



BEST MANAGEMENT PRACTICES

AUTOMOTIVE INDUSTRY

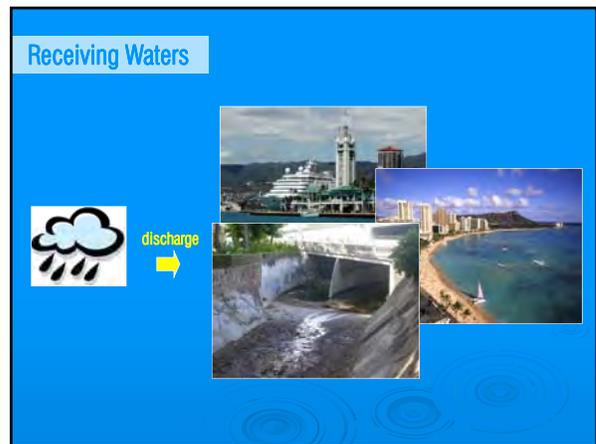
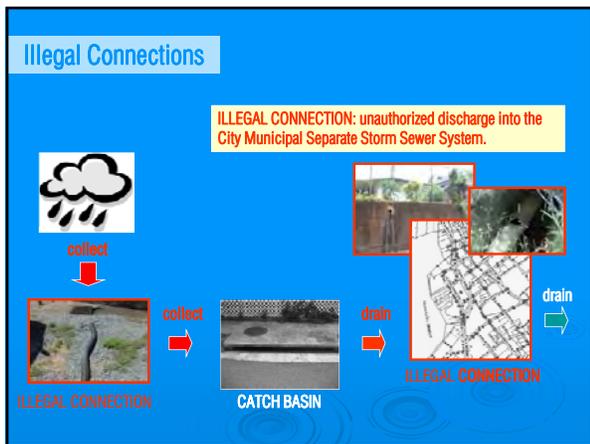


PLEASE HELP PROTECT OUR WATERS...FOR LIFE
 auto repair shops • auto dealerships • car rentals • gas stations • automotive specialty shops and services

February 2014

AGENDA

- Introduction
- The Law
- National Pollutant Discharge Elimination System (NPDES)
- The City's Storm Water Management Plan (SWMP)
- Best Management Practices (BMPs) for Automotive Industry
- City Inspections and Enforcement Program
- Summary

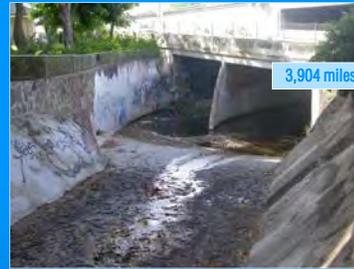


Water Pollution



One gallon of oil has the potential to contaminate up to one million gallons of water
Storm Water/Clean Water protection program

Water Pollution



3,904 miles of streams

Water Pollution



1,200 miles meet State Water Quality Standards
(3,904 miles of streams)
Storm Water/Clean Water protection program

Water Pollution



1,052 miles of coastline



Water Pollution



102 miles substandard Water Quality
(1,052 miles of coastline)
Storm Water/Clean Water protection program

Federal Law

THE CLEAN WATER ACT (CWA)

"...employed to achieve the broader goal of restoring and maintaining the chemical, physical and biological integrity of the nations waters so they can support the protection and propagation of fish, shellfish, and wildlife and recreation in and on the water..."

