal	Activities Planned in 2025
SWMP A.3.2.2 Maintain an electronic tenant inventory and update in accordance with the Harbors Tenant Inspection Manual (TIM).	HAR-EE/ HAR-EP/ HAR-PM	Percentage of tenants updated information listed in the electronic inventory based on the most recent inspection.	1/1/22	<ul style="list-style-type: none"> <li>• Harbors continued to maintain their electronic tenant inventory.</li> <li>• 100% of tenants are included in Cityworks.</li> </ul>		N/A	Continue to update and maintain tenant inventory data using GIS-centric AMS.
SWMP B.6.1 Provide effective educational materials to relevant employees to maintain their knowledge of Harbors stormwater pollution prevention program.	HAR-EE	<p>Provide information about stormwater pollution prevention to all Harbors employees.</p> <p>Provide IDDE training to all Marine Cargo Specialists, and Grounds Supervisors.</p>	1/1/22	<ul style="list-style-type: none"> <li>• Educational materials distributed in 2024 include outreach messages and handouts via emails on October 4, 2024 (Attachment 4a)</li> <li>• 87.50% of Harbors employees responded to the Survey. A summary of the results and the hard copy questionnaire are included in Attachment 4c.</li> </ul>		N/A	Update the training content, quiz, and distribute to employees.

**Table 4. Public Education and Outreach**

MCM/BMP Description	Responsible Party	Evaluation Metric	BMP Start Date	Permit Year 3 Milestones/Progress on Goal(s)	Completed in 2024?	New or Revised Goal	Activities Planned in 2025
SWMP B.6.1 Provide effective educational materials to relevant employees to maintain their knowledge of Harbors stormwater pollution prevention program.	HAR-EE	Provide training to staff whose job duties include implementing the Tenant Inspection Program (TIP), as specified in the TIM.  Provide training to staff whose job duties include implementing the Outfall Reconnaissance Inventory and Inspection Program (ORIIP), as specified in the manual.	1/1/22	One TIM/ORIIP inspector training was completed (Attachment 6b).		N/A	Update the training content, quiz, and distribute to employees.

**Table 4. Public Education and Outreach**


MCM/BMP Description	Responsible Party	Evaluation Metric	BMP Start Date	Permit Year 3 Milestones/Progress on Goal(s)	Completed in 2024?	New or Revised Goal	Activities Planned in 2025
SWMP C-CSRCP Section 5.1 & 6 Provide training and resources for Harbors employees, consultants, tenants, and construction contractors regarding construction BMPs. Update training materials when necessary.	HAR-EE / HAR-E	Provide contractors with CSRCP Manual via Harbors Storm Water website.  Provide training to personnel whose primary job duties related to implementing the CSRCP.	1/1/22	Handouts are posted on Harbors website (inside Construction Site Runoff Control Program Manual) and available at the annual HDOT POW conference on 11/13/2024.		N/A	Distribute materials annually.
SWMP A.3.2.1 Continue to update the New Tenant Information Package, when necessary, to ensure new tenants are aware of stormwater requirements.	HAR-EE	Develop and update as necessary the New Tenant Information Package to include stormwater requirements.	1/1/22	The new tenant information package is available on the Harbors web page and is also provided to the new tenants directly.		N/A	Distribute information to new tenants.

## 4.2 ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM




HAR 11-55, Appendix K requires the small MS4 permittee to create an IDDE program. The program implements and enforces methods to detect and eliminate illicit discharges that, at a minimum, include the following:

- A. Establish rules, ordinances, or other regulatory mechanism, including enforcement procedures and actions, that prohibit non-stormwater discharges, Section 1 of HAR 11-55, Appendix K lists discharges that do not cause or contribute to any violations of water quality standards, into the permittee’s small MS4 system;
- B. Procedures to detect and eliminate illicit discharges as defined in Code of Federal Regulations 40 Section 122.26(b) (2); and
- C. Compile a list of non-stormwater discharges or flows that are considered to be significant contributors of pollutants to the system, and measures to prevent these discharges into the permittee’s small MS4, or reduce the amount of pollutants in these discharges.


Table 5 summarizes data regarding Harbors IDDE program, MCMs, BMPs, goals, milestones, and planned activities.

<b>Table 5. Illicit Discharge Detection and Elimination Program</b>							
MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 2 Milestones/Progress on Goal(s)	Completed in 2024?	New or Revised Goal	Activities Planned in 2025
SWMP TIM – 2 Harbors will inspect all regulated tenants at frequencies based on their environmental risk.	HAR-EE	Percentage of new tenants having initial/new tenant inspection completed.	1/1/22	Five new/initial inspections were conducted in 2024, which represents 100% of new tenants formally identified by Harbors Property Management Staff (HAR-PM) (Labeled as “new” under the “Inspection Type” column in Attachment 7).		N/A	Continue to inspect new tenants upon notification.

**Table 5. Illicit Discharge Detection and Elimination Program**

MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 2 Milestones/Progress on Goal(s)	Completed in 2024?	New or Revised Goal	Activities Planned in 2025
SWMP TIM – 4.3 Harbors will inspect all regulated tenants at frequencies based on their environmental risk.	HAR-EE	Percentage of tenants having risk ranking updated per the TIM.	1/1/22	All tenant sites risk ranking were evaluated/updated. <ul style="list-style-type: none"> <li>• Three tenant sites upgraded from low to medium.</li> <li>• One tenant site downgraded from medium to low.</li> <li>• One tenant site downgraded from high to medium.</li> </ul>		N/A	Update IDDE and tenant training and continue to conduct site assessments.
SWMP B.2 – TIM Harbors will inspect all regulated tenants at frequencies based on their environmental risk.	HAR-EE	Percentage of follow-up inspections completed within 7 days upon discovery.	1/1/22	100% of follow-up inspections in response to a formal complaint were completed within 7 days of discovery (if any).		N/A	Continue to conduct outreach activities.
SWMP B.2 – TIM Harbors will inspect all regulated tenants at frequencies based on their environmental risk.	HAR-EE	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.	1/1/22	<ul style="list-style-type: none"> <li>• 97.05% of follow-up inspection completed within 30 days of a reconnaissance inspection.</li> <li>• A total of 34 reconnaissance inspections were completed in 2024. And one triggered a follow-up inspection, which was completed in 2024.</li> </ul>		N/A	Continue the low-risk tenant reconnaissance.

