

Appendix C4: Program to Prevent and Response to Spills to the
City MS4, 2016





Program to Prevent and Respond to Spills to the City MS4

**For the City and County of Honolulu
Municipal Separate Storm Sewer System
National Pollutant Discharge Elimination System
Permit No. HI S000002**

Revised February 2016

**Prepared by
Department of Facility Maintenance, Storm Water Quality Branch
City and County of Honolulu**



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Definition and Acronyms

BMP	Best Management Practice
City	City and County of Honolulu
CSM	Collection System Maintenance, Department of Environmental Services, City and County of Honolulu
CWB	Clean Water Branch, Department of Health, State of Hawaii
DOH	Department of Health, State of Hawaii
ENV	Department of Environmental Services, City and County of Honolulu (from July 1, 1998)
HAZMAT	Hazardous Materials Response Unit, Honolulu Fire Department, City and County of Honolulu
HEER	Hazard Evaluation & Emergency Response Office, Environmental Division, Department of Health, State of Hawaii
HFD	Honolulu Fire Department, City and County of Honolulu
HPD	Honolulu Police Department, City and County of Honolulu
MS4	Municipal Separate Storm Sewer System
NPDES	National Pollutant Discharge Elimination System
Permit	National Pollutant Discharge Elimination System Permit No. HI S000002
State	State of Hawaii
SPCC	Spill Prevention, Control, and Countermeasure
SSBMP	Site-Specific Best Management Practices Plan
SWPCP	Storm Water Pollution Control Plan
SWQ	Storm Water Quality Branch, Department of Facility Maintenance, City and County of Honolulu
WTD	Division of Wastewater Treatment and Disposal, Department of Environmental Services, City and County of Honolulu
WWB	Wastewater Branch, Department of Health, State of Hawaii

References

Engineering and Policy Memorandum No. 2-95, “Criteria for Handling Drainage Discharge from Buildings and Appurtenant Structures,” City and County of Honolulu, dated June 14, 1995.

“Field Screening Plan,” City and County of Honolulu, dated February 2016

“Memorandum of Agreement between Departments Covered Under NPDES Permit HI S000002,” City and County of Honolulu, 2012

“Memorandum of Understanding between the Department of Health, Environmental Management Division, State of Hawaii and the Department of Public Works, City and County of Honolulu,” dated October 11, 1995.

“Memorandum of Understanding between the Department of Transportation, Highways Division, State of Hawaii, and City and County of Honolulu Departments of Environmental Services and City and County of Honolulu Department of Facility Maintenance,” dated February 2, 2002.

“National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit HI S000002,” State of Hawaii Department of Health dated May 24, 2011, referred to as the City and County of Honolulu’s Large MS4 permit.

“Response Plan for Investigations of Illegal Discharges,” City and County of Honolulu, February 2016.

Revised Ordinances of Honolulu, Chapter 14, Article 12, Drainage, Flood and Pollution Control.

“Rules of the Engineering Division for Drainage, Flood and Pollution Control, and Grading, Soil Erosion and Sediment Control Programs,” Department of Public Works, City and County of Honolulu, dated September 16, 1994.

“Rules Relating to Soil Erosion Standards and Guidelines,” Department of Planning and Permitting, City and County of Honolulu, dated April 1999.

“Sanitary Sewer Overflow Standard Operating Procedures,” Department of Environmental Services, City and County of Honolulu, dated December 2011

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1. Introduction

This document has been prepared in compliance with Part D.1.c.(7) of the City and County of Honolulu's (City) municipal separate storm sewer system (MS4) National Pollutant Discharge Elimination System (NPDES) Permit No. HI S000002 (Permit), effective February 16, 2015, issued by the State of Hawaii (State), Department of Health (DOH). Text from the permit has been provided below (in italics) with the corresponding permit reference numbers.

Part D.1.c.(7): "Prevent and Respond to Spills to the City MS4. The Permittee shall continue implement a program to prevent, respond to, contain, and clean up all wastewater and other spills that may enter into its MS4 from any source (including private laterals and failing cesspools Spill response teams, which may consist of local, state, and/or federal agencies, shall prevent public exposure to spills prior to preventing entry of spills into the City's MS4 and contamination of surface water, ground water, and soil to the MEP.

The Permittee shall continue to coordinate spill prevention, containment, and response activities throughout all appropriate departments, programs, and agencies to ensure protection of public health and maximum water quality protection at all times.

The Permittee shall continue to implement a procedure whereby DOH is notified of all wastewater spills or overflows from private laterals and failing septic systems into its MS4. The Permittee shall prevent, respond to, contain, and clean up wastewater from any such notification."

