

**Storm Water Pollution
Control Plan
(SWPCP)**

NPDES No. HI R60F157

Honolulu Disposal Service, Inc.

Honolulu, Hawaii

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TABLE OF CONTENTS

SECTION 1 OVERVIEW

1.1 PURPOSE OF DOCUMENT	Page 5
1.2 DOCUMENT ORGANIZATION	Page 5
1.3 NPDES REGULATORY BACKGROUND	Page 5
1.4 WHO MUST OBTAIN AN NPDES PERMIT?	Page 6
1.5 WHAT IS A SWPCP?	Page 6
1.6 WHAT IS A STORM WATER MONITORING PROGRAM?	Page 6
1.7 DEFINITIONS	Page 7

SECTION 2 STORM WATER POLLUTION CONTROL PLAN

2.1 INTRODUCTION	Page 10
2.2 FACILITY DESCRIPTION	
2.2.1 FACILITY LOCATION	Page 12
2.2.2 FACILITY SITE DESCRIPTION	Page 12
2.2.3 FACILITY OPERATION	Page 13
2.2.4 FACILITY STORM WATER DRAINAGE SYSTEM	Page 15
2.3 MATERIAL HANDLING AT FACILITY	
2.3.1 MATERIAL INVENTORY	Page 17
2.3.2 MATERIAL HANDLING AND MANAGEMENT PRACTICES	Page 19
2.3.3 POTENTIAL CONTAMINATION TO STORM WATER	Page 20
2.3.4 HISTORICAL SPILLS OR LEAKS TO STORM WATER SYSTEM	Page 23
2.4 MANAGEMENT CONTROL	
2.4.1 GENERAL BEST MANAGEMENT PRACTICES (BMPs)	Page 24
2.4.2 CURRENT AND SUGGESTED BMPs	Page 28
2.5 ADMINISTRATIVE PROCEDURES	
2.5.1 RESPONSIBLE PARTIES	Page 32
2.5.2 PLAN REVIEW	Page 32
2.5.3 PLAN REVISION	Page 33
2.5.4 REPORTING	Page 33
2.5.5 RECORD KEEPING	Page 34

SECTION 3 MONITORING PROGRAM & RECORD KEEPING

3.1 INTRODUCTION	Page 36
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3.2	SITE INSPECTIONS	Page 36
3.3	CHECKING ON NEW BMP'S IMPLEMENTATION	Page 36
3.4	MONITORING OF STORM WATER	Page 37
3.5	RECORD KEEPING	Page 38
3.6	REPORTING	
3.6.1	ANNUAL REPORT	Page 39
3.7	STORM WATER MONITORING PLAN	
3.7.1	SAMPLE COLLECTION METHODS	Page 39
3.7.2	TYPE OF SAMPLE	Page 40
3.7.3	EPA-APPROVED TEST PROCEDURES	Page 42
3.7.4	QUANTITY OF STORM WATER FLOW	Page 42
3.7.5	PROCEDURES FOR COLLECTION STORM EVENT INFORMATION	Page 43
3.7.6	QUALITY ASSURANCE/QUALITY CONTROL PROCEDURES	Page 43

TABLES

4.1	TABLE 1	MATERIAL INVENTORY	Page 46
4.2	TABLE 2	POTENTIAL CONTAMINATION SOURCES TO STORM WATER	Page 47
4.3	TABLE 3	SUMMARY OF SELECTED BMPs FOR POTENTIAL SOURCE OF CONTAMINATION	Page 48
4.4	TABLE 4	DESCRIPTION OF SELECTED BMPs	Page 49

MAPS

5.1	A-1	Location Map	Page 56
5.2	A-2	Sewage Drainage System	
5.2	A2-1	Stormwater Drain Pipe Layout on Lot 12	
5.2	A3	Stormwater Flowcharts	
5.2	A4	Site Map	

FORMS

SWPCP Revisions/updates	Page 57
Assigned Management Team and/or Members	
SWPCP Revisions Form Update	
Quarterly Site Inspection Form	
Worksheet 1 Annual or as needed Inspection of BMPs	
Filter Sock Inspection and Replacement Log	

Overview

Section 1

OVERVIEW

1.1 PURPOSE OF DOCUMENT

The U.S. Environmental Protection Agency (EPA) and by its delegation authority to the State of Hawai'i Department of Health, Clean Water Branch (CWB) require many industries to apply for a National Pollutant Discharge Elimination System Permit (NPDES) for all storm water discharges. The CWB has elected to issue a statewide Notice of General Permit Coverage (NGPC) permit that will apply to all discharges requiring an NPDES permit. A Notice of Intent for a NGPC for an NPDES permit generally requires dischargers to:

1. Eliminate non-storm water discharges, including cross-sections between municipal wastewater and storm water collection systems that can contaminate storm water discharges to storm water systems.
2. Develop and implement a storm water pollution control plan (SWPCP).
3. Perform monitoring of discharges to storm water systems (where applicable).

1.2 DOCUMENT ORGANIZATION

This document is divided into three main sections; an overview, the SWPCP, and the monitoring program. There are separate appendices for both the SWPCP and monitoring program sections. The overview section describes the purpose of this document, provides some regulatory background and describes the SWPCP and monitoring program. The SWPCP and monitoring program sections begin with an introduction of the requirements for the SWPCP and monitoring program per the NPDES permit, followed by the SWPCP and monitoring program.

1.3 NPDES REGULATORY BACKGROUND

The EPA and CWB regulations allow the issuance of general permits for storm water discharges for activities associated with industrial activities. The CWB will issue an NPDES permit that will apply to all discharges requiring a EPA permit (except construction activities). To obtain authorization for continued and future storm water discharges, operators must submit a Notice of Intent (NOI) to be covered by the NGPC. All dischargers covered by the permit will be required to begin implementing practices to prevent pollution of storm water.

The CWB oversee implementation of the NPDES permit and authorize enforcement actions to ensure compliance. The following is a list of applicable federal, state, and regional regulations, criteria, and guidance documents pertinent to the NPDES storm water discharge permit:

1. Federal Regulation 40 CFR parts 122, 123, 124 and 504.
2. Clean Water Act, as amended (33 U.S.C. § 125 *et seq.*: the "Act")
3. Hawaii Administrative Rules, Title 11, Department of Health, Chapter 54, Water Quality Standards.
4. Hawaii Administrative Rules, Title 11, Department of Health, Chapter 55, Water Pollution Control.

1.4 WHO MUST OBTAIN AN NPDES PERMIT?

The NGPC is intended to cover all new or existing discharges composed entirely of industrial storm water from facilities required by federal regulation to obtain a NPDES permit. If a storm water discharge from a designated industrial activity is mixed with storm water discharge from non-industrial activities on the same premises, the combined discharge is subject to permit application requirements. Unlike the federal permit, this NPDES permit must extend to all facilities whether the activity is primary or auxiliary to the owner or operator of the facility.

The federal regulations require specific categories of industrial facilities, which discharge storm water associated with industrial activity, to obtain an NPDES permit. The regulatory definition of associated with industrial activity is based on the Standard Industrial Classification (SIC) codes.

Facilities engaging in industrial activity that require a storm water permit are listed by category in Title 40 of the Code of Federal Regulations (CFR) Section 122.26 (b) (14), which includes:

Transportation facilities classified as Standard Industrial Classification 40 through 45 and 47, which have vehicle maintenance shops, material handling facilities, equipment cleaning operations and airport deicing operations. Only those facilities or portion of facilities that are either involved in vehicle maintenance, loading, storage or unloading activities, or equipment cleaning operations or which are subject to another subparagraph under this paragraph are associated with industrial activity.

1.5 WHAT IS A SWPCP?

A SWPCP is a document, which describes the various actions to be conducted at a site in order to prevent the contamination of storm water runoff. All storm water dischargers must prepare, retain on site and implement a SWPCP. The SWPCP has two major objectives: 1) to help identify the sources of pollution that affect the quality of industrial storm water discharges; and 2) to describe and ensure the implementation of practices to reduce pollutants in industrial storm water discharges. The permit prohibits non-storm water discharges into the industrial storm water system and is intended to authorize discharges composed entirely on industrial storm water.

1.6 WHAT IS A STORM WATER MONITORING PROGRAM?

A monitoring program provides data on the quantity and quality of storm water discharges flowing from the facility. The purpose of the storm water monitoring program is to:

1. Demonstrate that the quality of storm water discharged is in compliance with all discharge prohibitions, effluent limitations, and receiving water limitations,
2. Aid in implementation of the Storm Water Pollution Control Plan (SWPCP), and

3. Measure the effectiveness of best management practices (BMPs) in eliminating pollutants in storm water discharge.

The storm water monitoring program involves the development of a monitoring plan and establishing reporting procedures. The storm water monitoring plan is prepared as a supplement to the SWPCP.

1.7 DEFINITIONS

1. Best Management Practices (BMPs) means schedule of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of the waters of the United States of America. BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff spillage or leaks, sludge or waste disposal, or drainage from raw material storage.
2. Clean Water Act (CWA) means the Federal Water Pollution Control Act enacted by Public Law 92-500 as amended by Public Laws 95-217, 96-483, and 97-177; 33USC. 1251 et seq.
3. Facility is the location that is discharging storm water within the property boundary or operational unit. And can include multiple lots or parcels.
4. Non-Stormwater Discharge means any discharge to storm water Systems that is not composed entirely of storm water except discharge pursuant to a NPDES permit.
5. Significant Materials includes, but is not limited to: raw materials; fuels; materials such as solvents, detergents, and plastic pellets; finished materials such as metallic products; raw materials used in food processing or production; hazardous materials designated under 101(14) CERCLA; any chemical the facility is required to report pursuant to Section 313 of Title III of SARA; fertilizers; pesticides; and waste products such as ashes, slag and sludge that have the potential to be released with storm water discharges.
6. Significant Quantities is the volume, concentrations, or mass of a pollutant in storm water discharge that can cause or threaten to cause pollution, contamination, or nuisance, adversely impact human health or the environment, and cause or contribute to a violation of any applicable water quality standards for the receiving water. This generally is accepted to be 0.10 of rainfall during the storm water sampling event.
7. Stormwater means storm water runoff, surface runoff and drainage. It excludes infiltration and runoff from agriculture land.
8. Stormwater Associated with Industrial Activity means the discharge from any conveyance which is used for collecting and conveying storm water and which is directly related to manufacturing, processing, or raw materials storage areas at an industrial plant. The term does not include discharge from facilities or activities excluded from NPDES program. The term includes, but is not limited to; storm water discharges from industrial plant yards, immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the

facility; material handling sites; refuse sites; sites used for the storage and maintenance of material handling equipment; sites used for residual treatment, storage, or disposal; shipping and receiving areas; manufacturing buildings; storage areas (including tank farms) for raw materials, and intermediate and finished products; and areas where industrial activities have taken place in the past and significant materials remain and are exposed to storm water. The term also includes storm water discharges from all areas as listed in the previous sentence (except access roads) where material handling equipment or activities, raw materials, intermediate products, final products, waste materials, by-products, or industrial machinery are exposed to storm water. Material handling activities include: the storage, loading and unloading, transportation or conveyance of any raw material, intermediate product, finished product, by-product, or waste product.

The term excludes areas separate from a facility's industrial activities, such as office buildings, and accompanying parking lots as long as the drainage from the excluded areas is not mixed with storm water drained from the above described areas. Industrial facilities (including industrial facilities that are Federally, State, or municipally owned or operated that meet the description of the facilities listed in this paragraph) include those facilities designated under 40 CFR 122.26 (a)(1)(v).

**STORM WATER POLLUTION
CONTROL PLAN (SWPCP)
SECTION 2**

SECTION 2

STORM WATER POLLUTION CONTROL PLAN

2.1 INTRODUCTION

The Storm Water Pollution Control Plan (SWPCP) is developed in compliance with the National General Permit Coverage for a NPDES permit for storm water discharge associated with industrial activities. The purpose of the SWPCP is to describe the various actions a facility will undertake in order to prevent the contamination of storm water discharge.

Facility Location

A description of the facility location including such items as the city and state the facility presides, approximate distance and direction to a major city (if applicable), location in relation to freeway systems, cross streets, and/or major surface waters, and descriptions of adjacent facilities (if applicable). A site vicinity map will be included to help describe the pertinent information.

Facility Site Description

A description of the facility including such items as types of ground surfacing; location and description of major facility features (i.e. buildings, piers, storage areas, parking lots, storage tanks, material loading/unloading areas); approximate size of facility (in acres or ft²); location of storm water discharge outlets, catch basins, and drainage areas; boundary containment types (i.e. fences, walls, ditches). In order to clarify the site description, a plot plan(s) will be included showing the following features: (the following features may be included on any of the maps)

1. Stormwater conveyance system,
2. Paved areas and buildings,
3. Areas of pollutant contact, actual or potential,
4. Location of existing storm water structural control measures (i.e. berms, coverings, curb and gutter),
5. Location of any surface water,
6. Areas of existing and potential sediment erosion, and
7. Vehicle service areas.

Additional features such as treatment facilities; material loading, unloading, and access areas; landscaping and waste storage areas should be noted on the map.

A USGS topographic map will be included, extending beyond the property boundaries of the facility. The map should show (the following features may be included on any of the maps) the facility, surface water and, if possible, stormwater discharge points to either a municipal storm drain system or other water body.

Facility Operation

Descriptions of facility operations will include outdoor storage, manufacturing, loading and unloading areas, and processing activities

which discharge wastewater into the ocean or other surface water body.

Material Inventory

An inventory of various materials used or stored on a particular site (i.e. raw materials, intermediate products, waste) will be presented. The plot plan should show these materials: storage and handling locations. This will help in determining the potential pollution to storm water discussed later in this section.

Material Handling and Management Practices

Documentation of existing material handling and management practices include:

1. Methods of material handling loading/unloading and access areas,
2. Materials, equipment, and vehicle management practices employed to minimize contact of significant materials with storm water discharge,
3. Sediment and erosion prevention, identifying measures to limit erosion around the storm water drainage and discharge points,
4. Methods of on-site storage and disposal of significant materials, and
5. Outdoor storage, manufacturing, and processing activities including activities that generate significant quantities of dust or particulates.

The regulatory definition of significant materials is raw materials; fuels; materials such as solvents, detergents, and plastic pellets; finished materials such as metallic products; raw materials used in food processing or production; hazardous substances designated under Section 101(14) of CERCLA; any chemical the facility is required to report pursuant to Section 313 of Title 111 of SARA; fertilizers; pesticides; and waste products such as ashes, slag and sludge that have the potential to be released with storm water discharges.

Potential Pollution to Stormwater

A list of pollutants that have a reasonable potential to be present in storm water discharge in what are deemed "significant" quantities. The regulatory definition of significant quantities is "the volume, concentrations, or mass of a pollutant in stormwater discharge that can cause or threaten to cause pollution, contamination, or nuisance, adversely impact human health or the environment, and cause of contribute to a violation of any applicable water quality standards for the receiving water." Effluent limitations established in Sections 208 (b), 301, 302, 303(d), 304, 306, 307, and 403 of the Federal Clean Water Act (CWA), as amended, are applicable to stormwater discharges regulated by this permit.

Historical Spills or Leaks to Stormwater System

Any significant materials that have spilled or leaked in significant quantities in storm water discharge after November 19, 1988 will be discussed. Questions such as when, where and how the spill or leak occurred will be assessed. A list of significant spills or leaks of toxic or hazardous pollutants to storm water will be included.

Management Control

The SWPCP describes the storm water management controls appropriate for the facility. The Best Management Practices (BMPs) will reflect identified potential sources of pollutants at the facility.

Administrative Procedures

Administrative procedures addresses the topics of plan review, plan revision, reporting, and record keeping by the assigned management team. The SWPCP will include the designated person or assigned management team responsible for preparing the plan and assuring that the information included is complete as possible at that time.

The designated person or assigned management team will be responsible for the development, administration, and implementation of the SWPCP.

The SWPCP will be amended whenever there is a change in construction, operation, or maintenance that may affect the discharge of significant quantities of pollutants to surface water, ground waters, or the facility's storm drain system. The SWPCP will also be amended if it is in violation of any conditions of the NPDES permit, or has not achieved the general objectives of controlling pollutants in storm water discharges. Any amendments to the SWPCP will include the date of amendment on the front cover of the revision.

Prior to the implementation of the SWPCP, the management team will determine that all non-storm water discharges to any storm water conveyance system or body of water have been mitigated and/or eliminated.

2.2 FACILITY DESCRIPTION

2.2.1 FACILITY LOCATION

Honolulu Disposal Service owns the Facility that the original NGPC was been issued for. The main Facility including the office, shop, transfer station and parking is located at 1169 Mikole Street in the Sand Island Business Association Industrial Park (SIBA) approximately 1.45 miles west of downtown Honolulu (Map#1).

For the SWPCP, the Facility's adjacent locations include the following Tax Map Keys (TMK): 1-05-041:014, 037, 259, 280 and 281 (refer to Facility maps). Please note: the street addresses for: Lot 12 TMK 1-05-041:037 is 1169 Mikole Street; Lot 7 TMK 1-05-041:014 is 1071 Makepono St; Lot 8 TMK 1-05-041:259 is 1059 Makepono St.; Lot 9 TMK 1-5-041:280 is 1045 Makepono St. and for Lot 14 TMK 1-05-041:281 is 316 Kilua Pl.(Map#3 Site Map) The gates for the Makepono Street addresses are locked and rarely opened.

2.2.2 FACILITY SITE DESCRIPTION

The Facility's buildings and operations are all located on Sand Island within SIBA. The Facility's consists of a two-story office building, shop and a two-story Transfer Station (TMK: 1-05-041:037 or SIBA Lot

12), a Materials Recovery Facility (TMK: 1-05-041:014 or SIBA Lot 7), an automated truck wash and a steam sterilizer building (TMK: 1-05-041:281 or SIBA Lot 14) and trucking parking (TMK:1-05-041:280/SIBA Lot 9 & 1-05-041:259 / SIBA Lot 8). All of the properties are zoned 1-3, Waterfront Industrial District.

