

## CHAPTER 3

### ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM

The primary function of the Illicit Discharge Detection and Elimination Program (IDDE Program) is to detect and eliminate illegal connections and illicit discharges into the MS4. The IDDE Program is administered in conjunction with the Industrial and Commercial Activities Discharge Management Program (IC Program), with which it shares a common purpose, policies, and personnel.

The IDDE Program includes the following BMPs:

1. Require, issue, and track permits for private drain connections.
2. Detect illegal connections and illicit discharges.
3. Implement an Outfall Field Screening Plan to screen for improper discharges.
4. Investigate potential illegal connections and illicit discharges and conduct follow-up actions.
5. Establish and implement enforcement policies for illegal connections and illicit discharges into the MS4.
6. Prevent, respond to, contain, and clean up all wastewater and other spills that may enter into the MS4.
7. Track illegal connections, illicit discharges, spills, and follow-up actions.
8. Facilitate the proper management and disposal or recycling of used oil and toxic material.
9. Train IDDE Program staff to identify and eliminate illegal connections, illicit discharges, and spills into the MS4.

The IDDE Program is administered in accordance with the MS4 Permit and Consent Decree requirements outlined in Table 3-1 and Table 3-2, respectively.

**Table 3-1. MS4 Permit Requirements for the IDDE Program**

| MS4 Permit Reference   | SWMPP Section |
|--|---------------|
| <i>Part D.1.c The Permittee shall implement the ongoing SWMP to detect and eliminate illicit connections and illegal discharges into its MS4 and shall include an improved program in the revised SWMP Plan. The program shall include:</i>  |               |
| <i>Part D.1.c.(1) Connection Permits for private drain connections - Within one (1) year after the effective date of this permit the Permittee shall establish requirements for issuing connection permits and require obtaining the permit prior to allowing the drain connections. A database shall be maintained of all permitted connections to its MS4. Prior to issuing a connection permit, the Permittee shall ensure the following are met:</i> <ul style="list-style-type: none"><li>• <i>the project has provided proof of filing a Notice of Intent (NOI) or NPDES application, if applicable; and</i></li><li>• <i>control measures comply with its requirements to minimize pollutant discharge into its MS4</i></li></ul> | Section 3.1   |

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| <b>MS4 Permit Reference</b>   | <b>SWMPP Section</b> |
|---|----------------------|
| <b>Part D.1.c.(2)</b> Field Screening - The Permittee shall implement its Outfall Field Screening Plan for observing major and minor outfalls to screen for improper discharges. The plan shall designate priority areas for screening, specify the frequency for screening, and identify the procedures to be followed if a discharge is observed. At a minimum, outfalls in priority areas shall be screened once per permit term.  | Section 3.3          |
| <b>Part D.1.c.(3)</b> Tracking - The Permittee shall maintain a database of illicit connections, illegal discharges, and spills that tracks the type of discharge, responsible party, DOT-HWYS response, and resolution of the discharge to the MS4.  | Section 3.7          |
| <b>Part D.1.c.(4)</b> Investigate complaints - The Permittee shall promptly investigate observed, suspected, or reported illicit flows and pursue enforcement actions, as appropriate. Complaints made to the CWB, which discharge to the DOT-HWYS MS4 will be forwarded to the Permittee for their action. The Permittee shall:  | Section 3.4          |
| <b>Part D.1.c.(4).(i)</b> Develop and implement a database to identify illicit discharge activities by Tax Map Key (TMK). The database shall include information about each suspected improper discharge, the Permittee's investigation of that discharge, follow-up activities, and the resolution of each discharge;  | Section 3.7          |
| <b>Part D.1.c.(4).(ii)</b> Implement a program to facilitate public reporting of illicit discharges (i.e., environmental hotline and/or website for reporting), including providing at least one contact that the public can reach (including phone number and/or email address) be clearly posted on its website; and  | Section 3.2          |
| <b>Part D.1.c.(4).(iii)</b> Develop a response plan for the investigation of illicit discharges to be consistent with the requirements in this permit.  | Section 3.4          |
| <b>Part D.1.c.(5)</b> Enforcement – Within one (1) year after the effective date of this permit the Permittee shall:  | Section 3.5          |
| <b>Part D.1.c.(5).(i)</b> Establish policies for enforcement and penalties when in noncompliance with its requirements as developed in accordance with Part D.1.c.(1), including for persons illegally discharging pollutants to its MS4, and   | Section 3.5          |
| <b>Part D.1.c.(5).(ii)</b> Pursue enforcement actions against property owners in non-compliance with its requirements, those with illegal drain connections, and persons without direct connections whom illegally discharging pollutants to its MS4.   | Section 3.5          |
| <b>Part D.1.c.(6)</b> Prevent and Respond to Spills to the DOT-HWYS MS4 - The Permittee shall implement its ongoing SWMP to prevent, respond to, contain, and clean up all wastewater and other spills that may enter into its MS4 from any source (including private laterals and failing cesspools). This program shall be included in the SWMP. Spill response teams, which may consist of local, state, and/or federal agencies, shall prevent entry of spills into the DOT-HWYS MS4 and contamination of surface water, ground water, and soil to the MEP.<br><br>The Permittee shall coordinate spill prevention, containment, and response activities throughout all appropriate departments, programs, and agencies to ensure maximum water quality protection at all times.<br><br>The Permittee shall notify DOH of all wastewater spills or overflows from private laterals and failing septic systems into its MS4. The Permittee shall prevent, respond to, contain, and clean up wastewater from any such notification. | Section 3.6          |
| <b>Part D.1.c.(7)</b> Facilitate Disposal of Used Oil and Toxic Materials - The Permittee shall implement its ongoing SWMP to facilitate the proper management and disposal or recycling of used oil, vehicle fluids, toxic materials, and other household hazardous wastes. Such a program shall include educational activities, public information activities, and identification of collection sites or methods.   | Section 3.8          |

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| MS4 Permit Reference  | SWMPP Section |
|---|---------------|
| <i>Part D.1.c.(8) Training - The Permittee shall provide annual training to staff on identifying and eliminating illicit connections, illegal discharges, and spills to its MS4. This training shall be specific to DOT-HWYS activities, policies, rules, and procedures.</i> | Section 3.9   |

**Table 3-2. Consent Decree Requirements for the IDDE Program**

| Consent Decree Reference  | SWMPP Section |
|---|---------------|
| <i>Pg 26, Section V.10.k.(1) HDOT shall develop procedures for identifying and responding to possible illicit connections and illegal discharges. These procedures shall include, but not be limited to, specific time deadlines for responding to identified discharges. Such identification and response procedures shall be coordinated with the inspection procedures required under the revised Debris Removal Best Management Practices Program set forth in Paragraph 10.f, above.</i> | Section 3.4   |



*Industrial vacuum trucks are utilized to clean the storm drains.*

### 3.0 Program Organization

To fulfill the requirements of the MS4 Permit and the Consent Decree, the following organizational structure has been established for the IDDE Program.



**Figure 3-1. IDDE Program Organizational Chart**  
(Note: The number in parenthesis indicates the number of individuals involved.)

### 3.1 Connection Permits

DOT-HWYS administers a permitting program for any business (industrial or commercial) that establishes a permanent physical connection to the MS4 (connection permit) and/or discharge its storm water runoff into the MS4 (discharge permit).

#### 3.1.1 Permitting New Connections

A permit must be acquired prior to constructing a physical drain connection to the MS4. A connection permit for the establishment of a new, private drain connection will not be issued until:

- The applicant has provided proof of filing a Notice of Intent (NOI) or an Industrial NPDES Permit application with the DOH, if applicable; and
- The applicant has control measures that comply with DOT-HWYS' requirements to minimize pollutant discharge into the MS4.

A request for a connection permit is made by submitting two separate forms. The first form that must be completed is the *Application for a Private Storm Drain Connection and/or Discharge Permit to the State of Hawaii Highways Division Storm Drain System* (Appendix C.1). For each connection, the applicant is instructed to submit information on the connection location, size, type of discharge and flow rate, as well as a facility drainage report. In addition, the applicant is required to indicate if their facility or activities generate Industrial Storm Water, as defined by 40 CFR Part 122.26(b)(14), and whether or not they have obtained an NGPC under HAR, Chapter 11-55, Appendix B, NPDES General Permit Authorizing the Discharge of Storm Water Associated with Industrial Activities (General Industrial Storm Water Permit aka Industrial NPDES Permit).

A second form, the *Permit for Connection to the State Highways Drainage System* (Appendix C.2), must be filled out and submitted to DOT-HWYS, stating that the applicant agrees to the terms and conditions of the connection permit.