EPA Website



- CWA Regulatory & Non-regulatory Tools:
- Reduce direct pollutant discharges into waterways
 - Finance municipal wastewater treatment facilities
 - Manage polluted runoff

State Legislation

"No person, including any public body, shall discharge any water pollutant into State waters, or cause or allow any water pollutant to enter State waters"

[Hawaii Revised Statutes (HRS) 342D-50(a)]



- Hawaii Administrative Rules:
- Hawaii Water Quality Standards
 - Hawaii Pollution Control
- Hawaii Revised Statutes
- Hawaii Water Pollution

City Legislation

"It shall be unlawful for any person to discharge or cause to be discharged any pollutant into any drainage facility which causes a pollution problem in state waters, or causes a violation of any provision of the city NPDES permit or the water quality standards of the State of Hawaii"

[Revised Ordinances of Honolulu Section 14-12.23a]



- Revised Ordinances of Honolulu:
- Section 14-12.12 Connection to city-owned separate sewer system- violation
 - Section 14-12.22 Discharge of effluent other than storm water runoff- violation
 - Section 14-22.23 Environmental quality
 - Section 14-20.1 Cleaning of sidewalks

Enforcement



City and County of Honolulu
\$1,000 to \$25,000
Per violation/day



State Department of Health
\$25,000/violation/day
(Administrative/Civil Penalties)
\$50,000/violation/day
(Criminal Violation)
Criminal Prosecution



Environmental Protection Agency
\$37,500/day/violation
Criminal Prosecution

Violations



Hawaii DOT agrees to pay \$1 million to resolve storm water violations

Release date: 10/6/2009

Contact information: Lisen Higuchi, 808-541-2711, lhighuchi@epa.gov

Released jointly by the U.S. EPA, U.S. DOJ and Hawai'i Department of Health
Department fined \$1 million, will spend over \$50 million on compliance

HONOLULU - The Department of Justice, the U.S. Environmental Protection Agency, and the Hawai'i Department of Health have reached an agreement with the Hawai'i Department of Transportation that requires the department to pay a \$1 million penalty and spend an estimated \$50 million to address Clean Water Act storm water violations at highways and airports in Hawai'i.

"Storm water discharges pollute Hawai'i's streams, coastal waters, and coral reefs," said Wayne Nease, administrator of the EPA's Pacific Southwest region. "By agreeing to make long-lasting



Violations



Hawaii landowner agrees to pay \$7.5 million for stormwater pollution

Release date: 03/09/2009

Contact information: Dean Higuchi, 808-541-2711, dhiguchi@epa.gov

Honolulu - March 9, 2009) The United States government and its partners announced today that James Pflueger will pay more than \$7.5 million for Clean Water Act violations associated with construction activities on Pflueger's property at Pili'a on Kauai.

The Department of Justice, U.S. Environmental Protection Agency, Hawai'i Department of Health, Kauai County, Earthjustice, Limu Coalition and Kilauea Neighborhood Association are all part of the largest storm water settlement for violations at a single site, by a single landowner, in the United States.

The settlement calls for the payment of \$7.5 million in penalties to the state of Hawai'i and the United States, and Pflueger will spend approximately \$6.5 million to prevent erosion and restore kulauea at areas damaged by the construction activity. The settlement also requires Pflueger to spend \$200,000 to replace cross-poles with improved wastewater systems at residences in a nearby coastal community.

NPDES

MUNICIPAL
SEPARATE STORM
SEWER SYSTEM



(MS4)

discharge

RECEIVING WATERS



MS4 PERMIT

Issued to CITY by DOH
May 24, 2011
Effective June 24, 2011
Expires Sept. 8, 2014

STORM WATER MANAGEMENT PROGRAM REQUIRED ELEMENTS

Public Participation & Outreach 	Pollution Prevention and Good Housekeeping 	
Construction Site Runoff Control 		Post Construction Storm Water Management 
Illicit Discharge Detection & Elimination 	Monitoring & Implementation Plans 	Industrial & Commercial Discharge 

Industrial & Commercial Discharge

Reducing pollutant discharge from industrial & commercial facilities & activities to the City MS4

Commercial Facilities 	Inspections 	Inventory & Tracking 
Industrial Facilities 		

Our Goals

- ✓ Reduce storm water pollution
- ✓ Educate the public & city employees & contractors on storm water
- ✓ Maintain storm water infrastructure and Best Management Practices
- ✓ Develop a proactive process through which the City's SWMP can evolve to meet changing future needs
- ✓ Ensure compliance with permit requirements
- ✓ Meet the seven program elements required by EPA

AUTOMOTIVE INDUSTRY

Auto repair & maintenance are potentially significant sources of storm water pollution due to the handling of hazardous wastes.