**Table 5. Illicit Discharge Detection and Elimination Program**

MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 2 Milestones/Progress on Goal(s)	Completed in 2024?	New or Revised Goal	Activities Planned in 2025
SWMP B.3 - ORIIP Harbors will inspect outfalls to identify illicit discharges.	HAR-EE	Percentage of investigative inspections performed by next working day.	1/1/22	<ul style="list-style-type: none"> <li>85% of accessible outfalls inspected during dry weather in 2024.</li> <li>A total of 11 outfalls were inaccessible or unobservable at the time of inspection.</li> <li>Wet weather reconnaissance was completed on April 12, 2024.</li> </ul>		N/A	Conduct dry weather reconnaissance of all inaccessible outfalls. Conduct dry weather reconnaissance of the 24 outfalls at Pier 12 & 15. Conduct wet weather reconnaissance.

**Table 5. Illicit Discharge Detection and Elimination Program**




MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 2 Milestones/Progress on Goal(s)	Completed in 2024?	New or Revised Goal	Activities Planned in 2025
SWMP B.3 ORIIP Section 2.0 and 3.0 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.	HAR-EE/ HAR-ESRM	Re-prioritize all outfalls.  Biannually inspect all outfalls ranked Unlikely during dry weather.  Annually inspect all outfalls ranked Potential, Suspect, and Obvious during dry weather.  Annually inspect outfalls at “high risk” area during wet weather.	1/1/22	<ul style="list-style-type: none"> <li>Dry weather ORI report is found in Attachment 8b.</li> <li>141 out of the 164 outfalls were inspected during the dry weather ORI. 10 previously listed outfalls have been physically removed due to the construction project at Piers 40-43.</li> <li>All 141 outfalls were characterized as Unlikely.</li> <li>One outfall was inspected during wet weather reconnaissance in 2024 (Attachment 8a).</li> </ul>		N/A	Continue to address illicit discharges, if any.
SWMP B.3 - ORIIP Section 3.3 and 3.4	HAR-EE	Percentage of illicit discharges identified during both dry and wet weather inspections properly addressed.	1/1/22	Outfall reconnaissance conducted during wet weather revealed no illicit discharges.		N/A	None



Table 5. Illicit Discharge Detection and Elimination Program							
MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 2 Milestones/Progress on Goal(s)	Completed in 2024?	New or Revised Goal	Activities Planned in 2025
SWMP B.4 Perform site assessments to identify active or recent illicit discharges and increase the field presence of Harbors personnel.	HAR-O/ HAR-EE	Percentage of identified suspected illicit discharge tracked. Respond to violations in accordance with the ERP.	1/1/22	There were 26 suspected illicit discharges reported in 2024 (Attachment 9).		N/A	Continue to address BMPs that need improvement.



### 4.3 CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

HAR § 11-55, Appendix K requires the small MS4 permittee to develop, implement, and enforce a program to reduce pollutants in stormwater runoff entering the permittee’s small MS4 system from construction activities disturbing one acre or more. Included are construction activities less than one acre that are part of a larger common plan of development or sale that would disturb one acre or more. Program priorities, includes:



- A. Established rules, ordinances, or other regulatory mechanism, including enforcement procedures and actions, that require erosion and sediment controls;
- B. Requirements for construction site operators to implement appropriate erosion and sediment control BMPs;
- C. Requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality;
- D. Procedures for site plan reviews which incorporate consideration of potential water quality impacts;
- E. Procedures for receipt and consideration of information submitted by the public; and
- F. Procedures for site inspection and enforcement of control measures.

Table 6 provides information about the construction site runoff controls, including MCMs, BMPs, goals, milestones, and planned activities.


**Table 6. Construction Site Stormwater Runoff Control**

MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 2 Milestones/Progress on Goal(s)	Completed in 2024?	New or Revised Goal	Activities Planned in 2025
SWMP C-CSRCP Harbors will maintain oversight of all non-exempt construction projects for compliance with the CSRCP.	HAR-E / HAR-EE	Percentage of applicable construction projects reviewed using the Construction Site Design Review Checklist.  Percentage of contractor SWPPPs, NOI, and discharge permit applications reviewed.	1/1/22	<ul style="list-style-type: none"> <li>100% of the NOI-C regulated projects reviewed are required to use the Construction Site Design Review Checklist.</li> <li>100% of project supporting documents are reviewed as a part of the standard review process.</li> </ul>		N/A	Continue to review form where applicable.
SWMP C – CSRCP Harbors will maintain oversight of all non-exempt construction projects for compliance with the CSRCP.	HAR-E / HAR-EE/ HAR-PM	Percentage of construction site inspection records into database.	1/1/22	100% of construction site inspection records were entered into database.		N/A	Continue to track inspection records.

**Table 6. Construction Site Stormwater Runoff Control**

MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 2 Milestones/Progress on Goal(s)	Completed in 2024?	New or Revised Goal	Activities Planned in 2025
SWMP C – CSRPC Harbors will maintain oversight of all non-exempt construction projects for compliance with the CSRPC.	HAR-E / HAR-EE / HAR-PM	Percentage of non-exempted projects less than one acre that submitted Notification Form for Project Site Disturbing Less Than One Acre (HDOT HAR-EE Form SD<1_NFT).		<ul style="list-style-type: none"> <li>A total of 26 Harbors projects were reviewed in 2024. Four of them were considered non-exempt and/or regulated by NPDES NOI-C Permit (Attachment 11b).</li> <li>A total of 10 Tenant projects were reviewed in 2024. Two of them was considered non-exempt but none were regulated by ND PES NOI-C Permit (Attachment 11a).</li> <li>100% of non-exempt projects submitted the form.</li> </ul>		N/A	Continue to review form where applicable.
SWMP C – CSRPC Harbors will maintain oversight of all non-exempt tenant construction projects for compliance with the CSRPC.	HAR-E / HAR-EE / HAR-PM	Percentage of applicable construction projects reviewed for necessary BMPs.  Percentage of tenant site inspection records entered into database.	1/1/22	<ul style="list-style-type: none"> <li>100% of project supporting documents are reviewed as a part of the standard review process.</li> <li>100% of tenant site inspection records entered into database.</li> </ul>		N/A	Review construction plans.

**Table 6. Construction Site Stormwater Runoff Control**


MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 2 Milestones/Progress on Goal(s)	Completed in 2024?	New or Revised Goal	Activities Planned in 2025
SWMP C- CSRPC Sections 3.4, 4.4 Ensure illicit discharges from Harbors construction projects and tenant improvement projects are deferred or eliminated through inspection and enforcement.	HAR-EE	Percentage of completed enforcement actions recorded in construction project database	1/1/22	<ul style="list-style-type: none"> <li>100% of completed enforcement actions recorded in the construction project database.</li> <li>None triggered escalated enforcement in 2024.</li> </ul>		N/A	Continue to keep track of records.

