# **EXECUTIVE SUMMARY**

#### ES.1 Overview of Storm Water Management Program Plan

The State of Hawaii Department of Transportation, Highways Division, Oahu District (DOT-HWYS) owns and manages a municipal separate storm sewer system (MS4) that conveys storm water runoff from DOT-HWYS' right-of-way (ROW) to State Waters. DOT-HWYS administers a Storm Water Management Program (SWMP) to comply with state and federal storm water regulations, including the Clean Water Act (CWA), and to reduce the discharge of pollutants from the MS4 to receiving water bodies to the maximum extent practicable (MEP). The State of Hawaii Department of Health (DOH) issued DOT-HWYS the National Pollutant Discharge Elimination System (NPDES) Permit No. HI S000001 (MS4 Permit), authorizing DOT-HWYS to discharge storm water runoff and certain non-storm water discharges from the MS4, and storm water runoff from DOT-HWYS' five municipal industrial facilities, into State Waters in and around the Island of Oahu, Hawaii. The MS4 Permit became effective on October 28, 2013, and will expire at midnight, September 26, 2018. On January 30, 2006, the United States Environmental Protection Agency (USEPA) and DOH issued the Consent Decree Civil Action No. CV05-00636-HG- KSC (Consent Decree) to DOT-HWYS, which stipulates storm water requirements with which DOT-HWYS must comply. Until termination of the Consent Decree, DOT-HWYS will implement the SWMP in compliance with the requirements of the Consent Decree in addition to those set forth in the MS4 Permit.

This Storm Water Management Program Plan (SWMPP) describes the program elements and associated best management practices (BMPs) administered by the SWMP in order to comply with applicable storm water requirements and reduce the discharge of pollutants from the MS4 to State Waters to the MEP. The SWMP is composed of the following program elements:

- ES.2 Public Education and Outreach Program
- ES.3 Illicit Discharge Detection and Elimination Program
- ES.4 Construction Site Runoff Control Program
- ES.5 Post-Construction Storm Water Management in New Development and Redevelopment Program
- ES.6 Pollution Prevention/Good Housekeeping Debris Control BMPs Program
- ES.7 Pollution Prevention/Good Housekeeping Chemical Applications BMPs Program
- ES.8 Pollution Prevention/Good Housekeeping Erosion Control BMPs Program
- ES.9 Pollution Prevention/Good Housekeeping Maintenance Activities BMPs Program
- ES.10 Industrial and Commercial Activities Discharge Management Program
- ES.11 Municipal Industrial Facilities Program
- ES.12 Monitoring Program
- ES.13 Total Maximum Daily Load Program
- ES.14 Reporting Program

The SWMPP chapters are organized by program element. Each chapter addresses the requirements, program activities implemented to comply with those requirements, personnel, and measurable goals related to the program element being discussed. Brief summaries of each program element are provided in the following sections.

# ES.2 Public Education and Outreach Program

The Public Education and Outreach Program (Public Education Program) addresses the need to inform the general public about ways in which their daily activities may affect the quality of storm water runoff and receiving waters. The purpose of the Public Education Program is to motivate the community to control pollutants at the source by increasing public awareness of storm water pollution issues. DOT-HWYS' strategy for educating target groups about the impacts of pollutants in storm water runoff is outlined in the Public Education Plan. The Public Education Program's primary responsibilities are to implement the Public Education Plan and encourage public participation in DOT-HWYS' storm water management efforts. The Public Education Program is discussed in Chapter 2.

# ES.3 Illicit Discharge Detection and Elimination Program

The Illicit Discharge Detection and Elimination Program (IDDE Program) is responsible for detecting and eliminating illegal connections and illicit discharges to the MS4. The IDDE Program fulfills this function by permitting and tracking permits for private drain connections; responding to public complaints of potential illicit discharges; screening outfalls for evidence of improper discharges; implementing spill prevention and response BMPs; and tracking information about illegal connections, illicit discharges, and spills to the MS4. The IDDE Program is discussed in Chapter 3.

### ES.4 Construction Site Runoff Control Program

The purpose of the Construction Site Runoff Control Program (Construction Program) is to reduce to the MEP the discharge of pollutants from private and public construction projects implemented within or otherwise encroaching on DOT-HWYS' right-of-way. There are two types of construction projects – contract construction projects and encroachment permit construction projects – both of which are required to comply with applicable DOT-HWYS' policies and standards. The Construction Program requires proposed construction projects to implement BMPs and standards in accordance with DOT-HWYS' policies, maintains an inventory of construction projects, reviews project plans and permits, conducts site inspections, implements enforcement actions, as necessary, and provides Construction BMP Training. The Construction Site Runoff Control Program is discussed in Chapter 4.

### ES.5 Post-Construction Storm Water Management in New Development and Redevelopment Program

The purpose of the Post-Construction Storm Water Management in New Development and Redevelopment Program (Post-Construction Program) is to address storm water runoff from all

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new development and redevelopment projects that result in a land disturbance of one acre or more and smaller projects that have the potential to discharge pollutants to the MS4. The Post-Construction Program institutes procedures to incorporate the installation of appropriate permanent BMPs (PBMPs) for non-exempt contract and encroachment permit construction projects. PBMPs are designed to be installed and remain in place as part of a project to provide for long-term storm water quality or quantity control. The Post-Construction Program is discussed in Chapter 5.