The vehicle repair shop, the Transfer Station, Material Recovery Facility, truck wash and steam sterilizer buildings have concrete floors with a steel siding and roofs. The yards that are not covered by a roof are paved with concrete or asphalt.

2.2.3 FACILITY OPERATION

Office and Shop

The shop maintenance area, approximately 90 ft. by 120 ft., has a concrete floor and a steel roof. The shop's concrete floor is slightly sloped towards the center of the shop area. All areas outside the shop are asphalted paved and graded, so that, any storm water drains away from the shop area.

Within this shop area, the equipment and truck long-term, i.e. more than one day, repairs and routine maintenance are conducted. It is standard operating procedures that any and all liquid spills associated with these repairs are contained and absorbent material is applied to any liquids to solidify the spill. After the liquid is absorbed, the material is then swept up and disposed of into trash bins that are emptied in the Transfer Station. In addition, the shop has spill collection kit(s) located in the facility that are labeled as spill kits. Each kit consists of 4 to 5 cubic feet of absorbent litter, to contain and clean up any liquid spills (up to 6 gallons).

The Office, shop and first floor Transfer Station restrooms are served by a City & County of Honolulu's sanitary sewer collection system and it's Sand Island Wastewater Treatment Plant (WWTP).

The Facility's storm water drainage system and the sanitary sewer system have no cross-connections within the Company's premises. The Surface Runoff from Industrial Activities entering the City's Storm Sewer System Form was submitted to City and County of Honolulu, Department of Environmental Services on January 4, 2006 and was signed off January 24, 2006 (copy in Forms).

Transfer Station

All incoming municipal solid wastes (MSW), which consist primarily of residential, commercial, construction and demolition debris (C&D) wastes, are unloaded on the Transfer Station's tipping floor for processing. The Transfer Station's tipping or MSW offloading floor is concrete with a steel roof. All storm water is diverted away from the tipping floor because the tipping floor is not at ground level but on the second floor of the building.

On the tipping floor, the C&D, which consists primarily of dry wastes, i.e. lumber, sheet rock, etc., are unloaded on the west side of the floor. If implemented, old corrugated cardboard can be sorted out from the C&D wastes and recycled. The remainder of the C&D is top loaded by

a wheel loader into transfer trailers for appropriate disposal at PVT Landfill.

The residential and commercial municipal solid wastes are unloaded on the mauka side of the tipping floor. Then, these wastes are top loaded into a TransPak Compactor manufactured by AmFab Resources (AmFab Compactor). The AmFab Compactor compacts the waste into a 24 to 25 ton load.

Then, the compressed load is ejected by the AmFab Compactor into a trailer that has been locked on to the ejection side of the AmFab Compactor. The MSW is then trucked to the C&C owned H-Power or Waimanalo Gulch Landfill facilities for appropriate disposal.

The AmFab Compactor is located on the first floor of the Transfer Station which is below the tipping floor to allow gravity loading of the MSW into the AmFab Compactor. This allows gravity loading of the transfer trailer and why the MSW and C&D unloading is done on the second floor of the Transfer Station. The AmFab Compactor is located on a concrete floor under the roof of the Transfer Station. As with the shop floor, the trailer loading and compactor area's floor is sloped to prevent any spills from draining outside of its area.

Transfer Trailer Temporary Staging Area

The facility's transfer trailers after loading with MSW or C&D materials are temporarily staged within a bermed areas to ensure any liquids contained in the MWS or C&D materials is contained to this area of staging and is prevented from flowing to the facility's storm drains and/or off-site curb and gutter. The temporary staging area is filled with crushed asphalt to absorb any liquids from the trailers. The berm in front of the trailer is raised up to hold back any liquids that may be dripping from the trailers. The asphalt berm is inspected quarterly to make sure that the berm height is high enough to retain any liquid in the Staging area.

Truck Wash Building

The truck wash is fully enclosed with steel siding and has a concrete floor. The sump for the wash building is connected to an oil/water separator. The oil/water separator is served by a City & County of Honolulu's sanitary sewer collection system and it's Sand Island Wastewater Treatment Plant (WWTP). The floor is sloped, so that, all wash water drains to the sump. All pre-wash activities is done on the mauka end of the building which drains into a trough that empties into the oil water separator. All truck wash activities are under roof.

The oil/water separator is checked and/or serviced as required by the C&C Permit and, as needed, pumped by a C&C permitted hauler. The oil/water separator is permitted by the C&C of Honolulu and inspected by C&C annually.

Steam Sterilizer Building

The steam sterilizer (autoclave) is located inside a building that is adjacent to the truck wash building. The sterilizer is inspected and permitted by the U.S. Department of Agriculture (USDA), Department of

Homeland Security, Customs and Border Patrol (CBP), the C&C of Honolulu and Department of Health-Solid and Hazardous Waste Branch (S&HWB).

The building is roofed with steel siding and a concrete floor. All waste is contained in 3 mil., zipped-tied plastic bags per USDA and CBP regulations and autoclaved to kill all pathogens. Any spills associated with this operation and per USDA and CBP regulations are disinfected and picked up with litter immediately. Then the litter is then bagged in 3 mil., zipped tied bags and autoclaved. After the bags are autoclaved, the trash is emptied into the Transfer Station for delivery to HPOWER. In addition, the only non-storm water associated with the sterilizer is water vapor.

Material Recovery Facility

Material Recovery Facility (MRF) is located on the mauka side of the Transfer Station under a roofed area. The MRF is an elevated sort line manufactured by Krause Engineering, Inc. for the Company. The Sort Line and its appurtenant operating equipment are fully contained within a pre-manufactured steel building with a concrete floor. The Sort line can be manned by up to twenty-six (26) personnel that will manually sort old corrugated cardboard; newsprint; HI-5 Program Deposit Beverage Containers (DBC's) and non-deposit aluminum, plastic, bi-steel, metal and glass containers via a positive sort procedure, i.e. manually removed by the sort personnel. The MRF accepts only recyclable materials delivered by Company's vehicles.

Given the fact that the Company only deliver recyclable materials it collects and no third-party materials are accepted, the non-deposit and DBC's have minimal liquids and therefore the MRF has no spills. Nonetheless, the personnel are required to contain and clean-up any spills per the same procedures as the Shop and Transfer Station.

Truck Parking

Lots 8 & 9 are used only for truck parking and no industrial activities take place on these parcels. Truck maintenance is performed at the adjacent truck shop. Because of the uses of these properties

2.2.4 FACILITY STORM WATER DRAINAGE SYSTEM

There are two separate storm drains for the different lots leased by Honolulu Disposal Service, Inc. Lots 7 & 12 drain into the Discharge location #1 (Map#1). Lot 14 drains into a separate storm drain that discharges at a different location in Honolulu Harbor Discharge location #2 (Map#1). Lot 8 is a large bowl-shaped property that retains all stormwater within the lot (Map#3).

Storm Discharge Location #1

Storm Drains within property

There are four storm drains on Lot 12 that located within Lot 12 that collect stormwater from Lots 7 and 12. The interior storm drains are connected by concrete piping and drain to a sewer hookup under Mikole Street. See Map #2 for the map of the stormwater lines and the direction of the stormwater flow.

The stormwater drain exits the lot at approximately Latitude N 21°18'15.249" and Longitude W 157°52'34.676".

Exterior Street Gutter

The stormwater from Lot 12 also exits the property through surface runoff off the driveways that enter the street gutter system on Mikole Street at approximately Latitude N 21°18'14.893" and Longitude W 157°52'33.605".

After the Exterior Street Gutter and Storm Drains within Lot 12 enters the storm drain, the flow enters a force main pumping system which pumps the storm water into Honolulu Harbor at approximately Latitude N 21°18'35.669" and Longitude W 157°52'30.657".

Storm Discharge Location #2

The stormwater discharge from Lot 14 enters a separate stormwater system. Stormwater from Lot# 14 runs out to the driveway entrance and enters the exterior concrete street gutter on Kilua Street at Latitude N 21° 18' 14.721" and Longitude W 157° 52' 30.968". After it enters the storm drain, the flow enters a force main pumping system which pumps the storm water into Honolulu Harbor at approximately Latitude N 21°18'13.683" and Longitude W 157°52'13.66". This storm water force main pumping system serves all the properties located within the Sand Island Business Association (SIBA). The storm water is discharged through a pair of submerged pipes, estimated 18-inch diameter, into Honolulu Harbor.

The shop, transfer station and its first floor storage areas have concrete floors and a steel columns and walls with a roof. Any long-term (more than one day) vehicle repairs and routine maintenance, unloading and loading of MSW are conducted under these roofs. Therefore, the potential of liquids from these respective activities contaminating the storm water flowing from the roof are significantly reduced.

In addition, the storage of any materials at the Shop or the first floors of the Transfer Station, except for those liquids stored in double-walled tanks, are on pallets on a concrete floor with a roof. The majority of the materials stored on the first floor of the Transfer Station are vehicle tires and parts. Again, the potential of liquids from this storage of materials contaminating the stormwater flowing from the roof are significantly reduced.

Short-term equipment diagnostic work or repairs are conducted on the perimeter of the shop due to the site's physical constraints and allow the mechanic close proximity to their tools. Repairs done at the perimeter of the shop either use drip pans or absorbent fabric specifically to prevent any liquids from contacting the floor or pavement. If spills/leaks are noted after the short-term work is completed and the equipment is moved, shop personnel are required to apply absorbent litter immediately to contain any liquid. Given the fact that it is time consuming effort and the mechanic may be required to work on another equipment, the Facility's Facility Yard Sweeper is notified to finish the cleanup of the absorbent material and dispose of the litter. Absorbent litter that is applied outside of the truck shop is to be picked up immediately or same day. Twice a day, the Facility Yard Sweeper is tasked with inspecting the entire facility, cleaning

the yard of debris and sweeping up the absorbent litter that is under the Truck shop roof and outside.

Vehicles and equipment that have the potential to leak fluids such as oil and grease are covered with plastic to prevent stormwater from contacting the vehicles and equipment.

2.3 MATERIAL HANDLING AT FACILITY

2.3.1 MATERIAL INVENTORY

Within the Facility's Shop, materials associated with the maintenance of the Company's collection vehicles are handled as required by best management practices or a specific materials' Material Safety Data Sheets (MSDS). All MSDSs for materials used in the shop are on file for use by the Company's employees (mechanics, drivers, etc.) at all times.

All used oils, which are drained during the maintenance or repair of the vehicles, are collected in containers designed to accomplish this removal. The used oils are collected in steel mesh reinforced 300 gallon totes secured on steel pallets. The totes have funnels to prevent spillage when emptying the used oil from the drip pans. If there is any liquid spill, absorbent litter is immediately applied to soak up the spill. The totes will be inspected and cleaned by the Facility Yard Cleaner on a weekly basis to wipe off any oily residue on the sides of the totes. These filled 300 gallons totes of used oil are then stored, up to twelve (12) to fifteen (15) of these totes at any one time, in the truck wash facility within a roof and concrete block walled building that drains to a C&C Industrial Wastewater Permitted oil/water separator. After passing through the oil/water separator the water goes to the C&C of Honolulu Sanitary sewage system. Therefore, no secondary containment is required when the used oil totes are stored in this building. The used oil totes are delivered to an affiliated company that is a DOH permitted used oil facility. The Company and the shop does not accept any used oils from any third party sources.

Within the Facility's Transfer Station, all incoming municipal solid wastes (MSW), which consist primarily of residential, commercial and construction and demolition (C&D) debris wastes, are unloaded on the Transfer Station's tipping floor for processing. All MSW and C&D waste unloading and the loading of the MSW and C&D wastes into transfer trailers is conducted on a concrete floor with a steel roof.

All stormwater is diverted away from the tipping floor because the tipping floor is not at ground level but on the second floor of the building.

On the Transfer Station's tipping floor, the C&D wastes, which consists primarily of dry wastes, are unloaded on the west side of the floor. Old corrugated cardboard can be sorted out from the C&D waste and recycled. The remainder of the C&D is top loaded by a wheel loader into transfer trailers for appropriate disposal at PVT Landfill.

The residential and commercial wastes are unloaded on the mauka side of the tipping floor. Then, these wastes are top loaded by a wheel loader into the AmFab Compactor. The AmFab Compactor compresses the waste into a 24 to 25 ton load. Then, the compressed load is ejected by the AmFab Compactor into a trailer that has been locked onto the ejection side of the AmFab Compactor. The MSW is then transferred to the C&C of Honolulu facilities, that is, H-Power or Waimanalo Gulch Landfill for proper disposal.

The AmFab Compactor is located below the tipping floor of the Transfer Station to allow gravity loading of the C&D or MSW. This is why the MSW and C&D unloading is done on the second floor of the Transfer Station. The AmFab Compactor is located on a concrete floor under the roof of the Transfer Station. Liquid from the compressing of the trash is retained under the roof by concrete berms that retain the liquids. The liquids are vacuumed up on a daily basis and emptied into the truck wash drain that passes through an oil/water separator before going into the sanitary sewage system.

Again as with the shop floor, the trailer loading, AmFab Compactor and storage areas' floors are sloped to prevent any spills from flowing outside of its area. Table I lists a typical yearly material inventory list that may be expected for any given year at the Facility. In addition, asphalt berms have been installed to prevent any incidental liquids encountered with the loading of the MSW into trailers, it prevented from flowing from the transfer station. And the temporary transfer trailer has asphalt berms to contain incidental leaks from the trailers. This berm area interior has dirt placed on pavement. If the dirt has become saturated with organic material as observed by the Facility Manager, the dirt is removed and disposed of and replaced. The exterior of the berms is inspected daily and any liquids or dirt outside of the berms is swept up or vacuumed up on a daily basis.

The sterilizer and truck washing operations enclosed in two adjacent buildings. For the sterilizer operations, all USDA/CBP regulated wastes, primarily food waste/paper based products, are contained in 3 mil, zip-tied plastic bags and handled within the building. Therefore, non-storm water spills rarely occur. If a plastic bag breaks it is handled the same way as all spills and with the additional step after cleanup and bagging, the spill and absorbent materials are autoclaved. For the wash water generated by the truck wash, the wash water drains to a sump within the building itself. The sump for the wash building is connected to an oil/water separator. The oil/water separator is served by a City & County of Honolulu's sanitary sewer collection system and it's Sand Island Wastewater Treatment Plant (WWTP). The floor is sloped inward, so that, all wash water drains to the sump.

The oil/water separator also handles any liquids generated by the sterilizer operations, which is primarily water vapor from steam condensing into water which in the sterilizer's collection sump. The truck wash operations have been reorganized to ensure that any truck prep prior to entering the truck wash is completed inside the truck wash only. Truck wash employees are educated on BMPs for the truck wash operations when they are hired and in the annual stormwater training.

The MRF and it's associated Sort Line and appurtenant operating equipment are fully contained under roof within a pre-manufactured steel

building with a concrete floor. The Sort Line personnel manually sort old corrugated cardboard; newsprint; HI-5 Program Deposit Beverage Containers (DBC's) and non-deposit aluminum, plastic, bi-steel, metal and glass containers via a positive sort procedure, i.e. manually removed by the sort personnel. The MRF accepts only recyclable materials delivered by Company's vehicles. Given the fact that the Company delivers its recyclable materials and no third-party materials are accepted, the non-deposit and DBC's have minimal liquids and therefore the MRF has no spills. Nonetheless, the personnel are required to contain and clean-up any spills per the same procedures are the shop and Transfer Station.

Equipment parts, such as, engines, rear ends, transmissions, etc. that are stored outside are wiped down to remove oil. Then, they are covered with plastic to prevent stormwater from contacting the parts. The stored equipment are placed on wooden pallets to detect leaks from the stored equipment and cleaned up.

2.3.2 MATERIAL HANDLING AND MANAGEMENT PRACTICES

The various lubricants and fluids associated with the operation and maintenance of various collection vehicles (front-end loaders, fork, roll-off and flatbed trucks, wheel loaders, etc.,) are stored under roof and inside the Facility's shop or first floor of the transfer station. These various lubricants or fluids are transferred by hand and/or via automatic closed-loop feed systems.

All hydraulic liquids and fuel (diesel and unleaded gas) are stored in above ground storage tanks with secondary containment. The fuel is delivered by automatic pumping systems to the fueling station island.

Fueling of movable equipment, including off highway vehicles, such as the wheel loader, is conducted on a paved area adjacent to the Facility's shop. Dispensing of fuels is performed in accordance with standard operating procedures established by Honolulu Disposal. This fueling station elevated dispensing island is surrounded by an hydrocarbon absorbent bio-sock that circles the entire fueling island. The bio-sock is checked during the quarterly inspection by the Facility Manager and changed as necessary.

It is the Company's standard operating procedure and best management practice that any and all liquid spills are immediately contained and absorbent material is applied to any liquids to solidify the spill. This material is then swept up and disposed of. In addition, the shop and fueling station has spill collection kit(s) and/or barrels of absorbent materials located throughout the Facility. The individual spill kits consists of absorbent litter to contain and clean up any liquid spills. There are a total of 4 spill kits as noted on the Site Map (Map#3)

To mitigate the potential of oils and particulates flowing out of the Facility's storm water drains, the Company installed fabricated grate inlet skimmer boxes that are a stand alone insert system that is placed inside the concrete storm water drain box itself. These boxes are made of stainless steel and heavy duty fiberglass. These boxes will also allow the installation of filtration socks, called bio-socks, on the insert's top perimeter and just below the bottom of the stormwater

drain's steel grate. The insert box will capture wind-blown debris and dirt and the bio-socks capture petroleum hydrocarbons flowing from its drainage area into the storm drain and then the storm water conveyance system. The bio-socks will require periodic replacement as determined during the inspections by the Facility Manager. At a minimum, the bio-socks will be changed on a quarterly basis.

In addition to the above items, the Company employs full-time personnel to collect wind-blown debris daily to clean the Facility's paved yards by manual or mechanical means, such as, a Tennant street sweeper. On a daily basis, the full-time Facility Yard Cleaner inspects the yard for any oil on the ground and will apply the absorbent litter and sweep up the litter. A pressure washer is also used to remove any oils that has soaked into the pavement. This pressure washer is equipped with a vacuum to recover the waste liquid from the ground.