**4.4 POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT**


HAR 11-55, Appendix K requires the small MS4 permittee to develop, implement, and enforce a program to reduce pollutants in stormwater runoff entering the permittee’s small MS4 system from new development and redevelopment projects that disturb up to one acre. Included are construction sites less than one acre that are part of a large common plan of development or sale that would disturb one acre or more. The program includes the following:

- A. Establish rules, ordinances, or other regulatory mechanisms, including enforcement procedures and actions, that address post-construction runoff from new development and redevelopment projects.
- B. Structural and/or non-structural BMPs to minimize water quality impacts and attempt to maintain predevelopment runoff conditions; and
- C. Procedures for long-term O&M of BMPs.


Table 7 provides information about Harbors post-construction stormwater management activities in new development and redevelopment projects, including MCMs, BMPs, goals, milestones, and planned activities.

<b>Table 7. Post-Construction Stormwater Management in New Development and Redevelopment</b>							
<b>MCM/BMP Description</b>	<b>Responsible Dept. / Section</b>	<b>BMP Applied/ Measurable Goal(s)</b>	<b>BMP Start Date</b>	<b>Permit Year 2 Milestones/Progress on Goal(s)</b>	<b>Completed in 2024?</b>	<b>New or Revised Goal</b>	<b>Activities Planned in 2025</b>
SWMP D.7 Provide training and resources for Harbors engineers, consultants, and contractors regarding Post-Construction BMPs.	HAR-EE	Percentage of personnel whose primary job duties are related to implementing the Post-Construction BMP program have received training.	1/1/22	A total of 41 individuals completed the Harbors Construction & Post-Construction BMP training, which represents 100% of personnel whose primary job duties are related to implementing the relevant programs (Attachment 3c & 3d).  A total of 213 attendees joined Harbors training session during HDOT POW conference on November 13, 2024 (Attachment 3e).		N/A	Continue to provide and track the training.



**Table 7. Post-Construction Stormwater Management in New Development and Redevelopment**

MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 2 Milestones/Progress on Goal(s)	Completed in 2024?	New or Revised Goal	Activities Planned in 2025
SWMP D 1.0, 2.2, 5.4 Harbors will manage all Harbors Capital Improvement Projects (CIPs) that disturb one acre or more of land for compliance with the Post-Construction Stormwater Management Program.	HAR-EE	<p>Percentage of regulated projects reviewed in design phase for necessary BMPs using the <i>Permanent Post-Construction Best Management Practice Plan Checklist</i>.</p> <p>Percentage of projects for which O&amp;M Plans have been reviewed.</p> <p>Percentage of Post-Construction BMP inspections records entered in a database in a format compatible with GIS.</p>	1/1/22	<ul style="list-style-type: none"> <li>The Post-Construction BMP Plan Checklist was used to evaluate 100% of the regulated projects (Attachment 11b).</li> <li>100% of Harbors projects with permanent post-construction BMPs have an O&amp;M plan or have adopted one from the manufacturer(s), where applicable, and ongoing maintenance.</li> <li>100% of PBMP inspections were recorded in AMS (Attachment 13).</li> <li>Existing PBMP inspection and maintenance are conducted biennially. Inspection and maintenance frequency for newly installed PBMP will be assessed in 2025.</li> </ul>		N/A	<p>Continue to use the Post-Construction BMP Plan Checklist for plan review on applicable projects.</p> <p>Continue to review plans for permanent BMPs.</p> <p>Update the inventory as necessary.</p>

**Table 7. Post-Construction Stormwater Management in New Development and Redevelopment**

MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 2 Milestones/Progress on Goal(s)	Completed in 2024?	New or Revised Goal	Activities Planned in 2025
SWMP D 1 & 2.3 Harbors will manage all tenant improvement projects for compliance with the Post-Construction Stormwater Management Program.	HAR-EE	Percentage of regulated tenant projects reviewed in design phase for necessary BMPs using the Post-Construction BMP Plan Checklist.  Percentage of tenant facilities with permanent BMPs that have an updated revocable permit or lease language requiring the implementation of the operation and maintenance plan.	1/1/22	<ul style="list-style-type: none"> <li>The Post-Construction BMP Plan Checklist was used to evaluate 100% of the regulated projects (Attachment 11a).</li> <li>All projects with permanent BMPs have an O&amp;M Plan.</li> <li>100% of tenant projects with PBMPs have O&amp;M plans or have adopted one from the manufacturer(s).</li> </ul>		N/A	<p>Continue to review plans for permanent BMPs.</p> <p>Update leases (when applicable) for tenants with permanent BMPs in include requirements for an O&amp;M plan</p>

**Table 7. Post-Construction Stormwater Management in New Development and Redevelopment**

MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 2 Milestones/Progress on Goal(s)	Completed in 2024?	New or Revised Goal	Activities Planned in 2025
SWMP D.1 & 2.3 Harbors will manage all tenant improvement projects for compliance with the Post-Construction Stormwater Management Program.	HAR-EE	Percentage of projects for requiring annual Post-Construction BMP inspections were conducted by tenants and reported to Harbors.  Percentage of Post-Construction BMP inspections conducted by Harbors, including those conducted during regular tenant inspections.	1/1/22	<ul style="list-style-type: none"> <li>100% of required PBMP inspections are conducted by tenants and reported to Harbors.</li> <li>UHMC performs maintenance on the PBMPs at Pier 35 as part of their lease agreement.</li> <li>No enforcement actions were necessary.</li> </ul>		N/A	Continue to use the Post-Construction BMP Plan Checklist for plan review on applicable projects.  Continue inspections where necessary.
SWMP D.6 Ensure illicit discharges from improperly managed Post-Construction BMPs are mitigated by inspection and enforcement.	HAR-E	Percentage of enforcement actions recorded in project database.	1/1/22	There were no enforcement actions relating to permanent BMPs in 2024.		N/A	Record enforcement as necessary




#### 4.5 POLLUTION PREVENTION AND GOOD HOUSEKEEPING





HAR 11-55, Appendix K requires the small MS4 permittee to develop a P2/GH program that will implement and enforce an O&M program to prevent and reduce stormwater pollution from activities, including, but not limited to, park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance that, at a minimum, includes the following:

- A. Good housekeeping and other control measures; and
- B. Employee and contractor training on good housekeeping practices to ensure that good housekeeping measures and BMP practices are properly implemented.

Table 8 provides information about Harbors P2/GH program, including MCMs, BMPs, goals, milestones, and planned activities.

