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IN REPLY REFER TO:

April 12, 2024

Dear Ladies and Gentlemen:

Subject: Hawaii Department of Transportation (HDOT)

Oahu Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES)

Permit No. HI S000001

Storm Water Annual Monitoring Plan 2024 – 2025

In accordance with the requirements of the HDOT MS4 NPDES Permit No. HI S000001 (effective September 1, 2020), Part F.1, a draft Annual Monitoring Plan has been developed.

According to MS4 NPDES Permit Part A.6, the plan is required to be made available to the public on the HDOT website for a minimum of 30 calendar days for public review and comment.

Persons wishing to comment upon the draft Annual Monitoring Plan should submit their comments no later than 30 calendar days after the date of this notice. Please submit all comments as a word document attachment on our comment form <a href="http://www.stormwaterhawaii.com/contact/">http://www.stormwaterhawaii.com/contact/</a> or email to info@stormwaterhawaii.com. All comments received on time will be considered.

If you have any questions, please contact Rodney Gerard, Engineer, of our Environmental Management Section, at (808) 483-2543 or by email at rodney.gerard@hawaii.gov.

Sincerely,

for RYAN A. NAKATA

Oahu District Engineer

Rely Dx Rud

# Hawaii Department of Transportation Oahu District

# Storm Water Managment Program Annual Monitoring Plan 2024 - 2025



Hawaii Department of Transportation Oahu District 2024 - 2025 Annual Monitoring Plan April 2024 (Public Review Draft)

# HAWAII DEPARTMENT OF TRANSPORTATION OAHU DISTRICT

# STORM WATER MANAGEMENT PROGRAM ANNUAL MONITORING PLAN 2024 – 2025

MS4 NPDES Permit No. HI S000001





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

June 2024 Version: Public Review Draft (April 2024)

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#### LIST OF ACRONYMS AND ABBREVIATIONS

<u>Acronym</u> <u>Title</u>

AMP Annual Monitoring Plan

AMR Annual Monitoring Report

AMS Asset Management System

AR Annual Report

BMP Best Management Practice

COC Chain of Custody

CWA Clean Water Act

DOH Hawaii Department of Health

HDOT Hawaii Department of Transportation

EPA Environmental Protection Agency

I&M Implementation and Monitoring

LCS Laboratory Control Sample

LCSD Laboratory Control Sample Duplicate

LDPE Low-Density Polyethylene

MS Matrix Spike

MSD Matrix Spike Duplicate

MS4 Municipal Separate Storm Sewer System

NO2 Nitrite
NO3 Nitrate

NPDES National Pollutant Discharge Elimination System

PID Point Identification Number

QA Quality Assurance

QC Quality Control

ROW Rights-of-Way

RPD Relative Percent Difference

# LIST OF ACRONYMS AND ABBREVIATIONS (CONTINUED)

<u>Acronym</u> <u>Title</u>

SM Standard Methods

SWMP Storm Water Management Program

TKN Total Kjeldahl Nitrogen

TMDL Total Maximum Daily Load

TN Total Nitrogen

TP Total Phosphorus

TSS Total Suspended Solids

WLA Waste Load Allocation

#### 1. MONITORING PROGRAM OBJECTIVES

MS4 NPDES Permit Part F.1.

The Hawaii Department of Transportation (HDOT), Oahu District owns and operates a municipal separate storm sewer system (MS4) and has developed and implemented a Storm Water Management Program (SWMP) as required by National Pollutant Discharge Elimination System (NPDES) Permit No. HI S000001 (hereinafter MS4 NPDES Permit), effective September 1, 2020.

The MS4 NPDES Permit requires that the HDOT SWMP reduce, to the maximum extent practicable, the discharge of pollutants to and from the MS4 to protect water quality and to satisfy the appropriate water quality requirements of the Clean Water Act (CWA).

## 1.1 Annual Monitoring Plan | MS4 NPDES Permit Part F.1.

This Annual Monitoring Plan has been prepared in accordance with the HDOT SWMP, and MS4 NPDES, Part F.1.b. Annual Monitoring Plan requirements. The Permit defines the Monitoring Year as July 1 through June 30. This Annual Monitoring Plan 2024 – 2025 (hereinafter AMP) details HDOT SWMP efforts to be conducted from July 1, 2024, through June 30, 2025. The AMP is to be submitted to the Hawaii Department of Health (DOH) by June 1st of each year in compliance with the MS4 NPDES, Part F.1.a.. This AMP, in tandem with the Monitoring Report 2024 – 2025 and the Annual Report 2024 – 2025, to be submitted by October 31, 2025, will demonstrate compliance with all components of the MS4 NPDES Permit including the monitoring program requirements parts F.1.a.(1) – F.1.a.(7) as shown in Table 1.

Table 1. HDOT NPDES Permit No. HI S000001, Part F.1. Annual Monitoring Program Objectives and Permit Requirements.

OBJECTIVE	SECTION REFERENCE		
F.1. — Annual Monitoring Plan			
F.1.a. — Submit the Annual Monitoring Plan by June 1st of each year for review and acceptance. The Annual Monitoring Plan shall be implemented over the coming fiscal year.			
F.1.a.(1) — Assess compliance with permit (including TMDL I&M Plans and demonstrating consistency with WLAs)	AMP <sup>1</sup> Sections 1.0 and 2.0 AMR <sup>2</sup> Sections 1.0 and 4.0 AR <sup>3</sup>		
F.1.a.(2) — Measures the effectiveness of Permittee's storm water management program	AMP <sup>1</sup> Section 3.0 AR <sup>3</sup>		
F.1.a.(3) — Assess the overall health of the receiving waters based on the chemical, physical, and biological impacts resulting from the storm water discharges and an evaluation of the long-term trends	AMP <sup>1</sup> Section 4.0 AMR <sup>2</sup> Section 4.0		
F.1.a.(4) — Characterize storm water discharges from the MS4	AMP <sup>1</sup> Section 6.0 AMR <sup>2</sup> Section 6.0 AR <sup>3</sup> Section12.0		
F.1.a.(5) — Identify sources of specific pollutants	AMP <sup>1</sup> Section 5.0 AR <sup>3</sup> Sections 3.0 and 12.0		
F.1.a.(6) — Detect and eliminate illicit discharges and illegal connections to the MS4	AMP <sup>1</sup> Section 5.0 AR <sup>3</sup> Section 3.0		
F.1.a.(7) — Assess the water quality issues in the watershed resulting from storm water discharges to receiving waters.	AMP <sup>1</sup> Section 4.0 AR <sup>3</sup> Section 12.0		

More information on activities to meet each objective can be found in the sections referenced for the:

<sup>1.</sup> Annual Monitoring Plan 2024 - 2025 (AMP)

<sup>2.</sup> Annual Monitoring Report 2023 - 2024 (AMR)

<sup>3.</sup> Annual Report 2023 - 2024 (AR)

#### 1.2 HDOT Monitoring Program

HDOT conducts water quality monitoring as a part of the SWMP to assess pollutant load contributions from HDOT rights-of-way (ROW) to state waters. The primary purpose of this monitoring is to assess the characteristics of storm water (quality and quantity) and evaluate potential impacts to the watershed and receiving waterbodies so that effective control mechanisms can be developed and implemented. The AMP describes the monitoring activities planned for the upcoming Monitoring Year on a watershed basis to assess water quality issues resulting from storm water discharges from HDOT ROWs to receiving waters.

Historic, ongoing, and future efforts of the Monitoring Program focus on a watershed level approach, consisting of watersheds with impaired waterbodies per CWA Section 303(d), and watersheds where Total Maximum Daily Loads (TMDLs) have been approved that identify HDOT as a pollutant source through the assignment of a Waste Load Allocation (WLA).

HDOT is also proactively implementing monitoring in anticipation of future TMDLs that may be approved during the current permit term. Water quality monitoring activities are conducted in watersheds that are listed as High Priority for a TMDL in the State of Hawaii Water Quality Monitoring and Assessment Report (Clean Water Branch 2022) Appendix C, and in watersheds identified by DOH through informal communications.

