

## **CHAPTER 13**

# **DOCUMENTING PROGRAM EFFECTIVENESS**

In order to monitor program effectiveness, adequate documentation is necessary. The Consent Decree and MS4 NPDES Permit both require documentation of progress on current activities. Reporting requirements are described in Section 13.1. Similarly, additions, modifications, or revisions to the Oahu SWMP itself must also be documented. Procedures for major and minor changes to the Oahu SWMP are described in Section 13.2.

### **13.1 Progress Reports**

The status, progress and evaluation of the Oahu SWMP will be documented through Mid-Year and End-of-Year reports that are to be submitted to the HDOH during the duration of the Oahu MS4 NPDES Permit. The Mid-Year reports document activities for the period from July 1 to December 31 and are due to HDOH on March 31 of each year. The End-of-Year reports document activities for the period covered by the Mid-Year report plus the period from January 1 to June 30 and are due on October 31 of each year.

All future reports will include the following types of information or descriptions:

1. Oahu MS4 NPDES Permit and Consent Decree requirements, USEPA or HDOH orders for compliance, and other commitments set forth in the Oahu SWMP Plan;
2. Activities that occurred during the reporting period including, where applicable, progress accomplished toward meeting specific goals and performance measures, as specified in Chapter Twelve. If requirements are not fully met, a detailed explanation as to why HDOT Highways did not meet its commitments for the reporting period will be provided.
3. Specific future activities planned for the next reporting period to be undertaken during the next reporting period toward accomplishing specific goals and performance measures provided in Chapter Twelve.
4. Status of resources used during the reporting period, and an estimate of the resources over and above those required in the current reporting period that will be required in the next reporting period.

Due to the heavy emphasis on quantitative information and performance measures, the AMS will be integral in reporting information due to its ability to process information. Chapter Three contains a description of the AMS, including how it will be used for reporting purposes. The analytical capabilities of the AMS will also be used to calculate outcomes to evaluate project performance based on the objectives and Performance Measures provided in Chapter Twelve.

### **13.2 Changes to the Oahu Storm Water Management Program Plan**

During the life of the Oahu MS4 NPDES Permit, additions, modifications, or revisions will be made to the Oahu SWMP Plan due to receipt or development of new information, changing conditions or the incorporation of more effective approaches to pollutant control. All changes to the Oahu SWMP Plan will be documented in amendments to the plan. Minor changes may

be bundled within a single amendment. However, a major change, such as completion of the retrofit feasibility study (see Section 8.3), would require its own amendment.

If the amendment causes or implies a major reduction in the overall scope and/or level of effort of the Oahu SWMP, such a change would be made for cause and be in compliance with 40 CFR 122.62 and 40 CFR Part 124. The justification for the change must be supported by data or information contained in the most current or recent end-of-year report. A written report citing the data and information from the End-of-Year report and containing the proposed change or amendment would be submitted to HDOH 30 days prior to the initiation date of the modification.

The amendments would be provided to all parties who received a copy of Oahu SWMP Plan, and would be posted on the public website described in Section 4.2.1.5.