Table 8. Pollution Prevention and Good Housekeeping							
MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 2 Milestones/Progress on Goal(s)	Completed in 2024?	New or Revised Goal	Activities Planned in 2025
Ensure the small MS4 conveys water to the harbor without obstructions or adding pollutants by performing initial and recurring cleaning.	HAR-O / HAR-E	Percentage accessible features specified by SSS O&M Plan that were cleaned.  Percentage of feature inspections recorded in database.  Percentage of hot spots identified for which BMPs were implemented or modified.	1/1/22	<ul style="list-style-type: none"> <li>• 100% of accessible storm drain inlets and trench drains were inspected and cleaned in 2024 (Attachment 14a &amp; 14b).</li> <li>• 100% of inspection findings and cleaning results were recorded in the AMS.</li> <li>• Accessible drainage features were cleaned in 2024 when needed.</li> <li>• Approximately 228.7 cu ft of debris were removed from the cleaning activities.</li> </ul>		N/A	Continue the small MS4 O&M and related recordkeeping.

**Table 8. Pollution Prevention and Good Housekeeping**

MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 2 Milestones/Progress on Goal(s)	Completed in 2024?	New or Revised Goal	Activities Planned in 2025
Designate appropriate drainage system maintenance and perform maintenance according to inspection results.	HAR-EE / HAR-EP	Once every five years, determine the percentage of accessible drainage features that have been cleaned.	1/1/22	100% of accessible storm drain inlets and trench drains due for 5-year cleaning were inspected and cleaned in 2024.		N/A	Continue to track drainage features that have been cleaned.
SWMP E.3.1 Review applications related to washing activities.	HAR-EE / HAR-EP	Percentage of washing activities that have submitted applications for approval.	1/1/22	No applications were received in 2024.		N/A	Continue to review applications as received
SWMP E.3.2 Review applications for dry wells and infiltration sinks.	HAR-EE	Percentage of submitted applications for dry wells and sinks that were reviewed.	1/1/22	No applications were received for review in 2024.		N/A	Continue to review applications as received
SWMP A.3.2 Provide general outreach materials to harbors employees and tenants for Pollution Prevention and Housekeeping.	HAR-EE	Percentage of harbors employees and tenants provided with educational materials.	1/1/22	100% of harbors employees and tenants were provided with educational materials in 2024.		N/A	Continue to train harbors employees and tenants on Pollution Prevention and Housekeeping.

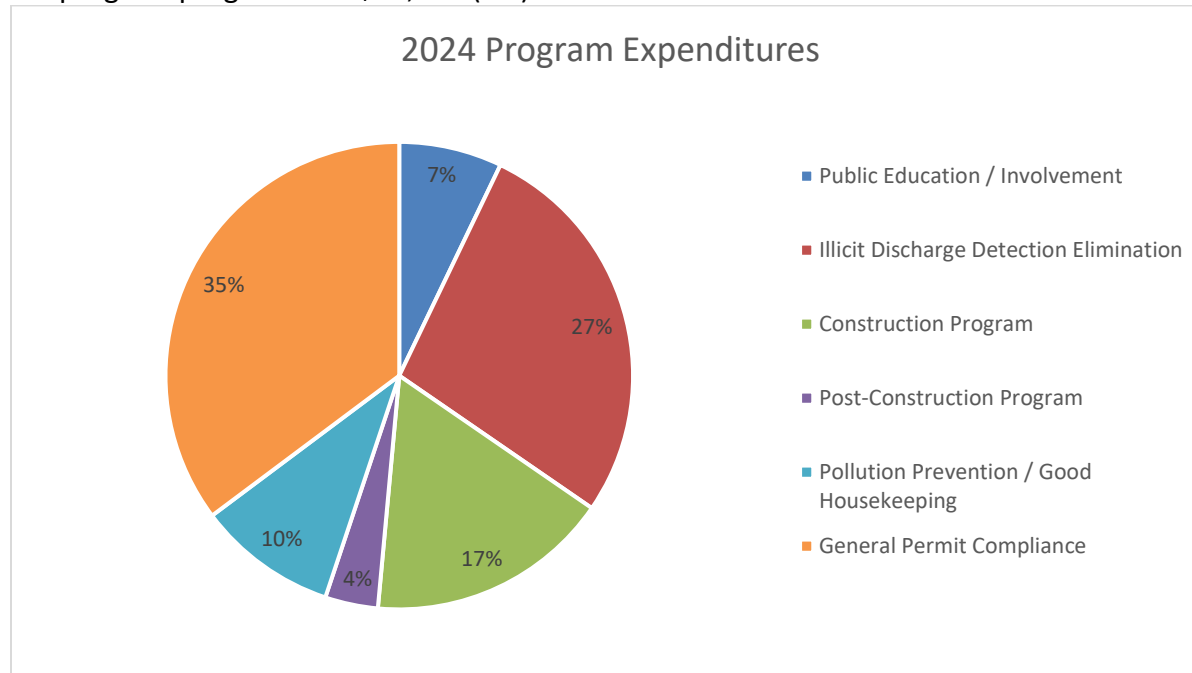
## 5.0 PROGRAM OUTPUTS AND ACCOMPLISHMENTS

### 5.1 MS4 PROGRAM EXPENSES

Program expenditures include the costs of several consultant contracts as well as an estimate of time spent by Harbors employees, AG and ENV support to ensure compliance with the conditions of the NPDES permit. Total expenditures in 2024 were slightly less than the previous year. Overall, funds expended in 2024 met current needs. Table 9 provides a summary of the MS4 program expenses.

<b>Table 9. MS4 Program Expenses</b>	
<b>Item</b>	<b>Response</b>
Office of Environmental Compliance created/staffed	Yes
Annual program budget/expenditures* ('Best efforts' estimates of 2024 expenditures)	
<ul style="list-style-type: none"> <li>• Public Education and Outreach &amp; Public Participation and Involvement program expenditures</li> </ul>	\$79,926
<ul style="list-style-type: none"> <li>• Illicit Discharge Detection and Elimination Program expenditures</li> </ul>	\$307,860
<ul style="list-style-type: none"> <li>• Construction Site Runoff Control expenditures</li> </ul>	\$189,149
<ul style="list-style-type: none"> <li>• Post-Construction Stormwater Management in New Development and Re-development programs expenditures**</li> </ul>	\$41,042
<ul style="list-style-type: none"> <li>• P2/GH BMP program expenditures</li> </ul>	\$108,299
<ul style="list-style-type: none"> <li>• General Permit Compliance expenditures</li> </ul>	\$394,832
<ul style="list-style-type: none"> <li>• Program Total Expenditures</li> </ul>	<b>\$1,121,109</b>
Funding mechanism(s) - (Routine Maintenance Fund, Special Maintenance, Major Maintenance, Service Project, Equipment Acquisition, CIP)	Routine and Special Maintenance Funds, CIP
Notes: Data is from the 2024 calendar year. *Expenditures from Harbors employees have been approximately based on the estimated percentage of time that they worked on stormwater related tasks. **Permanent Post-Construction BMP plan checklist reviews and associated inspections are accounted for under the Construction Site Runoff Control category since they are completed in conjunction with construction related tasks.	