#### 1.2.1 Long-Term Water Quality Monitoring Approach

HDOT has implemented a watershed-based approach to establish a long-term monitoring strategy. Since 2001, HDOT has sampled and analyzed storm water runoff from various watersheds island-wide to identify potential sources of pollutants and assess its impact on water quality in receiving waters. Watersheds are identified based on the CWA Section 303(d) List of Impaired Waters on Oahu, HDOT contributing area, and potential pollutant loads.

Table 2 shows the historical sampling effort and number of samples collected within the corresponding watershed.

Table 2. HDOT Historical Sampling June 2001 - June 2024

WATERSHED	DATA COLLECTION PERIOD	NO. OF STORM WATER SAMPLES
Aiea	2011 – 2014	20
Ala Wai	2006 – 2010, 2018 – 2021	130
Halawa	2001 – 2009	167
Kaelepulu	2007 - 2010, 2021 - 2023	93
Kalihi	2023 - Current	3
Kaneohe	2009 – 2021	219
Kapaa	2007 – 2009	209
Kapakahi	2009 – 2015	98
Kawa	2006 – 2007, 2012 – 2021	334
Kawanui	2008 – 2009	85
Keehi	2023 - Current	4
Moanalua	2021 – Current	29
Waiawa	2009 – 2012	88
Waikele	2010 – 2014	254
Waimalu	2009 – 2012	112
Waimanalo	2007 – 2011	164

#### 1.2.2 Monitoring Program Framework Documents

The MS4 NPDES Permit requires five types of plans and reports to address and report on SWMP monitoring activities. The plans and reports, along with the MS4 NPDES Permit submittal requirements for each, are as follows.

- Storm Water Management Program Plan Submitted in February 2022.
- Annual Report To be submitted each year by October 31st reporting on the previous fiscal year.
- TMDL Implementation and Monitoring (I&M) Plans Five plans submitted October 28, 2014, and one plan submitted May 8, 2020.
- Annual Monitoring Plan To be submitted each year by June 1st, describing planned monitoring activities for the upcoming fiscal year.
- Annual Monitoring Report To be submitted each year by October 31st, reporting on all monitoring activities during the previous fiscal year.

These documents comprise the framework by which HDOT monitors and evaluates the compliance status and effectiveness of the SWMP. Collectively, they detail program activities, standards and milestones, assessment methods, and results of SWMP implementation.

The 2022 Storm Water Management Program Plan, appendices, and related plans are on the HDOT website, www.stormwaterhawaii.com.

#### 2 PERMIT COMPLIANCE ASSESSMENT

MS4 NPDES Permit Part F.1.a.(1)

The MS4 NPDES Permit Part F.1.a.(1), requires that the Monitoring Program be designed and implemented to assess compliance with the MS4 NPDES Permit, TMDL I&M Plans, and WLAs. The required planning documentation for program compliance in regard to the MS4 NPDES Permit, TMDL I&M Plans, and WLAs is fulfilled in the *2022 Storm Water Management Program Plan*.

#### **3 SWMP EFFECTIVENESS**

MS4 NPDES Permit Part F.1.a.(2)

The MS4 NPDES Permit Part F.1.a.(2), requires that the Monitoring Program be designed and implemented to assess effectiveness of the SWMP. In accordance with MS4 Permit Part G.1.d, HDOT submitted a Program Effectiveness Strategy in October 2022. The Program Effectiveness Strategy is provided in the *2022 Storm Water Management Program Plan* as Appendix A.3, and it includes program implementation monitoring information and other performance indicators. HDOT will include a program effectiveness assessment and identify water quality improvements in the *Annual Report*.

#### 4 ASSESS WATERSHED HEALTH & WATER QUALITY ISSUES

MS4 NPDES Permit Part F.1.a.(3) and F.1.a.(7)

The MS4 NPDES Permit Parts F.1.a.(3) and (7), require that the Monitoring Program be designed and implemented to assess the overall health and water quality issues in watersheds based on the chemical, physical, and biological impacts to receiving waters resulting from HDOT storm water discharges, and to evaluate long-term trends. HDOT will meet this objective by gathering and analyzing historical storm water and stream data. HDOT retains an inventory of water quality sampling data that will be used, together with water quality data from other sources on the Island of Oahu, to evaluate trends in overall water quality and impacts to receiving waters due to discharges from the HDOT MS4. HDOT will include a watershed health and water quality assessment in the *Annual Monitoring Report*.

#### 5 ILLICIT DISCHARGE DETECTION AND ELIMINATION

MS4 NPDES Permit Part F.1.a.(5) and F.1.a.(6)

MS4 NPDES Permit Parts F.1.a.(5) and (6) require that objectives of the HDOT Monitoring Program include measures for identifying sources of specific pollutants and detecting and eliminating illicit discharges and illegal connections to the MS4. HDOT has a process for identifying sources of specific pollutants and detecting and eliminating illicit discharges and illegal connections to the MS4, through implementation of the Industrial Commercial Activities Discharge Management Program and Illicit Discharge Detection and Elimination Program. Details of these plans and programs can be found in the *2022 Storm Water Management Plan*.

#### 6 MONITORING SITES AND SAMPLING METHODS

MS4 NPDES Permit Part F.1.a.(4)

#### 6.1 Water Quality Monitoring

In the 2023 – 2024 Monitoring Year, HDOT continued conducting water quality monitoring activities in the Moanalua Stream Watershed and began water quality sample collection activities in Keehi and Kalihi Stream Watersheds. HDOT will continue these monitoring efforts in the 2024 - 2025 Monitoring Year.

Monitoring activity details are provided in Section 6.2 – 6.4. Details of the storm water quality sampling sites for Moanalua Stream Watershed, Keehi Watershed, and Kalihi Stream Watershed are provided in Appendix A, B, and C respectively.

#### Moanalua Stream Watershed

- Site #1 Water quality monitoring of MS4 network along H-1 Freeway and Ala Napunani Street interchange which discharges to an intermittent portion of Moanalua Stream.
- Site #2 Water quality monitoring of MS4 network along Puuloa Road, North King Street, and H-1 Freeway interchange which discharges to Moanalua Stream, approximately one mile upstream from Keehi Lagoon.
- Site #3 Water quality monitoring of MS4 network along H-1 Freeway near the Funston Road interchange which discharges to an intermittent portion of Moanalua Stream (Kahauiki Tributary).

#### Keehi Watershed

 Site #1 – Water quality monitoring of MS4 network along the H-1 Freeway viaduct, accessible along North Nimitz Highway near Ohohia St, which discharges to Keehi Lagoon. Samples from this location will also be used to represent the lower Kalihi Watershed since the same H-1 Freeway viaduct traverses that watershed, and storm water runoff is anticipated to be substantially similar.

During the Monitoring Year, additional sampling locations within Keehi Watershed will be evaluated. Updates to the sampling locations, details, and associated analytical results will be provided in the Annual Monitoring Report 2023 – 2024, as applicable.

#### Kalihi Stream Watershed

- Site #1 Water quality monitoring of MS4 network along the Likelike Highway and Holua Way which discharges to Kalihi Stream.
- Site #2 Water quality monitoring of MS4 network along the H-1 Freeway viaduct, using data from Keehi Watershed site #1 as a representative sample.

# 6.2 Moanalua Stream Watershed Monitoring

Moanalua Stream Watershed is located near the Daniel K. Inouye International Airport, and the neighborhoods of Salt Lake and Kalihi. Moanalua Stream Watershed was selected for monitoring since it contains the largest area of HDOT ROW that drains to Keehi Lagoon. Keehi Lagoon is a Class A receiving waterbody, determined to be a high priority for TMDL development by DOH. The 2022 CWA Section 303(d) List of Impaired Waters on Oahu states that Keehi Lagoon is impaired for Total Nitrogen (TN), Nitrate + Nitrite (NO3 + NO2), Total Phosphorus (TP), Turbidity, and Total Suspended Solids (TSS)

The upper area of the Moanalua Stream Watershed consists of mixed residential and business developments, while the lower portion primarily consists of military, commercial, and industrial facilities. Facilities within the watershed include the Moanalua Golf Club, Walter J. Nagorski Golf Course, Moanalua Medical Center, Tripler Army Medical Center, the Fort Shafter Army Base, and Red Hill Naval Base. HDOT routes in the watershed include H-1 Freeway, H-201 Freeway, and Nimitz Highway (Route 92).