AUTOMOTIVE INDUSTRY

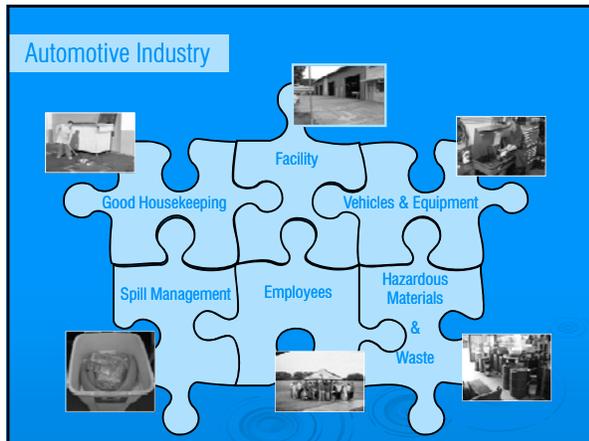


Implementing Best Management Practices (BMPs) will help minimize the discharge of pollutants in storm water from automotive activities.

BEST MANAGEMENT PRACTICES



Any program, technology, process, siting criteria, operating method, measure, or device that controls, prevents, removes, or reduces pollution



Types of BMPs

(secondary containment)

PREVENTION

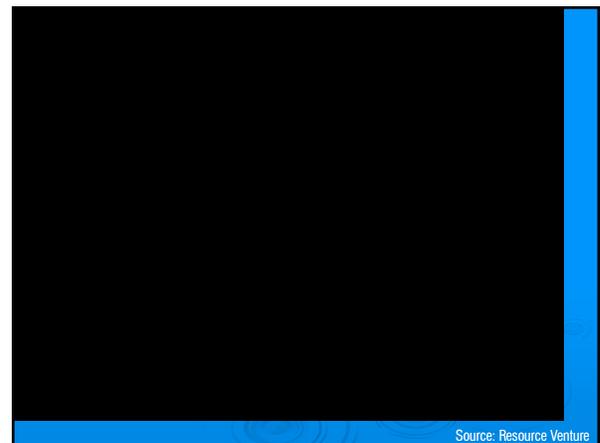
Source Controls:
Keep pollutants from coming into contact with storm water

(oil/water separator)

REMOVAL

Treatment Controls:
Capture and Remove pollutants from storm water

BMPs - Facility



Good Housekeeping - Paved Surfaces

- ❑ Do not hose down fuel-dispensing islands or spills
- ❑ Use dry methods (like sweeping) to clean and maintain these areas
- ❑ Inspect oil/water separator frequently
- ❑ Monitor parked vehicles for leaks
- ❑ Contain and collect any wash water runoff and solids
- ❑ Absorbent used for fuel spills should be swept up immediately & disposed of properly

BMPs - Good Housekeeping

Good Housekeeping - Supply & Waste Management

- ❑ Keep storage & disposal areas free of debris
- ❑ Provide overhead coverage for all outside hazardous materials or waste storage areas

BMPs - Good Housekeeping

Good Housekeeping - Supply & Waste Management



Leaking and uncovered dumpster

- ❑ Provide trash cans with lids to discourage littering
- ❑ Maintain dumpster and trash containers & keep them securely closed to prevent contact with storm water.
- ❑ Do not overfill trash receptacles or leave trash outside of containers
- ❑ Promptly clean up any spills or leaks around dumpsters.

BMPs - Good Housekeeping

Good Housekeeping - Supply & Waste Management



- ❑ Store batteries indoors in secondary containment
- ❑ Recycle used batteries

BMPs - Good Housekeeping

Vehicles & Equipment - Fluid Storage



Do not store unlabeled containers outside where they can rust!