Equipment parts, such as, engines, rear ends, transmissions, etc. stored outside that previously contained oil, will be emptied and cleaned of oils and grease before storage. In the event that the equipment has the potential to continue to leak oil or grease, a secondary containment such as a drip pan or hydrocarbon absorbent fabric will be used to capture any oils & grease. All stored parts will be covered with plastic to prevent stormwater from contacting the stored equipment.

2.3.3 POTENTIAL CONTAMINATION TO STORM WATER

In an effort to determine the potential sources of contamination to the storm water system, a review of material inventory lists, storage container types, material handling and storage practices, location of material handling operations and storm water flow patterns within the Facility is conducted annually.

It is the Company's standard operating procedure and best management practice that liquid spills are contained and absorbent material is applied to any liquids to solidify the spill. This material is then swept up and disposed of immediately or on the same day. Information detailing the potential areas of concern, potential problems, and type of potential pollutant found at the facility are summarized in Table 2.

Table 2 lists the Shop, Transfer Station and storage area on the first floor of the Transfer Station/Temporary staging of transfer trailers, the Materials Recovery Facility, the Truck Wash building, the Steam Sterilizer building, truck parking and stored parts located outside of the buildings as potential contamination sources. The following will detail the best management practices put in place for these areas.

SHOP

Within this shop area where all equipment and truck repairs are conducted, it is standard operating procedure that any and all liquid spills are contained and absorbent material is applied to any liquids to solidify the spill. This material is then swept up and disposed of immediately or the same day. All long-term equipment repairs and/or diagnostic work are conducted in the shop and all non-storm liquid spills are contained within the shop area and swept up. This procedure

significantly minimizes the potential for non-storm water liquids from contaminating the storm water.

Short-term equipment diagnostic work or repairs are conducted on the perimeter of the shop's floor and outside of the shop's roof line due to the site's physical constraints and to allow the mechanic close proximity to their tools. Drip pans and/or hydrocarbon absorbent fabric is placed on the ground to prevent the oils from contacting the ground. If spills/leaks are noted after the short-term work is completed and the equipment is moved, shop personnel are required to apply an absorbent material and then clean the material. Given the fact that is time consuming effort and the mechanic may be required to get to another equipment diagnostic or repair work, the Facility Yard Sweeper is notified to finish the cleanup of the absorbent material and dispose of the waste material before the end of the day.

The Truck Shop has spill kit(s) and barrels of absorbent material located within the facility. Each of the kit(s) consists of absorbent litter to contain and clean up any liquid spills. On a daily basis, the barrels of absorbent are replenished as needed by the Facility Yard Cleanup worker from the stored absorbent on a pallet in the first floor of the Transfer station.

TRANSFER STATION

The Transfer Station is entirely under a roofed building. At the Transfer Station, all MSW and C&D unloading and loading is accomplished on the second floor of the Transfer Station which is concrete. The AmFab Compactor is located on a concrete floor under the roof of the Transfer Station. For non-storm liquid spills, it is standard operating procedure for the spill to be contained, absorbent material applied and the absorbed material to be swept up and disposed.

Again as with the Shop floor, the trailer loading and AmFab Compactor areas' floor is sloped to prevent any spills from draining outside of its area. This sloping of the floors significantly minimizes the potential for non-storm water liquids from contaminating the storm water.

STORAGE AREA ON FIRST FLOOR OF TRANSFER STATION/TEMPORARY STAGING OF TRANSFER TRAILERS

The majority of the materials stored in this area are solid materials, such as, vehicle tires and parts and equipment. If required, parts are stored on pallets to detect any leaks of liquids and, if necessary, cleaned up. For non-storm liquid spills, it is standard operating procedure for the spill to be contained, absorbent material applied and the absorbed material to be swept up and disposed. Also, long-term repairs of the transfer trailers and trucks that required fabrication work are conducted here. Spill kit(s) consists of absorbent litter to contain and clean up any liquid spills and barrels of absorbent materials. The barrels are replenished as needed from the stored absorbent (40 lb. bags) at this location.

Again as with the shop's floor, the storage area's floor is sloped to

prevent any spills from draining outside of its area. This inward slope of the floor significantly minimizes the potential for non-storm water liquids from contaminating the storm water. In addition, a floor drain is located in this area and drains to the sump that collects flow for within the shop too. This sump does not collect storm water and the non-storm waste is pumped and disposed per the facility's C&C of Industrial Wastewater Hauler's Permit.

The facility's transfer trailers after loading with MSW or C&D materials are temporarily staged within a bermed areas to ensure any liquids contained in the MSW or C&D materials is contained to this area of staging and is prevented from flowing to the facility's storm drains and/or off-site curb and gutter. The berms are constructed of crushed asphalt. The berms are inspected by the Facility Manager as noted on the site inspection checklist to ensure that it is able to hold back the liquids from the trailer and if it is necessary to replace the asphalt and dirt behind the berms.

In the event that there are any observed liquids outside of the berms, the liquid is to be power washed and vacuumed up to suck up any liquids on the ground. The liquid is to be picked up immediately or no later than same day to prevent it from entering the stormwater system. Alternatively, spill kits are available to pick up small quantities of liquids that have spilled outside of the berms.

As trailers are replaced, the new trailers are purchased with leakproof seals that retain the liquids in the container instead of dropping it on the ground.

MATERIAL RECOVERY FACILITY

The MRF accepts and sorts only recyclable materials collected by the Company's trucks. The majority of the materials are solid, such as old corrugated cardboard, paper, metal, etc. A small portion of the incoming materials are HI-5 DBCs and non-deposit aluminum, plastic, steel and glass containers that have incidental amounts of liquids. For non-storm liquid spills that may occur with the offloading of these containers, is primarily asborbed by the fiber materials and then sorted and recycled. In addition, the off-loading and sorting is completely contained within the building that has steel sheeted walls and roof.

TRUCK WASH AND STERILIZER BUILDINGS

Both of these buildings have a concrete floors and the operations are under roof. The sterilizer has a steel walls and roof. The truck wash has concrete block walls with a steel roof. The truck wash's oil/water separator handles non-storm water generated by both operations and it has a C&C of Honolulu Industrial Wastewater Permit. The liquids generated by the operations are contained by a interior sloped floor (truck wash) or a sump (sterilizer) and therefore, storm water are miniumal or no path to flow into or out of the buildings. In addition, the sterilizer has spill kit(s)and bags of absorbent materials that service both buildings.

TRUCK PARKING

Trucks are temporarily parked overnight on all four (4) parcels and every truck shall have a spill kit that can contain incidental equipment leaks when operating are the roadways or parked. The vehicles' assigned driver is the first line of responsibility to ensure each vehicle spill is noted and cleaned up. Drivers are required to perform a pre-check to determine if anything is wrong with the vehicle which includes leaking fluids before driving the vehicle. If anything is leaking from the vehicle, it is reported on the vehicle condition form and they are to inform their supervisor and/or shop personnel when needed. Temporary drip pans may also be required to capture any dripping liquids until the leak can be repaired. If the stormwater can contact the drip pan, the truck cab shall be covered with plastic sheeting material.

Facility personnel have access to barrels of absorbent located throughout the facility to contain and solidify equipment/truck leaks. In addition, the facility has a pressure washer with rinseate water recovery to clean the parking areas when the Facility Maintenance Manager deems it is necessary for more than just sweeping to clean these parking areas. The Yard Equipment Operator is trained on how to properly use the pressure washer and vacuum system. All the rinseate is to be vacuumed up before it has the potential to escape into the drains or exit the property. The rinseate water is emptied into the Truck wash drain which runs through an oil-water separator before entering the Sanitary sewage system.

STORED PARTS

Equipment parts, such as, engines, rear ends, transmissions, etc. that are stored outside are drained of all fluids into drip pans. Care is to be taken to prevent any drained fluids from contacting the ground by using absorbent cloth underneath the drip pans. The parts are wiped down and covered with plastic. The best management practice for parts stored outside is cover the parts with plastic sheeting material. Then, placed on pallets to ensure that stormwater on the ground does not come in contact with the truck parts. Damaged trucks waiting to be repaired are inspected by the mechanics to assure that there are no fluid leaks then covered in plastic.

OVERALL FACILITY BEST MANAGEMENT PRACTICE

In addition to the above items, the Company employs full-time personnel that are specifically tasked with cleaning the yard on a full-time basis. The Facility Yard Sweeper uses a mechanical Tennant street sweeper everyday to collect wind-blown debris and tracked dirt. The Facility Yard Sweeper will then manually pick up any debris that the mechanical sweeper is unable to reach. The second full-time employee is the Facility Equipment operator that utilizes a steam pressure washer with a vacuum to clean any stained areas throughout the yard. The vacuumed wastewater is emptied into the truck wash trough that passes through an oil-water separator before draining into the sanitary sewer system.

2.3.4 HISTORICAL SPILLS OR LEAKS TO STORM WATER SYSTEM

There is no history of any reported major spills or leaks entering the storm water system at the Facility.

2.4 MANAGEMENT CONTROL

2.4.1 GENERAL BEST MANAGEMENT PRACTICES (BMPs)

By utilizing best management techniques and practices, it is possible to improve and minimize those identified potential sources of pollutants and prevent the number of spills/releases to the storm water system. A general list of management control practices consisting of non-structural control measures and structural control measures has been generated.

A description of each of type of potential best management practices (BMPs) in general follows:

NON-STRUCTURAL CONTROL MEASURES

Employee Training (ET)

Employee training programs are to provide the employee an understanding of the processes and materials, the health and safety hazards, the practices for preventing spills and the procedures for responding properly and rapidly to spills. The important aspects of this control measure include the following:

1. Training and refresher sessions are held at appropriate intervals to assure adequate understanding of training goals and objectives. At a minimum, the training will be done annually for employees working in the Truck Shop, Transfer Station and Yard. Depending of the department assigned to, new employees will be trained within one month of employment.
2. Making employees working in the Truck Shop, Transfer Station and Yard aware of proper procedures on material handling, equipment handling, equipment operation, visual inspection, preventative maintenance, and good housekeeping.
3. Making employees aware of the concept of separation of non-storm water and storm water.
4. Discussion of how potential releases may occur.
5. Adequate training in noting reporting procedures of observed leaks on site and spill cleanup measures. Leaks to be reported to the Facility Manager who will document the leak or spill and resolution of the problem.

Visual Inspection (VI)

Visual inspection consists of inspecting the Facility's daily activities, observing operation, maintenance and housekeeping practices to detect variances from procedures, releases or evidence of potential releases. The Facility Manager to perform a daily walkthrough of the facility to determine if any spills have occurred that are required to be cleaned up and correct any improper procedures. The Facility Manager to perform a complete inspection of the facility and procedures on a quarterly basis and document the inspection on the Quarterly

Inspection report form.

It is the Company's standard operating procedure and best management practice that any and all liquid spills are contained and absorbent material is applied to any liquids to solidify the spill. The person that discovers the spill is to immediately apply absorbent litter onto the liquid. This material is then swept up by the Facility Yard Sweeper Worker immediately or no later than the end of the day and disposed of in the trash. In addition, the shop has spill collection kit(s) located within the facility. Each of the kits consists of absorbent litter to contain and clean up liquid spills of up to six (6) gallons. There are barrels of absorbent materials staged in the shop for containing spills and/or leaks as noted in the Site Map. The Facility Cleanup Worker is responsible for checking the Spill kits on a daily basis to make sure that the Spill Kits are refilled.

Preventative Maintenance (PM)

Preventative maintenance involves examination of mechanical equipment systems to identify issues that could cause equipment breakdowns and correction of those conditions by adjustment, repair, or replacement of worn parts before the equipment or systems fail. A preventative maintenance program shall include the following elements:

1. Identification of equipment and systems that have the potential of non-storm water spills.
2. The trucks are inspected daily by the drivers who fill out a vehicle condition report if the truck is leaking any fluids. The vehicle condition report is provided to the mechanics that are tasked with repairing any leaks. The yard equipment is inspected for any leaks by the operator on a daily basis. Any leaks are communicated to the mechanics for repair. If the leak cannot be repaired immediately, a drip container is used to prevent any liquids from contacting the ground.
3. Appropriate adjustment, repair, or replacement of parts as necessary. Recheck hydraulic lines for deterioration that requires replacement

Good Housekeeping (GH)

Good housekeeping is essentially the maintenance of a clean and orderly work environment. A clean and orderly work area reduces the possibility of accidental spills caused by mishandling of equipment and should reduce safety hazards to personnel. Examples of good housekeeping include:

1. Neat and orderly storage of chemicals in proper manner and area. Oils and chemicals shall be stored in impermeable containers and stored under roof to prevent contact with storm water.
2. Diesel and gasoline pumping station shall be encircled with hydrocarbon absorbent booms to prevent accidental spills from the pumping station.

3. Cleanup and removal of spills.
3. Regular wind-blown debris pickup.
4. Maintenance of floors by use of brooms, vacuums, power wash down. Waste water to be vacuumed up and drained into the truck wash drain that empties into the sanitary sewer.
5. Provisions for storage or removal of container cleanups.
6. Immediate cleanup of liquids and solids on the ground to prevent contact with storm water.

Preventative Practices (PP)

Preventative practices involve close control of Facility operations and equipment to prevent spills of liquids or fuels from their primary and secondary containment. For example, Liquids are stored under roof and shall be located in an area that is away from vehicle and foot traffic. Unused Oils are stored in double walled containers to contain leaks from the inner container. Used oil is stored in the Truck Wash building with a slope grade that will drain to the truck wash drain. Fuel islands are encircled with hydrocarbon absorbent socks.

Labeling (PP1)

Labeling includes general labeling and warning signs per applicable MSDS. General labeling refers to marking such items as containers, tanks and equipment to inform personnel of particular liquid being stored or handled and the potential hazards involved per specific materials' MSDS. Spill kits are labeled for quick identification.

Vehicle Positioning (PP2)

Vehicle positioning is the practice of properly locating the loading and unloading vehicle so that it is stable and cannot be moved during transfer operations. Wheel chocks can also be used to prevent truck movement. All operations of the trucks emptying their load and loading the transfer trailers are done under the Transfer Station roof and any debris dropped is swept up and discarded on a daily basis.

Mitigation Cleanup (MC)

Once a spill is contained, the material has to be cleaned up and proper disposal by the Facility Yard Sweeper worker to prevent the release to storm water. Mitigation cleanup measures include the practices used to physically, mechanically, or chemically remove a spilled material. They can be applied separately or jointly.

Physical (MCI)

Physical methods for cleanup of spills include the application of absorbents and cleanup with of brooms and/or shovels.

Mechanical (MC2)

Mechanical methods for removing of spills/leaks in a concrete containment area include the use of steam pressure washers or vacuum trucks, and pumping could include pumping to a storage vessel or tank.

Chemical (MC3)

Chemical cleanup of spills/leaks can be accomplished with the use of various absorbents and/or stabilization chemicals. Absorbents are compounds that remove materials by surface adsorption, or absorption in the absorbent bulk. Spill kit(s) are placed within the facility to assist with the cleanup of potential releases(See Site Map). Steam Pressure washer used to cleanup oil stains that utilize heat and high pressure to remove the oils. Waste Water from the cleanup is vacuumed up and emptied into the Truck Wash Oil/Waste Separator that drains to the City & County of Honolulu Sanitary Sewer system.

STRUCTURAL CONTROL MEASURES

Preventive Covering (PC)

Preventive covering comprises the physical enclosure of material, equipment, or the facility's operations. Covering is applicable to storage areas. Covering such as impermeable plastic tarp can be used to cover outdoor storage of materials to prevent windblown and runoff contamination. The Facility does not store liquids outside of the Shop or Transfer station. The Facility Cleanup worker to check for any liquids that may have been left outside during his daily cleanup.

Roof Structure/Tarp (PC 1)

Trash containers shall have lids closed to prevent storm water from contacting the trash in the can and leaking out.

Building Structure (PC2)

Total enclosure, pre-engineered, steel or concrete structures are used to meet security and weather requirements for specific site conditions. Such as, the Facility's Shop and Transfer Station.

Substance Containment (SC)

Substance containment measures are used to physically contain or capture a release of solid or liquid material. These containment measures prevent the release of material from the primary containers to reach the receiving water. Containment will prevent both run-on and runoff.

Secondary Containment (SC 1)

Secondary containment is the physical confinement of material at its original location. Secondary containment is accomplished by physical structures or by collection equipment such as a berm area or drip pan to contain material after it has been released from its original container. Secondary containment alternatives include dikes, berms, curbs, depressed areas, storage basins, sumps, drip pans, or double-walled tanks.

Flow Diversion (SC2)

Flow diversion is used to divert a flow or discharge from its original location to containment or treatment facilities, usually at another location. Diversion systems include trenches, drains, graded pavements, overflow structures, sewers, and culverts.

Dust Control (SC3)

Dust control is the collection and/or containment of particulates (dust, dirt, etc.) to prevent its release to the receiving water.

Mitigation Treatment (MT)

Treatment is a method of mitigation to reduce the potential impact of a material on the water quality, to pretreat a material before ultimate disposal, or to separate valuable materials for recovery. In order to apply treatment practices to a spilled material, the material first has to be collected and analyzed. Materials to be treated could include liquid materials collected in secondary-containment facilities, and contaminated storm water collected in diked areas or storm sewers.

Drainage System Improvement (DS)

By improving the drainage pattern at the site, possible pollutant contamination with storm water can be reduced. Improving the existing drainage system can be accomplished by regrading or repaving the surface, or diverting the existing storm drain system using curbs, berms, etc.

Ultimate Disposal (UD)

Ultimate disposal measures are either associated with final disposal of potentially contaminated storm water after proper treatment or pretreatment is made, or associated with final disposal of non-contaminated storm water runoff. Disposal alternatives suitable for point sources include discharge to a receiving water, and discharge to the sanitary sewer system.

Discharge to a Receiving Water (UD1)

Discharge of potentially contaminated storm water to receiving water may be a feasible alternative with proper analysis or treatment, depending upon the water quality impact and the terms and conditions specified in the NPDES discharge permit. Disposal of potentially contaminated storm water to receiving water would require treatment to levels consistent with applicable effluent limitations. This disposal alternative also applies to other sites where the storm water runoff is without any potential contamination.