During the 2021 – 2022 Monitoring Year, HDOT commenced water quality sampling from HDOT ROW into Moanalua Stream to help characterize storm water runoff and assess the potential of implementing enhanced operational or structural best management practices (BMPs) in the watersheds (or other watersheds which drain to the impaired waters of Keehi Lagoon). During the 2024 – 2025 Monitoring Year, HDOT will continue to collect storm water quality samples from three monitoring sites in the Moanalua Stream Watershed.

See Appendix A Moanalua Stream Watershed for a map of all locations.

#### 6.2.1 Moanalua Stream Watershed Monitoring Site #1

HDOT will continue conducting storm water monitoring on a portion of the H-1 Freeway and adjacent roads near the Ala Napunani Street interchange. The drainage area is approximately five acres. Storm water runoff in the area is collected by a network of grated drain inlets in the concrete medians along the freeway, adjacent roads, and ramps. This

drainage area discharges to a 60-inch pipe which outfalls at Point Identification Number (PID) 300311 directly into an intermittent portion of Moanalua Stream.

Storm water quality samples will be collected at grated drain inlet PID 110647, which is approximately 325 yards upstream of the outfall to Moanalua Stream. This point of the MS4 network was selected since it does not contain upstream contributions from the non-HDOT sources along Ala Napunani Street.

Storm water quality samples will be collected from this site using automated samplers, grab samples, or a combination of both.

See *Appendix A* for the location map of Moanalua Stream Watershed Monitoring Site #1.

#### 6.2.2 Moanalua Stream Watershed Monitoring Site #2

HDOT will continue conducting storm water monitoring on a portion of Puuloa Road, H-1 Freeway, and North King Street near the Puuloa Road interchange. The drainage area is approximately 12 acres. Storm water runoff from the north end of Puuloa Road, the onramp to North King Street, a 0.25-mile length of H-1 Freeway, and the Kaua Street on-ramp, drains into a 54-inch pipe that runs along North King Street. This pipe splits at inlet PID 115335 and discharges directly into Moanalua Stream via two 42-inch outfalls (PID 304426 and PID 303121), approximately one mile upstream of Keehi Lagoon.

Storm water quality samples will be collected at inlet PID 103372. Samples may be collected at the outfalls at a future time, however currently both the outfalls are partially buried in the stream bank and potentially submerged during high tides, and/or during large storm events. The inlet closer to the stream, PID 115335, is also inaccessible for sampling because of tidal influence.

Storm water quality samples will be collected from this site using automated samplers, grab samples, or a combination of both.

See Appendix A for the location map of Moanalua Stream Watershed Monitoring Site #2.

#### 6.2.3 Moanalua Stream Watershed Monitoring Site #3

HDOT will continue conducting storm water monitoring on a portion of the H-1 Freeway near the Funston Road interchange. The drainage area is approximately two acres. Storm water runoff in the area flows off the highway and is collected by a network of grated drain inlets within concrete medians and shoulders of the road. This drainage area

discharges to a 24-inch pipe which outfalls at PID 304595 into a grassed area, and eventually into an intermittent portion of Moanalua Stream (Kahauiki Tributary).

PID 304595 is located within a fenced area along Moanalua Stream and is not accessible, stormwater quality samples will be collected from the upstream inlet PID 103380.

Storm water quality samples will be collected from this site using automated samplers, grab samples, or a combination of both.

See Appendix A for the location map of Moanalua Stream Watershed Monitoring Site #3.

#### 6.2.4 Moanalua BMP Activities

HDOT will track operational BMPs conducted within the Moanalua Stream Watershed monitoring site's drainage areas to evaluate the effectiveness at reducing pollutant concentrations and flow. BMPs evaluated will include the following:

- Landscaping maintenance and litter removal, including the frequency and quantity of material removed/disposed.
- Street sweeping, including the frequency, coverage, and quantity of material removed/disposed.
- Manhole and inlet cleaning, including the frequency and quantity of material removed/disposed.

# 6.3 Keehi Watershed Monitoring

Keehi Watershed is located in an area of mixed development between Moanalua Stream Watershed and Manuwai Stream Watershed. Within the watershed are industrial, commercial, and residential developments; Salt Lake District Park, Honolulu Country Club, Navy housing, and part of the Salt Lake neighborhood are contained in the northern region of the watershed boundary. The southern region contains the east end of Daniel K. Inouye Airport as well as industrial use buildings. There are two HDOT routes within the watershed, the H-1 Freeway and Nimitz Highway (Route 92).

Nimitz Highway is located directly beneath the H-1 Freeway. Deck drains along the H-1 Freeway superstructure convey runoff down to Nimitz Highway. Several drainage networks direct storm water runoff south which connects to the City and County of Honolulu (CCH) MS4 which ultimately discharges into Keehi Lagoon via an indirect connection.

Keehi Lagoon is a Class A receiving water body that has been deemed a high priority TMDL development by DOH. The 2022 CWA Section 303(d) List of Impaired Waters on Oahu states Keehi Lagoon is impaired for TN, NO3 + NO2, TP, Turbidity, and TSS.

During the 2023-2024 Monitoring Year, HDOT commenced water quality sampling from HDOT ROW into Keehi Watershed to help characterize storm water runoff and assess the potential of implementing enhanced operational or structural BMPs in the watersheds (or other watersheds which drain to the impaired waters of Keehi Lagoon). During the 2024 – 2025 Monitoring Year, HDOT will continue to collect storm water quality samples within Keehi Watershed.

See Appendix B Keehi Watershed for a watershed location map.

#### 6.3.1 Keehi Watershed Monitoring Site #1

HDOT will continue conducting storm water monitoring under a portion of the H-1 Freeway Viaduct along the North Nimitz Highway near Ohohia St, west of the Keehi interchange. Storm water runoff in the area is collected by grated drop inlets, before entering downspouts daylighting at the ground level and entering the drainage network along N Nimitz Highway. This drainage area discharges to CCH owned box culvert at PID J00522 on Ohohia St before discharging into Keehi Lagoon.

Storm water quality samples will be collected at a downspout, which outlets to an adjacent catch basin with PID 101708.

Storm water quality samples will be collected from this site using automated samplers, grab samples, or a combination of both.

See Appendix B for the location map of Keehi Watershed Monitoring Site #1.

#### 6.3.2 Keehi BMP Activities

HDOT will track operational BMPs conducted within the Keehi Watershed monitoring site's drainage areas to evaluate the effectiveness at reducing pollutant concentrations and flow. BMPs evaluated will include the following:

- Landscaping maintenance and litter removal, including the frequency and quantity of material removed/disposed.
- Street sweeping, including the frequency, coverage, and quantity of material removed/disposed.
- Manhole and inlet cleaning, including the frequency and quantity of material removed/disposed.

# 6.4 Kalihi Stream Watershed Monitoring

Kalihi Stream Watershed is located in a densely populated and trafficked portion of Honolulu near Honolulu Harbor. It is bordered by Moanalua Stream Watershed to the west and Kapalama Stream Watershed and Nuuanu Stream Watershed to the east. The northern portion of the watershed is occupied by highway and undeveloped areas, the central region contains residential development, and the southern region contains industrial and commercial development as well as residential areas. There are several HDOT routes in the watershed, the H-1 Freeway, N Nimitz Highway (Route 92), Sand Island Access Road (Route 64), and Likelike Highway (Route 63).

Storm water runoff from Kalihi Stream Watershed discharges to Keehi Lagoon. Keehi Lagoon is a Class A receiving water body that has been deemed a high priority TMDL development by DOH. The 2022 CWA Section 303(d) List of Impaired Waters on Oahu states that Keehi Lagoon is impaired for TN, NO3 + NO2, TP, Turbidity, and TSS.