- ❑ Store vehicle fluids in separate sealed & leak-proof containers in a designated area indoors on an impervious surface where there are no drains.
- ❑ Provide secondary containment if there is a potential for leakage or spills
- ❑ Store off the ground where items will not be exposed to storm water

BMPs - Vehicles & Equipment

Vehicles & Equipment - Fluid Handling



- ❑ Drain vehicles indoors or within covered areas over non-porous floors
- ❑ Use drip pans, containers and other methods of spill containment
- ❑ Transfer waste fluids to a labeled waste storage as soon as possible
- ❑ Prevent leaks & spills by draining disabled or stored vehicles
- ❑ Minimize "topping off"

BMPs - Vehicles & Equipment

Vehicles & Equipment - Maintenance - Washing

- ❑ Wash vehicles in designated areas
- ❑ Do not conduct maintenance, repair, or refueling activities where washing occurs
- ❑ Do not allow wash water to leave your site or enter the storm drain
- ❑ Pre-treatment of wash water may be required before discharging to the sanitary sewer.



BMPs - Vehicles & Equipment

Vehicles & Equipment - Maintenance - Washing

If you cannot contain the water on your site, don't wash! Take your equipment to a commercial washing site.



Here are two examples of what not to do:
 - Picture on the left shows poor washing practices, where soapy water is being allowed to run off the site.
 - The smaller picture above shows an oil stain that's being picked up by the wash water.

BMPs - Vehicles & Equipment

Vehicles & Equipment - Maintenance – Cleaning Parts



- ❑ Do not rinse or wash parts outdoors
- ❑ Designate areas for parts cleaning
- ❑ Use water-based cleaning solutions, minimize solvent use
- ❑ Avoid hose-off degreasers
- ❑ Brush off loose debris and wipe down
- ❑ Clean parts in self-contained sinks or drum units when working with solvents

BMPs – Vehicles & Equipment

Vehicles & Equipment – Waste Storage



- ❑ Keep liquid waste segregated
- ❑ Store off the ground & avoid exposure to rain water
- ❑ Recycle waste water from steam cleaning or pressure washing activities
- ❑ NEVER discharge rinse fluids to the City storm drain system

BMPs – Vehicles & Equipment

Vehicles & Equipment - Waste Disposal



- ❑ Transfer waste fluids to a labeled waste storage container as soon as possible
- ❑ Recycle empty used oil filters
- ❑ Recycle used solutions through a licensed hazardous waste hauler
- ❑ Manage used rags through a rag service or as hazardous waste

BMPs – Vehicles & Equipment

Hazardous Materials & Waste



- ❑ Secure lids and caps on containers
- ❑ Do not remove the original product label
- ❑ Do not store incompatible materials or waste together
- ❑ Contact licensed hazardous waste hauler to dispose of saturated absorbents, do not throw it away in dumpsters!

BMPs

Hazardous Materials & Waste



- ❑ Know your *Hazardous Spill Response Plan*
- ❑ Store hazardous materials & waste indoors in a secured area under lock and key
- ❑ Inspect hazardous materials & waste storage areas frequently for any leaks.
- ❑ Only purchase and store reasonable quantities of hazardous materials

BMPs

Employees - Training

- ❑ Standard Facility Procedures
- ❑ Spill Response
- ❑ Hazardous Material Response
- ❑ Emergency Response



BMPs - Employees

Spill Management

- ❑ Clean up spills immediately
- ❑ Place spill kit in easily accessible areas
- ❑ Use dry methods
- ❑ Do not leave absorbent on ground
- ❑ Do not hose down area
- ❑ Make sure employees are trained in spill management procedures



Spill Kit



Source: Resource Venture

Spill Management – Reporting

Report spills that cannot be completely contained or cleaned prior to entering the storm drain system