Sanitary Sewer System (UD2)

Discharge to the sanitary sewer system would depend on the compatibility of the material with the system.

2.4.2 CURRENT AND SUGGESTED Best Management Practices (BMPs)

The Facility's operation and taking into consideration short and long-term costs, level of potential risk, and maintenance upkeep; a list of BMPs to reduce the risk of a contamination at the Facility was generated. Table 3 summarizes both current and suggested BMPs for each potential area at the Facility. Table 4 gives descriptions of the BMPs selected for each potential pollutant area within the Facility.

The following describes the best management practices for each material listed in Table 1:

Motor and lubricating Oils

Motor and lubricating oils are pumped by the bulk delivery vehicle operated by a licensed hauler into three (3) 55-gallon aboveground steel containers with secondary containment, which is accomplished by a double-walled tank. If any spills occur during the transfer of the bulk delivery or the transfer to a vehicle during maintenance or repair work, it is the Company's standard operating procedure and best management practice that the spill is immediately contained and absorbent material is applied to any liquid to solidify the spill. This material is then swept up and disposed of by the Facility Yard Sweeper worker before the end of the day. Oil changes are performed with drip pans under the Shop roof that has floor drains that collect into a sump. Should the sump become full, the liquid is either dried out with absorbent material and dumped as trash or delivered by truck to the City and County sanitary sewer system. Oil absorbent fabric is used when infrequently repairing trucks that are not under roof.

In addition, the shop has spill collection kit(s) filled with absorbent litter located at critical areas in the Facility (See Site Map).

Used oil

All used oils, which are drained from the Company vehicles only during preventive maintenance work, are collected in containers designed to accomplish this removal, such as drip pans. The used oils are then collected in steel mesh reinforced 300-gallon totes secured on steel pallets. The used oil is temporarily staged inside the Truck Wash Building and then transferred to a licensed used oil facility for reuse. The Shop does not accept any used oils from any non-Company sources. Once emptied, the bins are covered and wiped down so they do not become a potential source of pollutants.

If any spills occur during the transfer of the used oil, it is the Company's standard operating procedure and best management practice that the spill is immediately contained and absorbent material is applied to any liquid to solidify the spill. This material is then swept up and disposed of by the Facility Yard Sweeper worker before the end of the day. In addition, the shop has spill collection kit(s) and barrels of absorbent material located in the Facility (See Site Map).

Diesel Fuel and Unleaded Gas

Diesel and unleaded gas is delivery in bulk by a permitted wholesale hauler. These liquids are transferred by approved transfer methods into two (one for diesel and one for that holds diesel and unleaded gas) 6,000 gallons above ground concrete storage tanks with secondary containment, which is accomplished by a double-walled tank and is manufactured by ConVault™.

If any spills occur during the transfer of the bulk delivery, it is the Company's standard operating procedure and best management practice that the spill is immediately contained and absorbent material is applied to any liquid to solidify the spill. This material is then swept up and disposed of. There is a spill kit(s) located on the fuel island for immediate application by the driver in the event of a fuel spill.

The fuel pumps shut off if the handle is not squeezed to prevent fuel from continuing to dispense if the operator is not at the pump. The fuel nozzles will automatically shut off when the tank is full. Hydrocarbon absorbent socks encircle the fueling dispensers as a secondary containment of small spills.

Parts Cleaning

The Company utilizes a non-petroleum based parts cleaner which is contained in an enclosed recycle system. This enclosed system is a Dyna*Seal parts washers sold by ZEP Manufacturing, which conforms to Federal and Hawaii regulations. When the solvent becomes dirty, the used fluid is disposed of with the used oil which is processed by Pacific Biodiesel Company. These washers are located on a concrete floor within the Shop so if they were to ever experience a leak, it would be retained by the internal truck sump under roof which is periodically pumped out and either emptied into the truck wash drain that goes to C&C Sanitary sewer or delivered to C&C Sewage treatment facilities.

Trash Bin Deodorizers

The deodorizer liquid is a non-petroleum based disinfectant and deodorizer for refuse bins. The deodorizing liquid, such as pine oil, is contained in 300-gallon steel reinforced steel mesh totes secured on a pallet. Because this liquid is non-petroleum based disinfectant, it is not required to have secondary containment. If the disinfectant tote were to leak, it would be retained within the internal truck sump under roof.

MSW and C&D unloading and loading into transfer trailers

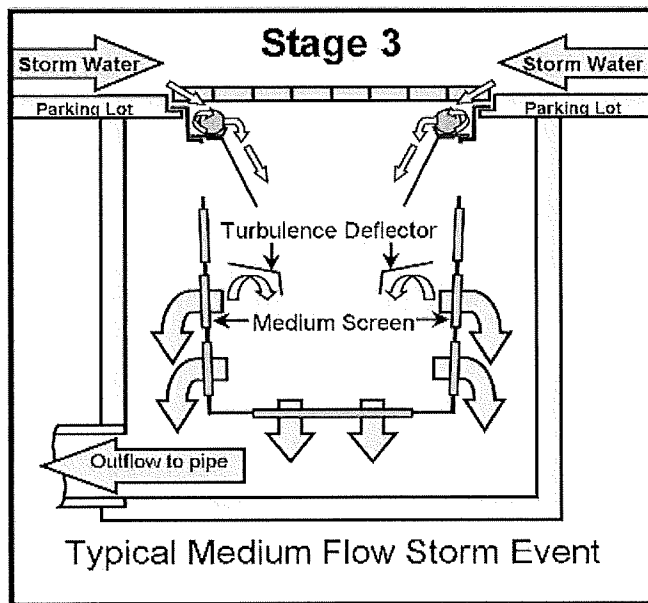
The unloading or receipt of MSW or C&D materials are done on concrete within the roofed building and the temporary staging of the loaded transfer trailers are within a bermed pad that has dirt placed on asphalt to contain any liquids from the trailers within the berms. Also purchasing leak-proof trailers whenever feasible to keep the liquids contained within the trailer in the temporary staging area.

Storm water Drains

The storm water drains have been fitted with a containment system that retains scum, floating debris, and hydrocarbons. To mitigate the potential of oils and particulates flowing out of the Facility's storm water drains, the Company installed fabricated grate inlet skimmer boxes that are a stand alone insert system that is placed inside the concrete storm water drain box itself. These boxes are made of stainless steel and heavy duty fiberglass. These boxes will also allow the installation of filtration socks, called bio-socks, on the insert's top perimeter and just below the bottom of the stormwater drain's steel grate. The insert box will contain wind-blown debris and dirt and the bio-socks contain petroleum hydrocarbons flowing from its drainage area into the storm drain and then the storm water conveyance system. The bio-socks will require periodic replacement as determined by the assigned management team. The manufacturer does not have any timetables on replacing the sock because each user has different environment factors. However, if the sock is dirty, damaged or saturated, it shall be replaced as deemed necessary by the Facility Manager. At a minimum the bio-socks will be replaced and the filter box cleaned out every quarter. Such replacements shall be documented in the Filter Sock Inspection and Replacement Log as listed under the Forms section.

Figure 1

Skimmer Box Diagram



Manufacturer: Bio Clean Environmental Services
 Product: Grate Inlet Skimmer Box
 Dimensions-18" x 24"
 Material: Stainless Steel and Fiberglass
 Filter Material: BioSorb hydrocarbon boom

Manufacturer's Recommendations
 Inspection Interval: 6 months
 Replacement Required: When Black
 Empty Screens: When 50% full

Sampling location is after absorbent bio-sock

2.5 ADMINISTRATIVE PROCEDURES

To track facility changes, the BMPs, record keeping, and reporting requirements, an administrative system has been implemented by the assigned management team or members. Administrative procedures include: SWPCP review, SWPCP revision, reporting, and record keeping (i.e. personnel training, inspections, significant spills, follow-up responses).

2.5.1 RESPONSIBLE PARTIES

The assigned management team or member(s) will be identified for the preparation of the SWPCP, revision and/or Plan Update Form. The assigned management team or member(s) will maintain the necessary records associated with the SWPCP and monitoring program. Periodic inspections of the facility operations and monitoring program will be conducted to ensure the implementation of the SWPCP.

Storm water Team

Compliance Administrator - Harold Yamada
Assure overall compliance paperwork and sampling is done in accordance with the SWPCP. Maintain compliance record keeping. Modify SWPCP procedures as deemed necessary. Follow up on spill reporting.

Facility Manager - Ray Luavasa
On a daily basis, walk the yard and determine the priority of areas to be cleaned. Ensure that BMPs are being performed every day. Perform a quarterly inspection and complete the Site Inspection report.

Facility Yard Sweeper Worker- Lucy Medeiros
On a daily basis, utilize a Tennant mechanical sweeper to clean the entire yard of debris and absorbent litter. Manual sweeping is also required for areas that the mechanical sweeper cannot reach.

Facility Cleanup Worker - Tai Vaeluaga
Clean up the yard with the Steam Pressure washer. Refill the Spill Kits on a daily basis

2.5.2 PLAN REVIEW

The SWPCP and Monitoring Program shall be reviewed as needed or as conditions indicate. The assigned management team or member(s) will be revised and updated the SWPCP as condition dictate. Examples of such changes are as follows:

1. Changes in materials used on site.
2. Changes in the materials handling procedures.
3. Changes in management practices.

The plan review process will be noted using the Plan Review Form and

submitted to the Compliance Administrator. The plan shall be reviewed annually by the Compliance Administrator to make sure the plan addresses the potential storm water issues at the Facility.

The form Site Inspection for General Industrial Activities shall be used during each inspection is included in the Forms section. After each inspection, the completed checklist will be dated and signed by the Facility Manager and placed with the SWPCP in use. This checklist will be utilized for tracking and determining follow-up procedures used to ensure appropriate response to an inspection. Based on the results of the Site Inspection, the SWPCP will be revised accordingly. A NO may also be required based on the necessary revisions.

2.5.3 PLAN REVISION

The SWPCP may be amended whenever there is a change in operation or maintenance activities, which may affect the potential discharge of pollutants to surface water, ground waters or the storm water drain system. In the event that a revision of the SWPCP is required, at minimum the following procedures, based on changes in the activity, will be implemented as soon as practicable:

1. Changes in materials used on site:
 - a. The material inventory will be updated for all affected operations.
 - b. The table of potential pollution to storm water will be updated.
 - c. Material handling procedures will be changed if needed.
 - d. BMPs will be updated if necessary.
2. Changes in the materials handling procedures.
 - a. The table of potential pollution to storm water will be updated if necessary.
 - b. Material handling procedures will be changed.
 - c. BMPs will be updated if necessary.
3. Response to specific problems anticipated while conducting the daily operations at the Facility (e.g., spills).
 - a. The table of potential contamination to storm water will be updated if necessary.
 - b. Material handling procedures will be changed if needed.
 - c. BMPs and spill prevention plans will be updated if necessary.
4. Modification of Monitoring Program due to changes in regulatory requirements.
 - a. Modifications of the monitoring plan to meet the new requirements.
 - b. Additional training measures will be assessed, if necessary.

In the event of any revision to the SWPCP, a Plan Revision Form will be filled out and given to the designated management team and/or member(s).

2.5.4 REPORTING

The following is a list of actions that require a report and/or report

form to be submitted to the Clean Water Branch. These forms will be filled out by the Compliance Administrator.

1. Any revision to the SWPCP.
2. Revision to the NOI.
3. Discharge Monitoring report along with sample data
4. Notification of sample exceedance of effluent levels
5. Discharges in violation of permit requirements.

2.5.5 RECORD KEEPING

Records will be kept of all significant storm water discharges from the property, samples testing data, in-house quarterly inspections, follow-up responses to these inspections, and any significant changes in on-site activities. These records will be maintained on-site. A copy of the Facility's Storm Water Prevention Control Plan (SWPCP) will also be kept on-site in an accessible area. All completed forms will be kept with the SWPCP.

Because the CWB may be conducting facility inspections to verify that all elements of the SWPCP, the Compliance Administrator and Facility Manager will have available documents, reports and forms as required by the SWPCP.

MONITORING
RECORD KEEPING
SECTION 3

SECTION 3

MONITORING PROGRAM & RECORD KEEPING

3.1 INTRODUCTION

This storm water monitoring program is developed in accordance with the requirements of the Hawaii State Department of Health, Clean Waters Branch (CWB) and the Notice of General Permit Coverage for NPDES for Storm Water Discharges Associated with Industrial Activities. The purpose of the storm water monitoring program is to:

1. Monitor the quality of storm water discharges relative to discharge prohibitions and effluent limitations for Salt water.
2. Aid in the implementation of the Storm Water Pollution Control Plan (SWPCP).
3. Determine the Best Management Practices (BMPs) in removing pollutants in storm water discharge.
4. Ensure appropriate employees are trained and instructed to visually monitor storm water discharge at the facility for pollution and report to supervisors any problems noted.

3.2 SITE INSPECTIONS

3.2.1 SITE INSPECTIONS

An annual site inspection will be conducted by the Facility Manager and Compliance Administrator and it will be documented by the Annual Site Inspection Form. The Facility Manager will conduct this inspection with the respective employees in their areas. The inspection of the facility's operating areas, will use a checklist of BMPs to denote if they are in place, if there are any issues noted and as needed, the applied resolution. These checklists will be kept with the SWPCP. Unless a change of the BMPs are in order than a copy will be provided to the employee(s) within their respective area of operation for revision and implementation.

A quarterly site inspection will be performed by the Facility Manager documented by a Quarterly Site Inspection checklist in the Forms section to check for items that cannot wait for an annual inspection. This will include checking on absorbent bio-socks to be changed and rechecking the berms to make sure they are high enough to retain any liquids from the trailers.

3.3 CHECKING ON NEW BMPs IMPLEMENTATION

Upon completion of the annual and quarterly inspections, the Facility Manager will consider how well the BMPs are working and compliance with the SWPCP.

3.4 MONITORING OF STORM WATER

Samples shall be taken no less than annually during a representative storm event exceeding .1 inches of rainfall.

The Compliance Administrator or Facility Manager shall be specifically trained by a third party firm to collect representative storm water samples at the facility. The Compliance Administrator or Facility Manager will ensure the "chain of custody" is not compromised and deliver the samples to an independent testing laboratory. The samples will be tested for contaminants specified in the "Notice of Intent" (NOI) of any suspected new contaminants. Analytical results will be sent to DOH per existing permit and SWPCP requirements and kept on file with the SWPCP.

The sample data will be submitted on a Discharge Monitoring Report (DMR) via the CWB website. The first sample will be submitted 30 days after taking the sample. If no exceedances from a complete and representative storm water event, then 60 days after the sample is taken in subsequent years. If no sample is taken during the year, submit the document by 60 days after year end. Sample data shall include the laboratory reports along with the effluent limitation for each parameter.

If the sample event results in effluent levels that have been exceeded, subsequent qualifying rain events are to be sampled for the specific parameters that have been exceeded.

Sampling Locations

The following are the Sampling locations along with descriptions of the nearby activities that drain into each respective outgoing storm drain or driveway:

Sample #1 - Drain #1A (Map#3 Site Map)

Latitude N 21° 18' 17.221" and Longitude W 157° 52' 34.208"

There are four storm drains within Lot 12 that are linked together by underground concrete pipes to a junction box under Drain# 1A. The stormwater exits the junction box via an underground pipe for the remainder of the flow until it hooks up with the main storm pipe under Mikole street. Drain# 1A junction box is the last location where a sample can be pulled before it exits the property and enters the stormwater drainage system on Mikole Street.

- The storm water sample will be taken with a container lowered into the junction box into Drain# 1A. This junction box is a consolidation of Drain#1A, 1B, 1C and 1D. The following are the activities that are performed nearby each drain.
 - o Drain 1A - Employee and truck parking, Fuel pumping station, Nearby the truck shop where the oils are stored under roof.
 - o Drain 1B - Trailer temporary storage area
 - o Drain 1C - Nearby tire shop and storage of cleaned parts covered with plastic on pallets
 - o Drain 1D - Truck parking and nearby tire shop and Northeast corner of the Truck shop.

Sample #2 - Southwest Driveway Runoff

Latitude N 21° 18' 15.243" and Longitude W 157° 52' 34.512"

The storm water flows into the concrete street gutter that enters the stormwater drainage system on Mikole Street. The storm water is from the rain water draining down through roof gutters from the Southwest side of the Truck shop and Office buildings. There is also employee parking and is nearby the Southwest corner of the Truck shop.

Sample #3 - Southeast Driveway Runoff

Latitude N 21° 18' 14.842" and Longitude W 157° 52' 32.827"

The storm water flows into the concrete street gutter that enters the stormwater drainage system on Mikole Street. The storm water is from the rain water draining down through roof gutters from the Southeast side of the Truck shop and Office buildings. There is employee parking and is nearby the Southeast corner of the Truck Shop. It also receives storm water from the nearby the truck scale and the entry ramp to the Transfer Station.

Sample #4 - Kilua Place Driveway Runoff

Latitude N 21° 18' 15.746" and Longitude W 157° 52' 30.795"

The storm water flows into the concrete street gutter that enters the storm water drainage system on Kilua Street. The storm water is from the rain water draining off the roof of the Steam Sterilizer building and from the gutters off the Truck wash building. The Truck wash is completely under roof and the interior drains empty into the oil/water separator and ultimately into the C&C of Honolulu sanitary sewer. There is truck parking on the property and it is the storage yard for the empty foreign garbage containers.

3.5 RECORD KEEPING

The Compliance Administrator will be assigned to maintain any and all records and make them available to any CWB for review and audit. The following documents are to be kept at the Facility:

- a. The Storm Water Pollution Control Plan (SWPCP).
- b. Noted revisions to the SWPCP.
- c. Assigned management team and/or members.
- d. Any notes and revision form.
- e. Plan Reviews.
- f. Plan Revision.
- g. Annual and Quarterly Site Inspection Reports.
- h. Discharge Monitoring Reports.
- i. If representative samples are collected, the storm water samples results enclosed with Item h.

