How to Perform Construction BMP Inspections for Larger (NPDES) Projects

Jennifer Little

Lead 3rd Party Construction Inspector
Learning Objectives

- Understand the new Rules Relating to Stormwater Quality
- Understand the roles of the ESCP Coordinator and CWPPP
- Understand the requirements for Self-inspection
- How to Document inspections to show Compliance
- How to Conduct a Construction BMP inspection
Background for Changes

- 2013 EPA Audit → CCH MS4 NPDES Permit
  - MS4 = municipal separate storm sewer system
  - NPDES = National Pollutant Discharge Elimination Systems (DOH for EPA)

- Violations → indicated a need for revisions in City “Rules Relating to Water Quality”, more training, and 3rd Party Stormwater Construction Inspections

Kaukonahua Stream, North Shore Oahu December 2013
Water Quality Rules- Revisions August 2017

- Revisions to Definitions and Project Categories
- Updated BMP standards and minimum requirements
- **ALL** categories must submit Erosion and Sediment Control Plan (ESCP)
  - Category 1A, 1B, 2, 3, 4 (City permitted)
  - Category 1C, 5 (City & NPDES permitted).
- **ALL** applicants must designate an ESCP coordinator to implement the ESCP and perform inspections
- New requirements for Self-Inspection
ESCP and SWPPP

- **ESCP** = Erosion and Sedimentation Control Plan or the “BMP” Map
  - Mandatory for all category projects (new)
  - Mandatory for both public CIP and private projects

- **SWPPP** = Stormwater Pollution Prevention Plan
  - Mandatory for all NPDES permitted sites
  - Must be completed prior to applying for the NPDES General Permit Coverage (NGPC) to DOH

The ESCP may seem redundant to the SWPPP, but the intension is for the ESCP to be complementary
ESCP Submittal Requirements

- ESCPs must be submitted with the first set of construction plans.

- All ESCPs must indicate a ESCP Coordinator:
  - Name, phone number, mailing address, and email of ESCP coordinator
  - Must be provided to DPP 2 weeks prior to commencing any work

<table>
<thead>
<tr>
<th>ESCP must be prepared by:</th>
<th>Project Category</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1A</td>
</tr>
<tr>
<td>Licensed Civil Engineer</td>
<td>x</td>
</tr>
<tr>
<td>Owner or Agent</td>
<td>x</td>
</tr>
</tbody>
</table>

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City and County of Honolulu July 2018 | Construction Stormwater Quality Workshops
Inspectors - Need to know:

✓ What Category is your Project?

✓ What Documentation requirements do you need to review?

✓ What BMP requirements to check for?

✓ What is my role as an Inspector or ESCP Coordinator?
Project Category Overview
### Project Categories (§20-3-14 and 17) Trenching Permits

<table>
<thead>
<tr>
<th>New Category</th>
<th>Development that requires a trenching permit but <strong>does not</strong> require a grading, grubbing, or stockpiling permit.</th>
</tr>
</thead>
</table>

- ESCP shall be incorporated into trenching plan and notes (§20-3-17)

- Minimum BMPs required:
  - Project Scheduling
  - Storm Drain Inlet Protection for storm drains that may receive runoff from the Disturbed Area
  - Stockpile Management BMPs
  - Perimeter Controls
  - Dewatering Operations BMPs, and
  - Good Housekeeping Practices for work area and staging areas
# Project Categories (§20-3-14)
## Building Permits

<table>
<thead>
<tr>
<th>Category 1 (all):</th>
<th>Development that requires a building permit but does not require a grading, grubbing, or stockpiling permit.</th>
</tr>
</thead>
</table>
| **Category 1A**  | Must meet ALL of the following criteria:  
|                  | 1. Residential single-family or two-family detached residential Development;  
|                  | 2. The total Disturbed Area for the Project is less than 1,000 square feet; and  
|                  | 3. Land Disturbing activities will not occur on slopes equal to or greater than 15 percent at the Site. |
| **Category 1B**  | Must meet ANY of the following criteria:  
|                  | 1. Commercial Development with less than one acre of Disturbed Area;  
|                  | 2. Residential single-family and two-family detached Development between 1,000 square feet and less than one acre of Disturbed Area; or  
|                  | 3. Residential single-family and two-family detached Development less than 1,000 square feet of Disturbed Area if work will be performed on slopes equal to or greater than 15 percent at the Site. |
| **Category 1C NPDES** | Development that involves a Disturbed Area of one acre or more or requires a NPDES General/Individual Permit Authorizing Discharges of Storm Water Associated with Construction Activity, issued by the DOH. |
ESCP Requirements for **SMALL** Projects Category 1A and 1B

