

**Statewide Storm Water Management Program  
Industrial and Commercial Facilities Inspection  
Training Plan  
June 20, 2006  
DRAFT**

Under the revisions and requirements of the Oahu MS4 NPDES permit (Permit), which became effective on March 31, 2006, HDOT is tasked with developing and providing training to staff on:

- How to conduct industrial and commercial inspections, including how to identify deficiencies and assess potential impacts to receiving waters;
- Types of facilities covered by the General Industrial Storm Water permit coverage or any other applicable NPDES permit;
- Components in a Storm Water Pollution Control Plan (SWPCP) for industrial facilities, including how to evaluate the appropriateness and effectiveness of deployed BMP's and SWPCP's, if applicable;
- BMP's and source control measures for industrial and commercial facilities; and
- Other inspection and enforcement techniques, including how to document site conditions and BMP conditions.

This training is to be specific to HDOT Highways Division activities, policies and procedures. The Permit requires that the training plan shall be submitted for DOH review by June 28, 2006, which is 90 days from the effective date of the permit. Inspectors are to receive training by September 26, 2006, which is 180 days from the effective date of the Permit, and annually thereafter.

The 2006 SSWMP Chapter 10 - Industrial and Commercial Activities Discharge Management currently states that "Storm water flowing from industrial and commercial areas may be a significant source of pollutants that enter the Oahu MS4. Therefore, the objectives of the Industrial and Commercial Discharge Management Program (Industrial Discharge Program) are to reduce to the maximum extent practicable the discharge of pollutants from all industrial and commercial facilities and activities that discharge into the Oahu MS4." Proper training in how to conduct industrial and commercial inspections is essential to meeting the objectives of this program.

Subsection D.1.g.(4)(b) of the Permit requires that inspections of the industrial and commercial facilities be in accordance with the applicable sections of the EPA's "NPDES Compliance Inspection Manual" (EPA 300-B-94-014, September 1994). Therefore, training will follow the guidance offered in several chapters of this EPA Manual as they relate to Highways Division activities, specifically with regard to storm water pollution control. While not all of the chapters or the entire content of each chapter will be pertinent to the Industrial/Commercial program the basic understanding of the methodology for inspections can be derived by using the EPA Manual.

The pertinent chapters are:

- Chapter 1 - Introductions  
This chapter deals with purpose and objectives, legal authority of the inspections, and responsibilities of the inspectors.
- Chapter 2 - Inspection Procedures  
This chapter offers information on pre-inspection preparation, entry onto the site, opening conference, documentation, closing conference and inspection report.
- Chapter 3 - Documentation / Recordkeeping and Reporting  
This chapter gives guidance on inspection authority, evaluation procedures and a checklist for verification, recordkeeping and reporting.
- Chapter 4 - Facility Site Review  
This chapter addresses objectives of the site review, physical inspection of the facility, operation and maintenance evaluation and a checklist.
- Chapter 11 - Storm Water  
This chapter covers a review of the storm water regulations, permits and sampling/ inspection considerations.
- Chapter 13 - Pollution Prevention  
This chapter has an overview of pollution prevention and assessment procedures for industrial facilities.

It should be pointed out that inspections for the SSWMP Industrial / Commercial program will be Category A as noted in Chapter 14 of the EPA Manual. These inspections are defined as program specific compliance inspections (NPDES permit requirement) conducted by one or more inspectors. The objective is to determine facility compliance status for program-specific regulations.

Inspections will be conducted on parcels prioritized from a list of industrial and commercial facilities and activities which initially discharge into HDOT Highways MS4. The list of parcels will be obtained from the best available information at the time that the list was assembled.

