

# Prioritized Area Plan for Industrial and Commercial Facility and Activity Inspections



HAWAII DEPARTMENT OF TRANSPORTATION  
OAHU DISTRICT

STORM WATER MANAGEMENT PROGRAM  
**PRIORITIZED AREA PLAN**  
**FOR INDUSTRIAL AND COMMERCIAL**  
**FACILITY AND ACTIVITY INSPECTIONS**

MS4 NPDES Permit No. HI S000001



Hawaii Department of Transportation  
Oahu District  
727 Kakoi Street, Honolulu, Hawaii 96819

July 2023  
Version: Final

## RECORD OF REVISION

Revision No.	Revision Date	Description	Sections Affected
Original Document	October 2014	Original	N/A
1	February 2015	Formatted Plan	All
2	September 2015	Updated Watersheds	Tables 1 – 4
3	September 2016	Updated Watersheds	Tables 1 – 4
4	September 2017	Updated Watersheds	Tables 1 – 4
5	August 2018	Updated Watersheds	Tables 1 – 4
6	July 2019	Updated Watersheds	Tables 1 – 4
7	July 2020	Updated Watersheds	Tables 1 – 4
8	July 2021	Reformatted Plan. Updated to reflect 2020 MS4 NPDES Permit.	All
9	October 2022	Updated Watersheds	Tables 1 – 4
10	July 2023	Deleted "Division" and Updated Watersheds	All

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## 1. PURPOSE

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This *Prioritized Area Plan for Industrial and Commercial Facility and Activity Inspections* was developed to fulfill the requirement found in Part D.1.g.(4) of the Hawaii Department of Transportation (HDOT), Oahu District Municipal Separate Storm Sewer System (MS4) National Pollution Discharge Elimination System (NPDES) Permit No. HI S000001, effective date September 1, 2020.

The MS4 NPDES Permit Part D.1.g.(4) requirements are as follows.

“On an annual basis, the Permittee shall modify the Plan based on updated information from its industrial and commercial inventory, findings from previous inspections, the number of industrial and commercial facilities in the area, the density of these facilities, previous storm water violations in the area, and water quality impairments in the area. The modified Plan shall set a schedule that ensures inspections will be completed in accordance with the schedule in part D.1.g.(5). This Plan shall be submitted with the Permittee’s annual report.”

## 2. BACKGROUND

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The original *Prioritized Area Plan for Industrial and Commercial Facility and Activity Inspections* was completed and submitted as a part of the *Storm Water Management Program Plan* in March 2007. To develop this plan, information from the industrial and commercial inventory was analyzed using the Asset Management System (AMS), and priority areas for inspection were identified. These priority areas were delineated by watershed and were listed in Table 1 of the *Prioritized Area Plan for Industrial and Commercial Facility and Activity Inspections (2007)*.

The original plan was structured so that watersheds with Waste Load Allocations (WLAs) were given the highest priority, watersheds with 303(d) stream intersections were given second highest priority, and non-WLA or non-high priority watersheds were given the lowest priority. Watersheds within each priority level were then ranked based on their site or facility densities. Those watersheds that had the highest density of sites or facilities were ranked or prioritized as first.

### 3. UPDATED PLAN

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Using the updated information from the industrial and commercial facilities inventory, priority areas for inspection were re-evaluated and ranked according to the relative risk that any discharge may be contaminated with pollutants. Similar to the original plan, watersheds with WLAs were given highest priority, watersheds with 303(d) stream intersections were given second highest priority, and all other watersheds were given lowest priority.

The targeted groups that HDOT will address during the permit term and their respective desired behaviors are shown in Appendix A Table 1.

Watersheds within each priority level were first ranked based on the number of facilities within the priority area (Appendix A Table 1). Watersheds within each priority level were then ranked based on facility densities, e.g., Number of Facilities/Watershed Acres (Appendix A Table 2). Watersheds within each priority level were further ranked based on the number of violations or deficiencies within the priority area (Appendix A Table 3). Finally, the watershed rankings noted in Tables 1, 2, and 3 were totaled. Priority areas were then delineated by the sum of these rankings (Appendix A Table 4).

The priority area with the lowest sum was ranked highest priority.



## 4. INSPECTION SCHEDULE

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Industrial facilities with NPDES coverage will be inspected once every five years. Industrial facilities without NPDES coverage will be inspected twice every five years. Highly ranked commercial facilities will be inspected once every five years. Since the majority of the facilities identified in the industrial and commercial inventory have previously been inspected, the inspection schedule is determined by the aforementioned inspection frequency. Facilities within the industrial and commercial inventory that have not been previously inspected will be scheduled for inspection in accordance to the priority areas identified in Appendix A Table 4.

Once all industrial and highly ranked commercial facilities within a priority area have been inspected, the Industrial and Commercial team will move on to the next priority area.