- Submit Small Project ESCP Template (Appendix A or B)
  - Submit additional information if needed
- ESCP must include:
  - BMP Site Plan
    - Outline of buildings and structures
    - Clear delineation of disturbed areas
    - Proximate location of proposed BMPs and drainage structures
    - Receiving waters located within 50 feet of the project site
- Minimum BMPs, checklist format
## Project Categories (§20-3-14) Grading, Grubbing, and Stockpiling Permits

<table>
<thead>
<tr>
<th>Category 2</th>
<th>Area of the zoning lot or portion thereof subject to the permit is less than 15,000 square feet for single-family or two-family dwelling uses and less than 7,500 square feet for other uses.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category 3</td>
<td>Area of the zoning lot or portion thereof subject to the permit is 15,000 square feet or more for single-family or two-family dwelling uses, or 7,500 square feet or more for other uses, but where the total area graded or stockpiled upon is less than 15,000 square feet for single-family or two-family dwellings uses and less than 7,500 square feet for other uses.</td>
</tr>
<tr>
<td>Category 4</td>
<td>Total area including any areas developed incrementally that is to be graded, grubbed, or stockpiled upon is 15,000 square feet or more for single-family or two-family dwelling uses, or 7,500 square feet or more for other uses, or in the event a proposed cut or fill is greater than 15 feet in height for single-family or two-family dwelling uses, or 7.5 feet in height for other uses.</td>
</tr>
<tr>
<td>Category 5 NPDES</td>
<td>Development that involves a Disturbed Area of one acre or more or requires a NPDES General/Individual Permit Authorizing Discharges of Storm Water Associated with Construction Activity, issued by the DOH.</td>
</tr>
</tbody>
</table>
ESCP Requirements Category 2 and 3 (§20-3-21 and 22)

ESCP must include:

- BMP Site Plan, drawn to scale, which depicts:
  - Outline of buildings and structures
  - Clear delineation of Disturbed Areas
  - Proximate location of proposed BMPs

- Construction notes with a narrative description of any BMPs that cannot be shown on a Site plan

- A vicinity map showing any drainage structures and Receiving Waters located within 50 feet of the Project Site
ESCP Requirements for: Category 1C, 4, and 5 (§20-3-20, 23, and 24)

**ESCP must include:**

- A location map showing the name, coordinates, and RW classification.
- A vicinity map showing the location of, within 100 ft of the project:
  - Streams, channels, and drainage structures.
- The location of the 100-year flood plain.
- Topo maps of the existing/finished contours.
- Existing/final drainage patterns and discharge points.
- Proposed structures, impervious areas, existing vegetation, final landscaping conditions, and appurtenant improvements.
- Erosion Control construction notes include BMPs that cannot be shown on a Site Plan.

- A BMP Site Plan, drawn to scale, showing:
  - Outline of buildings and structures,
  - Delineation of Disturbed Areas, and
  - Proximate location of proposed BMPs.
- BMP design details and notes identifying:
  - Temporary and Permanent BMPs,
  - Schedule for BMP implementation, and
  - BMP maintenance activities.
- A list or table of:
  - Preconstruction, during construction, and post-construction BMPs;
- A statement in construction notes that the contractor/developer/owner shall obtain written approval from DPP at each stage of Development before proceeding to the next step in Development described in the ESCP.
Example of ESCP - Larger Sites
Example of ESCP- Larger Sites

Include:

- Project Sequence and Rain Response Plan
- Narrative description of BMPs that cannot be shown on Site Plan (Good Housekeeping & maintenance requirements)
- List BMPs that are not applicable
Projects may also require NPDES permits from DOH
- (Category 1C and 5)
  - Form C: Construction > 1 acre
  - Form F: Hydrotesting
  - Form G: Dewatering