3.6 REPORTING

The purpose of the monitoring program is to evaluate the effectiveness of the BMPs, the implementation the SWPCP elements, and to monitor the

effluent quality. Records and reporting of the monitoring program will also provide documentation for compliance with the Notice of General Permit Coverage (NGPC).

If effluent levels have been exceeded, a verbal notification to CWB(808-586-4309) will be made by the Compliance Administrator or Facility Manager within 5 days of discovering that effluent levels have been exceeded. A written report shall also be submitted through the CWB E-permitting portal(www.eha-cloud.doh.hawaii.gov) within 5 days of discovering such exceedance. A DMR will be submitted through the E-permitting portal along with the laboratory reports within 30 days of receiving the laboratory report. Corrective actions will be noted to reduce future exceedances.

3.6.1 ANNUAL REPORT

The annual report for the storm water monitoring program will include:

- a. DMR report with all parameters, units and effluent limitations
- b. Storm water samples laboratory results
- c. Exceedances noted and BMPs to correct.
- d. Chain of Custody report
- e. If applicable, Revisions for SWPCP.

Corrective action will be noted and additional samples to be taken when effluent levels have been exceeded.

3.7 STORM WATER MONITORING PLAN

The purpose of this monitoring plan is to describe the collection and documentation of storm water samples and ensure quality assurance and quality control (QA/QC). The objectives of obtaining representative storm water samples are:

- a. To monitor the quality of storm water discharges relative to effluent limitations and receiving water limitations.
- b. To aid in the implementation of the Storm Water Pollution Control Plan.
- c. To measure the effectiveness of BMP in removing pollutants in storm water discharge.

Required analyses. Storm water samples will be analyzed for the water quality parameters listed in the table below in accordance with the Notice of General Permit Coverage (NGPC), File No. HI R60A568. Samples to be taken by the Facility Manager and Compliance Administrator that will work as a team during a rain event.

3.7.1 Sample Collection Methods

Sampling frequency. HDS or its representative will collect and analyze samples of storm water discharge from at least one representative storm event during each fiscal year. A representative storm event is one that produces at least a 0.1 inch of rainfall and is preceded by at

least 72 hours with no rainfall greater than 0.1 inch. The "grab" sample will be taken during the first 15 to 30 minutes of the discharge.

Sampling method. The following procedure will be followed, whenever possible, to minimize sample collection errors, thus improving sample integrity:

- a. In advance, obtain the sampling bottles directly from the laboratory that has setup the bottles for the effluent parameters being tested. Chain-of-Custody reports and bottle labels are provided by the laboratory being used. Label each bottle with the sample number, location and type of sample taken. Sample bottles to be kept separate by sample number.
- b. Collect the storm water discharge samples at the storm water outfall while flowing. Avoid skimming the water surface or dragging against the drain structure. Sample to be collected immediately after it passes through the bio-sock used to absorb the oils and grease. (see Table 5)
- c. If possible, collect another batch of samples simultaneously for field measurements including pH and temperature.
- d. If required to be sampled, for volatile compounds no headspace or "bubble" should be left in the sample jar.
- e. Exercise caution not to empty any of the chemical preservative from the sample jar while collecting the sample. Note: Only those sample jars for volatile compounds require complete fill without bubbles. Other sample jars may be filled to the neck.
- f. Where it is necessary to use funnels, buckets, or other equipment to collect storm water samples, they must be cleaned and decontaminated prior to sample collection. They must be hand-washed with a non-phosphate detergent (such as Alconox® or Liquinox®), rinsed with tap water, rinsed with distilled or deionized water, and left to air dry. Where laboratory grade carbon-free deionized water is not available, distilled or deionized water purchased from a local grocery store may be used to rinse.
- g. Once the sample bottles are filled, quickly chill the sample jars in a cooler provided by the laboratory with ice until delivery to laboratory.
- h. Complete the chain-of-custody form provided by the laboratory and deliver to the laboratory within the maximum holding times for the different tests being performed. Retain Chain of custody report and testing results on site.

3.7.2 Type of Sample

The samples will be either grab or composite. Grab samples will be taken during the first 15 to 30 minutes of the representative storm event exceeding .1 inches of rainfall. If the representative storm event lasts longer than 30 minutes, two(2) or more sample aliquots will be combined as a composite sample. Samples of time-sensitive analyses, such as oil & grease and pH, will be grab-samples during the first 15 minutes.

Samples shall be taken at multiple outfall locations as noted in the Site plan. In areas that have similar industrial activities and therefore similar effluent levels but multiple outfall points, DOH

approval will be required in order to take a sample at a specific outfall which would be representative of the other outfalls in the same area.

The following are the effluent parameters that shall be tested on a minimum monitoring frequency.

Effluent Parameter (units)	Effluent Limitation (µg/l)	Minimum Monitoring Frequency	Type of Sample
Flow Volume			
Flow (gallons)	Monitor	Annually	Estimated
Water Quality			
Biochemical Oxygen Demand (5-day) (mg/L)	Monitor	Annually	Composite
Chemical Oxygen Demand (mg/L)	120	Annually	Composite
Total Suspended Solids (mg/L)	100	Annually	Composite
Total Phosphorus (mg/L)	50	Annually	Composite
Total Nitrogen (mg/L)	350	Annually	Composite
Nitrate + Nitrite as N (µg/L)	20	Annually	Composite
HEM (Oil & Grease) (mg/L) (EPA method 1664, Rev.A)	15	Annually	Grab
pH Range - (Standard Unit) measure within 15 minutes of collecting sample	7.0 - 8.6	Annually	Grab
Metals			
Aluminum (µg/L)	Monitor	Annually	Grab
Antimony (µg/L)	Monitor	Annually	Grab
Arsenic (µg/L)	69	Annually	Grab
Beryllium (µg/L)	Monitor	Annually	Grab
Cadmium (µg/L)	43	Annually	Grab
Chromium, hexavalent (µg/L)	1100	Annually	Grab
Copper (µg/L)	2.9	Annually	Grab
Cyanide, Total (µg/L)	1	Annually	Grab
Iron (µg/L)	1000	Annually	Grab
Lead (µg/L)	144	Annually	Grab
Magnesium (µg/L)	64	Annually	Grab
Mercury (µg/L)	2.1	Annually	Grab
Nickel (µg/L)	75	Annually	Grab
Selenium (µg/L)	300	Annually	Grab
Silver (µg/L)	2.3	Annually	Grab
Benzidine (µg/L)	Monitor	Annually	Grab

Polynuclear Aromatic Hydrocarbon			
Naphthalene (µg/L)	780	Annually	Grab
Polynuclear Aromatic Hydrocarbons	Monitor	Annually	Grab
Volatile Organics			
Benzene (µg/L)	1700	Annually	Grab
Dichlorobenzenes (µg/L)	660	Annually	Grab
Dichlorobenzidine (µg/L)	Monitor	Annually	Grab
1,2-Dichloroethane (µg/L)	38000	Annually	Grab
2,4-Dichlorophenol (µg/L)	Monitor	Annually	Grab

3.7.3 EPA-Approved Test Procedures

The approved test methods are listed in the table below:

Effluent Parameter	Test Method
Total Suspended Solids	EPA 160.2
Total Phosphorus	EPA 365.1
Total Nitrogen	SM 4500-N D
Nitrate + Nitrite Nitrogen	EPA 353.2
Oil & Grease	EPA 1664, Rev. A
pH Range	4500-H+

3.7.4 Quantity of Storm Water Flow

The storm water discharge will be calculated using the following equation:

$$Q = CIAc$$

Where

Q = peak discharge, ft³/s

C = runoff coefficient = percentage of rain that appears as direct runoff

I = rainfall intensity, inches per hour

Ac = drainage area, acres

For example,

Where C = 0.50 (different estimate for each sample location)

I = 1 inch/hr

Ac = 2.62 acres

$$Q = 0.50 \times \frac{1 \text{ in}}{\text{hr}} \times 2.62 \text{ Ac} \times \frac{43560 \text{ ft}^2}{1 \text{ Ac}} \times \frac{1 \text{ ft}}{12 \text{ in}} \times \frac{1 \text{ hr}}{3600 \text{ sec}} = 0.1322 \text{ ft}^3/\text{s}$$

Figures will differ for each sampling location which will have different computations due to different runoff coefficient, drainage area and potentially different rainfall intensity. Rainfall shall be computed from independent rainfall gauge at the Daniel K. Inouye Airport rain gauge with hourly reports of the rainfall and intensity. Our facility on Sand Island has a similar proximity to the Airport gauge. Rain gauges can also be used at the Sand Island facility that will be more accurate and specific to the site.

The duration of the storm event will also be recorded. The duration of the storm event is necessary to compute the volume(gallons) that has been discharged off the property. The volume discharged will be reported on the DMR submitted to the CWB.

3.7.5 Procedures for Collection Storm Event Information

The rainfall and storm event tracking will be performed by the Compliance Administrator to document the rainfall activities at the site. Rain events exceeding the threshold of > 0.1" rainfall will be documented and labeled on the rain reports. The Compliance Administrator will continue to monitor the weather forecasts to be prepared for an upcoming rain event.

The following information will be recorded for all storm water monitoring performed:

- a) The date, location, and time of sampling,
- b) Individual(s) who performed the field testing and sampling,
- c) Date and amount of the previous (> 0.1") rainfall exceeding 72 hours,
- d) Duration of the storm event.
- e) Rainfall measurement (in inches) of the storm event which generated the sampled discharge (go to <http://wl.weather.gov/obhistory/PHNL.html> which provides the rainfall for the last 72 hours.
- f) PH shall be taken within 15 minutes of taking each sample using PH strips of .25 increments. The strips cannot be used if it has passed any expiration date on the
- g) An estimate of the size of the area (acres) drained by the sampled discharge point, and
- h) An estimate of the runoff coefficient of the drainage area.
For example:
Low (< 40%) - (unvegetated soil, gravel)
Medium (40 - 65%) - (partial vegetation, soil and pavement)
High (> 65%) - (mostly pavement)
Runoff coefficient will be adjusted depending if the ground is already saturated from recent rain events not exceeding the 0.1" threshold.

3.7.6 Quality Assurance/Quality Control Procedures

QA/QC procedures will include proper sampling, sample handling & preservation, and timely analysis with appropriate laboratory internal QA/QC. Proper Chain of Custody (COC) records are also necessary to insure the integrity of the samples and the analyses. A COC record will be completed for all storm water sampling and included in the report.

Samples shall be shipped or delivered to the testing laboratory in insulated shipping containers, ice chests or coolers typically supplied by the analytical laboratory conducting the analyses. Shipment and receipt of samples will be coordinated with the laboratory to minimize

transit time.

3.7.7 Revised Monitoring

As noted in Section 2.5.3 Plan Revision 4.c and as the test results of the storm monitoring as detailed in Section 3.7.2 Type of Sample dictate (i.e. non-detect), those parameters with the appropriate regulatory concurrence will not be sampled and tested in the succeeding years' storm water monitoring plan.

TABLES

TABLE 1
MATERIAL INVENTORY

Material Name	Physical State	Storage Container Type	Total Est. Annual Use	Unit
40W Motor Oil (a)	Liquid	Bulk tank	7,200	Gallon
Lubricating Oil (a)	Liquid	Bulk tank	4,800	Gallon
Used Oil (b)	Liquid	(b)	6,000	Gallon
Antifreeze	Liquid	Drum, Plastic container	1,000	Gallon
Diesel Fuel (c)	Liquid	Above ground	600,000	Gallon
Unleaded Gasoline (c)	Liquid	Above Ground Storage tank	14,400	Gallon
Parts Cleaning (d)	Liquid	Self-Contained Parts Washer	210	Gallon
Bin Deodorizer fluid	Liquid	Steel drums	1000	Gallon

Footnotes:

(a) The motor and lubricating oils are delivered in bulk and transferred to 55-gallon aboveground double-walled steel containers with secondary containment by a licensed hauler. The secondary containment is accomplished by a double-walled tank.

(b) Placed in steel mesh reinforced 300-gallon totes secured on steel pallets. The totes are located on concrete or asphalted floors.

(c) There are (2) aboveground concrete storage tanks with secondary containment, which is accomplished by a double-walled tank and is manufactured by ConVault™.

Tank#1	6,000 gallon tank	Diesel Only
Tank#2	4,000 gallon section	Diesel Only
	1,000 gallon section	Unleaded Gasoline Only

(d) An enclosed (i.e., self-contained) Dyna*Seal parts washers system by ZEP Manufacturing, which conforms to Federal and Hawaii regulations, and uses a non-petroleum based liquid.

(e) A non-petroleum based disinfectant and deodorizer for refuse bins. Such as, pine oil, is contained in 300-gallon steel reinforced steel mesh totes secured on a pallet.

TABLE 2

<p align="center">Potential Contamination Sources to Storm water from Facility Operations</p>		
<p align="center">Potential Area of Concern</p>	<p align="center">Potential Contaminant</p>	<p align="center">Materials</p>
<p>Facility's Shop</p>	<p>Potential contamination of storm water run-off due to maintenance work being conducted outside of shop's roof line.</p>	<p>Maintenance chemicals, lubricating oil, antifreeze, diesel fuel.</p>
<p>Transfer Station</p>	<p>Potential contamination of storm water due to MSW and C&D unloading and loading into trailers.</p>	<p>MSW and C&D waste.</p>
<p>Transfer Trailer Staging Area</p>	<p>Potential contamination of storm water run-on/run-off</p>	<p>Vehicle tire & MSW.</p>
<p>Material Recovery Facility</p>	<p>Potential contamination Of storm water run-off</p>	<p>Recyclable Materials</p>
<p>Truck Wash Building</p>	<p>Run-off to storm water of truck wash detergents.</p>	<p>Trucks and the detergent.</p>
<p>Steam Sterilizer Building</p>	<p>Potential contamination of storm water runoff due to regulated waste spills</p>	<p>Food waste & MSW.</p>
<p>Truck Parking</p>	<p>Potential contamination</p>	<p>Vehicle oil, antifreeze, grease & dirt.</p>
<p>Parts Storage outside of Buildings.</p>	<p>Potential contamination</p>	<p>Vehicle oil, antifreeze, grease & dirt.</p>

**TABLE 3
SUMMARY OF SELECTED BMPs FOR POTENTIAL
SOURCE OF CONTAMINATION**

	Employee Training	Visual Inspection	General Housekeeping	Preventive Maint	Preventive Practices	Preventive Practices Vehicle Positioning	Manual Cleanup	Mechanical Cleanup	Chemical Cleanup	Preventive Tarp	Preventive Building	Secondary Containment	Flow Diversion	Dust Control	Mitigation Treatment	Drainage Improvements	Discharge to Receiving Water	Sanitary sewer
Best Management Practice (a)	E T	V I	G H	P M	P P 1	P P 2	M C 1	M C 2	M C 3	P C 1	P C 2	S C 1	S C 2	S C 3	M T	D S	U D 1	U D 2

Areas Outside of Buildings

Truck Parking	X	X	X	X	X	X	X	X	X	X		X	X	X	X	X		
Trailer Staging Area	X	X	X	X	X		X		X			X		X	X			
Parts Storage outside of buildings	X	X	X	X	X		X	X	X	X		X		X	X			

Areas Under Roofed Building

Truck Shop	X	X	X	X	X		X		X		X	X		X	X			
Transfer Station	X	X	X	X	X		X		X		X	X		X	X			
Materials Recovery Facility	X	X	X	X	X		X		X		X	X		X	X			
Truck Wash Building	X	X	X	X	X		X				X	X		X	X			X
Steam Sterilizer Building	X	X	X	X	X		X				X	X		X	X			X

Footnote:

(a) See Section 2.4.1 General Best Management Practices (BMPs), page 22, for definitions of Best Management Practices abbreviations noted on the Table.

TABLE 4

TYPICAL DESCRIPTIONS OF BMP'S FOR SELECTED FACILITY'S SOURCES

Areas of potential concern	Description of recommended BMPs
Overall Facility ¹	<p data-bbox="792 457 1146 489">Employee Training (ET)</p> <p data-bbox="792 499 1385 768">Annually, the employees to be trained on good housekeeping standards and training for spill cleanup, including use of spill kit. Training shall also include proper handling, storage and disposal of trash, liquids and hazardous materials. Good housekeeping standards are Defined on page 26.</p> <p data-bbox="792 827 1094 858">Training to include</p> <p data-bbox="792 905 1133 936">Visual Inspection (VI)</p> <p data-bbox="792 961 1370 1083">Facility Yard Sweeper and Facility Yard Cleanup worker to conduct housekeeping cleanups on a daily basis.</p> <p data-bbox="792 1115 1281 1266">Facility Yard Cleanup worker to refill the spill kits on a daily basis. Facility Manager to inspect spill kits for physical condition quarterly.</p> <p data-bbox="792 1297 1349 1476">Quarterly inspection log to record the inspection results and maintain the logs for a minimum of five years. Identified deficiencies are to be corrected before the end of the day.</p> <p data-bbox="792 1507 1317 1656">Facility Manager to inspect catch basins for debris and clogs quarterly. He is to maintain the Filter Sock Inspection and Replacement Log.</p> <p data-bbox="792 1688 1349 1860">Facility Yard Cleanup worker to apply absorbent litter to the paved areas for any spills and leaks noted in their daily cleanup. Power Steam cleaning to be performed for oil stains.</p>

Good Housekeeping (GH)

Removal of any spills/leaks using spill kit or other means by the end of the day. Materials and absorbents will be disposed of in accordance with federal, state & local regulations specific to material collected and absorbent used. Maintain a clean organized environment.

Preventive Practices (PP1)

Containers of liquids and chemicals to be labeled as to the contents and potential hazards involved per the materials' MSDS. Spill Kits to be labeled so they can be quickly located in the event of a spill.

Preventative Maintenance (PM)

Trucks and Equipment are repaired and maintained on a daily basis. Drivers are required to notify the Truck Shop of any leaking fluids. The yard equipment and Amfab baler are all maintained on a schedule to make sure they do not leak any fluids.