In order to complete the application process, the forms must be filled out and mailed to:

State of Hawaii  
Department of Transportation  
Highways Division, Oahu District  
727 Kakoi Street  
Honolulu, Hawaii 96819-2017  
Attn: Environmental Management Section Program Engineer

### 3.1.2 Permitting Existing Connections

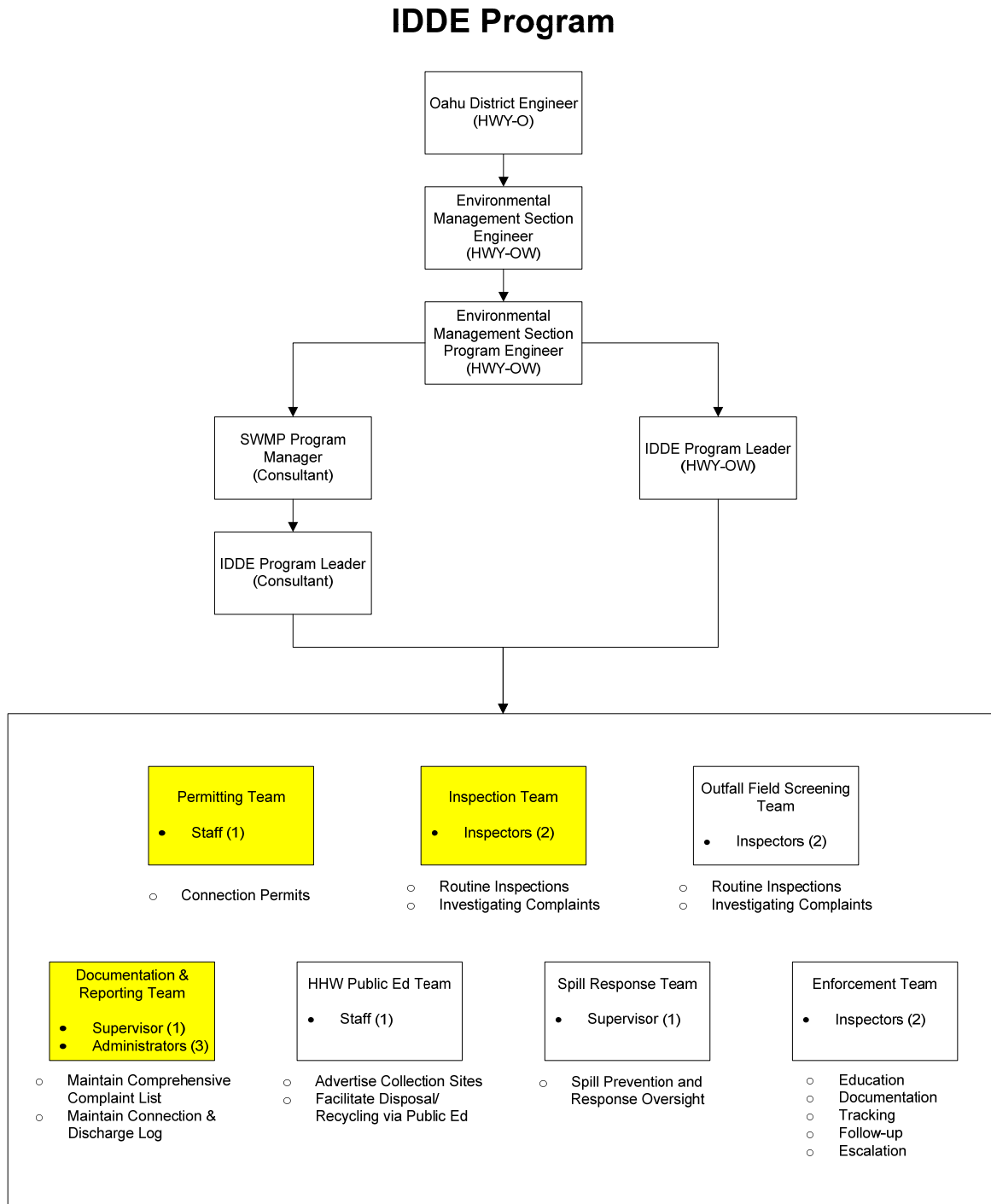
Existing connections to the MS4 are considered illegal if they have not been licensed by DOT-HWYS. When an illegal connection is identified, the IDDE inspectors determine if the connection is from an allowable source. If the connection is not from an allowable source or is conveying an illicit discharge, the case is treated as an illicit discharge. If the connection is from an allowable source and there is no illicit discharge, the appropriate corrective action is to file an application for a connection permit. Written documentation, which includes an inspection report, the connection permit forms described in Section 3.1.1, and a violation notification, is mailed to the property owner or facility representative within 30 calendar days of the inspection date. The property owner or facility representative has 30 days from the date marked on the violation notification to mail the completed connection permit forms to DOT-HWYS. The illegal connection is considered resolved upon DOT-HWYS' approval of the completed connection permit forms. If the property owner does not submit the completed connection permit forms within the allotted 30-day timeframe, IDDE Program staff may pursue enforcement actions in accordance with the escalating enforcement policy described in Section 10.8.

DOT-HWYS has an existing Memorandum of Understanding with the CCH (Appendix A.4) that establishes that interconnections between the DOT-HWYS MS4 and the CCH MS4 are not considered private drain connections, and therefore do not require private drain connection permits. DOT-HWYS extends this determination to other facilities which require an NPDES MS4 Permit. Therefore, the requirement to apply for and obtain a connection permit does not apply to those facilities which require an NPDES MS4 Permit.



*Inspectors document an existing connection to the MS4.*

The Inspection Team, Permitting Team, and Documentation & Reporting Team are responsible for the identification, issuance, and tracking of connection permits, as shown in Figure 3-2.



**Figure 3-2. IDDE Program Organizational Chart for Roles and Responsibilities Related to Issuing Connection Permits**



## **3.2 Detecting Illegal Connections and Illicit Discharges**

Potential illegal connections and illicit discharges to the MS4 are typically identified through the following methods of detection:

- Scheduled inspections of industrial and commercial facilities and activities conducted by the IC Program;
- Water quality monitoring;
- Storm drain inspections and cleaning;
- Outfall field screening;
- Public complaints; and
- Complaints received from the DOH or the CCH.

The IC Program's inspection procedures and frequencies are addressed in Chapter 10.

Water quality monitoring is performed by the Monitoring Program (Chapter 12), and storm drain inspections and cleaning are conducted under the Debris Control Program (Chapter 6).

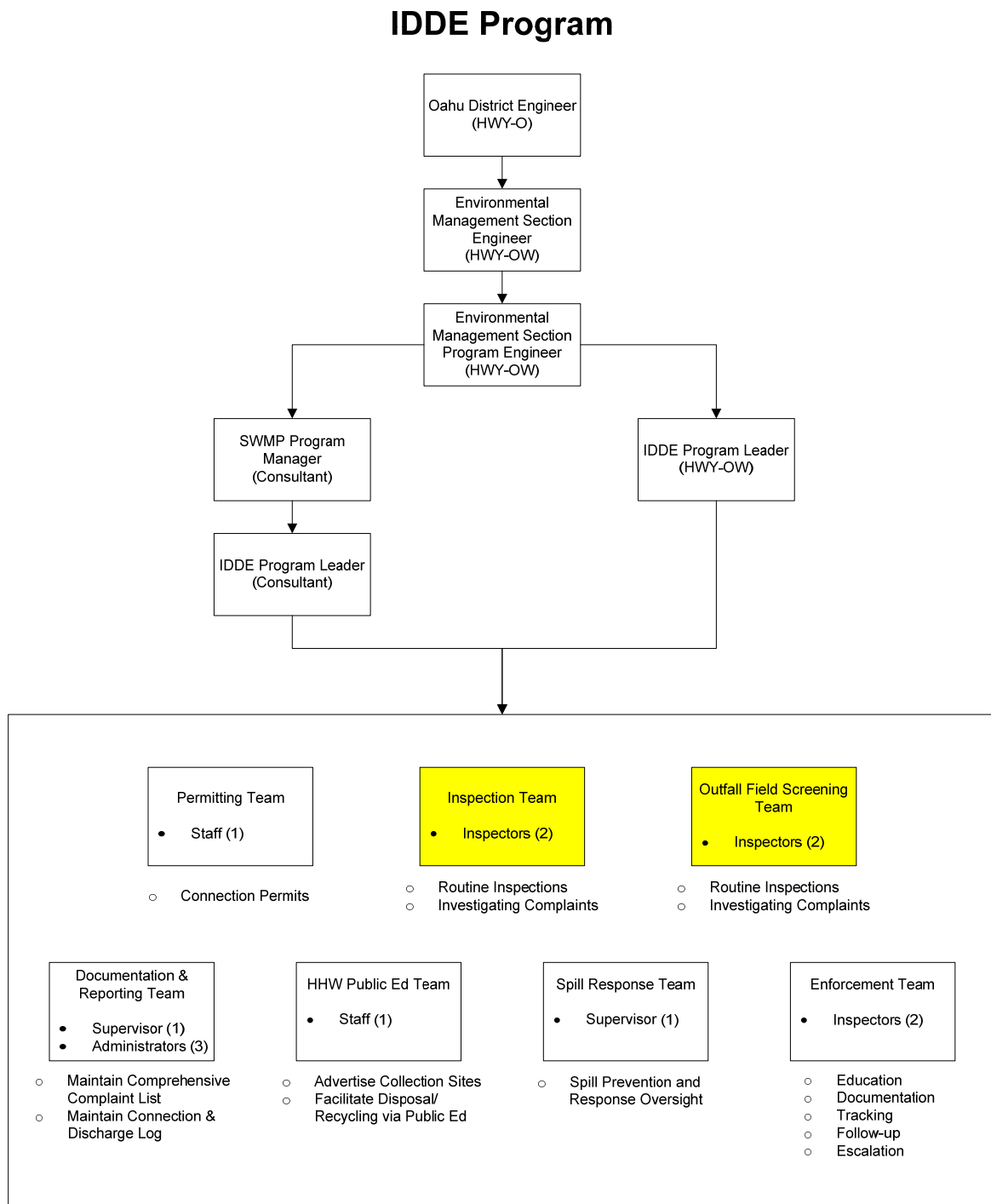
Outfall field screening will be discussed in Section 3.3.