City and County of Honolulu
768-3300



Department of Health
247-2191



Emergency
911



NPDES Inspection Requirements

Part D.1.g.(4) Inspection of Industrial and Commercial Facilities and Activities

“The Permittee shall ensure that at a minimum 400 industrial and commercial facilities and activities identified in the industrial and commercial inventories required under Parts D.1.g.(1) and D.1.g.(2) are inspected annually. Inspectors shall determine compliance with local ordinances and the terms of this permit. If DOH inspects a facility for compliance with the General Industrial Storm Water permit coverage or any other applicable NPDES permit, then the Permittee does not need to inspect the facility that year.”

Inspections must consist of a review of implementation of BMPs for compliance with local ordinances and this permit to assess potential impacts to receiving waters. Inspections shall also assess potential sources of pollutants to the City MS4 and require controls to prevent discharge of pollutants to the City MS4.”

City Inspection Checklist

Do you need...

- ❑ A Storm Water Pollution Control Plan (SWPCP)?
- ❑ An National Pollutant Discharge Elimination System (NPDES) Permit?
- ❑ A Drain Connection License?



Facility



Inspections

Do you know the storm water flow pattern on your site?



Inspections



Does the storm water go to a drain inlet, the street, or a drainage channel?

Are there any illegal connections on your site?



Inspections



Connection License

REQUIRED
Private storm drain connection to City MS4

Discharge must meet the requirements of the City's MS4 Permit and State Water Quality Standards

Application for a New/Existing Temporary Private Storm Drain Connection to the City and County Sewer and Storm Sewer Systems

Application form with fields for Name, Address, and other details. It includes a list of requirements for the connection.

Inspections

Common Yard Violations

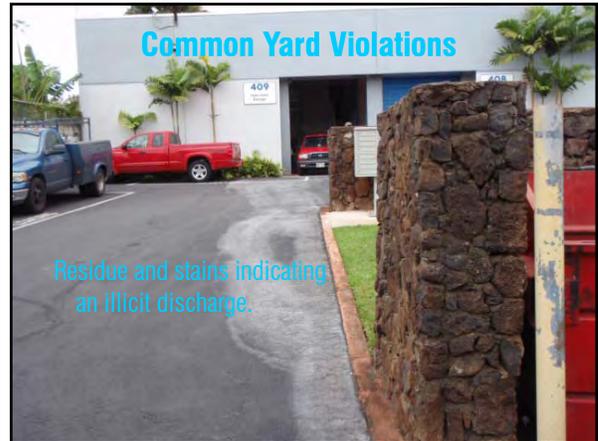


Storage of core batteries without overhead cover or secondary containment.



Common Yard Violations

Failure to promptly contain and clean-up spills and leaks



Common Yard Violations

Residue and stains indicating an illicit discharge.



Common Yard Violations

Lack of good housekeeping such as scrap metal, rusted parts and drums.

Enforcement

- ❑ Inspectors generally do not take enforcement action for deficiencies found on a first-time visit if facility is willing to correct them.
- ❑ Enforcement action, including fines, for deficiencies can be issued if a facility has failed to make corrections or has been visited before.

Enforcement

Investigations & Enforcement

- ❑ Deficiency Letter or Letter of Warning (minor first-time offenders)
- ❑ Notice of Violation (major or repeat offenses)
- ❑ Notice
- ❑ 90 days to obtain Connection License from DPP
- ❑ Fines from **\$1,000 to \$25,000**

Enforcement

QUESTIONS?

Please complete the EVALUATION FORM

Reminder

THANK YOU

For More Information:



www.cleanwaterhonolulu.com

RANDALL WAKUMOTO, CIVIL ENGINEER
Storm Water Quality Branch
Prt: 768-3242
Email: rwakumoto@honolulu.gov



Environmental Concern Line
768-3300

City & County of Honolulu
Department of Environmental Services