Mitigation Cleanup (MC)

Physical cleanup - Use brooms/shovels for cleanup of debris every day. Provide spill kit for emergency cleanup. A spill kit typically contains various absorbent including pads, pillows, and absorbent material (kitty litter). (MC1)

Mechanical cleanup - use Tennant sweeper to pick up dust and debris on a daily basis. (MC2)

Cleanup an liquid chemicals with absorbent litter. Also use the steam pressure washer to lift any liquids that have been absorbed into the asphalt. (MC3)

Dust Control (SC3)

Facility Yard Sweeper worker to use the Tennant sweeper to pick up any dust, dirt or debris in the yard on a daily basis.

Mitigation Treatment (MT)

Liquids picked up from the steam pressure washer is emptied into the Truck Wash Oil/Water Separator.

¹The BMPs associated with the "Overall Facility" section should be utilized at ALL areas of potential concern (where they are applicable). Additional BMPs for specific areas of potential concern are shown respectively.

Areas of potential concern	Description of recommended BMPs
Operations Outside	

Outside Truck Parking

Preventative Maintenance (PM)

Trucks to be maintained and repaired so they do not leak oils and other fluids.

Facility Cleanup worker to monitor the floor drains in the Shop and Transfer Station. Pump out the Sump when it becomes full into the Truck Wash Oil Water Separator that drains to the Sanitary Sewer.

Preventative Practices (PP)

Park vehicles and apply emergency brake to position truck for easy access to filling hose. (PP2)

**Preventive Covering (PC1)
Secondary Containment (SC1)**

Trucks that have been in an accident to be covered with a tarp pending repair. Drip pans shall be used as secondary containment should any leaks occur.

Drainage System Improvements (DS)

Hydrocarbon Filter Socks to be used and maintained around all storm drains. The Facility manager to examine the Filter Socks quarterly and document on

the Quarterly Site Inspection.

Flow Diversion (SC2)

A sump is used in a portion of the Northwest truck parking (TMK # 1-5-041:259). This section of the property drains to the sump. The sump is checked after every rain. When full it is vacuumed out and emptied into the Truck Wash Oil/Water Separator. Property is shaped like a huge basin with an asphalt berm preventing discharge of any liquids from this parcel.

Outside Transfer Container Staging Area

Secondary Containment (SC1)

Replacement Transfer Containers to be purchased that are leak-proof. Transfer Containers parked in an area surrounded by a berm of crushed asphalt. Within the berm is soil material to absorb any liquid that may drip from the containers. Berm to be 6" in height.

Parts Stored Outside

**Preventive Covering (PC1)
Secondary Containment (SC1)**

Spare parts to be wiped down to remove liquids. Drip pans or absorbent cloth shall be used as secondary containment should any leaks occur. Parts to be stored on a pallet to avoid contact with storm water. The parts and pallet to be covered with plastic tarp. Facility manager to review quarterly and document on Quarterly Site Inspection log

Areas of potential concern	Description of recommended BMPs
----------------------------	---------------------------------

Operations under Roofed Warehouse

Protective Building (PC2)

The following buildings are under roof with gutters to move the storm water away from the buildings

Truck Shop

Secondary Containment (SC1)

Motor and lubricating oil are pumped into aboveground steel containers with double walled tanks.

Absorbent cloth is used to capture any potential leaks if the mechanic does minor work outside of the roofed area.

Oil changes to be performed within the roofed Truck shop area using drip pans to collect the oil.

Used oil and Antifreeze to be disposed of through authorized recycling or disposal facilities

Drainage System Improvements (DS)

Truck shop floor slopes toward the interior drains which collect in a sump. When filled the Sump is vacuumed out and the liquid is drained into the Truck Wash Oil/Water Separator. Facility Manager to inspect the interior drains quarterly to make sure they are working properly. Document on Quarterly Site Inspection log

Transfer Building

Secondary Containment (SC1)

Concrete berms are used to hold back any liquid from the trash within the Transfer Building. The entire operation of the Transfer building is under roof.

Materials Recovery Facility

Mitigation Cleanup (MC1)

Physical cleanup - At the end of every day, use brooms/shovels for cleanup of debris from the sorting operations.

Truck Wash Building

Secondary Containment (SC1)

Used oil totes are stored in the building under roof. The totes are positioned so any leak will drain into the trough in the center of the building and pass through the oil/waste separator and into the Sanitary Sewer.

Mitigation Cleanup (MC3)

All soaps and chemicals used in the cleaning process are applied within the building such that it will drain into the trough.

Sanitary Sewer System (UD2)

The trough running through the center of the building drains through an Oil/Water Separator that empties into the Sanitary Sewer System.

Steam Sterilizer Building

Secondary Containment (SC1)

Sanitary Sewer System (UD2)

There is concrete basin under the Steam Sterilizer to be used when the tanks are drained. When the basin is full, a pump is engaged to suck the water into the Truck Wash drain trough next door.

Good Housekeeping (GH)

Prompt removal of any spills/leaks using spill kit or other means. Materials and absorbents will be disposed of in accordance with federal, state & local regulations specific to material collected and absorbent used.

Preventative Practices (PP1)

Visually monitor area for indications

of spills daily.

Mitigation cleanup (MC)

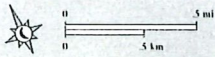
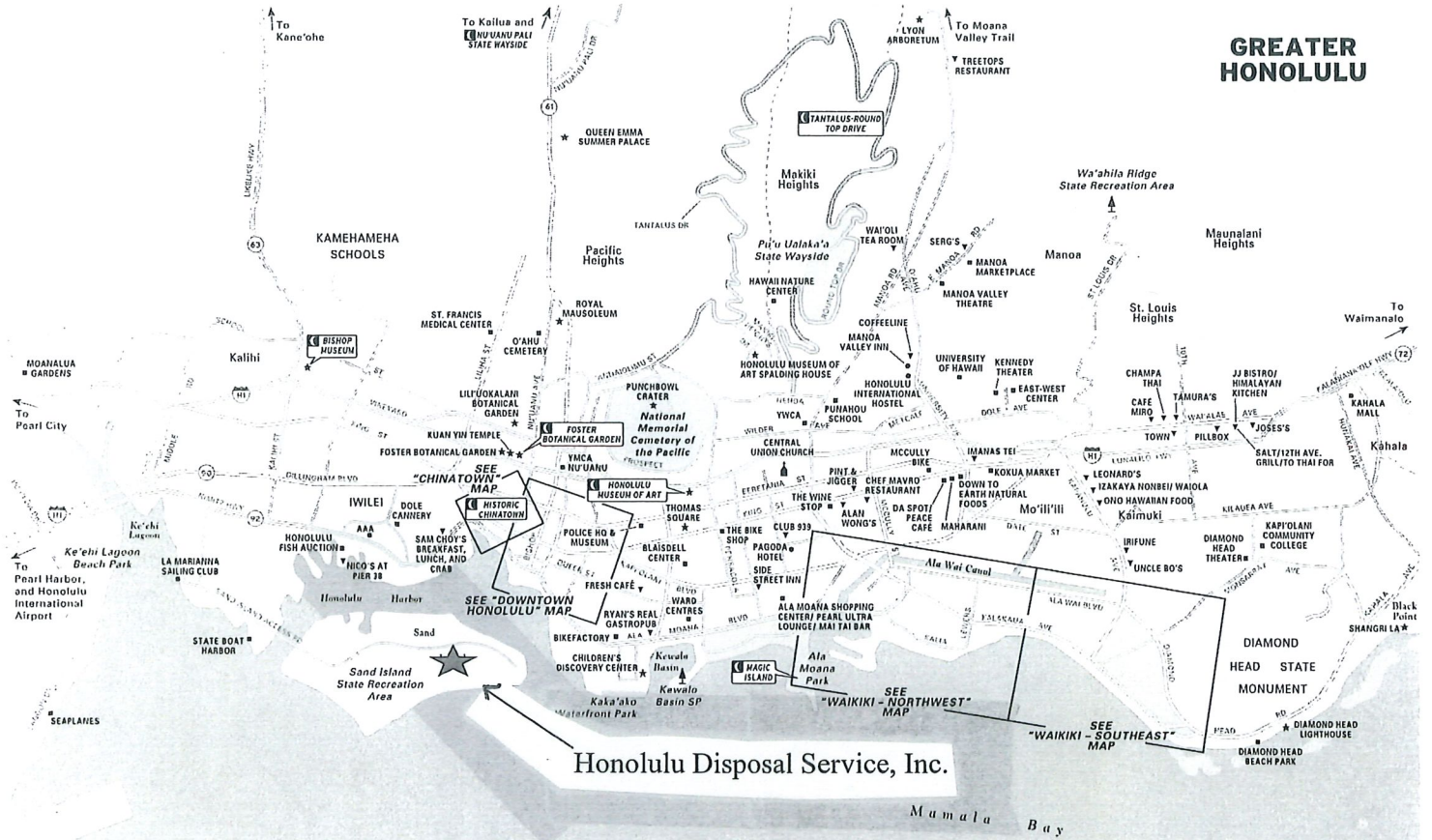
Facility Yard Sweeper worker to use brooms/shovels for cleanup of dry material on a daily basis. Brooms and dustpan is used for debris that the mechanical sweeper cannot access. (MC1)

The Facility Yard Sweeper to also drive the mechanical Tennant Sweeper to pick up any trash debris or absorbent litter on the ground on a daily basis (MC2)

Provide spill kit for emergency cleanup. A spill kit typically contains various absorbent including pads, pillows, and absorbent material (kitty litter). (MC3)

MAPS

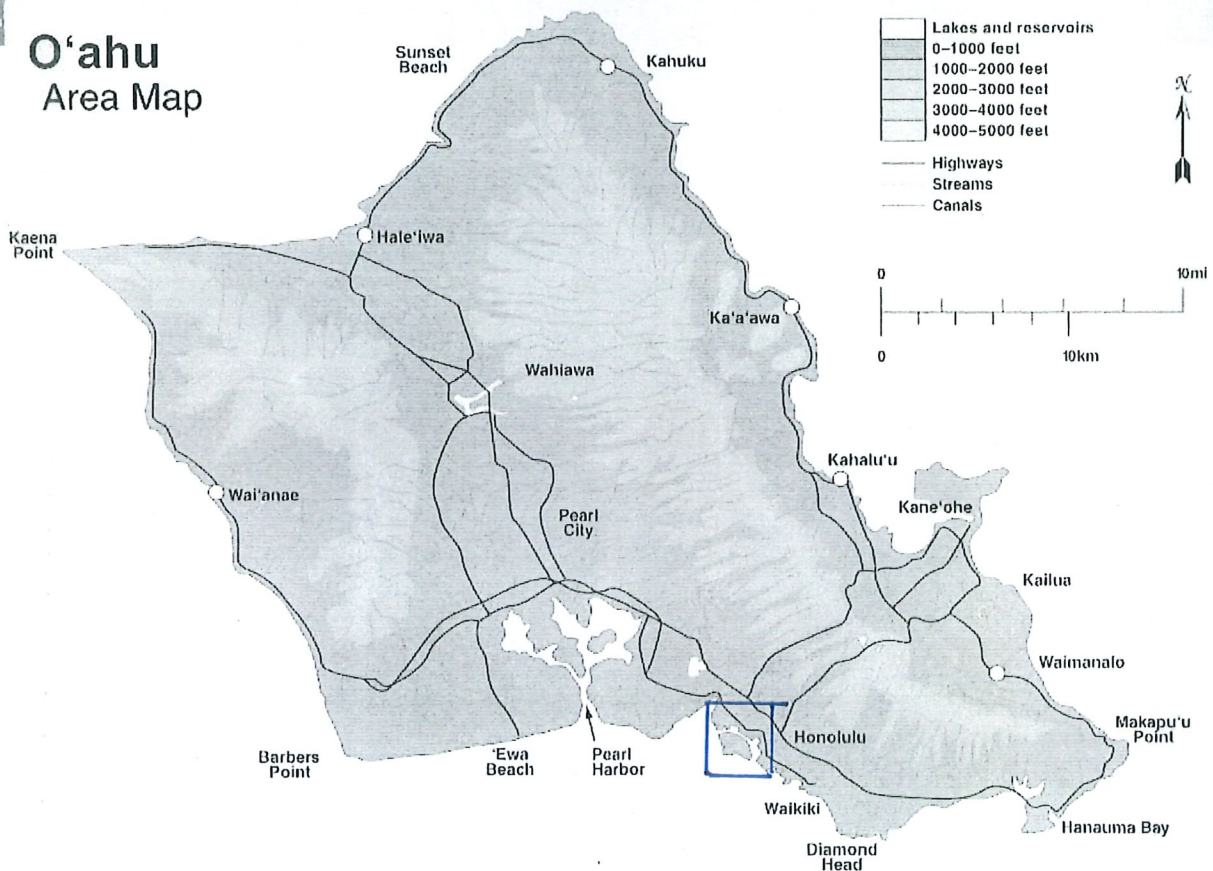
Attachment A-1 Location Map



© AVALON TRAVEL

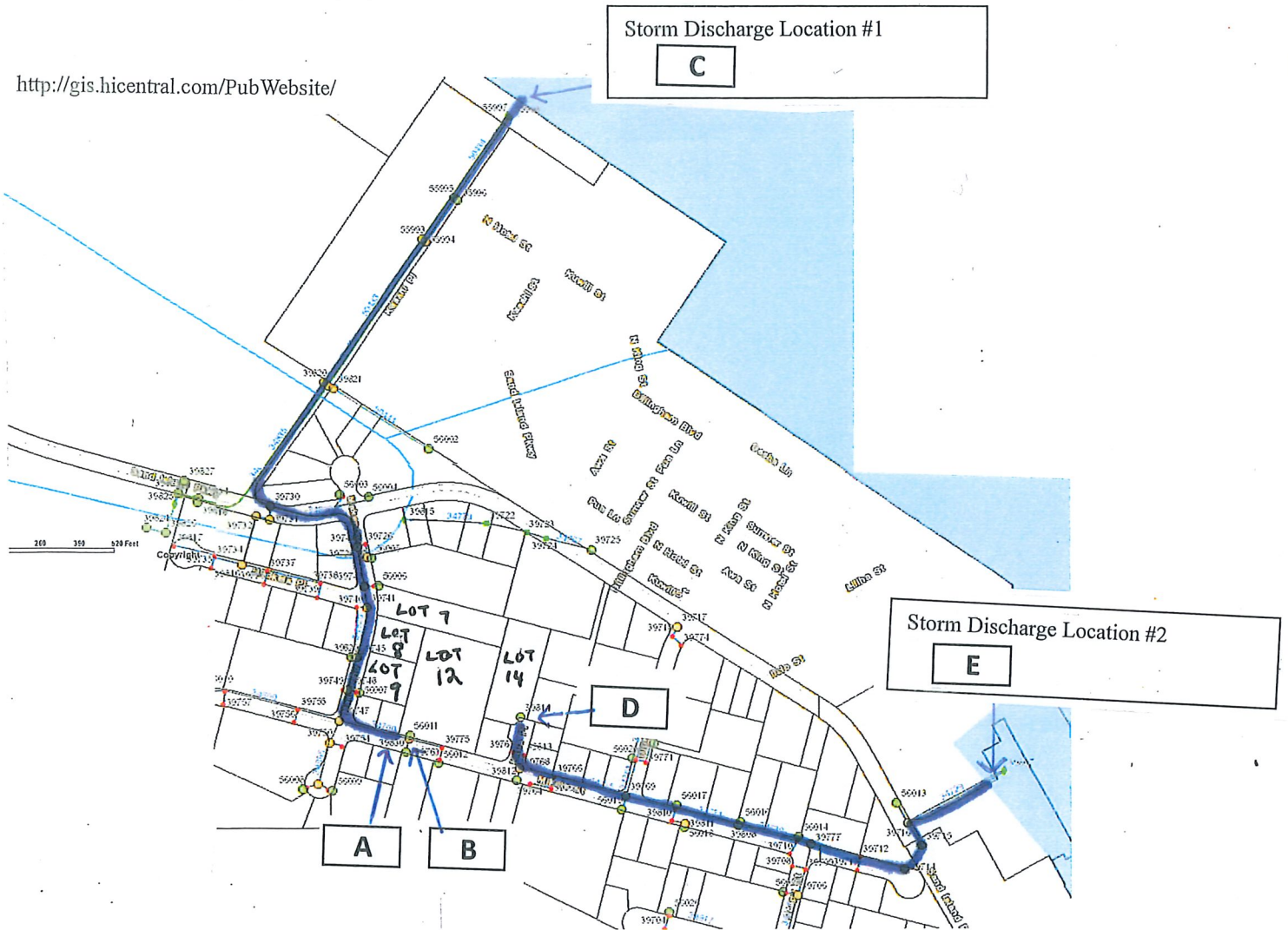
MOON
TRAVEL GUIDES

O'ahu Area Map



Attachment A-2 Sewage Drainage system

<http://gis.hicentral.com/PubWebsite/>



Stormwater Discharge Location #1

Lot 7 TMK# 1-5-041-037
 Lot 12 TMK# 1-5-041-014
 Lot 9 TMK# 1-5-041-280

A Storm drains on Property hookup to Exterior Storm Drain
 Latitude N 21° 18' 15.249"
 Longitude W 157° 52' 34.676"

B Surface runoff to Exterior Street Gutter
 Latitude N 21° 18' 14.893"
 Longitude W 157° 52' 33.605"

C Discharges from Storm Drain to Honolulu Harbor
 Latitude N 21° 18' 35.669"
 Longitude W 157° 52' 30.657"

Stormwater Discharge Location #2

Lot 14 TMK# 1-5-041-281

D Surface runoff to Exterior Street Gutter
 Latitude N 21° 18' 14.721"
 Longitude W 157° 52' 30.968"

E Discharges from Storm Drain to Honolulu Harbor
 Latitude N 21° 18' 13.683"
 Longitude W 157° 52' 13.66"

No Discharge to Stormwater system

Lot 8 TMK# 1-5-041-259

Stormwater Drain Pipe Layout on Lot 12

Attachment A2-1

LOT 12

CONCRETE SPECIALTIES, INC.
 1000 KALANUI BLVD., SUITE 100
 HONOLULU, HAWAII 96813
 PHONE: (808) 531-1111
 FAX: (808) 531-1112
 WWW: WWW.CONCRETE-SPECIALTIES.COM