Public complaints about suspected illicit discharges are a valuable source of information because they magnify the oversight capacity of the IDDE Program. The public is encouraged to report suspected illicit discharges by filling out online reporting forms, at [www.stormwaterhawaii.com](http://www.stormwaterhawaii.com), or by calling the storm water reporting hotline, at (808)-831-6714.

The IDDE Program, in conjunction with the Public Education Program, facilitates public complaints through educational media and outreach activities. The reporting hotline phone number and online reporting form are advertised on informational magnets that are distributed at storm water outreach events and on brochures that are provided to industrial and commercial facilities during routine inspections.



The teams depicted in Figure 3-3, as well as the various programs referenced in this section, are involved in the detection of illegal connections and illicit discharges.



**Figure 3-3. IDDE Program Organizational Chart for Roles and Responsibilities Related to Detecting Illegal Connections and Illicit Discharges**

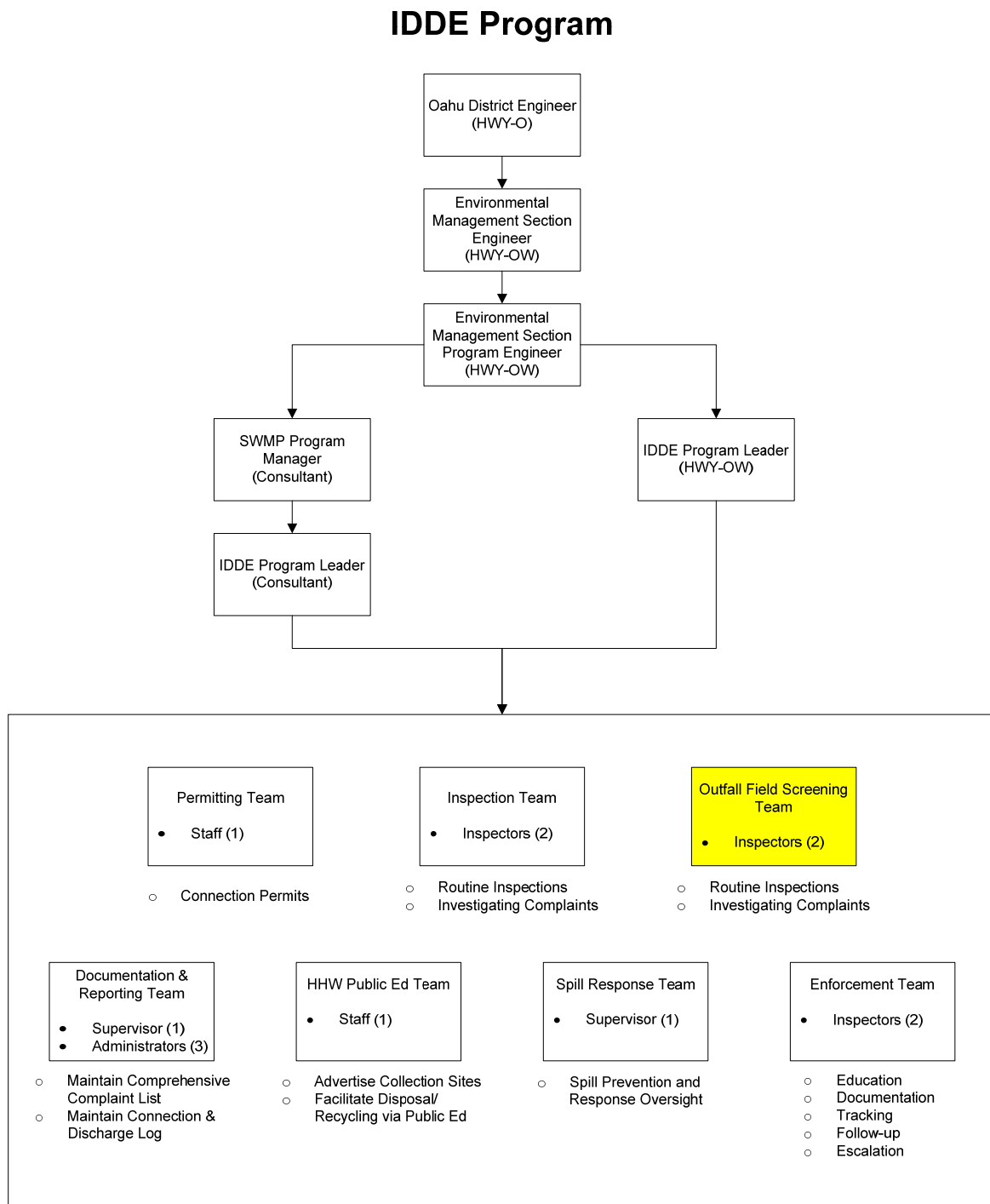
### 3.3 Outfall Field Screening

DOT-HWYS screens major and minor outfalls for the purpose of detecting and eliminating improper discharges. Priority areas for inspection are designated in the Outfall Field Screening Plan (Appendix C.3). Outfalls in priority areas are screened at least once per permit term. In addition to conducting screening in accordance with the Outfall Field Screening Plan, inspectors also investigate observed, suspected, or reported illicit flows at outfalls. The Outfall Field Screening Plan describes the procedures that are to be followed from when a potential illicit discharge is observed or suspected.



*Inspectors observed this clean outfall during a routine outfall field screening.*

The Outfall Field Screening Team is responsible for the implementation of the Outfall Field Screening Plan, as shown in Figure 3-4.



**Figure 3-4. IDDE Program Organizational Chart for Roles and Responsibilities Related to Outfall Field Screening**

### **3.4 Investigating Illegal Connections and Illicit Discharges**

This section describes the IDDE Program's response plan for investigating observed, suspected, or reported illegal connections and illicit discharges associated with industrial and commercial facilities and activities.

Inspectors shall promptly initiate investigation of the complaint within 24 hours of the next business day from receipt of the complaint report. Inspectors initiate investigation of a complaint response with information gathering and, as applicable, conduct subsequent investigative actions. The complaint response may involve one or more of the following:

- Information Gathering;
- Basic Site Research; and
- Field Investigation.

#### ***Information Gathering***

If possible, inspectors determine whether the discharge location may affect the MS4 or DOT-HWYS' ROW, and/or whether the discharge type is from a DOT-HWYS allowable non-storm water discharge source as listed in Part B.2 of the MS4 Permit. If inspectors determine the reported discharge location is not the responsibility of DOT-HWYS, the inspectors forward the complaint to the responsible agency. Should inspectors identify that the reported discharge type is from a DOT-HWYS allowable non-storm water discharge source, the case is considered closed. If the discharge is an unacceptable non-storm water discharge and/or if the inspectors cannot make such determination, basic site research will be conducted.

