

# 14 | Reporting Program



State of Hawaii, Department of Transportation  
Highways Division, Oahu District  
SWMPP, January 2022  
Public Review Draft





*DOT-HWYS maintains Kalanianaʻole Highway along of eastern coast of Oahu.*

The Reporting Program is designed to document SWMP activities and demonstrate compliance with conditions of the MS4 NPDES Permit and commitments set forth in the *SWMPP*.

The Reporting Program includes the following control measures:

1. Submit the Annual Report on October 31<sup>st</sup> for activities in the previous fiscal year.
2. Propose the content and structure of the Annual Report.

The Annual Report is submitted in accordance with the MS4 NPDES Permit requirements referenced in Table 14-1.

**Table 14-1. MS4 NPDES Permit Requirements for the Reporting Program.**

<b>MS4 NPDES Permit Reference</b>	<b>SWMPP Section</b>
<b>Part G.1.a</b> – The Permittee shall submit the Annual Report by October 31 <sup>st</sup> of each year in pdf format (minimum 300 dpi) in accordance with Part A.7. The Annual Report shall cover the past fiscal year. For the calendar year prior to the expiration date of the permit, the Annual Report and the e-Permitting CWB Individual NPDES Form, or other form approved by the DOH, shall be submitted to the DOH. The Annual Report shall include a description of the statuses of all items required in the permit. Submittal of the renewal application shall be at least one (1) year prior to the expiration date of this permit and include a \$1,000 filing fee.	Section 14.1
<b>Part G.1.b</b> – The Permittee shall revise its SWMP to include a description of reporting procedures and activities, including schedules and proposed content of the Annual Reports such that, at a minimum, the following is reported for each storm water program component in each Annual Report:	Section 14.2
<b>Part G.1.b.(1)</b> Requirements – Describe what the Permittee was required to do (describe status of compliance with conditions of this permit and other commitments set forth in the SWMP).	Section 14.2
<b>Part G.1.b.(2)</b> Past Year Activities – Describe activities over the reporting period in comparison to the requirements, including, where applicable, progress accomplished toward meeting specific measurable goals, standards and milestones or other specific performance requirements. When requirements were not fully met, include a detailed explanation as to why the Permittee did not meet its commitments for the reporting period. Also describe an assessment of the SWMP, including progress towards implementing each of the SWMP program components.	Section 14.2
<b>Part G.1.b.(3)</b> Future Activities – Describe planned activities, including, where applicable, specific activities to be undertaken during the next reporting period toward accomplishing specific measurable goals, standards and milestones or other specific performance requirements.	Section 14.2
<b>Part G.1.b.(4)</b> Resources – Report on the status of the Permittee's resource base for implementing this NPDES permit during the applicable reporting period and an estimate of the resources over and above those required in the current reporting period that will be required in the next reporting period.	Section 14.2
<b>Part G.1.c</b> Modifications – In each Annual Report, the Permittee shall describe any modifications made to the SWMP and implementation schedule during the past year, including justifications. The Permittee shall also describe major modifications made to the MS4, including, but not limited to, addition and removal of outfalls, drainage lines, and DOT-HWYS facilities.	Section 14.1
<b>Part G.1.d</b> Program Effectiveness Reporting – As part of the SWMP, the Permittee shall submit to DOH a written strategy for determining effectiveness of its SWMP. The strategy shall incorporate the results of water quality monitoring efforts (see Part G.2.) as well as program implementation information and other indicators. The Permittee shall include an assessment of program effectiveness and identification of water quality improvements or degradation beginning with the 2 <sup>nd</sup> Annual Report.	Section 14.1

## 14.0 Program Organization

To fulfill the MS4 NPDES Permit requirements of the Reporting Program, the following organizational structure has been established, as shown in Figure 14-1.