During the 2023-2024 Monitoring Year, HDOT commenced water quality sampling from HDOT ROW into Kalihi Watershed to help characterize storm water runoff and assess the potential of implementing enhanced operational or structural BMPs in the watersheds (or other watersheds which drain to the impaired waters of Keehi Lagoon). During the 2024 – 2025 Monitoring Year, HDOT will continue to collect storm water quality samples from the identified monitoring site in the Kalihi Watershed.

Results from samples collected at Keehi Site #1 will also be used to evaluate water quality of runoff discharged from the H-1 Freeway in Kalihi Stream Watershed because the same H-1 Freeway viaduct traverses that watershed. Traffic patterns of the H-1 Freeway viaduct are generally the same in the two watersheds, and storm water runoff is anticipated to be substantially similar, so the results from the Keehi Watershed Monitoring Site #1 are representative of runoff from the H-1 Freeway from the lower portion of Kalihi Stream Watershed. The Keehi Watershed monitoring point is located 1 mile from Kalihi Stream Watershed. Other potential evaluated sites in the lower portion of the watershed were deemed inaccessible due to infrastructure, construction activities, and safety concerns.

See Appendix C Kalihi Stream Watershed for a watershed location map.

#### 6.4.1 Kalihi Stream Watershed Monitoring Site #1

HDOT will continue conducting storm water monitoring along the Likelike from Holua Way off Valley View Dr. Storm water runoff in the area flows off the highway and is collected by a network of grated drain inlets in the shoulders of the road. This drainage area discharges to a 24-inch pipe which outfalls to a CCH owned drainage ditch and continues into Kalihi Stream.

Storm water quality samples will be collected at outfall PID 304465, which is approximately 245 yards upstream of the CCH owned outfall to Kalihi Stream.

Storm water quality samples will be collected from this site using automated samplers, grab samples, or a combination of both.

See Appendix C for the location map of Kalihi Stream Watershed Monitoring Site #1.

#### 6.4.2 Kalihi Stream Watershed Monitoring Site #2

HDOT will continue conducting storm water monitoring along the H-1 Freeway viaduct. Samples collected from the Keehi Watershed Monitoring Site #1, which will be used to evaluate storm water quality for the Kalihi Stream Watershed.

#### 6.4.3 Kalihi BMP Activities

HDOT will track operational BMPs conducted within the Kalihi Stream Watershed monitoring site's drainage areas to evaluate the effectiveness at reducing pollutant concentrations and flow. BMPs evaluated will include the following:

- Landscaping maintenance and litter removal, including the frequency and quantity of material removed/disposed.
- Street sweeping, including the frequency, coverage, and quantity of material removed/disposed.
- Manhole and inlet cleaning, including the frequency and quantity of material removed/disposed.

### 6.5 Other Watershed Monitoring

#### 6.5.1 Existing TMDL Monitoring

This section describes how the sampling results will be reviewed and used to facilitate analysis of current and future TMDLs.

The U.S. Environmental Protection Agency (EPA) has approved TMDLs for the Ala Wai Canal, Kawa Stream, Waimanalo Stream, Kapaa Stream, Kaneohe Stream and Waikele Stream Watersheds. During the 2024 – 2025 Monitoring Year, HDOT Monitoring Program will continue monitoring activities in HDOT ROW located in the six TMDL areas as described in the applicable I&M Plans. Monitoring activities in the TMDL Watersheds include tracking and analysis of BMPs such as street sweeping and other debris control operations and maintenance activities, and collection of rainfall data from rain gauges within each watershed.

A complete description of the BMPs, monitoring activities, and assessment methods for each TMDL watershed are provided in their corresponding I&M Plan. The six I&M Plans are provided on the HDOT website, www.stormwaterhawaii.com/resources/plans.

#### 6.5.2 Future TMDL Monitoring

In addition to conducting monitoring activities in approved TMDL areas, HDOT also proactively plans and implements monitoring activities in anticipation of future TMDLs. Monitoring is conducted in certain watersheds that are listed as High Priority for a TMDL in Appendix C of the State of Hawaii Water Quality Monitoring and Assessment Report (Clean Water Branch 2022), and in watersheds identified by DOH through informal communications.

Moanalua Stream, Keehi, and Kalihi Stream Watersheds are currently prioritized by DOH for the development of future TMDLs. During the 2024 – 2025 Monitoring Year HDOT will continue monitoring activities in Moanalua Stream Watershed, Keehi Watershed, and Kalihi Stream Watershed. Collection of samples that characterize storm water runoff from HDOT ROW in these specific watersheds will provide data for potential WLAs that may be assigned to HDOT, as well as provide data to identify effective operational and structural BMPs.

#### 6.5.3 Other High Priority Waterbodies and Watersheds

Per MS4 NPDES Permit Part F.4, as additional TMDLs are adopted by DOH, which are approved by the EPA and that identify HDOT as a source, HDOT shall develop I&M Plans for a minimum of one additional TMDL waterbody or watershed per year within one year of the approval date.

As part of a proactive watershed-based approach to monitoring, HDOT will continue to periodically review the most recent release of the State of Hawaii Water Quality Monitoring and Assessment Reports, in particular Appendix C, which contains the CWA Section 303(d) List of Impaired Waters on Oahu.

HDOT will also stay up to date with long-term planning efforts made by the DOH and EPA towards assessing impaired waterbodies and identifying and developing TMDLs for watersheds.

During the 2024 – 2025 Monitoring Year, HDOT plans to review existing water quality data from Oahu's receiving waters (i.e., surface water such as streams, estuaries, or marine shorelines) for select TMDL or high-priority watersheds. Data collected will be used in conjunction with water quality sample laboratory data collected during storm water discharges to assess impacts to receiving waters and specific water quality issues resulting from storm water discharges from the HDOT MS4, as well as to evaluate the long-term trends.

HDOT will continue to maintain awareness of projects and goals of regulatory agencies such as DOH and EPA and will consider the locations of other agencies' stream monitoring sites while planning and reporting on HDOT storm water monitoring activities. The results of the assessment of HDOT impact to the overall health of the receiving waters, based on the chemical, physical, and biological impacts resulting from storm water discharges, will assist HDOT to identify management measures proven to be effective or ineffective at reducing pollutants and flow, and provide guidance for future planning and design of institutional and post-construction BMPs.

#### 7 ANALYTICAL METHODS

MS4 NPDES Permit Part F.1.b.(4) and F.1.b.(5)

## 7.1 Watershed Water Quality Monitoring

Storm water samples collected under the Watershed Water Quality Monitoring Program, as described in Section 6, will be analyzed for TN, TKN, TP, and TSS by a State-approved laboratory. These parameters were selected since they are the most representative of the pollutants of concern for the watersheds of interest and the 303(d) List of Impaired Waters.

Table 3 lists the preferred analytical methods for each parameter and their associated holding times and preservation methods. If the analytical methods in Table 3 are not available, alternative methods may be approved under the guidelines of Code of Federal Regulations, Title 40, Subchapter D, Part 136 Guidelines Establishing Test Procedures for the Analysis of Pollutants.

Table 3. Storm Water Monitoring Parameters.

PARAMETER (MG/L)	ANALYTICAL METHOD	HOLDING TIME (DAYS)	PRESERVATION METHOD
Total Kjeldahl Nitrogen (TKN)	EPA 351.2	28	Cool to ≤6°C pH<2 using sulfuric acid
Nitrate + Nitrite (NO3 + NO2)	EPA 353.2	28	Cool to ≤6°C pH<2 using sulfuric acid
Total Nitrogen (TN)	Calculated by TKN plus Nitrate + Nitrite		
Total Phosphorus (TP)	SM¹ 4500PE	28	Cool to ≤6°C, pH<2 using sulfuric acid
Total Suspended Solids (TSS)	SM¹ 2540D	7	Cool to ≤6°C
¹Standard Methods (SM)			

Holding time is the maximum suggested period between sample collection and laboratory analysis. The laboratory will note in the Analytical Report if samples are received outside of the holding time. Holding times assume proper preservation methods have been followed.

Water quality testing parameters under other SWMP programs may differ from those listed in Table 3. The Monitoring Team will determine the specific parameters for field or laboratory analysis on a case-by-case basis.