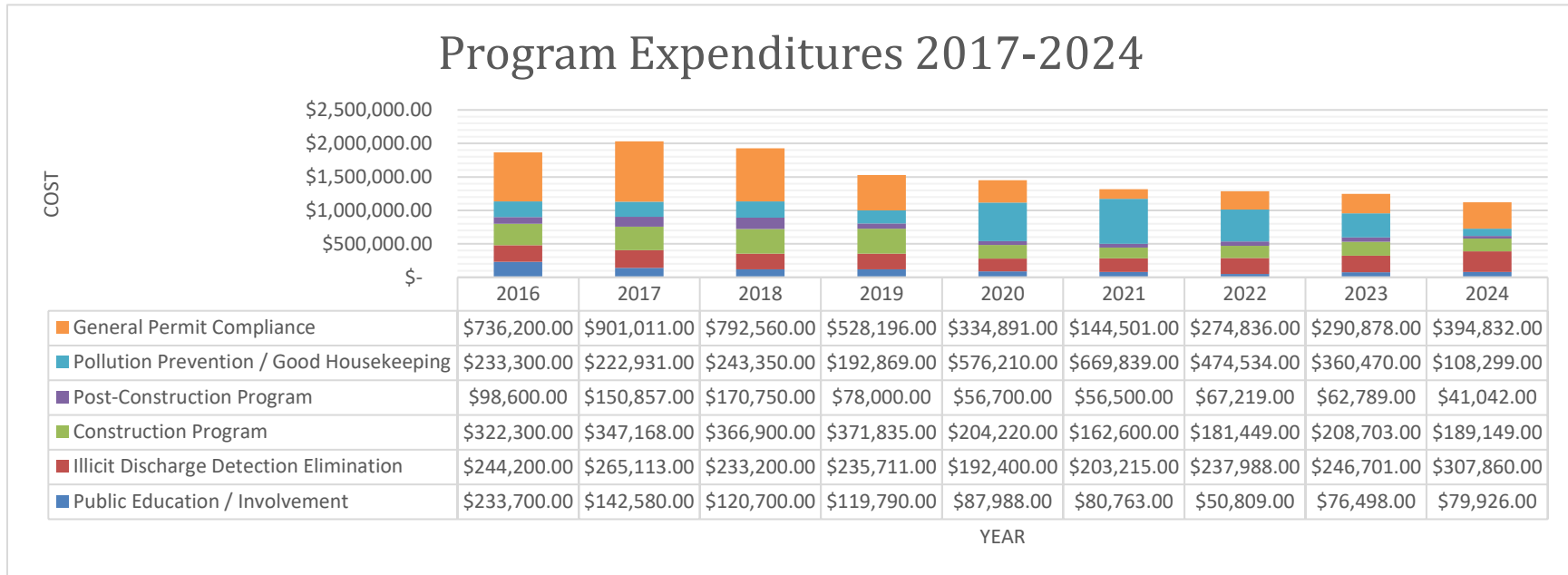
Figure 3 shows \$108,299 (10%) of the total expenditures for 2024 were for P2/GH BMP program expenditures. The General Permit Compliance program was the highest expense at \$394,832 (35%). The IDDE program was second most expensive at \$307,860 (27%). The Construction program cost \$189,149 (17%) of the total budget, the Post-Construction cost \$41,042 (4%), and the Public Education/Involvement program program cost \$79,926 (7%).



**Figure 3. 2024 Program Expenditures**

Figure 4 shows the program expenditures over the last eight years.

- The IDDE program expenditures increased in 2024 to \$307,860 compared to \$246,701 in 2023.
- The Construction program cost decreased slightly to \$189,149 in 2024 compared to \$208,703 in 2023.
- The General Permit Compliance expenditures increased in 2024. It was \$290,878 in 2023 and increased to \$394,832 in 2024.
- The Public Education and Involvement program increased in 2024. It was \$76,498 in 2023 and increased to \$79,926 in 2024.
- The P2/GH program decreased in 2024 to \$108,299 compared to \$360,470 in 2023.
- The Post-Construction program spending decreased slightly in 2024 to \$41,042 compared to \$62,789 in 2023.



**Figure 4. Program Expenditures from 2017-2024**

## 5.2 EDUCATION, INVOLVEMENT, AND TRAINING

The training and education of Harbors employees, tenants, and the public remained one of the top priorities in 2024. Reiteration of the environmental requirements, Harbors stormwater procedures, and BMPs has shown to be the best way to facilitate a culture of stormwater pollution prevention awareness and compliance. The large number of people trained, and their high quiz scores attest to the effectiveness of the training program.

Additionally, Harbors participated in the joint HDOT “Protect Our Water Conference” on November 13, 2024 along with HDOT Highways Oahu and Maui Districts, and HDOT Airports. The conference highlighted the joint effort that the entire HDOT is taking to collectively protect the water resources of the State of Hawaii.

<b>Table 10. Education, Involvement, and Training</b>	
Description	Response
Estimated number of people reached by education program(s)*	550
<ul style="list-style-type: none"> <li>• Tenant General Stormwater BMP Training</li> <li>• Employee Stormwater Training</li> <li>• Construction &amp; Post-Construction Training</li> <li>• IDDE</li> <li>• New Inspector(s)</li> </ul>	<p>104</p> <p>189</p> <p>41</p> <p>16</p> <p>1</p>
<b>Average score on the environmental knowledge survey(s):</b>	
<ul style="list-style-type: none"> <li>• Tenant Stormwater Training</li> <li>• Employee Survey (average % correct responses)</li> </ul>	<p>92.31%</p> <p>96.24 %</p>
Tenants who had positive view of the training	87.90%
Unique visitors to the stormwater web page	101 (roughly)
Public Education Signs	83
Storm Drain Inlets Stenciled	> 768
“Protect Our Water Conference” Attendees	213
Notes:	
Data is from the 2024 calendar year.	
*Some individuals may have been trained at two or more of the training sessions; however, they were counted separately.	

Figure 5 provides data on the total number of employees, tenants, and engineering staff/consultants/contractors that received training for the last eight years.

- In 2024, 189 employees, 104 tenant individuals, and 41 engineering staff/consultants/contractors were trained.
- In 2023, 206 employees, 99 tenant individuals, and 39 engineering staff/consultants/contractors were trained.
- In 2022, 212 employees, 85 tenant individuals, and 47 engineering staff/consultants/contractors were trained.
- In 2021, 227 employees, 127 tenant individuals, and 160 engineering staff/consultants/contractors were trained.
- In 2020, 203 employees, 105 tenant individuals, and 139 engineering staff/consultants/contractors were trained.
- In 2019, 201 employees, 102 tenant individuals, and 75 engineering staff/consultants/contractors were trained.