#### ES.6 Pollution Prevention/Good Housekeeping – Debris Control BMPs Program

The Debris Control BMPs Program (Debris Control Program) implements BMPs to reduce the amount of pollutants entering and discharging from the MS4. The Debris Control Program encompasses several sub-programs, including a Street Sweeping Program, a Storm Drain System Inspection and Cleaning Program, and a Trash Reduction Program. The Debris Control Program utilizes the asset management system (AMS) to maintain an inventory of MS4 structures and PBMPs, track debris removal activities, and evaluate inspection and cleaning priorities. The Debris Control Program also administers the installation and maintenance of educational storm drain placards and projects to retrofit structural BMPs. The Debris Control Program is discussed in Chapter 6.

### ES.7 Pollution Prevention/Good Housekeeping – Chemical Applications BMPs Program

The Chemical Applications BMPs Program (Chemical Applications Program) is responsible for implementing BMPs, including a training program, to reduce the contribution of pollutants to the MS4 associated with the application, storage, and disposal of chemicals (i.e., pesticides, herbicides, and fertilizers). The Chemical Applications Program conducts an annual Chemical Applications Training, which is supplemented by several chemical applications BMPs guidance documents. The Chemical Applications Program is discussed in Chapter 7.

### ES.8 Pollution Prevention/Good Housekeeping – Erosion Control BMPs Program

The purpose of the Erosion Control BMPs Program (Erosion Control Program) is to prioritize permanent erosion control improvements at erosional areas with the potential for significant water quality impacts, in addition to erosional areas that pose public safety concerns. The Erosion Control Program addresses erosional areas by implementing permanent erosion control projects, installing temporary erosion control BMPs, and addressing erosion at DOT-HWYS' storm drain outlets. The Erosion Control Program also developed the *Maintenance Plan for Vegetated Portions of the MS4*, to prevent the excessive removal of vegetation and over-application of herbicides in vegetated portions of the drainage system. The Erosion Control Program is discussed in Chapter 8.

#### ES.9 Pollution Prevention/Good Housekeeping – Maintenance Activities BMPs Program

The Maintenance Activities BMPs Program (Maintenance Activities Program) establishes pollution prevention strategies to be implemented by DOT-HWYS' personnel and service contractors during maintenance activities. Maintenance activities include, but are not limited to, debris and trash removal, curb and gutter replacement, repaving without disturbing the base course, tunnel washing, and landscape maintenance. The Maintenance Activities Program provides annual Maintenance Baseyard Storm Water Training for DOT-HWYS' personnel who have responsibilities associated with maintenance activities. The Maintenance Activities Program is discussed in Chapter 9.

#### ES.10 Industrial and Commercial Activities Discharge Management Program

The Industrial and Commercial Activities Discharge Management Program (IC Program) is designed to reduce, to the MEP, the discharge of pollutants from industrial and commercial facilities and activities that initially discharge into the MS4. IC Program staff issue and track connection and discharge permits, maintain industrial and commercial facility inventories, conduct facility inspections, and pursue enforcement actions, as necessary. The IC Program is discussed in Chapter 10.

### ES.11 Municipal Industrial Facilities Program

The Municipal Industrial Facilities Program addresses pollutants in storm water runoff associated with DOT-HWYS' municipal industrial facilities (i.e., baseyards) and related maintenance activities. The Municipal Industrial Facilities Program is responsible for inspecting baseyards, developing and implementing Storm Water Pollution Control Plans (SWPCPs), and providing BMP training to baseyard personnel. DOT-HWYS owns and operates five industrial baseyards, as follows: Keehi, Kakoi, Pearl City, Waianae, and Windward Baseyards. The Municipal Industrial Facilities Program provides the framework for the proper management of these baseyards, which are covered by the MS4 Permit and required to comply with Hawaii Administrative Rules, Chapter 11-55, Appendix B. The Municipal Industrial Facilities Program is discussed in Chapter 11.

### ES.12 Monitoring Program

The purpose of the Monitoring Program is to measure the effectiveness of the SWMP and assess water quality issues in watersheds resulting from storm water discharges to receiving waters. The Monitoring Program is responsible for submitting an Annual Monitoring Plan to DOH by June 1<sup>st</sup> of each year and implementing it over the coming fiscal year. The Monitoring Program also submits an Annual Monitoring Report by October 31<sup>st</sup> of each year that covers the past fiscal year. The Monitoring Program is discussed in Chapter 12.

# ES.13 Total Maximum Daily Load Program

Prior to the effective date of the MS4 Permit, DOH completed and the USEPA approved total maximum daily loads (TMDLs) for the Ala Wai Canal, Kawa Stream, Waimanalo Stream, Kapaa Stream, and Kaneohe Stream. The purpose of the Total Maximum Daily Load Program (TMDL Program) is to comply with the Schedule of Compliance found in Part F.3.c of the MS4 Permit, submit Implementation and Monitoring Plans (I&M Plans), and implement BMPs to comply with waste load allocation (WLA) reductions for the aforementioned water bodies. TMDL compliance is assessed on a watershed scale and exhibited through quantitative analyses of the required load reductions for total nitrogen (TN), total phosphorous (TP), and total suspended solids (TSS). The TMDL Program relies collaboratively on the effective implementation of BMPs by various SWMP program elements (e.g., Debris Control Program, Erosion Control Program, etc.) to attain and demonstrate compliance with WLA reductions for TMDL water bodies. The TMDL Program is discussed in Chapter 13.

### ES.14 Reporting Program

The Reporting Program is responsible for submitting Annual Reports to DOH by October 31<sup>st</sup> of each year. Annual Reports are the primary mechanism through which DOT-HWYS documents SWMP activities and demonstrates compliance with the MS4 Permit and Consent Decree. Annual Reports provide a detailed description of the storm water management activities conducted by each program element during the reporting period, as well as an evaluation of the effectiveness of such activities, the resources allocated to implement the SWMP, and an explanation of anticipated future activities. The Reporting Program is discussed in Chapter 14.

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