#### ***Basic Site Research***

Inspectors use the AMS to review the following, as applicable; storm drainage network in the area, site maps, upstream structures, associated outfalls, and the flow path where the suspected illegal connection and/or illicit discharge could enter State Waters. Inspectors may need to obtain highway as-built plans and/or the industrial and commercial facility drainage plans.

Inspectors may consult the CCH's Department of Planning and Permitting website for plat maps and property information to confirm the location of the reported illegal connection and/or illicit discharge.

#### ***Field Investigation***

Inspectors conduct a field investigation to visually identify the reported illegal connection and/or illicit discharge. The IDDE Complaint MS4 Site Investigation Sheet (MS4 SIS) (Appendix C.4) and photographs are used to document inspection findings.

Inspectors address cases involving potential illegal connections, as follows. If possible, inspectors identify the illegal connection's configuration, orientation, alignment, and point of entry into DOT-HWYS' ROW or the MS4. If the suspected illegal connection is permitted,

abandoned, or not present, inspectors close the case and document the inspection findings. Should the inspectors observe an unacceptable non-storm water discharge from the illegal connection the complaint case is handled as an illicit discharge. If the source of the illegal connection is identified, inspectors initiate DOT-HWYS' escalating enforcement policy.

For cases involving potential illicit discharges, inspectors identify the amount and type of illicit discharge, source, and point of entry into the MS4. Inspectors observe for indications of discharge such as dry weather flow, staining, and odor.

Inspectors attempt to determine the source of the discharge through observation of the flow direction and the surrounding activities and facilities. Further investigation may require water sampling and/or dye testing.

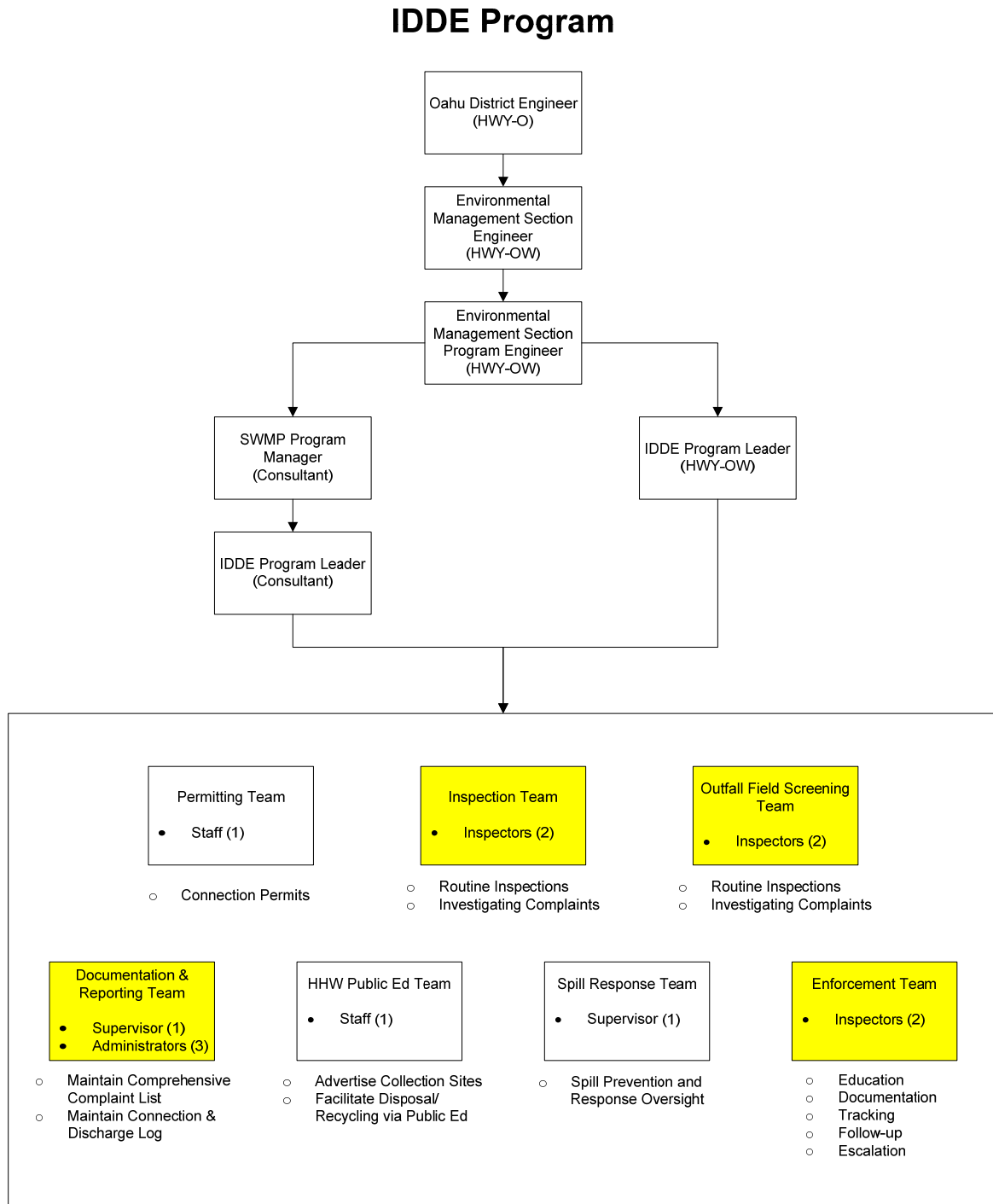
Should the source of the discharge not be determined during the field investigation, additional research may be needed, and inspectors may revisit the site as often as necessary to identify and locate the source of the illicit discharge. If inspectors do not observe any indications of a non-storm water discharge on-site, case findings are documented and the case is considered closed.

If the source of the discharge is identified, inspectors initiate DOT-HWYS' escalating enforcement policy.



*Inspectors investigate the storm drains for potential illicit discharge activity.*

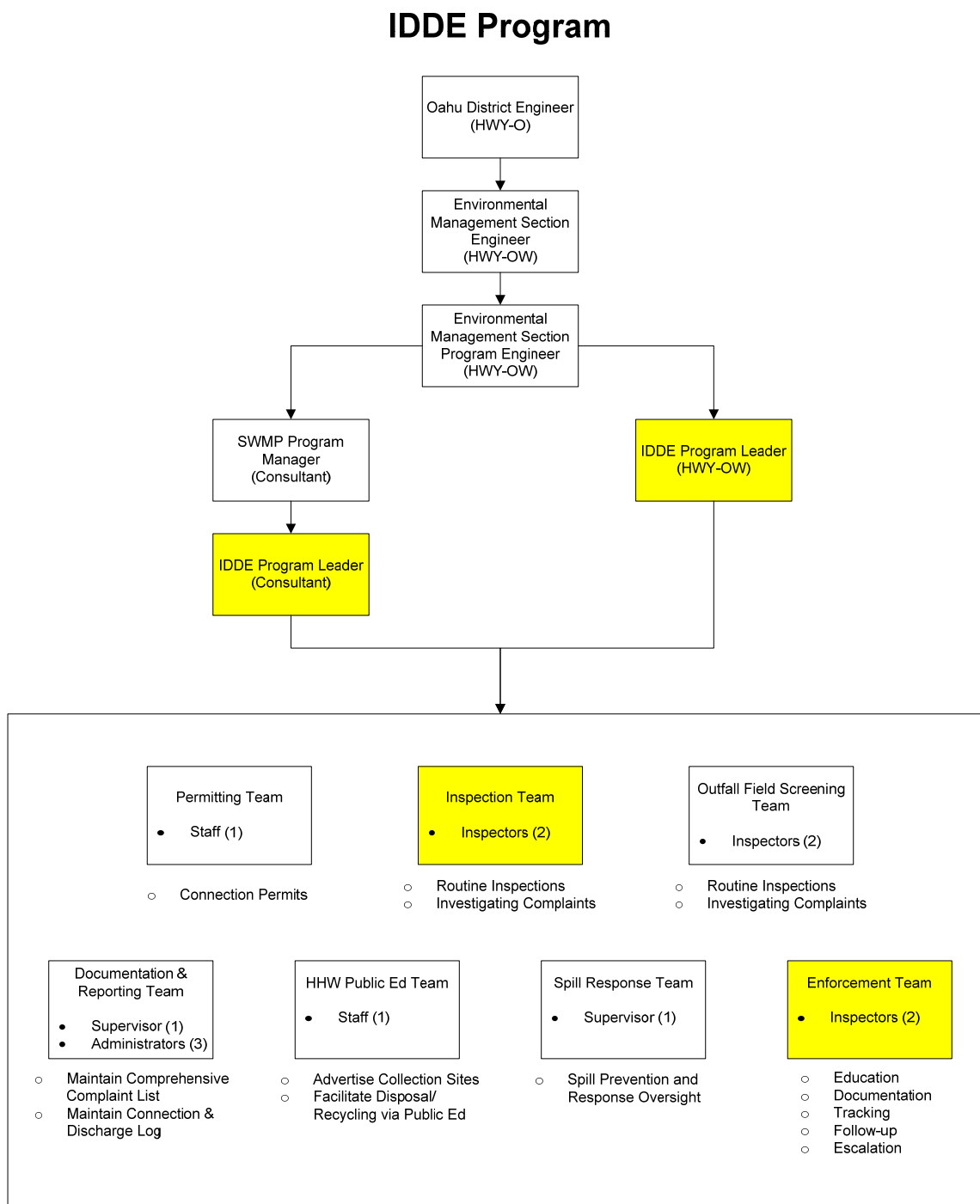
The personnel and teams depicted in Figure 3-5 are involved in the investigation of observed, suspected, or reported illegal connections, illicit discharges, and illicit flows.