- In 2018, 194 employees, 89 tenant individuals, and 26 engineering staff/consultants/contractors were trained.
- In 2017, 189 employees, 123 tenant individuals, and 20 engineering staff/consultants/contractors were trained.



**Figure 5. Number of People Trained from 2017-2024**

### 5.3 LEGAL/REGULATORY

All accompanying program elements (listed in Table 11) were in place prior to the 2022 SWMP revision and update.

**Table 11. Legal/Regulatory**

Description	In Place Prior 2022 SWMP
Illicit Discharge Detection & Elimination	✓
Construction and Post-Construction Related Activities	✓
Post-Development Stormwater Management	✓
Illicit Discharge Detection & Elimination	✓
Construction and Post-Construction Related Activities	✓
Post-Development Stormwater Management	✓

### 5.4 MAPPING AND ILLICIT DISCHARGES

None of the reported suspected illicit discharges led to escalated enforcement. All investigations ended with the resolution.

The majority of the illicit discharge reports in 2024 came from Harbors staff and tenants. This indicates that the training provided is effective and people understand the proper reporting protocols when potential pollution or a suspected illicit discharge is observed.

**Table 12. Mapping and Illicit Discharges**

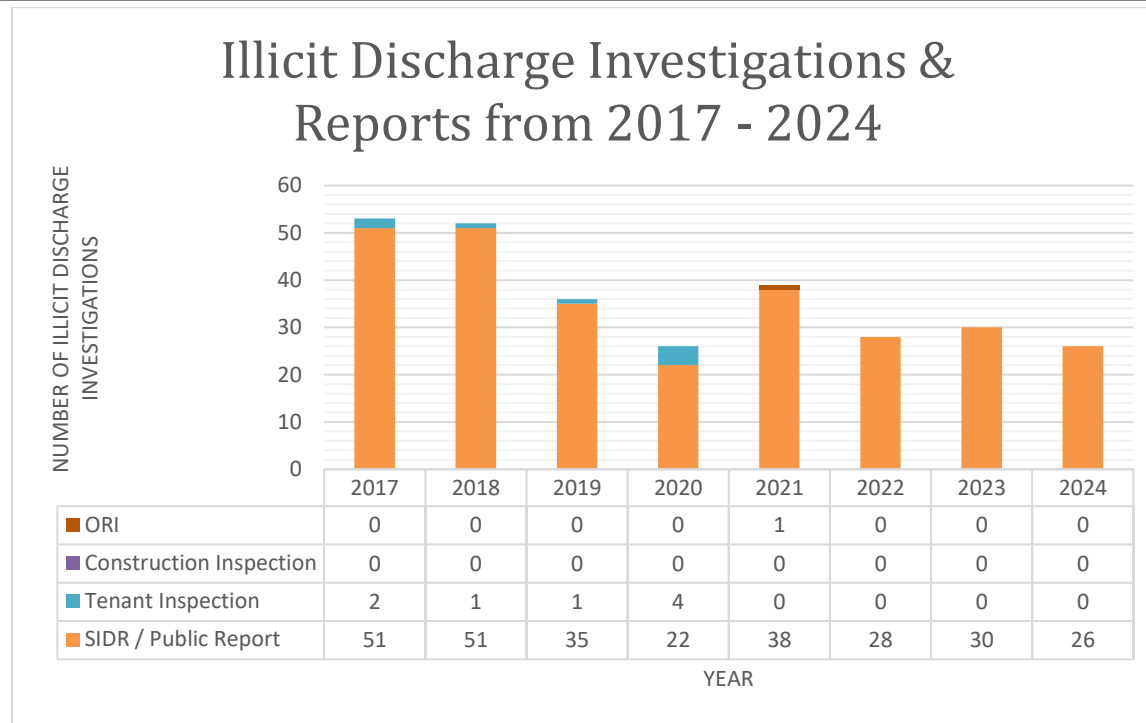
Description	Response
System-wide mapping complete <i>(Storm Sewer Infrastructure)</i>	100 %
<b>Mapping method(s)</b>	
Paper	when requested
GIS	100 %
<b>Outfalls required to be inspected/screened:</b>	



<b>Table 12. Mapping and Illicit Discharges</b>	
Description	Response
Honolulu Harbor	1
Kalaeloa Barbers Point Harbor	0
SIDR / Public Reports	26
Tenant Inspections	0
Construction Inspections	0
Outfall Reconnaissance	0
Illicit discharges recorded/investigated since 2010	422
Complaints/concerns received from public	1
Note: Data is from the 2024 calendar year.	

Figure 6 shows the data recorded for illicit discharge investigations over the past eight years.

- In 2024, there were 26 investigations performed in follow-up to 26 SIDRs.
- In 2023, there were 30 investigations performed in follow-up to 30 SIDRs.
- In 2022, there were 28 investigations performed in follow-up to 28 SIDRs.
- In 2021, there were 38 investigations performed in follow-up to 38 SIDRs. There was one from the wet weather outfall reconnaissance but none from tenant inspections and construction inspections.
- In 2020, there were 22 investigations performed in follow-up to 22 SIDRs. There were four from tenant inspections and none from construction inspections or outfall reconnaissance reports.
- In 2019, there were 31 investigations performed in follow-up to 31 SIDRs. There was one from tenant inspections, none from construction inspections, and none from outfall reconnaissance reports.
- In 2018, there were 51 investigations performed in follow-up to 51 SIDRs. There was one from tenant inspections, none from construction inspections, and none from outfall reconnaissance reports.
- In 2017, there were 51 investigations performed for the SIDR. There were only two from tenant inspections, none from construction inspections, and none from outfall reconnaissance reports.