2. Prevention of Spills to the City MS4

a. Prevention of Spills from the City's Wastewater Collection System

The City is implementing a large, aggressive program to upgrade the wastewater collection system as part of a wastewater consent decree (Civil no. 94-00765 DAE) between the City, the State of Hawaii, and United States Environmental Protection Agency.

Additionally, the Department of Environmental Services (ENV) has ongoing programs to prevent spills from its collection system, including Closed Circuit Television inspection of its wastewater lines; smoke testing to inspect for potential illegal inflow from downspouts and other private sources; regulation, including inspection of grease traps at restaurants and other potential sources of grease to prevent blockages in the collection system.

b. Spill Prevention Control and Countermeasures Plans

For each City facility that stores 1,320 gallons or more of petroleum products above ground, the Department of Facility Maintenance (DFM) Storm Water Quality Branch (SWQ) or the using agency has developed Spill Prevention, Control, and Countermeasure (SPCC) Plans in accordance with Code of Federal Regulations 112 - Oil Pollution Prevention. City departments that have facilities requiring SPCC plans include ENV, DFM, Honolulu Fire Department (HFD), Honolulu Police Department (HPD), and Department of Enterprises Services. The facilities are inspected at least monthly by onsite personnel, as described in their individual SPCC plans. DFM-SWQ, or their consultants, perform SPCC inspections annually, with follow-up inspections if required.

c. Storm Water Pollution Control Plans and Site-Specific Best Management Practices Plans

The City has developed Storm Water Pollution Control Plans (SWPCPs) for each of the City facilities identified as "industrial" under the Permit. These facilities are involved in vehicle or equipment maintenance, vehicle or equipment fueling, vehicle or equipment cleaning,

chemical storage, corporation yards, bus facilities, recycling centers, closed landfills, and refuse transfer stations or convenience centers. Site-Specific Best Management Practices Plans (SSBMPs) have been developed for each of the facilities not identified as industrial but identified as Small MS4 facilities (two [2] or more buildings and a drainage system). The City also develops plans for facilities and activities that do not meet the above criteria but which may have potential to impact receiving waters. Annual inspections by DFM-SWQ are conducted for all municipal facilities with a SWPCP, and facilities with SSBMPs are inspected on a rotational basis such that each facility is inspected at least once every five (5) years.

d. Technical Training for Municipal Employees

Annual training related to spill prevention and control is provided to appropriate staff through various venues, including on-line training, classroom training, comments and suggestions as part of scheduled site visits, and in some cases by mock audit inspections as described in Chapter 8 of the City's "Storm Water Management Program Plan," February 2016.

e. Industrial and Commercial Facility Surveys

The Permit requires that DFM-SWQ inspect a minimum of 300 industrial and 100 commercial facilities annually in priority areas or other areas as necessary. The surveys include industrial facilities, gas stations, vehicle repair shops, and restaurants. The surveys include review of chemical storage, and best management practices (BMPs) such as secondary containment. Semi-annual reports of the industrial/commercial surveys are submitted to DOH as required by Part D.1.g.(4) *Inspection of Industrial and Commercial Facility and Activity*, of the City MS4 Permit.

The City may require additional controls at industrial sites whose private drains have been modified since the date of issuance of connection licenses issued by the Department of Planning and Permitting. Any discharge which does not meet the State's water quality standards or the City's municipal permit requirements may result in a cease and desist order or license termination.

3. Coordination with other Agencies

DFM-SWQ shares data and/or cooperates and coordinates activities with the following agencies:

- State Department of Transportation, Highways Division
- DOH, Environmental Division, Clean Water Branch (CWB)
- DOH, Environmental Division, Hazard Evaluation & Emergency Response Office (HEER Office)
- DOH, Environmental Division, Wastewater Branch (WWB)
- City, HFD's Hazardous Materials Response Units (HAZMAT)
- City, HPD
- U.S. Coast Guard

Spill response teams may include City, State, and/or Federal agencies listed above.

At an interagency meeting held on March 14, 1995, it was agreed that the following response protocol would be used for illegal discharges and spills to State, private, and City roads and drainage systems.

The agency having primary responsibility for inspection and enforcement will determine ownership of the first connection or point of direct discharge or spill to a drain system or waterway. Any discharge or spill to the private portion of streams is under the DOH jurisdiction.

If the discharge is to the City MS4, then DFM-SWQ will initiate enforcement action. If the discharge is directly to State waters, then DFM-SWQ will forward the complaint to the CWB (808-586-4309) for investigation and follow-up.

If the effluent is suspected to be oil or hazardous material from an accident or accidental spill, the U.S. Coast Guard (808-842-2601) will be notified. Additionally, the U.S. Coast Guard Safety Officer will be informed of all oil and hazardous waste spills (808-522-8260) into any navigable waters.