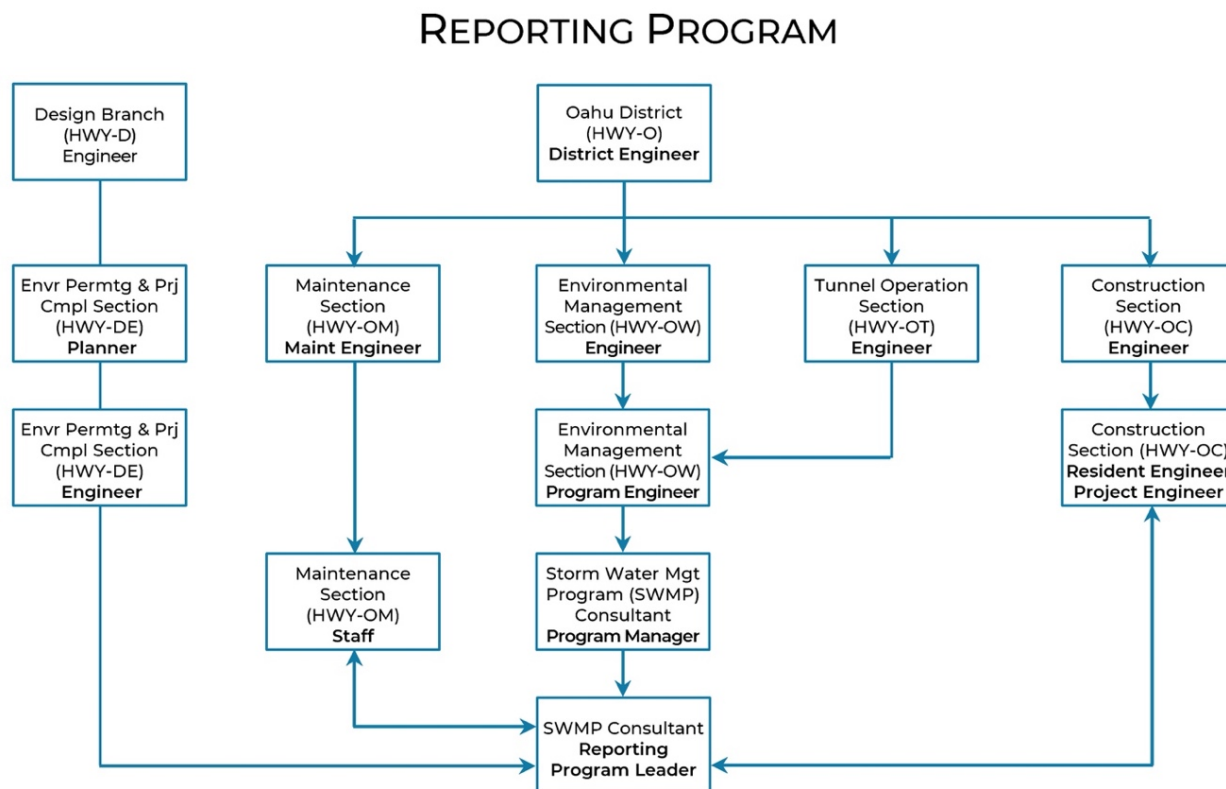


Figure 14-1. Reporting Program Organizational Chart.

### 14.1 Addressing Requirements | MS4 NPDES Permit Parts G.1.a, G.1.c, and G.1.d

DOT-HWYS submits an Annual Report to DOH by October 31<sup>st</sup> of each year. The Annual Report covers a reporting period from July 1<sup>st</sup> of the previous year to June 30<sup>th</sup> of the submittal year. The Annual Report is submitted to DOH through the e-Permitting Portal website. However, as previously described in Section 12.2, due to the use of the Electronic Signature Subscriber Agreement Form, a CD/DVD of the submission is no longer required.