NOTES:

NO. DATE REVISION

PROJECT TITLE:

FACILITIES FOR:
 HONOLULU DISPOSAL SERVICE

TKM: 1-5-41 LOT 12
 DESIGN DRAWN CHECKED
 PM PM JT

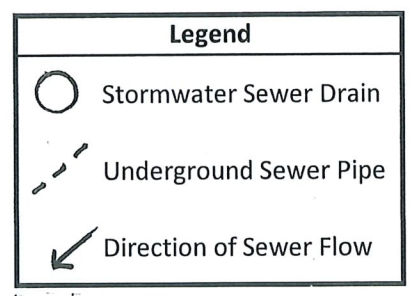
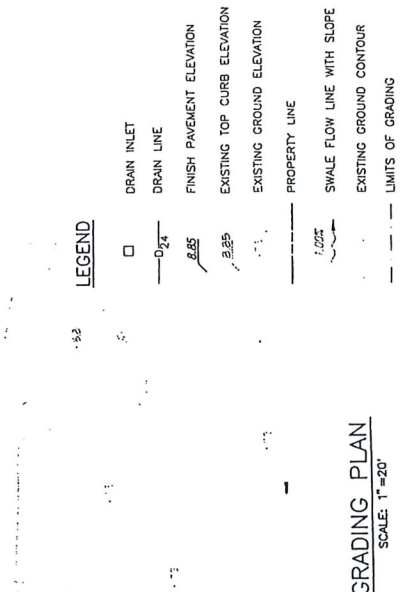
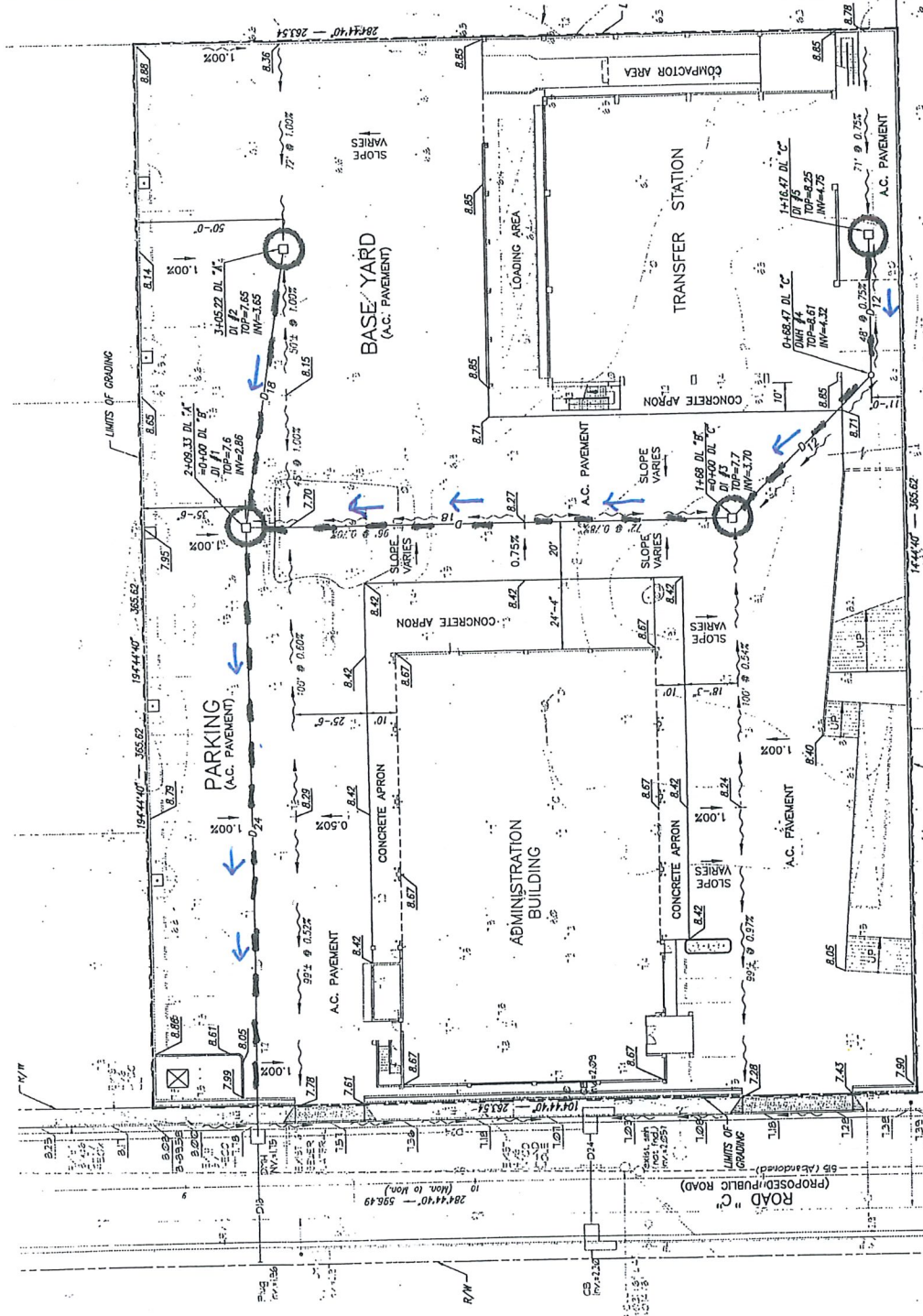
SHEET TITLE:

GRADING PLAN

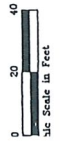
PROJECT NO. SHEET

C-4

DATE: 01/13/95
 OF 73



SUMMARY
 42 C.Y.
 95 C.Y.
 2 = 1.44 AC.
 (INC AREA)
 OSES ONLY

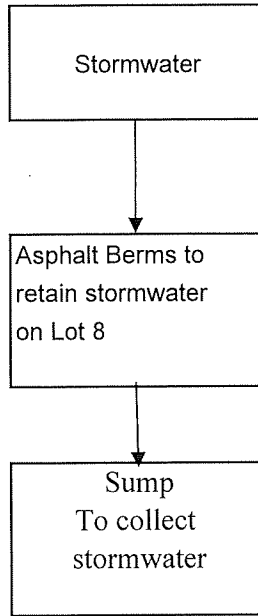


GRADING PLAN
 SCALE: 1"=20'

Attachment A3-1

Lot 8 TMK# 1-5-041-259

Stormwater Flow



Entire property is bowl-shaped

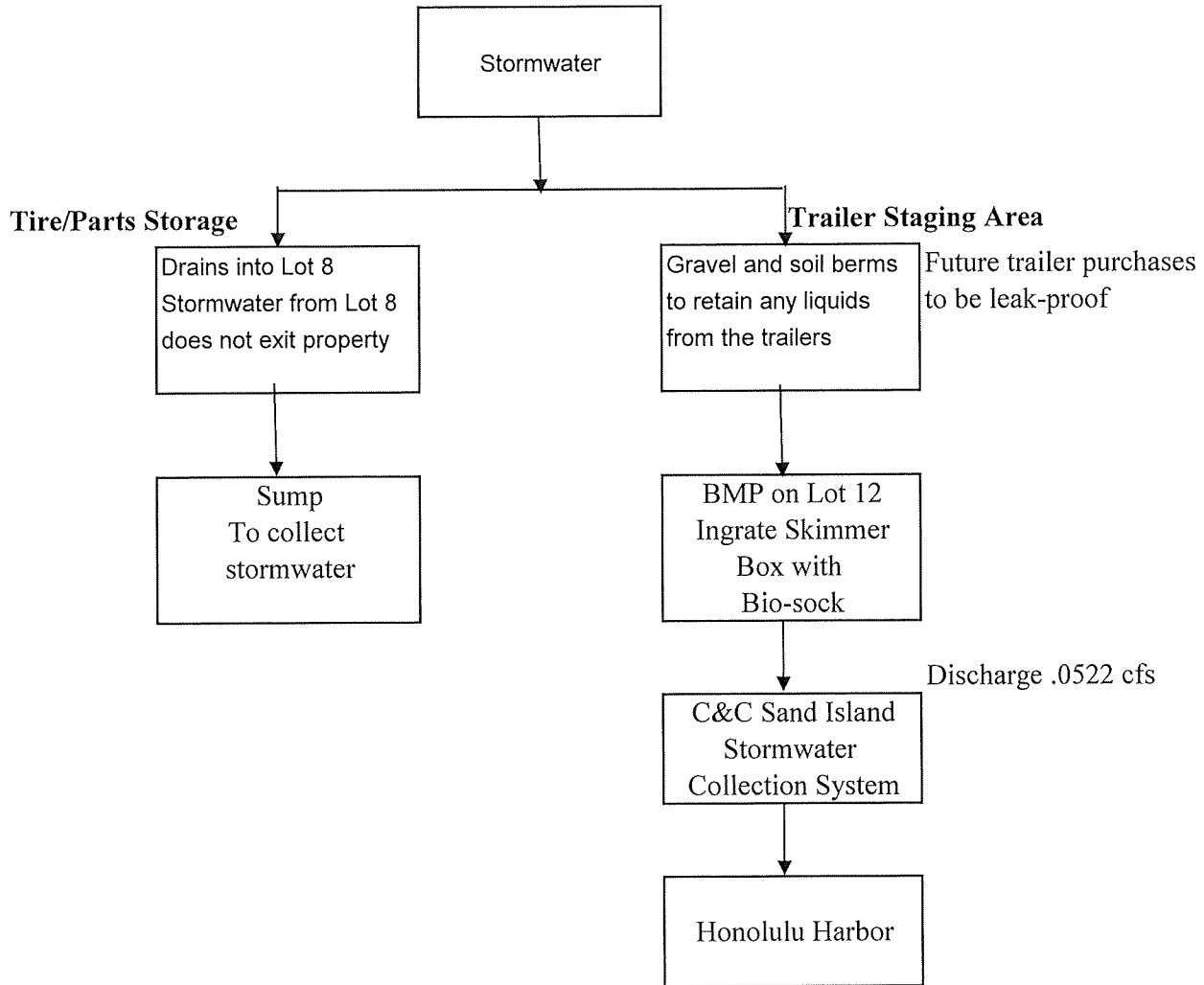
Sump pumped out when full
Waste water emptied into Truck Wash drain
that goes through an oil-water separator that then
drains to the C&C of Honolulu Sanitary system