**Figure 6. Illicit Discharge Investigations from 2017-2024**

## 5.5 HARBORS TENANTS

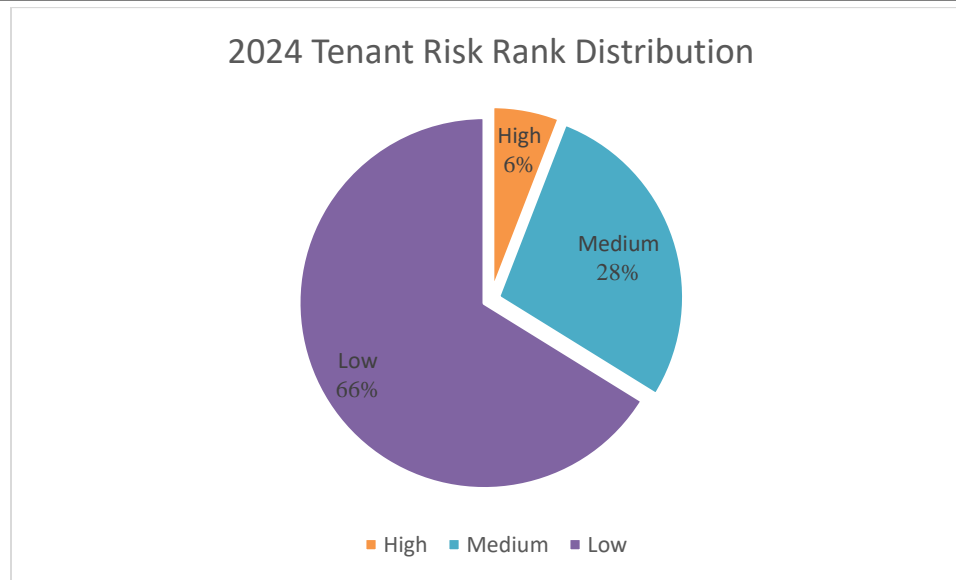
The risk ranking for tenants in 2024 was consistent with rankings performed in 2023, with 66% of tenant sites classified as low risk. This is consistent with the fact that the majority of tenants at Honolulu Harbor and Kalaeloa Barbers Point Harbor conduct small scale operations.

In 2024, the risk ranking of three tenant sites was upgraded from low to medium. Additionally, one tenant site downgraded from high to medium, one tenant site downgrade from medium to low. There were no tenant-related escalated enforcement actions in 2024.

Harbors highlighted management of non-stormwater discharges and the importance of implementing proper BMPs in the annual tenant trainings to protect harbor waters. Harbors is planning to continue to highlight management of non-stormwater discharges in 2024 training events.

Description	Response
Total Unique Tenants	54
Total Tenant Sites	68
<ul style="list-style-type: none"> <li>• Low Risk Rank</li> </ul>	45
<ul style="list-style-type: none"> <li>• Medium Risk Rank</li> </ul>	19
<ul style="list-style-type: none"> <li>• High Risk Rank</li> </ul>	4
Number of Tenant Inspections	75
<ul style="list-style-type: none"> <li>• New</li> </ul>	5
<ul style="list-style-type: none"> <li>• Regular</li> </ul>	32
<ul style="list-style-type: none"> <li>• Final</li> </ul>	3
<ul style="list-style-type: none"> <li>• Site Reconnaissance</li> </ul>	34
<ul style="list-style-type: none"> <li>• Follow-up</li> </ul>	1
Number of Enforcement Actions	0
Note: Data is from the 2024 calendar year.	

Figure 7 represents the distribution of tenant risk ranking. 66% of the tenant sites are low risk, 28% are considered medium risk, and only 6% are considered a high risk.



**Figure 7. 2024 Tenant Risk Ranking Distribution**

## 5.6 CONSTRUCTION

The number of construction inspections in 2024 decreased from 2023. Minor findings were reported and corrected during and following the inspections, leaving zero escalated enforcement actions taken. This indicates that construction-related stormwater training is effective and shows evidence of growing stormwater pollution awareness, as well as the contractor’s willingness to learn about the best methods to prevent pollution, and their commitment to protecting the environment.

Description	Response
Total number of project reviews	36
<ul style="list-style-type: none"> <li>• Harbors</li> <li>• Tenant</li> </ul>	26
	10
Total number of project reviews requiring NGPC	1

<b>Table 14. Construction</b>	
Description	Response
Number of inspected construction sites	9
• Harbors	4
• Tenant	3
• Others (e.g., CCH, Construction Right-of-Entry (ROE))	2
Estimated percentage of construction starts adequately regulated for erosion and sediment control	100%
Site inspections completed	50
Enforcement actions	0
• Written warning	0
• Notice of Apparent Violation (NAV)	0
• Issuance of stop work order and summons/citations	0
• Referral to HDOH	0
• Fines collected	0
Note: Data is from the 2024 calendar year.	

Figure 8 illustrates the number of construction inspections and enforcement actions taken over the last eight years.

- In 2024, there were 50 construction inspections and no escalated enforcement actions.
- In 2023, there were 74 construction inspections and no escalated enforcement actions.
- In 2022, there were 107 construction inspections and no escalated enforcement actions.
- In 2021, there were 70 construction inspections and no escalated enforcement actions.
- In 2020, there were 55 construction inspections and no escalated enforcement actions.
- In 2019, there were 47 construction inspections and no escalated enforcement actions.
- In 2018, there were 45 construction inspections and no escalated enforcement actions.
- In 2017, there were 31 construction inspections and two escalated enforcement actions.



**Figure 8. Construction Inspections and Enforcement from 2017-2024**

## 5.7 POST-CONSTRUCTION STORMWATER MANAGEMENT

Table 15 summarized all post-construction related stormwater management. Twenty-one inspections were conducted in 2024 to review proper post-construction BMP operations by Harbors (Pier 31, 35, 51, and 52). BMP maintenance is required through lease agreements, due diligence, property covenants, ROE/easements, etc. for Harbors tenants. 100% of tenants completed their PBMP inspections and cleanings in 2024.

**Table 15. Post-Construction Stormwater Management**

Description	Response
Estimated percentage of new development/redevelopment projects adequately regulated for post-construction stormwater control	100 %
Number of completed projects involving new permanent BMPs	0
Site inspections (for proper BMP operation) completed	21
BMP maintenance required through lease agreements, due diligence and property covenants, ROE/easements, etc.	1
Note: Data is from the 2024 calendar year.	

## 5.8 OPERATIONS AND MAINTENANCE

A total of 746.27 tons of debris was removed in 2024, which is slightly lower compared to 874.99 tons removed in 2023. The storm drain cleaning generated 228.7 cu ft of waste in 2024 which has increased from 10.23 cu ft of waste removed in 2024. Harbors employees and tenants demonstrated their commitment to pollution prevention through the implementation and maintenance of proper BMPs.