In conjunction with MS4 NPDES Permit Parts D.3.a and D.3.b, the Annual Report includes a description of any modifications made to the SWMPP and/or implementation schedule, and any major alterations made to the MS4. Proposed changes that imply a major reduction in the overall scope and/or level of effort of the SWMP will be submitted to the DOH Director for acceptance at least 30 calendar days prior to the initiation date of the major modification. Major alterations to the MS4 will be identified by letter within 30 calendars of the completion of the alteration. Any amendments to the MOU between DOT-HWYS and the CCH (Appendix A.5) or the MOU between DOT-HWYS and DOH (Appendix A.4) will be summarized in the Annual Report.

The *Program Effectiveness Strategy* for determining the effectiveness of the SWMP is included as Appendix A.3.

Table 14-2 summarizes additional information DOT-HWYS is required to include in the Annual Report, as necessary.

**Table 14-2. Additional MS4 NPDES Permit Reporting Requirements.**

MS4 NPDES Permit Reference	Action	Reporting Frequency
Part D.1.a.(3)	Summary of the public education evaluation results	Annually
Part D.1.d.(1)	Revisions to construction standards	As applicable
Part D.1.d.(4)(iv)	Revisions to construction inspection form(s), checklist, reporting and corrective procedures	As applicable
Part D.1.f.(1)(ii)	Revisions to priority-based schedules for street sweeping and drain inspections	As applicable
Part D.1.f.(1)(iv)	Annual updates to the implementation schedule of the <i>Action Plan for Retrofitting Structural BMPs</i>	Annually
Part D.1.f.(1)(v)	Revisions to the <i>Trash Reduction Plan</i>	As applicable
Part D.1.f.(3)(iv)	Annual updates to the implementation schedule of the <i>Action Plan to Address Erosional Outfalls</i>	Annually

MS4 NPDES Permit Reference (Continued)	Action (Continued)	Reporting Frequency (Continued)
Part D.1.f.(3)(v)	Annual updates to the implementation schedule of erosional areas with the potential for significant water quality impact	Annually
Part D.1.g.(2)	Inventory and Map of Industrial Facilities and Activities (4 <sup>th</sup> Annual Report only)	As applicable
Part D.1.g.(3)	Inventory and Map of Commercial Facilities and Activities (4 <sup>th</sup> Annual Report only)	As applicable
Part D.1.g.(4)	Annual updates to the Prioritized Areas for Industrial and Commercial Facility and Activity Inspections	Annually
Part D.3.a	Report and justify all other modifications made to the SWMP	As applicable
Part D.3.b	All alterations and/or additions to the DOT-HWYS MS4	As applicable
Part G.3.a	Amendments to the CCH MOU	As applicable
Part G.3.b	Amendments to the DOH MOU	As applicable

## 14.2 Annual Report Content | MS4 NPDES Permit Part G.1.b

The Annual Report chapters are organized by program element, as follows:

- Public Education and Outreach
- Public Involvement/Participation
- Illicit Discharge Detection and Elimination
- Construction Site Runoff Control
- Post-Construction Storm Water Management in New Development and Redevelopment
- Pollution Prevention/Good Housekeeping – Debris Control BMPs
- Pollution Prevention/Good Housekeeping – Chemical Applications BMPs

- Pollution Prevention/Good Housekeeping – Erosion Control BMPs
- Pollution Prevention/Good Housekeeping – Maintenance Activities BMPs
- Industrial and Commercial Activities Discharge Management
- Baseyard Facilities
- Water Quality Monitoring

Each chapter in the Annual Report contains three sections:

- Program Implementation of BMPs – Describes program requirements and provides a description of how DOT-HWYS complies with the MS4 NPDES Permit requirements.
- Program BMPs Assessment – Reports the metrics of the implemented BMPs and provides a temporal analysis on BMP effectiveness as further described in the *Program Effectiveness Strategy*.
- Future Activities – Describes planned activities and specific measurable goals to be met in the next reporting period.

The resources for SWMP implementation are detailed in the last section of the Annual Report. The Annual Report is utilized by program management to analyze the effectiveness of SWMP activities and to guide an iterative approach for future decision-making regarding resource allocation and program implementation.