#### 7.2 Storm Event Characterization

Precipitation will be monitored using a combination of on-site or web-based rain gauges, and the Molokai radar managed by the National Oceanic and Atmospheric Administration's National Weather Service. This data will be used to delineate storm characteristics (timing, duration, intensity, and relative total rainfall), and the range of discharge volumes that occur during sampling events. Rain gauges have been installed at locations within or near the Moanalua monitoring sites. Rain gauges will be installed near the Keehi and Kalihi monitoring sites once sites are selected.

When rainfall is anticipated based on local weather forecasts, online radar imagery will be monitored to determine the projected timing, duration, and intensity of incoming precipitation at the monitoring sites. The rain gauges will also be monitored to evaluate the intensity of rainfall at each location. If the rainfall volume is anticipated to be over one tenth of an inch, the Monitoring Team will mobilize sampling equipment and supplies to collect grab samples or samples from the automated samplers, as applicable.

# 8 QUALITY ASSURANCE/QUALITY CONTROL PROCEDURES MS4 NPDES Permit Part F.1.b.(6)

Quality Assurance (QA)/Quality Control (QC) is an important component of an effective sampling program. This section provides details of laboratory analytical methods, QA/QC procedures to be used in TMDL watershed monitoring, illicit discharge sampling, post-construction BMP effectiveness studies, and other storm water discharge characterization conducted as part of the HDOT SWMP.

#### 8.1 Field Sampling Methods

This section provides information regarding the specific field methods that will be used to accomplish the water quality monitoring activities.

#### 8.1.1 Automated Sample Collection

Automatic samplers may be used to collect samples and provide data control and logging for sensors. Each automatic sampler will be programmed to obtain a timed series of samples throughout a rainfall event. Once the water flow in the drainage structure reaches a predetermined depth, samplers will collect runoff at a prescribed time frequency. The samples are automatically collected by a pumping mechanism that draws water from the main channel of flow through a laboratory-grade vinyl tube and into a clean plastic bottle. Automatic samplers will normally be programmed to collect samples every 2-15 minutes to increase the chances of capturing a runoff event. In the occurrence of larger storms, samples may be collected at less frequent intervals to provide a more accurate representation of runoff from the entire storm. Samples will be collected until runoff slows to a point where there is insufficient water at the intake, there is no flow, and/or the supply of bottles is exhausted. The bottles can be submitted to the laboratory as discrete samples, or as composite sample(s), which can be obtained from combining multiple containers from different periods of the storm event. Automatic samplers will be serviced immediately following a storm event.

All samples will be placed on ice and maintained at a temperature equal to or less than 6 degrees Celsius (°C) until they are delivered to the laboratory. Sample containers will be packaged and handled to protect the integrity of the water samples.

#### 8.1.2 Manual Sample Collection

Manual samples may be collected by field personnel during a storm event. Storm events will be monitored by radar so that field personnel can be present in the watershed during active storms to obtain manual samples. Samples will be manually collected at 1-minute to 60-minute intervals depending on the anticipated storm duration and intensity. Samples will be deposited into clean, labeled plastic bottles. Samples will be collected via peristaltic pump through single use low-density polyethylene (LDPE) tubing directly into the appropriate sample bottles. The LDPE tubing will be weighed down at one end to aid in sample collection in high flow situations. If necessary, an extension pole, rope, or other apparatus can be used to aid in sample collection, especially during high flow conditions. Samples collected by this method will be considered a grab sample.

Manual samples will be placed on ice and maintained at a temperature equal to or less than 6°C until they are delivered to the laboratory. Sample containers will be packaged and handled to protect the integrity of the water samples.

#### 8.1.3 Sampling Equipment Decontamination and Calibration

Samples collected using non-disposable or non-dedicated equipment will require decontamination between samples to prevent cross-contamination. Prior to the start of sampling, surfaces of the sampling equipment that come into direct contact with sample water will be decontaminated. After each use, sample collection containers and lids will be decontaminated by a certified laboratory according to standard sampling protocols. In the event that this is not possible, containers will be washed using a non-phosphate detergent solution and brushed to remove sediment. Each bottle will then be triple rinsed and air- dried.

Field monitoring equipment will be calibrated according to the manufacturer's instructions.

#### 8.2 Data Management

Precautions will be taken in the storage and analysis of data to prevent errors, loss, or misinterpretation of data. Before data is modified or analyzed, a copy of the original data will be archived.

#### 8.2.1 Documentation

Information will be hand recorded on standardized Field Logs and Chain of Custody (COC) forms, which are scanned and electronically filed. The COC forms will accompany all samples. A Field Log will be kept for each sampling site with the details of the date, time, personnel, purpose of visit, weather, conditions observed, samples collected, and actions performed. Photographs may be used to document field conditions and samples.

#### Sample Labeling

All sample bottles are given simple consecutive labels specific to each sample location. Information such as sample date, time, analysis method, preservation method (if any), conditions, and personnel present are recorded in the Field Logs and COC forms and linked to specific sample bottle numbers when appropriate.

#### Chain of Custody

The COC forms will be used to trace the possession of each sample from the time it is collected until completion of analyses. All samples submitted to the laboratory will be

accompanied with a COC form. The COC form details the following information, at minimum, as follows:

- Name and contact information of sampling personnel
- Name and contact information for laboratory
- Sampling contract name
- Sample ID number
- Date and time of sample collection
- Sample matrix
- Sample location
- Number of containers
- Preservation method, if any
- Analytical test parameters
- Analytical method
- Sample temperature
- Name and signature(s) of persons involved in the COC
- Date and method of delivery

HDOT and the laboratory will maintain electronic copies of each COC form. Electronic copies of the completed COC forms will be submitted to DOH as an appendix of the *Annual Monitoring Report 2024 – 2025*.

Custody seals will be affixed to sample coolers to ensure that the sample COC has not been compromised during transit to the laboratory.

#### AMS Maximo

HDOT inventories and monitors SWMP assets and activities through an integrated, multiplatform asset management system (AMS). The foundation of the AMS is a georeferenced inventory of all known MS4 drainage structures and post-construction BMPs hosted on Esri's ArcGIS platform. All assets can be explored alongside reference information including hydrology, infrastructure, and cadastral datasets in an interactive, web-based map application (AMS Viewer).

The spatial inventory is directly linked to a relational database hosted on IBM's Maximo Asset Management platform (AMS Maximo). AMS Maximo connects each individual asset to an attribute dataset and inspection work orders. Inspectors enter data into AMS Maximo

either directly through its web interface or through a mobile data collection app, such as ArcGIS Field Maps or Survey123.

Water Quality monitoring activities and documentation are managed within the Water Quality Monitoring Module of AMS Maximo. Sampling events are logged as Site-Inspection Records and organized by Monitoring Site. Within this record, COC forms, site conditions, sampling event details, and laboratory results are stored.

The AMS is the principal management tool used by HDOT for short-term planning and long-term compliance monitoring. The AMS allows program managers to assess compliance with MS4 NPDES Permit requirements, measure effectiveness, and make modifications as necessary, by facilitating the visibility of resources and comprehensive data analysis.

#### Field Logs

Field Logs are completed during every sampling event to document the details of site visits such as location, date, time, personnel, purpose of visit, weather, conditions observed, samples collected, and actions performed. Data is then transferred to the AMS Maximo Water Quality Monitoring Module for storage and analysis.

#### **Photographs**

Photographs may be taken of each sample, by HDOT or the laboratory, to document visual characteristics of the sample contents. Photographs will be stored electronically in a dedicated project folder on a secure server and within the AMS Maximo Water Quality Monitoring Module.

# 8.3 Analytical Results

Each set of sample results will be provided in the analytical laboratory's report. This report will contain relevant information about the sample receipt and analysis procedures, including descriptions of problems with the analyses, corrective actions if applicable, deviations from analytical methods, QC results, and a definition list for each qualifier used. The laboratory analysis results reports will be maintained in a dedicated project folder on a secure server.

#### 8.3.1 Data Quality Assessment

All generated data will undergo data verification and validation. The items listed below will be evaluated, as applicable to the analytical method. Qualifiers will be applied, as necessary.