# APPENDIX A

## Table 1. Number of Facilities Per Area

Rank	Watershed	No. of Facilities
1	Ala Wai	62
2	Waikele	39
3	Kaneohe	22
4	Waimanalo	7
5	Kawa	6
6	Kapaa	0
7	Nuuanu	101
8	Kiikii	67
9	Kapalama	60
10	Kalihi	50
11	Waimalu	46
12	Kaupuni	43
13	Moanalua	35
14	Kapakahi	27
15	Kalauao	19
16	Halawa	16
17	Waiawa	15
18	Kawainui	13
19	Paukauila	8
20	Keehi	7
21	Kahaluu	6
22	Aiea	3
22	Wailele	3
24	Kaalaea	2
25	Waikane	1
25	Kahawainui	1
25	Waianu	1
25	Kealahala	1
25	Kuliouou	1
25	Kaelepulu	1
25	Heeia	1
32	Kaaawa	0
32	Keamanea	0
32	Anahulu	0
32	Waiahole	0
32	Kanana	0
37	Mailiili	29
38	Kaloi	27
39	Sand Island	19
40	Waialaenui	18
41	Ulehawa	15
42	Kahawai	12
43	Kalunawaikaala	9
44	Wailupe	7
45	Kaipapau	6
45	Paumalu	6

Rank	Watershed	No. of Facilities
47	Kamiloiki	5
48	Makaua	4
48	Waipuhi	4
48	Nanakuli	4
51	Makaiwa	3
51	Oio	3
51	Makaha	3
51	Haiamoa	3
51	Kamaileunu	3
51	Halehaa	3
51	Honouliuli	3
51	Hakipuu	3
59	Kamilonui	2
59	Manuwai	2
59	Malaekahana	2
59	Makapuu	2
63	Koko Crater	1
63	Niu	1
63	Puu Hawaiiiloa	1
63	Pahole	1
63	Punaluu	1
63	Keaau	1
63	Hahaione	1
70	Waimea	0
70	Hanauma	0
70	Kaluakauila	0
70	Diamond Head	0
70	Maakua	0
70	Kaluanui	0
70	Kawaihapai	0
70	Koloa	0
70	Kualoa	0
70	Loko Ea	0
70	Makaleha	0
70	Makua	0
70	Manini	0
70	Pakulena	0
70	Waialua	0
70	Kawela	0
70	Papaakoko	0
70	Portlock	0
70	Salt Lake	0
70	Waipio	0

Legend
WLA
303(d)
Other

## Table 2. Density Per Area

Rank	Watershed	Density	Rank	Watershed	Density
1	Kaneohe	0.0061	46	Paumalu	0.0040
2	Ala Wai	0.0051	48	Kaipapau	0.0032
3	Kawa	0.0045	49	Kamaileunu	0.0024
4	Waimanalo	0.0019	50	Mailiili	0.0023
5	Waikele	0.0013	50	Hakipuu	0.0023
6	Kapaa	0.0000	52	Wailupe	0.0022
7	Kapalama	0.0280	53	Kaloi	0.0016
8	Nuuanu	0.0167	53	Kamilonui	0.0016
9	Kalihi	0.0126	55	Kamiloiki	0.0010
10	Kapakahi	0.0124	56	Makaiwa	0.0009
11	Kalauao	0.0090	57	Hahaione	0.0007
12	Kawainui	0.0082	58	Pahole	0.0006
13	Kaupuni	0.0072	58	Niu	0.0006
14	Waimalu	0.0059	58	Makaha	0.0006
15	Moanalua	0.0052	61	Makaua	0.0005
16	Aiea	0.0023	61	Manuwai	0.0005
17	Wailele	0.0021	61	Oio	0.0004
18	Halawa	0.0018	63	Malaekahana	0.0004
18	Kiikii	0.0018	63	Koko Crater	0.0004
18	Kaalaea	0.0018	63	Keaau	0.0004
21	Waianu	0.0015	63	Puu Hawaiiiloa	0.0004
22	Kahaluu	0.0014	68	Punaluu	0.0002
23	Kealahala	0.0013	68	Honouliuli	0.0002
24	Waiawa	0.0009	70	Kawela	0.0000
24	Kuliouou	0.0009	70	Waialua	0.0000
26	Paukauila	0.0008	70	Maakua	0.0000
27	Waikane	0.0006	70	Waimea	0.0000
28	Keehi	0.0005	70	Diamond Head	0.0000
29	Heeia	0.0004	70	Hanauma	0.0000
30	Kaelepulu	0.0003	70	Kaluakauila	0.0000
30	Kahawainui	0.0003	70	Kaluanui	0.0000
32	Kaaawa	0.0000	70	Kawaihapai	0.0000
32	Keamanea	0.0000	70	Koloa	0.0000
32	Anahulu	0.0000	70	Kualoa	0.0000
32	Waiahole	0.0000	70	Loko Ea	0.0000
32	Kahana	0.0000	70	Makaleha	0.0000
37	Sand Island	0.0352	70	Makua	0.0000
38	Halehaa	0.0186	70	Manini	0.0000
39	Waipuhi	0.0076	70	Pakulena	0.0000
40	Haiamoa	0.0074	70	Papaakoko	0.0000
41	Kalunawaikaala	0.0062	70	Portlock	0.0000
42	Makapuu	0.0061	70	Salt Lake	0.0000
43	Nanakuli	0.0057	70	Waipio	0.0000
44	Ulehawa	0.0051			
45	Waialaenui	0.0047			
46	Kahawai	0.0040			