**Figure 3-5. IDDE Program Organizational Chart for Roles and Responsibilities Related to the Investigation of Potential Illegal Connections and Illicit Discharges**

### 3.5 Enforcement Policy

DOT-HWYS' enforcement policy for illegal connections and illicit discharges into the MS4 is administered by the IC Program and described in Section 10.8 of this SWMPP. The personnel and teams depicted in Figure 3-6 are responsible for implementing DOT-HWYS' enforcement policy.



**Figure 3-6. IDDE Program Organizational Chart for Roles and Responsibilities Related to Enforcement**



### 3.6 Spill Prevention and Response

DOT-HWYS implements spill response procedures to immediately contain and cleanup spills/discharges from entering, or which have already entered, into the MS4.

The spill response process is triggered by H-3 Tunnel Dispatch notification of complaint calls; spills reported on the highways; complaints reported via phone calls, e-mails, and [www.stormwaterhawaii.com](http://www.stormwaterhawaii.com); and storm water violations observed during routine site inspections of industrial and commercial facilities, outfall field screening inspections, and debris control inspections. Spills initially reported to DOT-HWYS or observed during routine inspections are forwarded to H-3 Tunnel Dispatch for immediate action. The H-3 Tunnel Dispatch 24/7 office forwards spill complaint call information received during regular work hours to the appropriate DOT-HWYS' Maintenance Section (HWY-OM) personnel in accordance with emergency contact information provided to DOT-HWYS' Tunnel Operations Section (HWY-OT). Complaint calls received after hours are forwarded to the HWY-OM On-Call Supervisor. The HWY-OM contact person or the On-Call Supervisor shall be, or shall designate, the Emergency Coordinator (EC). The EC takes the steps necessary to obtain as much of the following information as possible: date and time of spill, type of material (i.e., hazardous or nonhazardous), volume to contain or cleanup, location of spill, ground surface on which material spilled, how the spill occurred, type of cleanup equipment and/or trucks needed, the level of threat to water quality, and the level of threat to public safety.

The EC initiates the investigation of the reported spill incident to determine the appropriate follow-up action and coordinates the response for containment and cleanup. DOT-HWYS and/or their service contractor facilitates the response measures for containment and cleanup of spills. Tasks may include, but are not limited to, the following:

- Issue verbal order to cease the illicit discharge/spill;
- Determine if pollutants are entering or threatening to enter State Waters;
- Determine if pollutant is sewage or wastewater;
- Contain the discharge/spill area;
- Cleanup and call for assistance, as needed;
- Notify authorities and regulatory agencies;
- Conduct a field investigation; and
- Prevent spill entry into the MS4 (e.g., block drain inlets).

The EC will have a “tool box” of HWY-OM resources to facilitate immediate containment/cleanup and prevent/minimize pollutants from entering into the MS4. The EC investigates the spill incident, determines the appropriate action to take and the resources to employ from the HWY-OM “tool box”, and coordinates the response for containment and cleanup.

The HWY-OM “tool box” includes:

- HWY-OM personnel: HWY-OM is comprised of crews and baseyards located throughout Oahu. As determined by the EC, they may be requested to provide support and resources for the spill response process.
  - The Special Services Subunit can provide sweepers and vacuum trucks to clean up nonhazardous spills/discharges, labor support such as people with brooms and shovels, and installation of BMPs around a drain.
  - The Structures Subunit can perform preventative measures on storm drains, including repairs for catch basins, plugging drain pipes, and installation of BMPs around drain and inlets.
  - The Landscaping Subunit can respond to major spills in their work areas; and can provide labor support such as people with brooms and shovels and installation of BMPs around a drain.
  - The Bridge Maintenance Subunit can respond to a spill/discharge incident occurring on a bridge; and can provide labor support such as people with brooms and shovels, and installation of BMPs around a drain.
- Materials and Equipment: Warehouse inventory will be maintained with the necessary materials for containment and cleanup of oil, solvent, coolants, water, and hazardous/chemical spills.
- Vehicles and baseyards are currently equipped with spill kits and spill equipment.
- Service Contractor: A Spill Response Contractor is available for response to hazardous/chemical spills. The contractor is available 24/7 to provide spill response services for cleanup and removal of accumulated product resulting from the release.

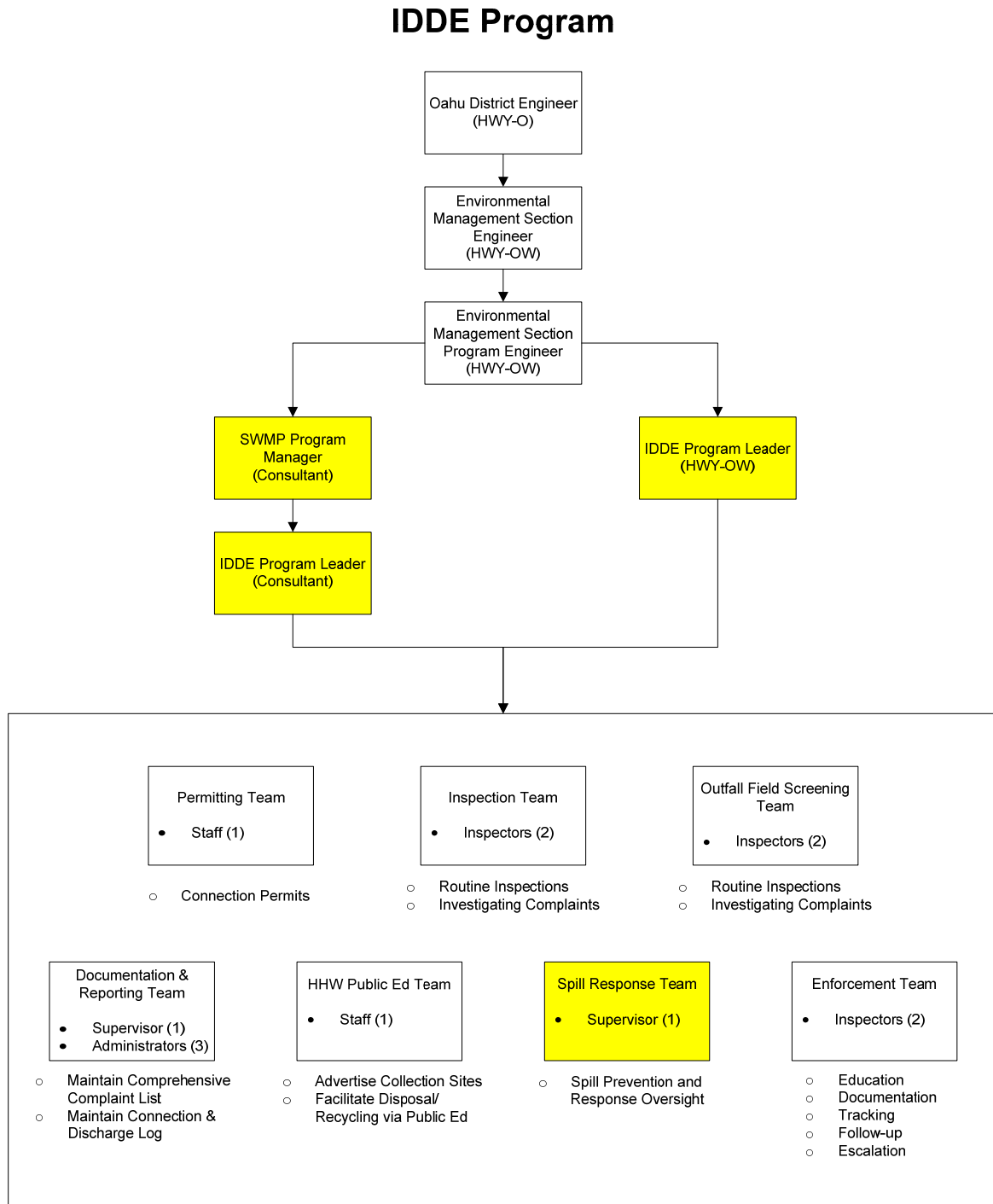
DOT-HWYS' illicit discharge and spill response notification procedures and contact information are provided in Table 3-3.