NPDES permit required for all point source discharges to State waters and three (3) situations involving stormwater
- Stormwater associated with construction activities that disturb 1 acre or more.
- Storm water associated with industrial activities.
- Storm water from Municipal Separate Storm Sewer Systems (MS4)

All NPDES permitted projects require a SWPPP (Stormwater Pollution Prevention Plan)

Hawaii Administrative Rules (HAR) Effective December 2013

- Chapter 11-54 - Water Quality Standards

- Chapter 11-55 Appendix C - NPDES General Permit
  - Authorizes Discharge of Stormwater associated with construction activity
  - DOES NOT include or authorize Non-stormwater discharges which require approval and additional permits from the City and County of Honolulu

- Department of Health (DOH) oversees the NPDES permits for EPA
Who Needs Inspections?

- Inspections are required for **ALL** construction projects:
  - City CIP (DDC, DFM, ENV, DTS)
  - Building-permitted private projects (DPP)

- **All categories** permitted by the City and County of Honolulu are subject to stormwater inspections by **both**:
  - City Inspectors (CCH)
  - 3rd Party Construction Inspectors (JACOBS)
  - Agencies (EPA, DOH)
Why conduct construction inspections?

✔️ Pollution prevention to the City’s MS4

→ Improve quality of runoff into the City’s storm drain system and reduce pollutants into our streams and ocean

✔️ Ensure that **Best Management Practices** (BMPs) are:

→ in place, installed properly and working as intended.

✔️ Comply with the City’s water quality rules (WQR) requirements

✔️ Avoid notices of violations and fines
Think:

Rain and Stormwater
Where is Stormwater going?

The first step in inspecting BMPs for a new development is to understand the site topography and impacts during construction. In particular, when it rains, the volume of stormwater and its velocity. This can differ based on storm events and phasing of your project.

- Perform a pre-construction site visit to determine runoff locations during rain
- Assess Volume
  - How much runoff are we trying to manage?
- Assess Velocity
  - Where is it going and how fast is it moving?
- Remember: the ESCP and SWPPP are living documents
Use BMPs to protect our streams and ocean.
Role of the Erosion and Sediment Control Plan Coordinator
ESCP Coordinator

“ESCP Coordinator” means the designee responsible for the implementation of an ESCP who has a current ESCP Coordinator Certificate from DPP.

- Requires a training, test, and certification from DPP.
- It can be the homeowner if the homeowner has taken the online training and obtained the certification.
- No professional credentials required.
- Responsible for implementation of BMPs and required inspections.
- Submits the inspection reports to the City’s DPP at the end of the project.
# Role of the ESCP Coordinator - Before, During, & After Construction

| Before Construction | • Read and understand ESCP and discuss with Contractor  
|                     | • Install BMPs as specified in ESCP  
|                     | • Conduct a **Pre-Construction Inspection** prior to start of work |
| During Active Construction | • Conduct **regular inspections**  
|                           | • Monitor and Maintain BMPs  
|                           | • Modify BMPs as needed, note changes in ESCP |
| After Construction | • Conduct a **Final Inspection** and confirm that all Disturbed Areas have been stabilized and all temporary BMPs have been removed  
|                    | • Submit the **Final Project Log*** and **ESCP Letter of Compliance** to DPP for project closeout |

* The **Final Project Log** is the file of all completed ESCP inspection reports and photographs. Keep it on Site or electronically accessible from the Site **at all times** and in a complete condition.

All communication is submitted through DPP and ultimately run through the assigned Inspector in order to close out the permit.
Role of the Certified Water Pollution Plan Preparer
CWPPP

“Certified Water Pollution Plan Preparer” means the designee Architect, Engineer, Land Surveyor, or Landscape Architect licensed in the State of Hawaii who has a current Water Pollution Plan Preparer Certificate from DPP.