**Table 16. Operations and Maintenance**

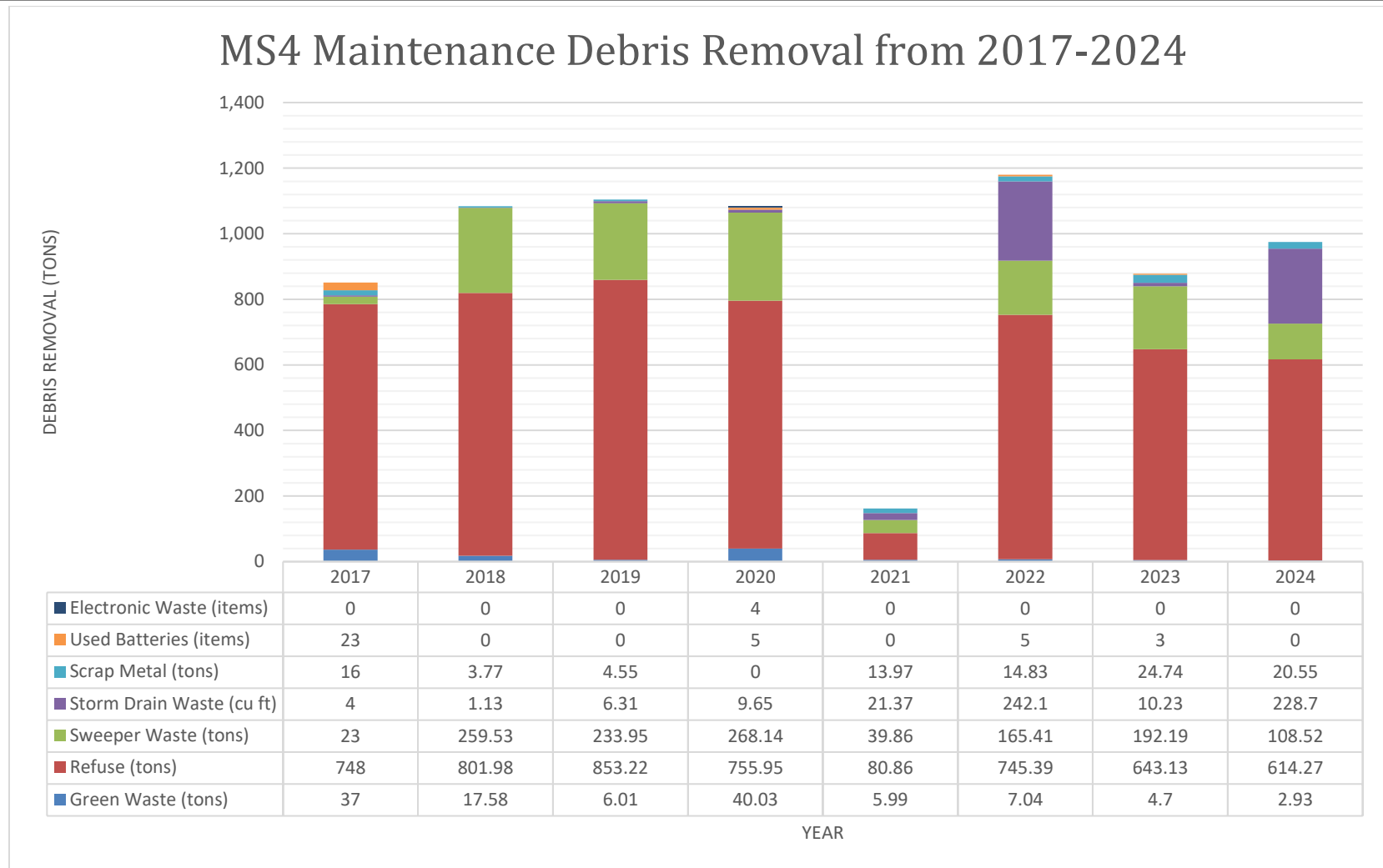
Description	Response
Average frequency of catch basin inspection and cleaning when needed	2 times/year
Number of storm drain cleanings	265
Quantity of screenings/debris removed from storm sewer infrastructure	228.7 cu ft
Disposal or use of screenings (landfill, publicly owned treatment works (POTW), compost, beneficial use, etc.)	PVT Landfill
<ul style="list-style-type: none"> <li>• Vacuum truck(s) owned/leased by Harbors</li> </ul>	1
<ul style="list-style-type: none"> <li>• Vacuum trucks specified in contracts</li> </ul>	No
<ul style="list-style-type: none"> <li>• % Structures cleaned with vacuum</li> </ul>	100%
<ul style="list-style-type: none"> <li>• % Structures cleaned with manual labor</li> </ul>	0%
<ul style="list-style-type: none"> <li>• Rotary brush street sweepers owned/leased</li> </ul>	4
<ul style="list-style-type: none"> <li>• Vacuum street sweepers specified in contracts</li> </ul>	No
Average frequency of street sweeping	2 times/week
Quantity of sand/debris collected by sweeping	108.52 tons

Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.)	Landfill
• Green Waste	2.93 tons
• Refuse	614.27 tons
• Scrap Metals	20.55 tons
• Human Waste	0
• Used Batteries	0
• Electronic Waste	0
Note: Data is from the 2024 calendar year.	

Figure 9 shows the level of debris and waste removed due to small MS4 maintenance actions over the last eight years.

- In 2024, Harbors removed 2.93 tons of green waste, 614.27 tons of refuse, 108.52 tons of sweeper waste, 20.55 tons of scrap metal, and 228.7 cu ft of storm drain waste.
- In 2023, Harbors removed 4.7 tons of green waste, 643.13 tons of refuse, 192.19 tons of sweeper waste, 24.74 tons of scrap metal, and 10.23 cu ft of storm drain waste.
- In 2022, Harbors removed 7.04 tons of green waste, 745.39 tons of refuse, 165.41 tons of sweeper waste, 14.83 tons of scrap metal, and 242.1 cu ft of storm drain waste.
- In 2021, Harbors removed 5.99 tons of green waste, 80.86 tons of refuse, 39.8 tons of sweeper waste, 13.97 tons of scrap metal, and 21.37 cu ft of storm drain waste.
- In 2020, Harbors removed 40.03 tons of green waste, 755.95 tons of refuse, 268.14 tons of sweeper waste, 51.39 tons of scrap metal, and 9.65 cu ft of storm drain waste.
- In 2019, Harbors removed 6.01 tons of green waste, 853.22 tons of refuse, 233.95 tons of sweeper waste, 29.41 tons of scrap metal, 4.55 tons of recycled metal, and 6.31 cu ft of storm drain waste.
- In 2018, Harbors removed 17.58 tons of green waste, 801.98 tons of refuse, 259.53 tons of sweeper waste, 26.48 tons of scrap metal, 3.77 tons of recycled metal, and 1.13 cu ft of storm drain waste.
- In 2017, Harbors removed 36.74 tons of green waste, 748.30 tons of refuse, 23 tons of sweeper waste, 15.80 tons of recycled material, 15 tons of recycled metal, and 4 cu ft of storm drain waste.





**Figure 9. MS4 Maintenance and Debris Removal from 2017-2024**

## **6.0 CONCLUSION**

Harbors continues to strive towards compliance with all requirements of the CWA and conditions of their NPGCs. The measurable goals that have been developed to gauge permit compliance and program effectiveness for each MCM has been deemed successful in 2024. All six MCMs are 100% in compliance.

Going forward, Harbors will continue to implement the updated SWMP and use best available efforts to stay compliance.