**Table 3-3. Illicit Discharge and Spill Response Notification Procedures**

| <b>Illicit Discharge and Spill Response Notification and Contact Information</b>   | <b>Telephone Number</b>                                     |
|--|---|
| <b>H-3 Tunnel Dispatch 24/7</b><br>The H-3 Tunnel Dispatch office should be notified immediately about illicit discharges and spills so they can contact the EC who will initiate DOT-HWYS' procedures for Illicit Discharge and Spill Response.   | <b>(808) 485-6200</b>                                       |
| <b>Honolulu Fire Department, Honolulu Police Department</b><br>If there is an emergency or life-threatening situation, 911 should be called first. Honolulu Fire Department (HFD) is normally the lead agency for emergency response to spills on all non-military lands of Oahu.<br>If requested, DOT-HWYS will assist the HFD with spill response for spills within DOT-HWYS' ROW. | <b>911</b>  |
| <b>CCH, ENV</b><br>In the event of a spill or overflow from a municipal wastewater facility, DOT-HWYS will immediately notify the CCH, ENV of any reported wastewater discharges into the MS4.   | <b>(808) 768-7272</b><br><b>or</b><br><b>(808) 768-3300</b> |
| <b>HWY-OW EMS</b><br>The EC should notify the State Highways Division, Oahu District, Environmental Management Section (HWY-OW) Engineer of any illicit discharges/spills entering into the MS4.   | <b>(808) 483-2569</b><br><b>or</b><br><b>(808) 221-7204</b> |
| <b>Spill Response Contractor 24/7</b><br>The spill response contractor should be notified for assistance when a spill is beyond the EC's capacity for removal or to dispose of spent absorbents. (Current contractor is Pacific Commercial Services.)  | <b>(808) 206-9989</b>                                       |

| <b>Illicit Discharge and Spill Response Notification<br/>and Contact Information</b>   | <b>Telephone<br/>Number</b>   |
|--|---|
| <p><b>DOH CWB, Oahu</b></p> <p>The EC should immediately notify the DOH CWB of pollutants entering or threatening to enter State Waters.</p> <p>The EC should immediately notify DOH of any municipal wastewater spills or overflows from private laterals and failing septic systems that discharges into the MS4.</p> <p>The EC should immediately notify the DOH CWB of any spills of any chemical of a <i>reportable quantity</i>; and a written notification must also be submitted no later than 30 days after the initial release.</p> <p><i>Note:</i> The reportable quantity for oil and fuel products is a spill of 25 gallons or more, a spill not cleaned within 72 hours, or a spill that threatens ground or surface waters.</p> | <p><b>(808) 586-4309</b></p>  |
| <p><b>DOH Hazard Evaluation and Emergency Response (HEER) Office, Oahu</b></p> <p>The EC should notify the HEER office of any discharge/spill that enters State Waters after work hours.</p> <p>The EC should notify the HEER office of any chemical spill of a <i>reportable quantity</i>, and a written notification must also be submitted no later than 30 days after the initial release.</p> <p><i>Note:</i> Reportable quantity for oil and fuel products is a spill of 25 gallons or more, a spill not cleaned within 72 hours, or a spill that threatens ground or surface waters.</p>  | <p><b>(808) 586-4249</b></p> <p><b>or</b></p> <p><b>(808) 247-2191</b><br/><i>(after hours)</i></p> |
| <p><b>U.S. Coast Guard Marine Safety Office, Oahu</b></p> <p>The U.S. Coast Guard should be notified of any quantity spill that reaches the ocean.</p>   | <p><b>(808) 522-8260</b></p>  |

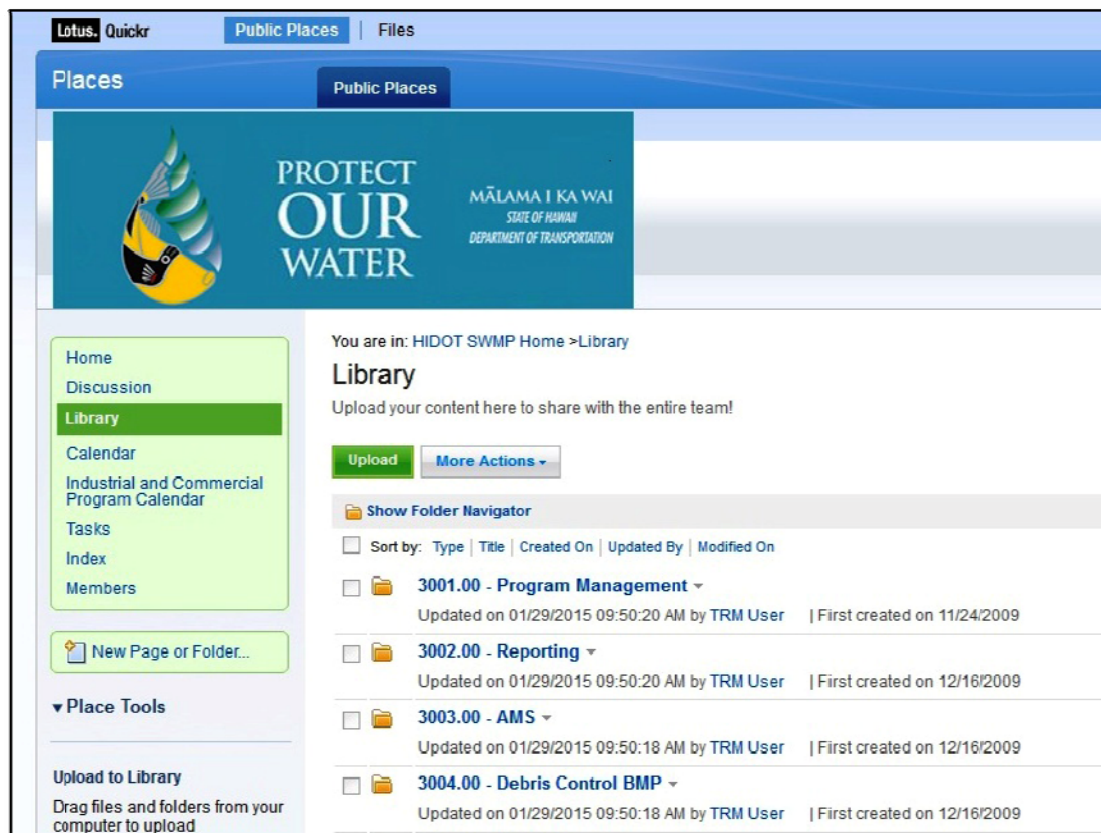
As depicted in Figure 3-7, the Spill Response Team administers the Spill Prevention and Response Program.