- Requires a training, test, and certification from DPP
- Required to prepare Stormwater Quality Report/Checklist
- Required to certify that post-construction BMPs are installed properly
Having a designated ESCP Coordinator or CWPPP **does not** relieve the property owner or other responsible parties from compliance with these Rules or liability for violations the same
Online Training

Mobilization

- Review your site ESCP and/or SWPPP (if NPDES permitted)
- **Tip** - Make a copy and carry with you during inspections
- Check the site for BMP installation
  - Are all BMPs installed?
  - Are all BMPs installed per the ESCP or SWPPP?
  - Are all BMPs installed correctly?
  - If unsure of installation requirements, review the CCH BMP Manual for guidelines
- Discuss any BMP installation concerns with Contractor
- Check scheduling - BMPs may change over time depending on site conditions and construction constraints
- Be prepared for changes or large rain events - Extra BMPs handy
Required Construction Inspections

- Inspections must be performed by the ESCP Coordinator
- Pre-construction inspection required for all projects
- Regular Inspections:

<table>
<thead>
<tr>
<th>Project Category</th>
<th>Frequency of Inspection</th>
<th>Checklist</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category 1A, 1B, &amp; 2</td>
<td>Once every 30 days*</td>
<td>Appendix C</td>
</tr>
<tr>
<td>Category 3, 4, &amp; Trenching</td>
<td>Once every 7 days</td>
<td>Appendix C</td>
</tr>
<tr>
<td>Category 1C &amp; 5</td>
<td>Once Every 7 days</td>
<td>Appendix D</td>
</tr>
</tbody>
</table>

* if the Project will be completed in less than 30 days, inspection shall occur midway through the Project

- Final Inspection at the conclusion of the project
  - Note that CWPPP to certify post-construction BMPs
NPDES Required Inspections

- Daily visual BMP inspection
- Once Every 7 calendar days- CCH DPP Appendix D
- Within 24 hours of qualifying rain event (0.25” or more)
- NPDES required documentation

Inspections required by “qualified person”
- knowledgeable in erosion and sediment control and pollution prevention
- who can assess conditions at the construction site that can impact water quality, and
- skills to access the effectiveness of stormwater controls to meet requirement of general permit.

- Must keep rain gauge on site or obtain storm event information from weather station that is representative of location.

- Inspections required during project’s normal working hours. Taking the day off because it is raining **DOES NOT EXEMPT** you from permit responsibilities!!
Conducting Inspections
Prior to Your Inspection

- Review Site Specifications or “BMP Plans”
  - Erosion and Sedimentation Control Plans (ESCP) and/or
  - Storm Water Pollution Prevention Plan (SWPPP)

- Perform a preconstruction inspection to determine site conditions

- Questions to ask yourself:
  - Where is the stormwater is going?
  - What type of BMPs are designated in the plans?
  - Are BMPs appropriate for the site?

- Resources: Who are your City Inspectors, PM, ESCP Coordinator, and Contractor site contacts?
Resources

- City and County of Honolulu BMP Manual (2011)
- [www.cleanwaterhonolulu.com](http://www.cleanwaterhonolulu.com)
- DOH E-Portal for NPDES reporting or SWPPP changes
On-site Documentation

- Project Log
  - Completed inspection reports
  - Photos

- Documents
  - Hardcopy onsite
  - Electronic files available by request
Documentation

- SWPPP and ESCP
- NGPC - Notice of General Permit Coverage
- Contacts - owner and Responsible persons
- List of subcontractors
- Schedule
- Staff Training log
- ESCP (include amendments or markups)
- Weather log - NOAA or rain gauge onsite
- Waste management, spill prevention, and response procedures
- Inspection Checklist - BMPs Weekly Inspections and Rain inspections
- Corrective Actions
- City permits posted
SWPPP

- Site specific, written document
- Identifies Potential sources of stormwater pollution at your construction site
- Describes stormwater control measures to reduce or eliminate pollutants in stormwater discharges from your site
- Identifies procedures you will implement to comply with the terms and conditions of this general permit

ESCP

- BMP map
ESCP and SWPPP- Living Documents

- **Minor Changes**
  - Changes must be noted on the Site copy and initialed by City inspector

- **Major Changes**
  - Changes must be proposed to DPP Director in writing and approved before work resumes
BMP Inspection Checklist for NPDES - Appendix D