NO DISCHARGE

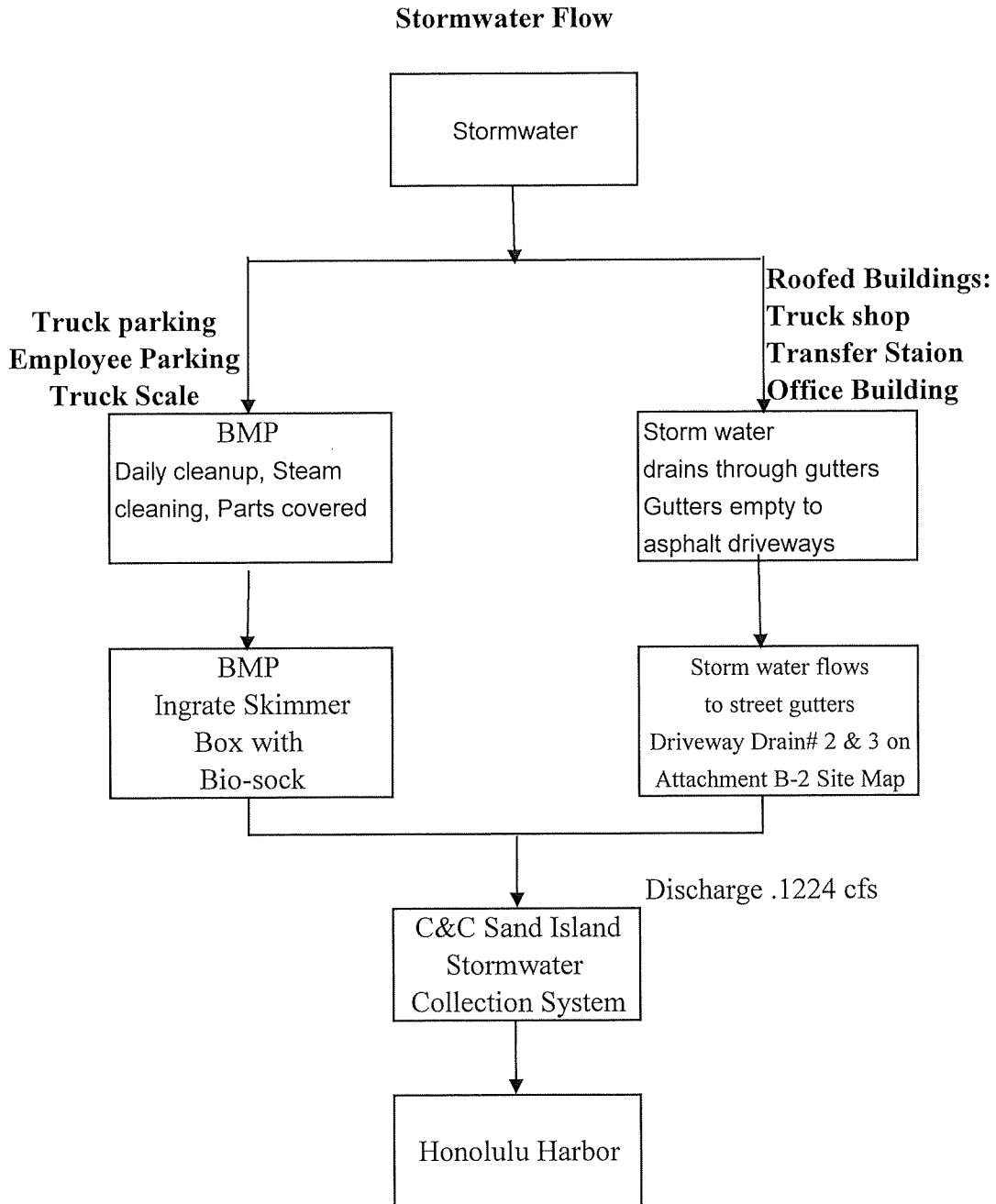
Attachment A3-2

Lot 7 TMK# 1-5-041-037

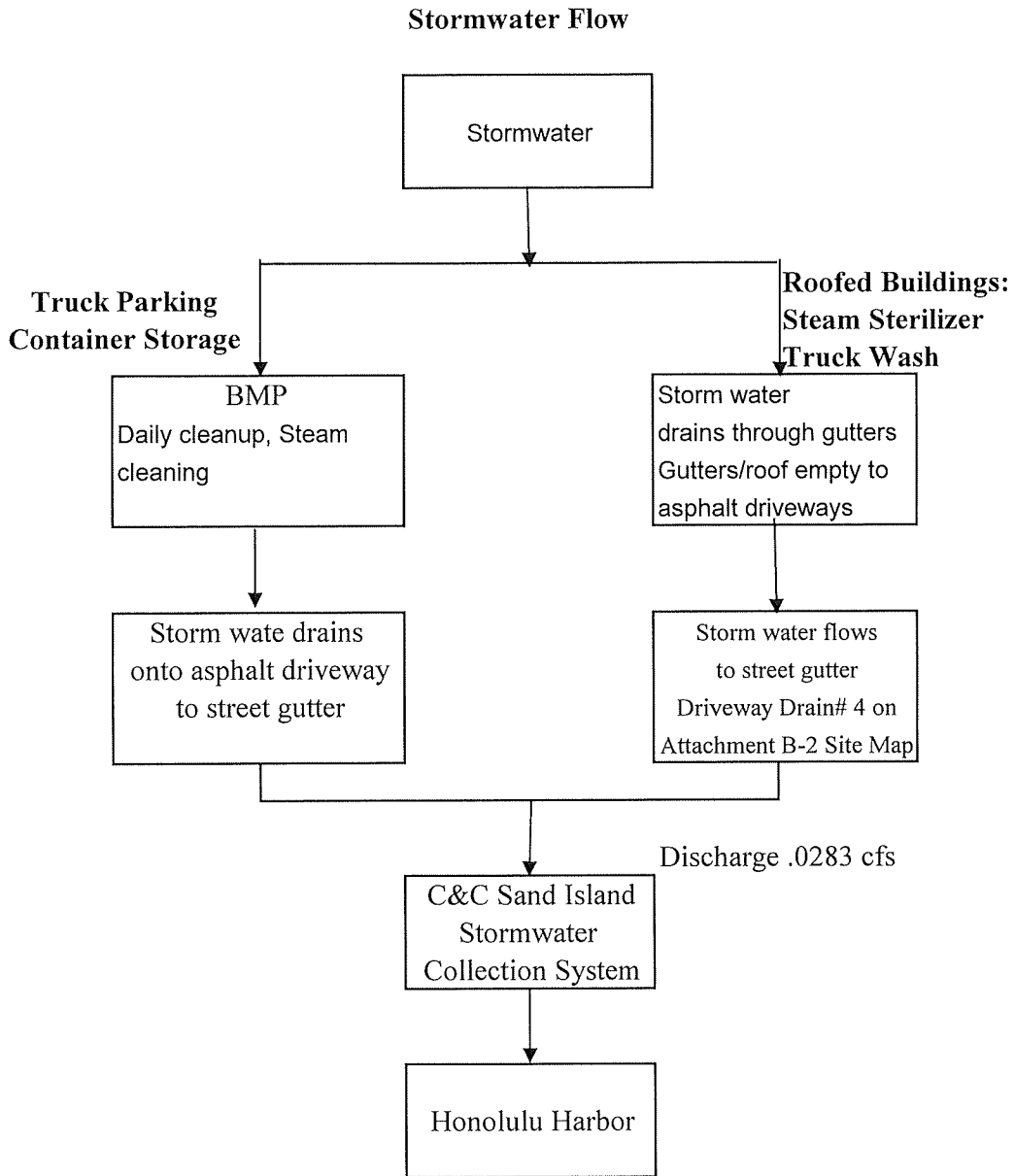
Stormwater Flow



Lot 12 TMK# 1-5-041-014



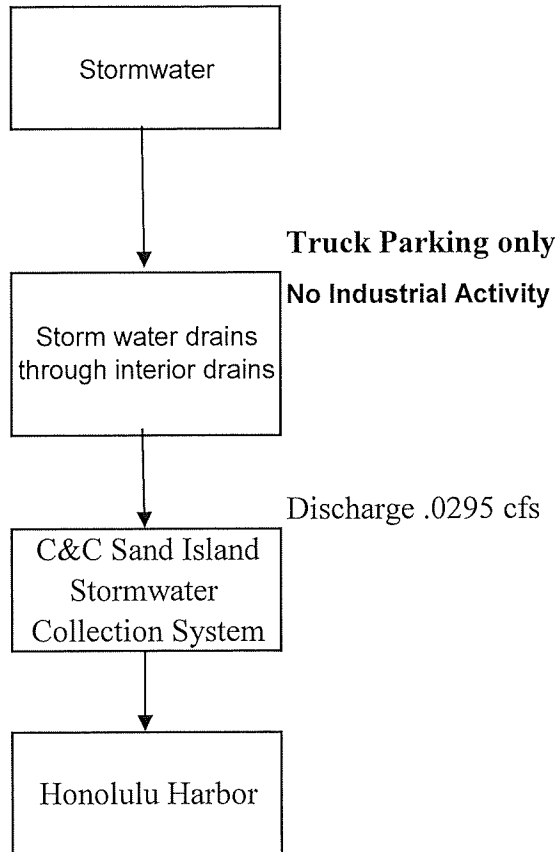
Lot 14 TMK#1-5-041-281

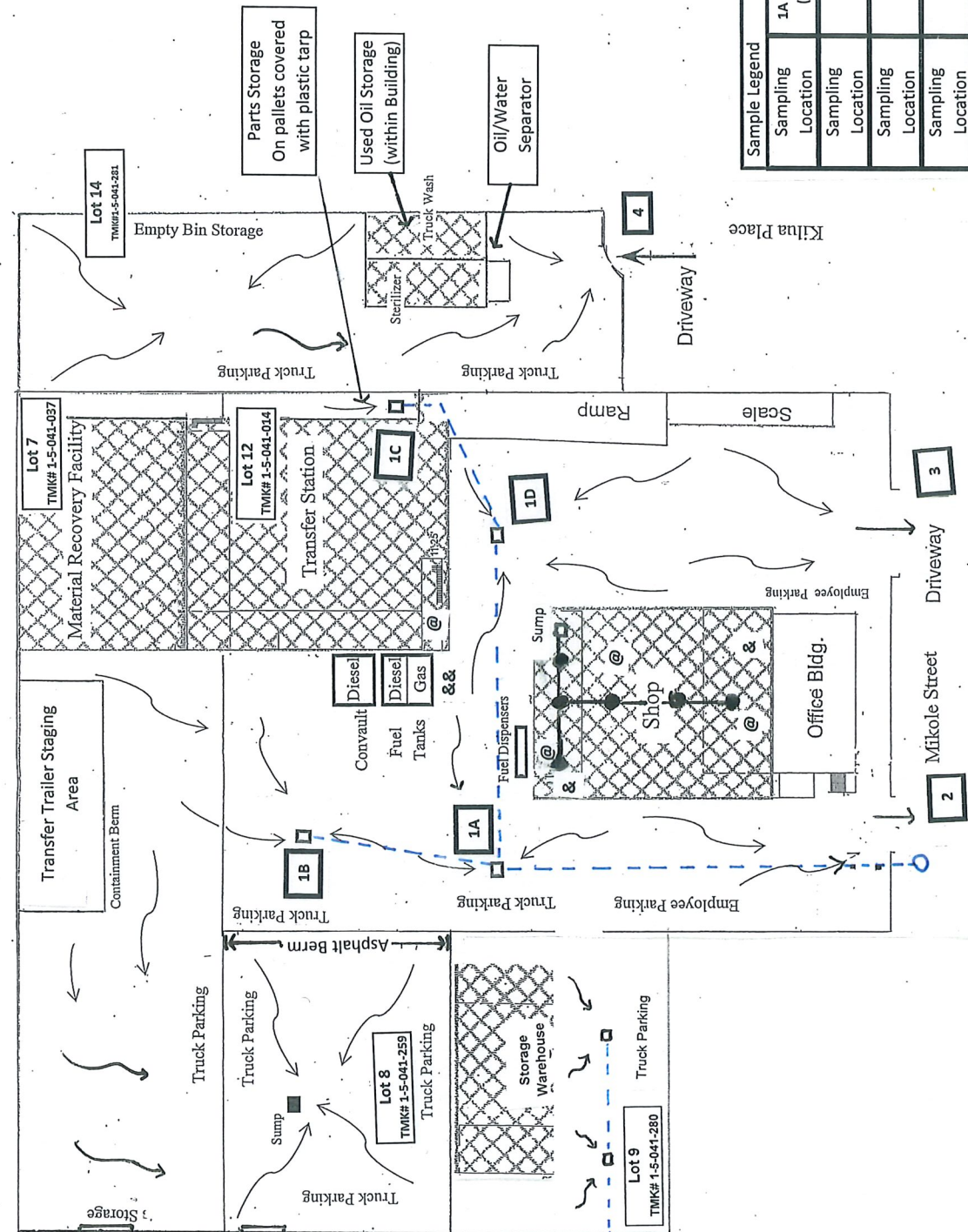


Attachment A3-5

Lot 9 TMK# 1-5-041-280

Stormwater Flow





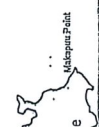
Sample Legend		1A - Consolidated flow (1A, 1B, 1C & 1D)
Sampling Location	(Symbol)	2
Sampling Location	(Symbol)	3
Sampling Location	(Symbol)	4

Driveways Blocked Off with Filter Socks



MAP LEGEND	
Covered Building	(Cross-hatched box)
Storm Water Flow Direction	(Arrow)
Storm Water Drain with Hydrocarbon Filter Socks	(Square with diagonal lines)
TMK Property Line	(Dashed line)
TMK/Parcel Numbers	1-5-041:XXXX
Spill Kit Location	(@ symbol)
Interior Drain to Sump	(Line with circles)
Covered Trash Bin, Leakproof bottom	(& symbol)
Storm Water Drain Pipes	(Dashed line)

Honolulu Disposal System
 Storm Water Site Map
 Not to Scale
 1169 Mikole Street
 Honolulu, Island of Oahu



FORMS

STORM WATER POLLUTION

CONTROL PLAN

REVISIONS/UPDATE

The assigned management team member (_____) documents the SWPCP and its attachments were prepared under my direction or supervision in accordance with a system designed to insure that the assigned management team member has appropriately gathered and evaluated this information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information; the information submitted, is, to the best of my knowledge and belief, true, accurate and complete.

Signature: _____

Name: _____

Title: _____

Date: _____

LIST OF ASSIGNED MANAGEMENT TEAM MEMBER(S)

The following is a list of the name and date of assigned to the storm water team and as needed training session.

**Quarterly Site Inspection for General Industrial Activities,
Storm Water Permit for Year: _____**

Honolulu Disposal Service, 1169 Mikole Street, Honolulu	
Date:	Member Name and Title:
Time:	Signature:

Form is to be completed and signed by Compliance Administrator

OBSERVATIONS

Evidence of non-stormwater discharge collection system (flow, standing water, drains, etc.)	1)
New discharge location(s) created since previous annual inspection (if any)	2)
New material in use which could affect stormwater run-off (favorably or unfavorably)	3)
Storm water control measures observed (good house keeping measures, proper storage, etc.)	4)
Storm water control measures needing closer adherence; measures removed or inoperable since previous inspection (if any)	5)
Measures contained in Item 4 above and in SWPCP that are effective preventing storm water pollution	6)
Measures contained in Item 4 above and in SWPCP that appear effective or could be modified/improved	7)
Additional measures which could reduce pollution of stormwater runoff	8)
Trailer Staging Area. Inspect berms to assure that they are 6" high to retain any liquids/debris from the trailers	9)
Inspector's general comments regarding the pollution prevention practices observed including items requiring follow up	10)

Note: Storm Water Pollution Control Plan (SWPCP) and NGPC for the NPDES permit shall be on file in office and should be referred to when completing this form.

**Quarterly or as needed, Site Inspection
for General Industrial Activities, Storm Water Permit for Year: _____**

Honolulu Disposal Service, 1169 Mikole Street, Honolulu	
Date:	Member Name and Title:
Time:	Signature:

Form is to be completed and signed by Facility Manager

OBSERVATIONS

Recheck and change all absorbent bio-socks To be changed no less than quarterly.	1)
Recheck the proper maintenance of Spill Kits	2)
Trailer Staging Area. Inspect berms to assure that they are high enough to retain any liquids/debris from the trailer	3)
Visual Inspections of maintenance activities and general housekeeping	4)
Parts are properly covered from contact with stormwater.	5)
Recheck the Truck Shop Interior Drains to make sure they are functioning properly.	6)
	7)
	8)
	9)
	10)

Note: Storm Water Pollution Control Plan (SWPCP) and NGPC for the NPDES permit shall be on file in office and should be referred to when completing this form.

Annual Inspection of BMPs

Team Member Name: _____

Compliance Administrator

Signature: _____

Date: _____

Activities

Descriptions:

- (ET) Employee Training
- (VI) Visual Inspection
- (GH) Good Housekeeping
- (MC) Mitigation Cleanup

Check each Activity Present at Site

Effectiveness
HIGH MED LOW

Shop/Yard:

(ET) Check that all employees have been properly trained.			
(GH) Check that good housekeeping practices are being followed.			
(MC) Check that spill/leak clean up procedures are being followed.			
(VI) Check spill kit for physical condition.			

Transfer Building:

(ET) Check that all employees have been properly trained.			
(GH) Check that good housekeeping practices are being followed.			
(MC) Check that spill/leak clean up procedures are being followed.			
(VI) Check spill kit for physical condition (Shop spill kit used for Transfer Station).			

Storage Area (First floor of Transfer Station)/Temporary Staging Area of Transfer Trailers:

(ET) Check that all employees have been properly trained.			
(GH) Check that good housekeeping practices are being followed.			
(MC) Check that spill/leak clean up procedures are being followed.			

Material Recovery Facility

(ET) Check that all employees have been properly trained.			
(GH) Check that good housekeeping practices are being followed.			

(MC) Check that spill/leak clean up procedures are being followed.			
--	--	--	--

Effectiveness
HIGH MED LOW

Truck Wash and Steam Sterilizer Buildings:

(ET) Check that all employees have been properly trained.			
(GH) Check that good housekeeping practices are being followed.			
(MC) Check that spill/leak clean up procedures are being followed.			

Truck Parking:

(ET) Check that all employees have been properly trained.			
(GH) Check that good housekeeping practices are being followed.			
(MC) Check that spill/leak clean up procedures are being followed.			

Stored Parts outside of buildings:

(ET) Check that all employees have been properly trained.			
(GH) Check that good housekeeping practices are being followed.			
(MC) Check that spill/leak clean up procedures are being followed.			

Overall Facility Best Management Practices:

(ET) Check that all employees have been properly trained.			
(GH) Check that good housekeeping practices are being followed.			
(MC) Check that spill/leak clean up procedures are being followed.			
(VI) Check spill kit for physical condition.			

EMERGENCY SPILL RESPONSE

It is Honolulu Disposal Service's responsibility and duty to prevent, control, and mitigate any hazardous material release/spill caused or initiated by our employees. In the event of a spill/release, usually stemming from a vehicular incident, a mechanic will be first to respond for repairs and to assess the scene if the Emergency Spill Response Team (ESRT) will be needed to clean and mitigate the incident.

If the spill incident is small enough, usually between 1-5 gallons of liquid, the reporting driver will immediately initiate the usage of the onboard Spill Kit, stop the flow of the spill, clean the area, and dispose of the contaminated material. The driver will immediately notify dispatch to send a mechanic to stop the leak and the mechanic will assist the driver with the clean-up process. If the spill is beyond the capabilities of the driver and mechanic the on duty manager or dispatch supervisor will be notified by the responding mechanic to activate the ESRT.

Dennis Kahaleua will be contacted immediately at (808) 383-2987, regardless of the time of day. If Dennis Kahaleua is unavailable Ray Luavasa will be contacted at (808) 630-1318 in his place.

When the incident exceeds the capabilities and resources of the ESRT, Pacific Commercial Services, Environmental Remediation Services will be contacted to respond to the incident. Contact Number; (808) 545-4599

If the spill or release is large enough, based on the chart below, to require a report to the Hawaii State Department of Health Evaluation and Emergency Response Office (HEER) the Safety Director, must be notified of the spill and he will facilitate the necessary reports.

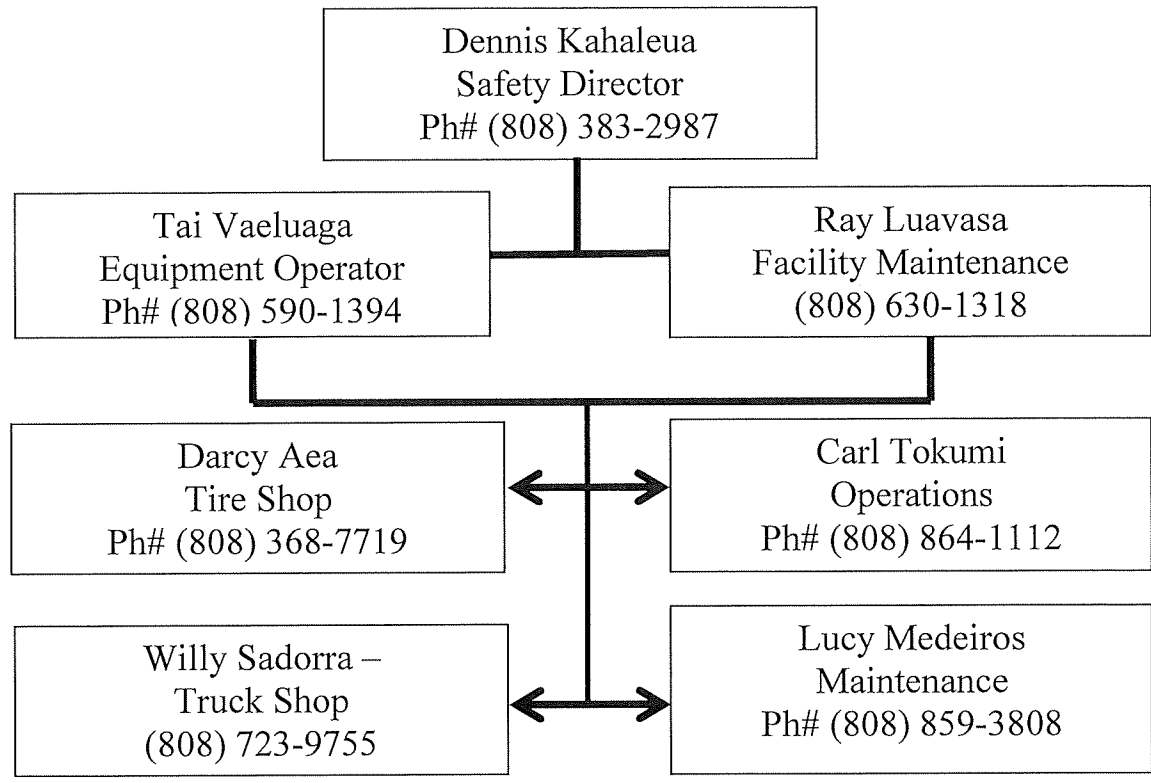
MATERIAL	RELEASED TO	REPORTABLE QUANTITY
Engine oil, fuel hydraulic & brake fluid	Land	>25 gallons
Engine oil, fuel hydraulic & brake fluid	Water	Visible Sheen On Water
Anti-freeze	Land	100 lbs. or >13 Gallons
Battery Acid	Land, Water	100 lbs. or > 6 Gallons
Freon	Air	1 lb.
Gasoline	Air, Land, Water	100 lbs. or > 15 gallons
Engine Degreasers	Air, Land, Water	100 lbs. or > 14 gallons

DOT DEFINITION

LARGE SPILL: ANY SPILL MORE THAN 55 GALLONS

SMALL SPILL: ANY SPILL LESS THAN 55 GALLONS

ACTIVATION CHART



RELEASE/SPILL CLEAN UP PROCEDURE

When a release is larger than what the spill kit on the truck or the spilled material exceeds the RQ levels:

- I) Dispatch is responsible to
 - a) Immediately activate the ESRT Leader of any and all spills.

- II) The Team Leader is responsible to:
 - a) Confirm the activation of the ESRT,
 - b) notify the Team Captains,
 - c) determine if the Steam Cleaner will be needed, and
 - d) determine if additional manpower will be necessary

- III) Crew Captains are responsible to
 - a) Meet at dispatch office immediately upon notification
 - b) Notify Team Members
 - i) Inform Team Leader members have been contacted
 - c) Gather/stage equipment and supplies
 - i) Absorbent – 5 bags
 - ii) Brooms & Pans – minimum 3 each
 - iii) Plastic bags – 5 minimum
 - d) Ensure each member has the appropriate PPE
 - i) Neoprene and Work Gloves
 - ii) Hard Hat
 - iii) Eye Protection
 - iv) N-95 Particulate Mask
 - v) Hi Visibility Vests
 - e) Enlist Ford P/U Truck #1 to load equipment and supplies and
 - (1) if necessary hook up the E-Vacuum Trailer and supplies

- IV) Team Members are responsible to:
 - a) Assemble at Dispatch Office
 - b) Assist in gathering equipment and supplies
 - c) Perform the duties at the scene as required
 - i) Be guided by Emergency Response team(s) at the scene
 - (1) HFD
 - (2) DOT Response
 - (3) HPD
 - d) Upon return
 - i) Dispose of the contaminated material,
 - ii) Clean and return all equipment and tools

Remember when Honolulu Disposal Service has caused or produced the spill/release we are the Responsible Party as part of the Incident Command System. We do not make any operational decisions but we can and will offer assistance wherever there is a need.