**Figure 3-7. IDDE Program Organizational Chart for Roles and Responsibilities Related to Spill Prevention and Response**

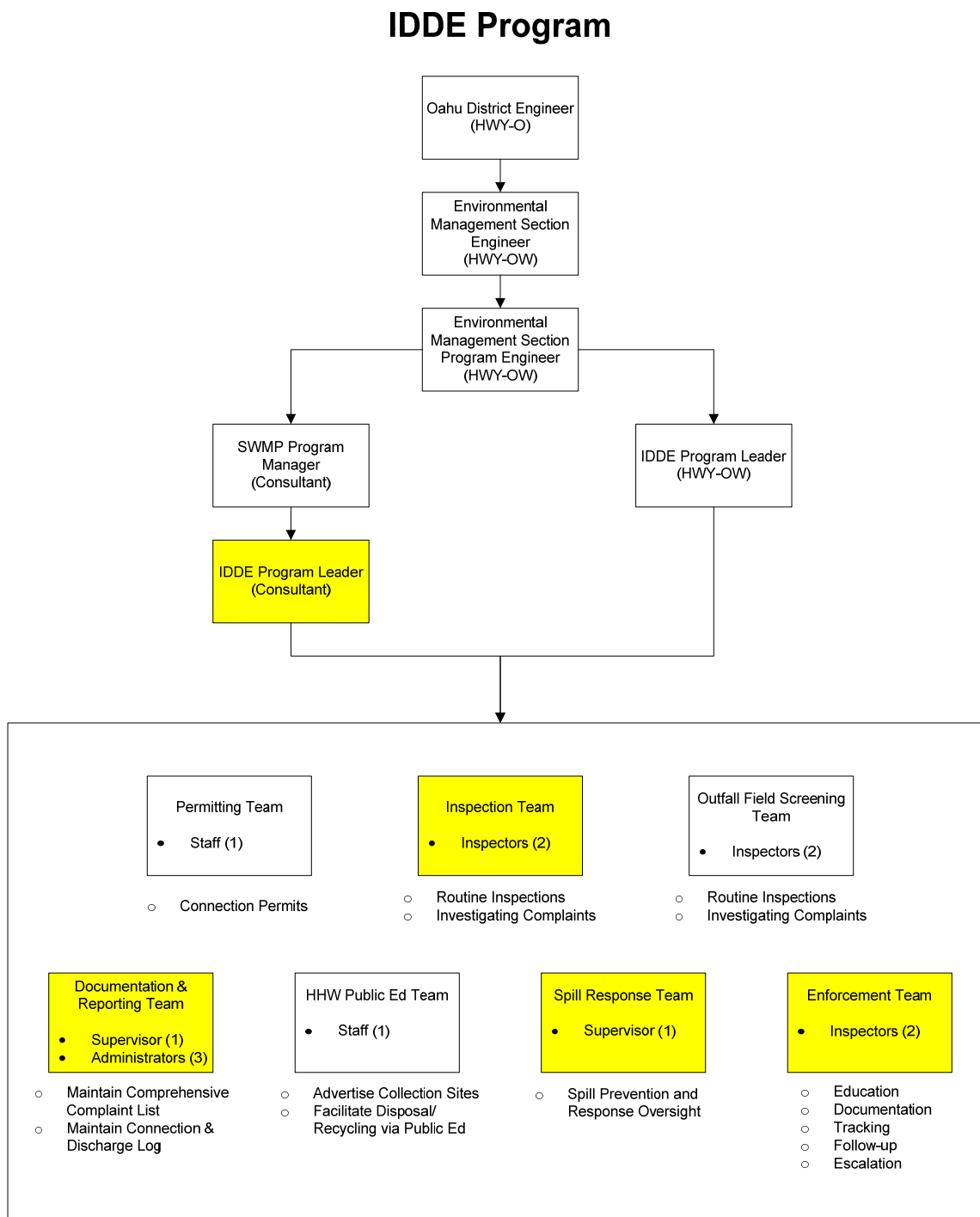
### 3.7 Tracking Illegal Connections, Illicit Discharges, and Spills

The Comprehensive Complaint List is used to document information about illegal connections, illicit discharges, and spills to the MS4. For each case, the database is used to track the type of discharge, the responsible party, DOT-HWYS' response and follow-up activities, and the resolution. Illegal connections and illicit discharge activities can be queried by Tax Map Key (TMK), if applicable.



*A database and file share system are utilized to track and document illicit discharges, illegal connections, and spills to the MS4.*

The IDDE Program Leader and the Documentation & Reporting Team coordinate with the Inspection Team and Enforcement Team in order to maintain the Comprehensive Complaint List, as shown in Figure 3-8.



**Figure 3-8. IDDE Program Organizational Chart for Roles and Responsibilities Related to Tracking Illegal Connections, Illicit Discharges, and Spills**



### **3.8 Household Hazardous Waste Disposal**

The EPA defines household hazardous waste (HHW) as, “leftover household products that contain corrosive, toxic, ignitable, or reactive ingredients.” Safe handling and proper disposal of HHW (e.g., paints, cleaners, oils, batteries, and pesticides that contain potentially hazardous ingredients) are important to protecting human health and the environment.

The CCH provides a bi-monthly service for the collection of HHW products that require special handling. Oahu residents who wish to drop off HHW can call the CCH, at (808)-768-3201, to make an appointment during a scheduled collection event. Further information about HHW, including waste prevention tips, is provided at [http://www.opala.org/solid\\_waste/Household\\_Hazardous\\_Waste.html#tips](http://www.opala.org/solid_waste/Household_Hazardous_Waste.html#tips).

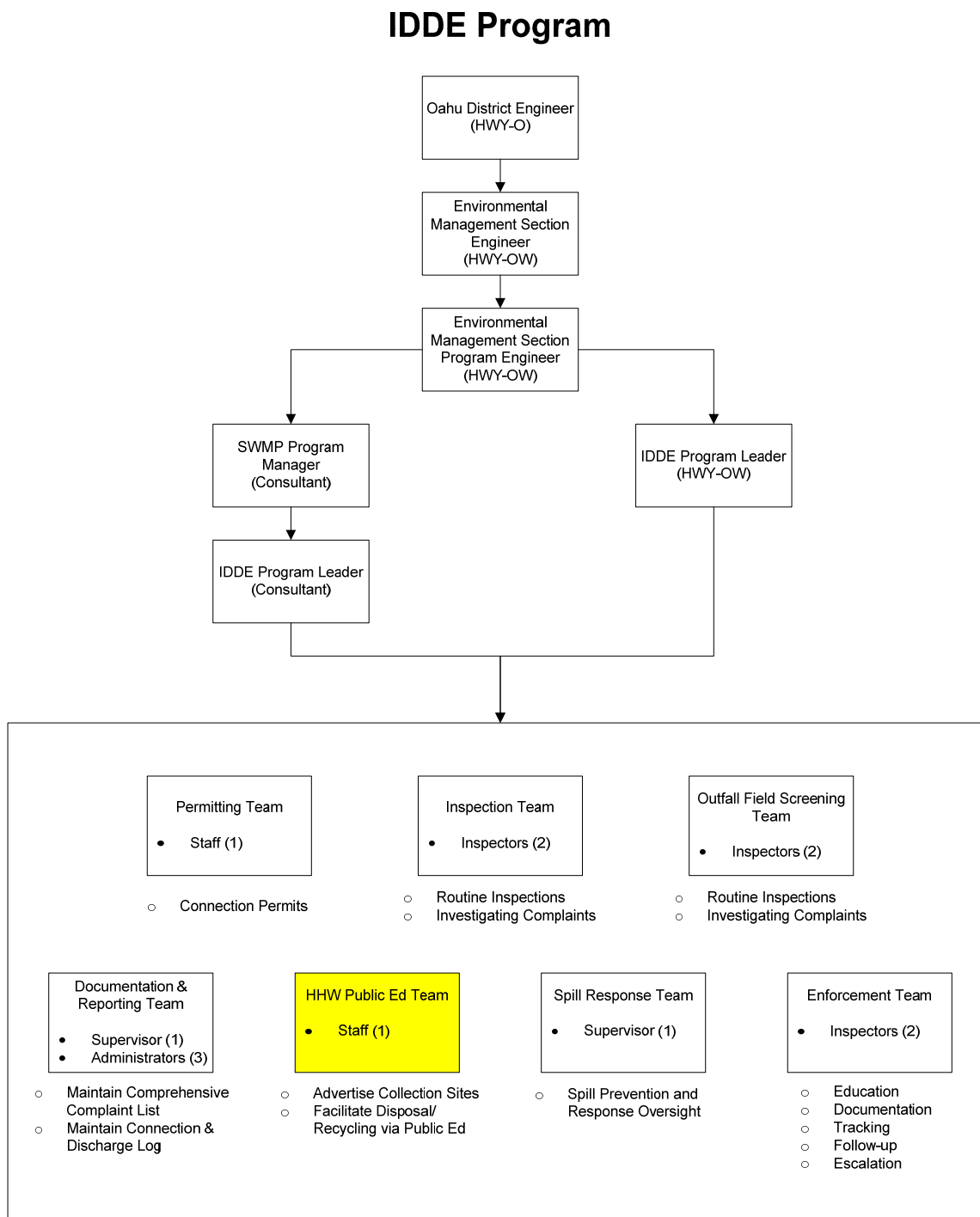
DOT-HWYS facilitates the proper management and disposal or recycling of toxic materials and other HHW by advertising information about the CCH’s collection program.