The Oahu Civil Defense Agency will also be contacted (808-733-4300), they in turn may call the DOH HEER Team (808-586-4249) and HFD's HAZMAT (808-422-1001) company in accidents involving toxic chemicals, petroleum, and radioactive material.

4. Responding to Complaints and Reports of Illegal Discharges to the City MS4

The process of responding to complaints and reports of illegal discharges to the MS4 is described in the "Response Plan for Investigations of Illegal Discharges," February 2016. The document discusses initiation, investigation procedures and enforcement procedures along with coordination with other agencies. As of July 1, 2015, The SWQ transferred from ENV to DFM. Through a memorandum of understanding, DFM-SWQ investigators will continue to enforce illicit discharges under ENV rules. DFM is currently going through the rule making process to obtain authority to enforce illicit discharges under their department.

5. Response Procedures for Spills from City Facilities

a. Wastewater Spills from the City Wastewater Facilities (Treatment Plants, Pump Stations, Sewers and Force Mains)

The overall requirements for responding to wastewater spills or discharges is contained in Appendix C of the DOH Administrative Rules, "Wastewater Systems," Chapter 11-62. Protocol for discharges and spills from the City's wastewater treatment plants, pump stations, and force mains is provided in the Wastewater Treatment Directive 0-7, ENV's Division of Wastewater Treatment and Disposal (WTD), dated October 24, 2006.

Wastewater spills from the City's wastewater treatment plants should be referred to the ENV-WTD.

Wastewater spills from the City wastewater collection system, should be referred to the ENV Collection System Maintenance (CSM) Division at (808) 768-7272, which responds during both normal working hours and after hours. The formal response procedure is provided in the ENV document titled "Sanitary Sewer Overflow Standard Operating Procedures," December 2011. It includes response and cleanup, reporting, sampling, sign posting, press releases, and coordination, including notifying the State Hospital Operator if necessary during off hours.

b. Spills from City Industrial Facilities

Oil discharges from SPCC regulated facilities shall follow the response and notification procedures in each facilities SPCC plan. In the case of a release of oil at the facility, prompt response must be conducted to limit environmental damage and human health and safety concerns. The Facility Manager (or designated alternate) is responsible for developing procedures for containing and cleaning up spills, including assuring that the necessary materials and equipment are available when needed.

Specialized spill response and cleanup contractors may be contracted by the City. These contractors have the necessary skills, experience, certifications, and equipment, including

floating booms and oil skimmers, to respond to a discharge of oil that affects navigational waters or adjoining shorelines.

6. Procedures for Spills from Private Facilities

a. Reports/Notification of Accidental Spills

The appropriate agency that is responsible to respond to the discharge or spill into the City MS4 shall comply with the provisions of this section regarding notifications, press releases, posting of warning signs, monitoring, and reporting.

b. Illegal Discharges from Private Laterals or Individual Wastewater Systems

When responding to a complaint of effluent discharge to a City street from failing individual wastewater systems (cesspools), the ENV-CSM crews procedures are required to do the following procedures.

- The owner is asked to cease the discharge, which would normally mean asking the resident to turn off his water and calling a plumber to fix the problem. If warranted, the police are called in to assist in stopping the discharge.
- Disinfect the street surface using “Tisan,” manufactured by Certified Labs, or a similar product.
- If the discharge is from a cesspool or individual wastewater treatment system, notification should be given to the WWB (808-586-4294) or the CWB (808-586-4309) during normal hours or the State Hospital Operator during nonworking hours (808-247-2191). DOH is the agency responsible for individual wastewater treatment systems, and makes the appropriate response including posting warning signs, if warranted.
- If the ENV’s cesspool pumping crews notice any overflow to the City Street, they notify the WWB (808-586-4294), for appropriate action (sign posting, disinfection, etc.).
- If the overflow enters storm drains or streams, the CWB (808-586-4309) is notified.

If it is not possible to contact the owner within a reasonable time frame as determined by the response team, the City may elect to clean up the spill and charge the owner for the cleanup cost including the cost of City labor, supplies, and equipment time, and material disposal. The City may also elect to use a contractor for cleanup and disposal of the collected material and required supplies. DFM is currently investigating the possibility of using indefinite delivery/indefinite quantity contracts to address the cleanup of spills from private facilities.

c. Department of Health Notification

If a spill occurs during working hours, the CWB (808-586-4309) shall be notified immediately. If a spill occurs during non-working hours, the State Hospital Operator shall be notified by phone immediately at (808) 247-2191. The next working day, the CWB shall be notified preferably by the City’s investigator.