The industrial and commercial databases are being created from the following information:

- Findings from the 2000 Storm Water Questionnaire Survey of Parcels Adjacent to Highways Rights-of-Way;
- Available information about parcel owners from the City and the State;
- Collection of new information obtained during field activities; and
- Readily available intra-agency informational databases;

The types of facilities and activities contained in the Industrial database include:

- Municipal landfills (open and closed);
- Hazardous waste recovery, treatment, storage and disposal facilities;
- Facilities subject to Section 313 of the Emergency Planning and Community Right-to-Know Act, 42 U.S.C. 11023;
- Findings from follow-up investigations of the industrial facilities identified in the Questionnaire Survey;
- Facilities subject to General Industrial Storm Water permit coverage or any other applicable NPDES permit coverage which are adjacent to the DOT-Highways right-of-way or discharge to the Oahu MS4; and
- Any other industrial facility that either HDOT Highways or HDOH determines is contributing a substantial pollutant loading to the Oahu MS4.

The types of facilities and activities contained in commercial database include:

- Retail gasoline outlets;
- Retail automotive services, including repair facilities;
- Restaurants; and
- Any other commercial facility that either HDOT Highways or HDOH determines is contributing pollutants to the Oahu MS4, which may cause or contribute to an exceedance of State water quality standards.

An Asset Management System (AMS) which is being developed as part of the overall storm water program will be used to identify and rank industrial and commercial

facilities or dischargers according to relative risk that the discharge may be contaminated with pollutants, and how this might affect the quality of storm water runoff entering the Oahu MS4. The methodology to rank facilities will take into account the number of industrial and commercial facilities within particular areas, and within those areas identified, the following factors will be considered:

- Number and density of industrial and commercial facilities;
- Previous storm water violations;
- Water quality impairments; and
- Distance to 303(d) listed streams.

Based on the information collected and analyzed using the AMS, priority areas will be identified, as well as identifying and prioritizing industrial and commercial facilities or parcels for inspections. This prioritized plan will be submitted to HDOH by March 30, 2007, which is one (1) year of the effective date of the Permit, and once approved the AMS will be used to schedule inspections in accordance with quotas contained in the Permit, which is indicated in Table 1. The inspections for Year 1 will be conducted prior to submitting the official prioritization plan to HDOH.

If the Industrial Discharge Program is able to conduct more inspections than required for a given Permit year, any additional inspections above the quota for that year would be credited to the following Permit year.

**Table 1**  
**Inspection Quota for the Industrial and Commercial Discharge Management Program**

Oahu MS4 NPDES permit Year	Minimum Number of Inspections
1	20
2	30
3	40
4	60
5	80

Note: The Oahu MS4 NPDES permit became effective on March 31, 2006, and would expire on September 9, 2009, about three-and-a-half years later. Therefore, half of year 4 and all of year 5 are not covered under the existing permit.

If an industrial or commercial facility or activity does not require NPDES permit coverage, this facility or activity would be subject to inspection at least twice every five (5) years. If an industrial facility has NPDES permit coverage, this facility would be subject to inspection at least once every five (5) years. However, inspections would not be conducted at those facilities or activities subject to HDOH inspections pursuant to its NGPC or any other applicable NPDES permit. If an inspector finds an industrial or commercial facility does not have NPDES permit coverage, but would be required to

have coverage under State law, the facility would be reported to HDOH within 30 days of the inspection date.

Inspection reports would be submitted to HDOH within two (2) months of the inspection date, and records of all inspections would be maintained for a minimum of five (5) years.

Training shall be required of any new person responsible for carrying out any element of the Industrial Discharge Program, including any additional staff contracted by the State or through the master consultant contract. This includes, but is not necessarily limited to, inspectors responsible for duties specified under this program and clerks or managers responsible for maintaining databases and records, scheduling inspections, arranging follow-up activities and coordinating with HDOH.

Training shall be conducted through a formalized “on-the-job” method by experienced staff, such as managers and supervisors.

The managers and supervisors conducting training, shall have the following qualifications:

- Awareness of HDOT Highways activities, policies and procedures;
- Understanding of federal and State laws pertaining to industrial and commercial storm water discharges; and
- Knowledgeable in identifying and eliminating illicit connection, illegal discharges and spills to the Oahu MS4.

Each “on-the-job” training session shall be recorded and entered into this program’s training database. The trainer and training recipient shall be recorded in the database. The mid-year and end-of-year reports submitted to DOH shall contain information on the number and dates of trainings, types of training, and recipients of the training.