- Deliverables
- COC/Condition of samples at laboratory receipt
- Holding times
- Calibration (initial and continuing)
- Blanks (method and calibration)
- Laboratory replicates
- Laboratory Control Samples (LCS)/Laboratory Control Sample Duplicates (LCSD)
- Matrix Spikes (MS)/Matrix Spikes Duplicates (MSD)
- Field QC samples
- Compound quantification and reported detection limits
- Overall assessment of data

The data will be reviewed in accordance with appropriate EPA method-specific, and/or laboratory-specific QC guidance documents.

### 8.3.2 Field Quality Assurance/Quality Control

The field and laboratory QA/QC procedures ensure the reliability and validity of field data gathered as part of the overall program.

#### Equipment Rinsate Blanks

Equipment rinsate blanks verify the adequacy of the decontamination process and whether the equipment is a source of sample contamination. To confirm that non-dedicated, non-disposable sampling devices (auto samplers) have been effectively decontaminated, rinsate samples will be collected and submitted to the laboratory for analysis. These samples will be submitted for analysis as normal samples.

The equipment rinsate blank will be collected from the decontaminated equipment prior to or after the completion of sampling. These samples will be obtained by pouring distilled or deionized water through or over sampling equipment. The water will be collected in a clean sample container and will be transported to the laboratory for analysis. Equipment rinsate blanks will be collected and analyzed for the same parameters listed in Table 3 as applicable.

Should the rinsate blank contain levels of contaminants within an order of magnitude above the analysis detection limits or within an order of magnitude of associated samples, potential contamination will be documented. No field rinsate blank is required for dedicated equipment (not reused to obtain other samples), or for laboratory supplied and/or cleaned containers. Equipment rinsate blanks will be collected at a frequency of one per twenty normal samples per matrix, or one per sampling event, whichever is more frequent.

#### Field Duplicates

A field duplicate will be collected at the same location immediately following the parent sample and will be composited with the parent sample. Duplicate samples will be assigned a different sample ID but is labeled in a manner such that it is not apparent to the laboratory. Duplicate samples will be preserved, packaged, and sealed in the same manner as other samples of the same matrix. The field duplicates will be sent blind to the laboratory. A minimum of 10% of normal samples will have a corresponding field duplicate sample.

Field duplicates will be collected and analyzed for the same parameters listed in Table 3 as applicable. Results for field duplicates will be used to verify the precision of the laboratory and/or sampling method and serve as an indicator of potential cross-contamination.

#### 8.3.3 Laboratory Quality Assurance/Quality Control

The laboratory QA/QC procedures ensure the reliability and validity of field and analytical laboratory data gathered as part of the overall program.

#### Container Certificate of Analysis

Bottles used for preservation and shipping are provided by the laboratory and are certified according to the container manufacturer's Certificate of Analysis.

#### Laboratory Quality Control Samples

Laboratory QC samples are analyzed as part of standard laboratory practice. The laboratory monitors the precision and accuracy of the results of analytical procedures through the analysis of QC samples, including LCS/LCSD samples, method blanks, laboratory replicates, and MS/MSD samples, one per batch per analysis.

A routinely collected water sample contains sufficient mass for both routine sample analysis and additional laboratory QC analyses, with the exception of MS/MSD samples. These will be analyzed at a frequency of one per sampling event. Precision, accuracy/bias, representativeness, completeness, and comparability are the data quality indicators used to assess the sampling results for usability. Each data quality indicator is described as

follows, including a definition of the terminology and the process for calculating the indicator.

#### Precision

Precision criteria monitor analytical reproducibility, and is the degree to which a set of observations or measurements of the same property, obtained under similar conditions, conform to themselves. The QC measures for precision include field duplicates, laboratory duplicates, LCS and LCSD samples, and MS and MSD samples. Precision is expressed as relative percent difference (RPD), which is calculated by dividing the absolute difference of two samples by their mean, as shown in the equation below.

The method performance criteria for precision is RPD  $\leq$  30%.

$$Relative Percent Difference = \underbrace{ (Result_{Parent Sample} - Result_{Duplicate Sample})}_{(Result_{Parent Sample} + Result_{Duplicate Sample})}_{2}$$

Precision variability may be the result of one or more of the following: field instrument variation, analytical measurement variation, poor sampling technique, sample transport problems, or spatial variation (heterogeneous sample matrices). To identify the cause of imprecision, the field sampling design rationale and sampling techniques will be evaluated, and both field and analytical duplicate sample results will be reviewed. If poor precision is indicated in both the field and analytical duplicates, then the laboratory may be the source of error. If poor precision is limited to the field duplicate results, then the sampling technique, field instrument variation, sample transport, and/or spatial variability may be the source of error.

#### Accuracy/Bias

Accuracy is the degree of agreement between an observed value and an accepted reference value. Accuracy includes a combination of random error (precision) and systematic error (bias) that are due to sampling and analytical operations. Examples of QC measures for accuracy include MS, LCS, and equipment rinsates (if non-dedicated sampling equipment is used). Accuracy is measured by the percent recovery for spiked samples (LCS/LSCD and MS/MSD). The method performance criteria for accuracy/bias will be established based upon the specific laboratory's statistically determined internal performance QC limits.

#### Completeness

Completeness is a measure of the amount of valid data obtained from a measurement system compared with the amount that was expected to be obtained under correct, normal circumstances. Completeness is calculated and reported for each method, matrix, and analyte combination. The number of valid results divided by the number of possible individual analyte results, expressed as a percentage, determines the completeness of the data set. The method performance criteria for completeness is 90%. Completeness measures the effectiveness in sample collection, analysis, and result reporting of the entire Monitoring Program, and is calculated on a per-analyte basis by the percentage of usable data (usable data divided by the total possible data), as follows.

% Completeness =  $\frac{Number\ of\ Valid\ Results}{Number\ of\ Possible\ Results}$  x 100

'Number of Valid Results' is the number of possible results minus the number of possible results not reported. Results may not be reported in instances in which the sample(s) are not analyzed for any reason (holding time violations in which resampling and analysis were not possible, samples spilled or broken, etc.).

#### Comparability

Comparability is a qualitative parameter expressing the confidence with which one data set can be compared to another. In order to meet the needs of the data users, the samples will be collected using the AMP guidelines, applicable field sampling techniques, and specific analytical methodology. If field QC issues affecting comparability are identified, data will be qualified as estimated.

#### 9 ESTIMATED BUDGET FOR MONITORING PROGRAM

MS4 NPDES Permit Part F.1.b.(7)

This section provides an estimated budget for the 2024 – 2025 Monitoring Year. Components that will require funding include the following:

- Sampling site setup and maintenance
- · Storm water sampling and analysis
- Data analysis and reporting
- · Administration and recordkeeping

Table 4 shows the estimated costs associated with water quality monitoring for the 2024 – 2025 Monitoring Year, as detailed in Section 6.

Table 4. Estimated Costs Associated with the 2024 - 2025 Monitoring Program.