Legend
WLA
303(d)
Other

### Table 3. Violations Per Area

Rank	Watershed	Violation	Rank	Watershed	Violations
1	Ala Wai	37	46	Kamilonui	1
2	Waikele	24	46	Haiamoa	1
3	Kaneohe	14	49	Sand Island	0
4	Kawa	1	49	Honouliuli	0
4	Waimanalo	1	49	Keaau	0
6	Kapaa	0	49	Puu Hawaiiiloa	0
7	Nuuanu	65	49	Hahaione	0
8	Waimalu	30	49	Makapuu	0
9	Moanalua	28	49	Hanauma	0
10	Kalihi	27	49	Kaluakauila	0
11	Kalauao	15	49	Kaluanui	0
11	Waiawa	14	49	Kawaihapai	0
13	Kapakahi	11	49	Koloa	0
14	Kapalama	9	49	Kualoa	0
15	Halawa	8	49	Loko Ea	0
16	Keehi	6	49	Makaleha	0
17	Wailele	4	49	Makua	0
18	Kahaluu	3	49	Manini	0
18	Kaupuni	3	49	Pakulena	0
20	Aiea	2	49	Papaakoko	0
20	Kawainui	2	49	Portlock	0
22	Paukauila	0	49	Salt Lake	0
22	Kaalaea	0	49	Manuwai	0
22	Kiikii	0	49	Oio	0
22	Kaelepulu	0	49	Kamiloiki	0
22	Waianu	0	49	Koko Crater	0
22	Waikane	0	49	Makaua	0
22	Kahawainui	0	49	Kamaileunu	0
22	Keeaahala	0	49	Malaekahana	0
22	Kuliouou	0	49	Waimea	0
22	Kaaawa	0	49	Waipuhi	0
22	Keamanea	0	49	Hakipuu	0
22	Anahulu	0	49	Halehaa	0
22	Waiahole	0	49	Niu	0
22	Heeia	0	49	Maakua	0
22	Kahana	0	49	Pahole	0
37	Mailiili	7	49	Waipio	0
38	Wailupe	5	49	Makaha	0
39	Kahawai	3	49	Nanakuli	0
39	Kaloi	3	49	Kawela	0
39	Kalunawaikaala	3	49	Punaluu	0
42	Waialaenui	2	49	Diamond Head	0
42	Makaiwa	2	49	Waialua	0
42	Paumalu	2			
42	Kaipapau	2			
46	Ulehawa	1			

Legend
WLA
303(d)
Other

## Table 4. Updated Priority Area

Rank	Watershed	Table Totals
1	Ala Wai	4
2	Kaneohe	7
3	Waikele	9
4	Kawa	12
4	Waimanalo	12
6	Kapaa	18
7	Nuuanu	22
8	Kalihi	29
9	Kapalama	30
10	Waimalu	33
11	Kalauao	37
11	Kapakahi	37
11	Moanalua	37
14	Kaupuni	43
15	Kiikii	48
16	Halawa	49
17	Kawainui	50
18	Waiawa	52
19	Wailele	56
20	Aiea	58
21	Kahaluu	61
22	Kaalaea	64
22	Keehi	64
24	Paukauila	67
25	Waianu	68
26	Keaahala	70
27	Kuliouou	71
28	Waikane	74
29	Heeia	76
30	Kaelepulu	77
30	Kahawainui	77
32	Kaaawa	86
32	Keamanea	86
32	Anahulu	86
32	Wiahole	86
32	Kahana	86
37	Kalunawaikaala	123
38	Mailiili	124
39	Sand Island	125
40	Waialaenui	127
40	Kahawainui	127
42	Kaloi	130
43	Ulehawa	131
44	Paumalu	133
45	Wailupe	134
46	Kaipapau	135

Rank	Watershed	Table Totals
47	Waipuhi	136
48	Haiamoa	137
49	Halehaa	138
50	Nanakuli	140
51	Makaiwa	149
51	Kamaileunu	149
53	Makapuu	150
55	Hakipuu	150
56	Kamiloiki	151
56	Makaua	158
56	Kamilonui	158
56	Makaha	158
59	Oio	163
60	Honouliuli	168
61	Hahaione	169
61	Manuwai	169
63	Pahole	170
63	Niu	170
65	Malaekahana	171
66	Keaau	175
66	Koko Crater	175
66	Puu Hawaiiiloa	175
69	Punaluu	180
70	Hanauma	189
70	Kaluakauila	189
70	Kaluanui	189
70	Kawaihapai	189
70	Koloa	189
70	Kualoa	189
70	Loko Ea	189
70	Makaleha	189
70	Makua	189
70	Manini	189
70	Pakulena	189
70	Maakua	189
70	Waimea	189
70	Waipio	189
70	Waialua	189
70	Kawela	189
70	Papaakoko	189
70	Portlock	189
70	Salt Lake	189
70	Diamond Head	189

Legend
WLA
303(d)
Other