The following information is available on [www.stormwaterhawaii.com](http://www.stormwaterhawaii.com) and on DOT-HWYS’ informational HHW brochures, which are provided at SWMP public outreach events:

- A list of materials that require special handling and should be disposed of at a HHW collection event;
- Dates of HHW collection events;
- CCH’s contact information to schedule appointments; and
- CCH’s website address for further information about HHW.

Certain materials, such as used oil and vehicle fluids, can be disposed of at home with the trash. DOT-HWYS facilitates the proper disposal of used oil and vehicle fluids by distributing educational brochures and/or oil change boxes at applicable public outreach events.

As depicted in Figure 3-9, the HHW Public Education Team supports the Public Education Program in educating the public about the proper disposal of used oil, vehicle fluids, toxic materials, and other HHW.



**Figure 3-9. IDDE Program Organizational Chart for Roles and Responsibilities Related to Household Hazardous Waste Disposal**

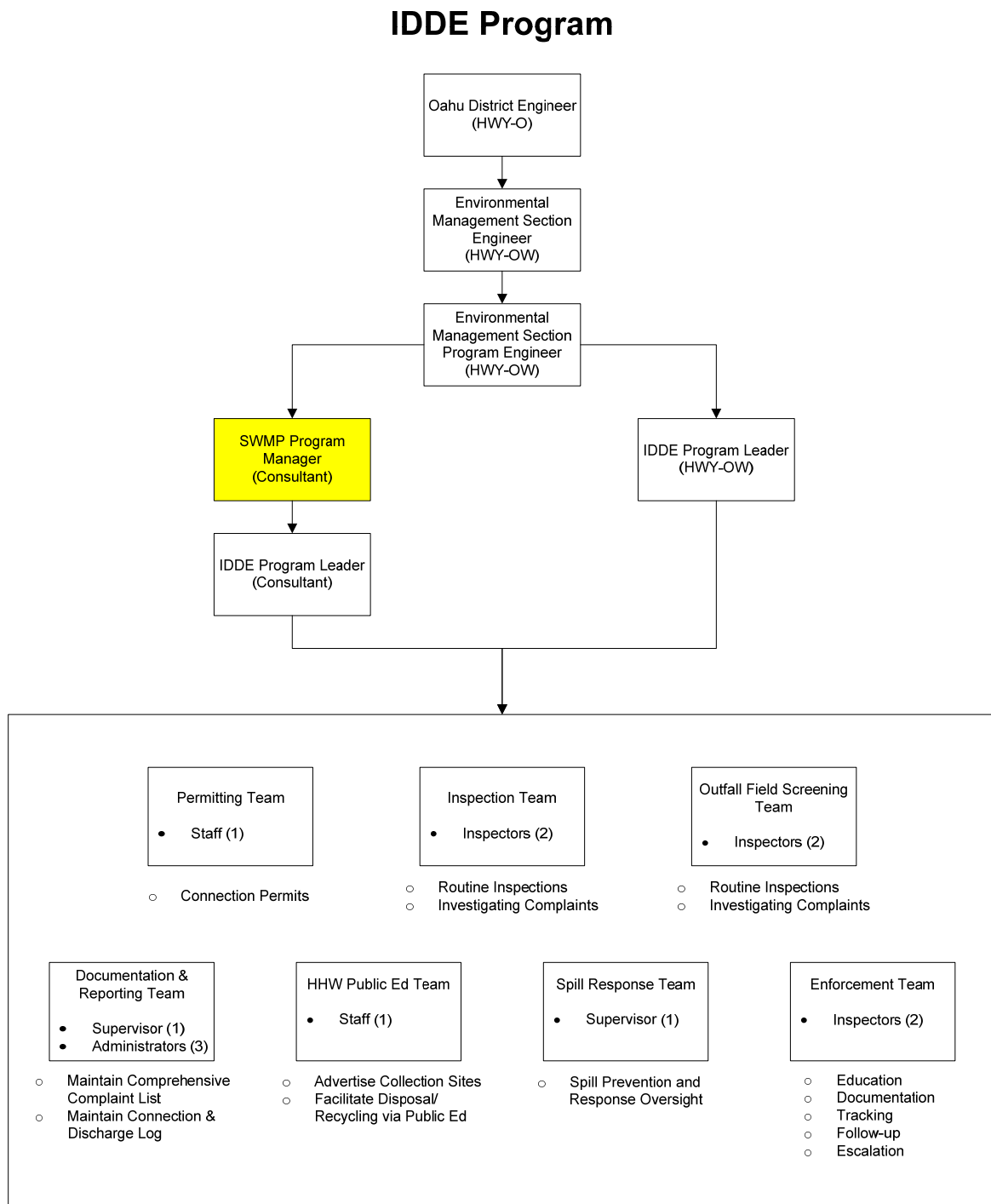
### 3.9 Training

IDDE Program staff receive annual training on how to identify and eliminate illegal connections, illicit discharges, and spills to the MS4. Training content is specific to the IDDE Program's policies, rules, procedures, and activities, such as investigating complaints and pursuing enforcement actions, as necessary.



*Periodic “on-the-job” training sessions instruct field inspectors on the methods for detecting, investigating, eliminating, and reporting illegal connections and illicit discharges.*

The SWMP Program Manager is responsible for ensuring that IDDE Program staff receive training, annually, as shown in Figure 3-10.



**Figure 3-10. IDDE Program Organizational Chart for Roles and Responsibilities Related to Training**

### 3.10 Monitoring Program Effectiveness

Table 3-4 provides measurable standards/milestones for the BMPs discussed in this chapter and DOT-HWYS' strategy for monitoring the effectiveness of their implementation.

**Table 3-4. Standards/Milestones for the IDDE Program**

| Section | BMP  | Standard/Milestone   | Monitoring Effectiveness   |
|---------|--|--|--|
| 3.1     | Connection Permits                                       | <ul style="list-style-type: none"> <li>• Ensure that all observed connections are permitted, as necessary.</li> </ul>  | <ul style="list-style-type: none"> <li>• Use the Comprehensive Complaint List to track the number of letters requiring connection permits issued.</li> <li>• Use the Connection and Discharge Log to track connection permits issued.</li> </ul> |
| 3.2     | Detecting Illegal Connections and Illicit Discharges     | <ul style="list-style-type: none"> <li>• Maintain the functionality of the storm water reporting hotline and online reporting forms.</li> </ul>                      | <ul style="list-style-type: none"> <li>• Ensure the hotline and website function properly.</li> </ul>  |
| 3.3     | Outfall Field Screening                                  | <ul style="list-style-type: none"> <li>• Screen outfalls in priority areas at least once per MS4 Permit term.</li> </ul>   | <ul style="list-style-type: none"> <li>• Track the number of priority outfalls/number of outfalls screened during the MS4 Permit term.</li> </ul>  |
| 3.4     | Investigating Illegal Connections and Illicit Discharges | <ul style="list-style-type: none"> <li>• Investigate public complaints and resolve cases.</li> </ul>   | <ul style="list-style-type: none"> <li>• Track public complaint cases in the Comprehensive Complaint List.</li> </ul>  |
| 3.5     | Enforcement  | <ul style="list-style-type: none"> <li>• Develop and implement enforcement policies.</li> </ul>  | <ul style="list-style-type: none"> <li>• Track enforcement actions using the Comprehensive Complaint List.</li> </ul>  |
| 3.6     | Spill Response   | <ul style="list-style-type: none"> <li>• Implement spill response procedures in accordance with those described in Section 3.6.</li> </ul>                           | <ul style="list-style-type: none"> <li>• Track spills into the MS4, follow-up actions, and resolutions using the Comprehensive Complaint List.</li> </ul>  |
| 3.7     | Tracking   | <ul style="list-style-type: none"> <li>• Track all cases of observed illegal connections, illicit discharges, spills into the MS4, and follow-up actions.</li> </ul> | <ul style="list-style-type: none"> <li>• Track cases and follow-up actions in the Comprehensive Complaint List.</li> </ul>   |
| 3.8     | HHW Public Ed  | <ul style="list-style-type: none"> <li>• Provide information to the public about disposal locations for HHW on Oahu.</li> </ul>                                      | <ul style="list-style-type: none"> <li>• Ensure phone number for collection sites and times is posted on website.</li> </ul>   |
| 3.9     | Training   | <ul style="list-style-type: none"> <li>• Provide annual training to IDDE Program staff.</li> </ul>   | <ul style="list-style-type: none"> <li>• Maintain sign-in sheets of all training attendees.</li> </ul>   |

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