PROGRAM COMPONENT	ESTIMATED ANNUAL COST
Labor	\$120,000
Materials	\$20,000
Laboratory Analyses	\$20,000
ESTIMATED TOTAL	\$160,000

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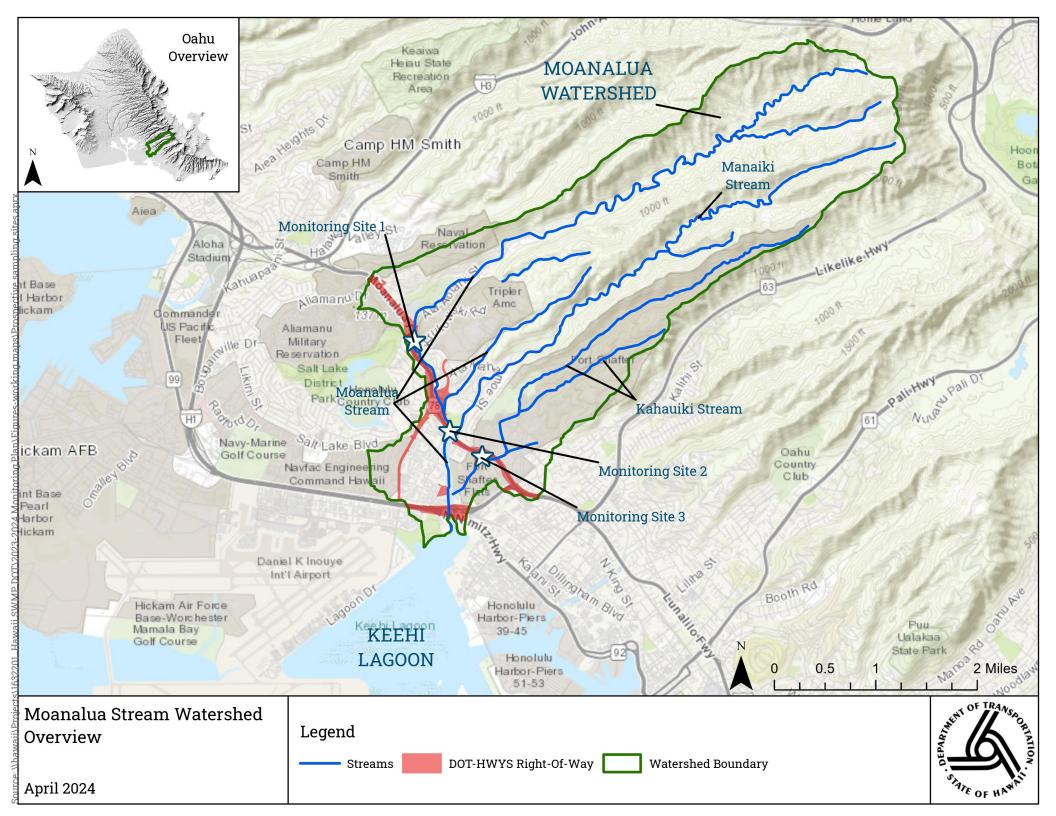
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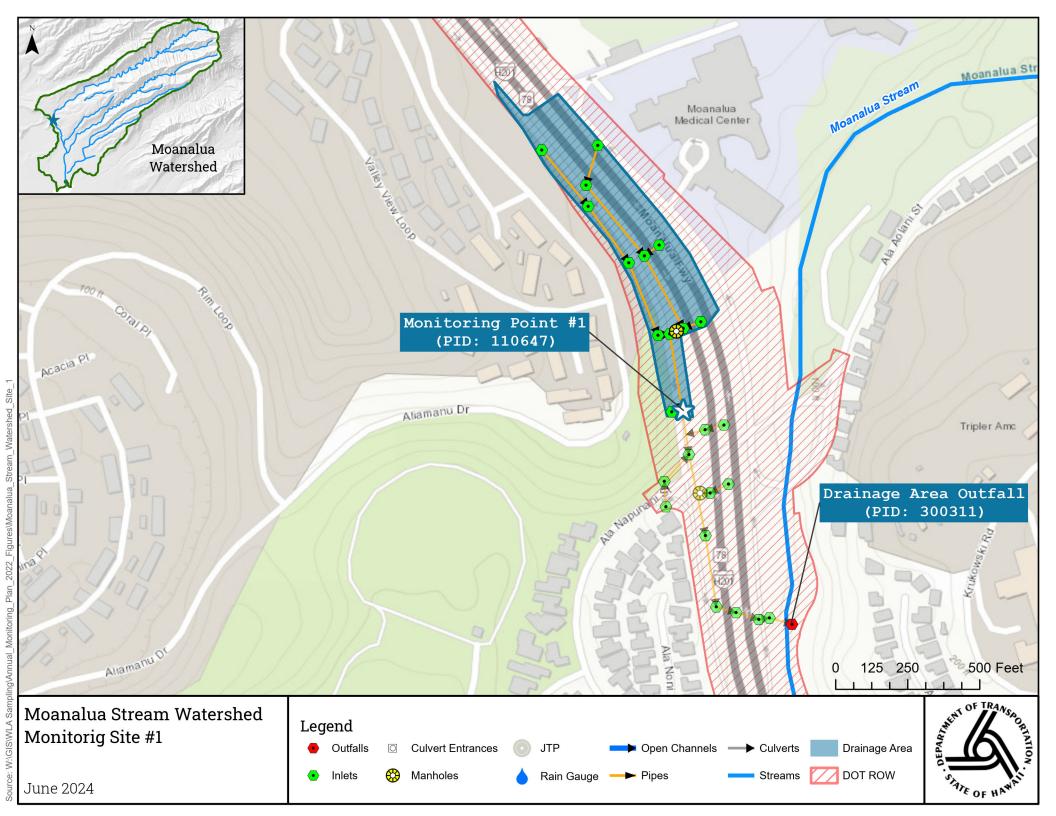
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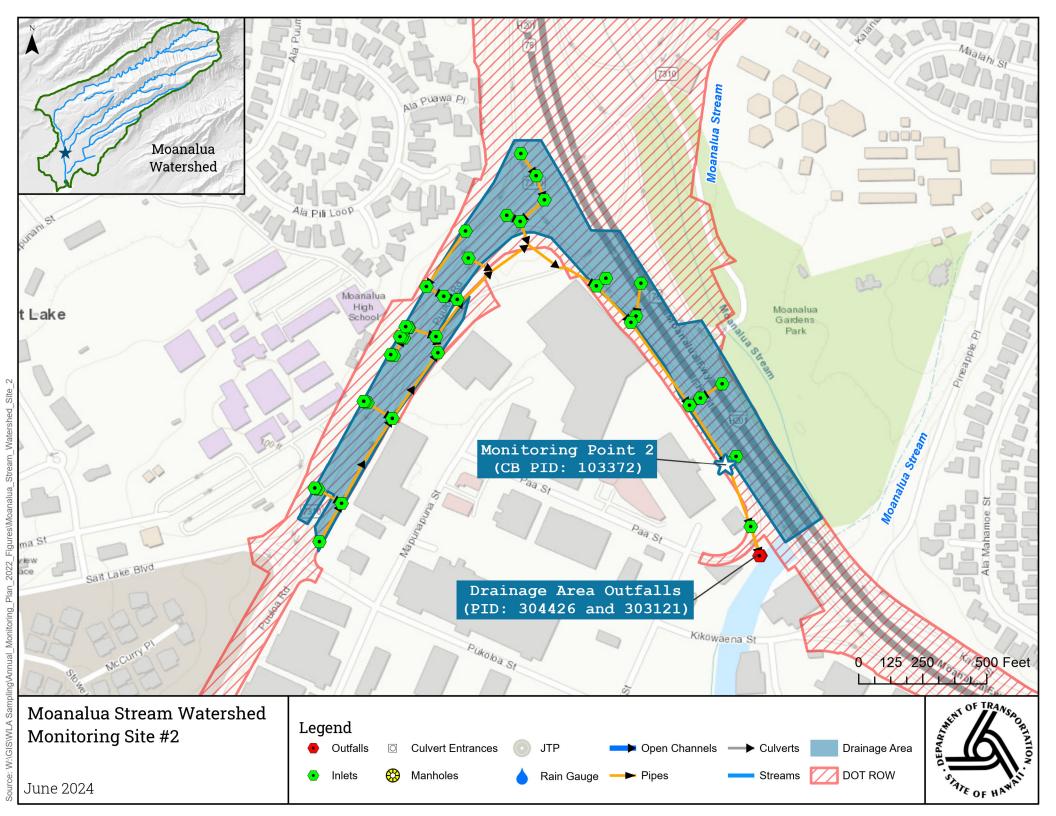
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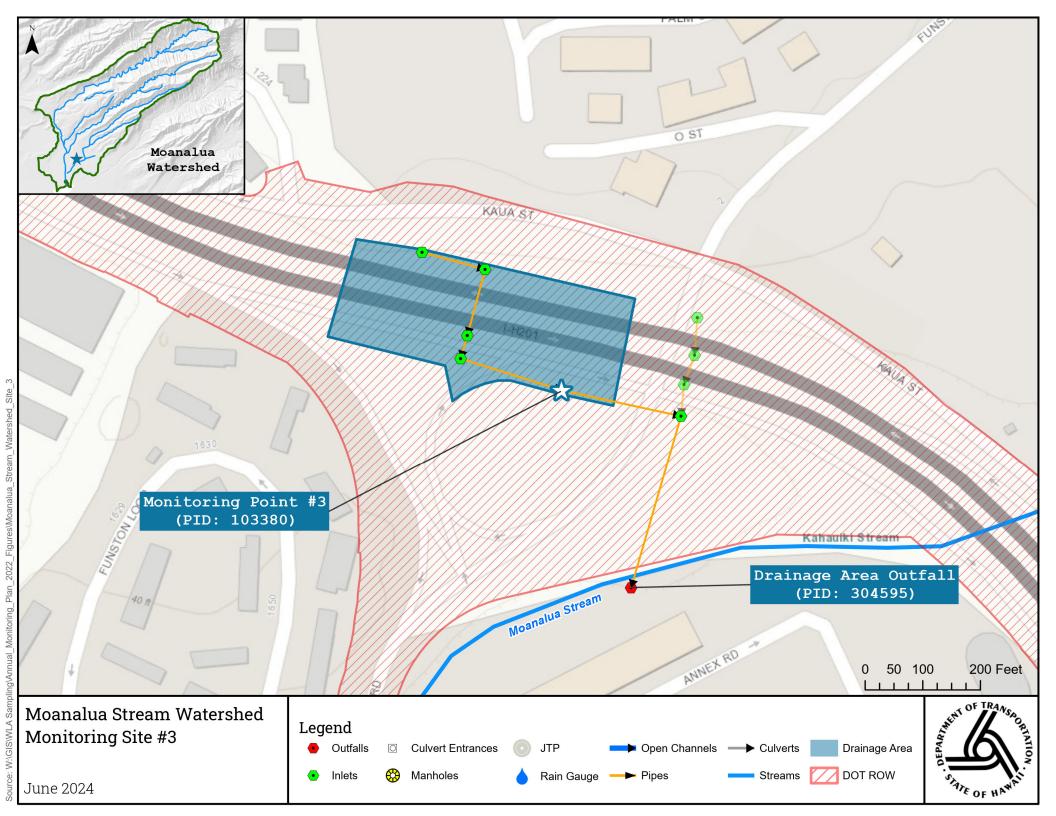
## **APPENDIX A**

Moanalua Stream Watershed



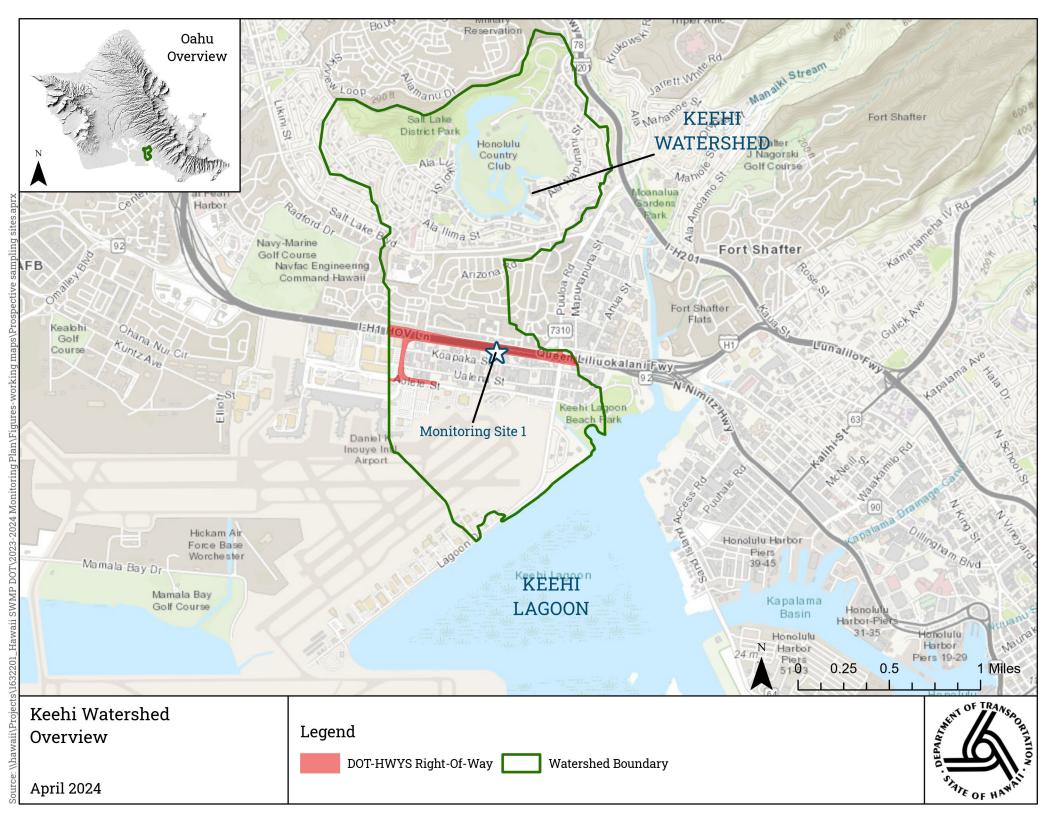


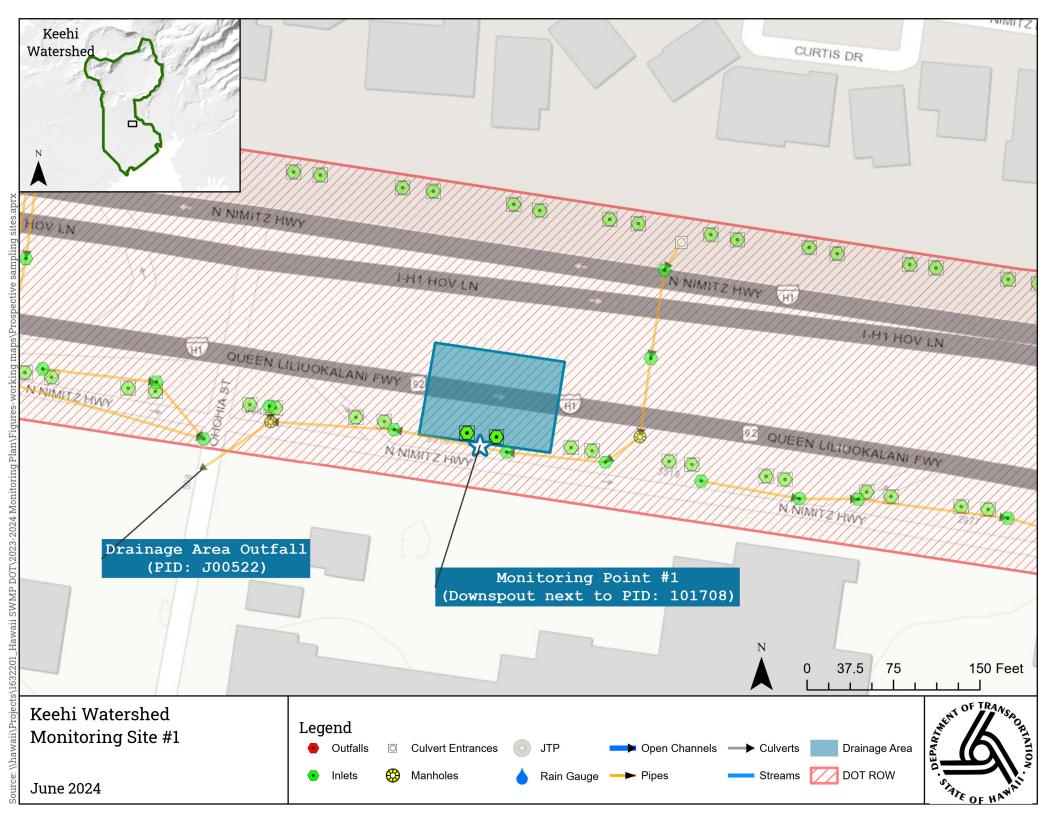




## **APPENDIX B**

Keehi Watershed





## **APPENDIX C**

Kalihi Stream Watershed