Projects subject to both City (DPP) and State (DOH) NPDES requirements

### BMP Inspection Checklist for NPDES Permitted Construction Projects

<table>
<thead>
<tr>
<th>General Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Name:</td>
</tr>
<tr>
<td>Inspector's Name:</td>
</tr>
<tr>
<td>Location:</td>
</tr>
<tr>
<td>Project Manager:</td>
</tr>
<tr>
<td>Authorized Rep.:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Inspections Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regular Weekly Inspection</td>
</tr>
<tr>
<td>Storm Event Report</td>
</tr>
</tbody>
</table>

### Construction Site BMPs Inspection Checklist

**General Information**
- **Project Name:** [Enter Project Name]
- **Inspector's Name:** [Enter Inspector's Name]
- **Location:** [Enter Location]
- **Project Manager:** [Enter Project Manager’s Name]
- **Authorized Representative:** [Enter Authorized Representative’s Name]

**Inspections Type**
- Regular Weekly Inspection
- Storm Event Report

**Description of BMP**

**Photo**

**Project Phase (check all that apply):**
- Monitoring: Description
- Grading: Clearing
- Grading: Earthwork
- Building Construction
- Demolition

**Photo**

**BMP Measures Implemented:**
- [ ] Berming (Intentional or Spontaneous)
- [ ] Erosion Control (Vegetation)
- [ ] Storm event controls
- [ ] Storage and Inventory

**Photo**

**Other Notes:**
- [ ] Note 1
- [ ] Note 2

**Conditions:**
- [ ] Note 3
- [ ] Note 4

**Conclusion:**
- [ ] Notes

**Photo**
How to Conduct a BMP Inspection

NPDES permitted and Larger sites
During Inspections

- Walk through **all** project areas!!!

- Exposed soils/Existing Vegetation
- Site perimeter Controls
- Storm Drain Inlet Protection
- Entrance/exit BMPs
- Sidewalk and roadway
- Dust control
- Equipment & vehicle parking
- Housekeeping practices
- Material storage areas
- Stockpiles
- Designated Concrete Washout
- Other liquid waste materials
- Spill Prevention
Exposed Soils During Construction

What BMPs to stay compliant?
Ask yourself:

- Is work Completed or Temporarily Inactive?
- Can completed areas be stabilized permanently?
- Do I need temporary coverage on soils while inactive?
- Other options?
Vegetation Preservation

The best way to prevent erosion is to not disturb the land.

Erosion control is the **FIRST LINE OF DEFENSE**.

Existing vegetation to be preserved on the site should be protected from mechanical and other injury while the land is being developed.
Natural Buffer

- Land Disturbance > 50 feet from State Water:
  - Provide 50 foot undisturbed natural buffer and sediment control

- Land Disturbance < 50 feet from State Water:
  - Provide undisturbed natural buffer less than 50 feet plus a double sediment control

- Cannot Provide Natural Buffer of any Size:
  - Provide double sediment control and complete stabilization within 7 calendar days of temporary or permanent cessation of earth disturbance.
NPDES

- Install sediment controls along all perimeter areas of site that will receive stormwater from earth disturbing activities.

- Protect storm drain inlets (DIs) that receives project site storm water only if Permittee has authority to access storm drain inlet.
  - DI Protection- May be removed in event of flood conditions where SAFETY or loss of property is concern. Otherwise let the BMP do its job during rain.

- Discharges of all non-storm water is prohibited. This includes stormwater mixed with wash water/ effluent and stormwater that has contacted contaminated soil. (contaminated soils must be segregated)

- For any portion of the site that discharges to sediment or nutrient-impaired State waters, complete stabilization within 7 calendar days after temporary or permanent cessation of earth disturbing activities.

- Complete BMP routine maintenance by close of next work day after discovering problem.

- Complete significant repairs to BMPs no later than 7 calendar days from time of discovery.
Site Perimeter Controls

- Sagging fence
- Full of sediment
- Wind blown and not trenched in
- Not installed properly
Site Perimeter Controls

- Silt fence
- Biosock
Storm Drain Inlet Protection

- Missing BMP
- Vehicle Parked on BMP
- Materials on inlet
- Exposed soils - Need more BMPs
- BMP pulled aside
- BMP falling into inlet
Storm Drain Inlet Protection

- Gutter buddies
- Filter fabric under grate
- Silt fence surrounding
- Gravel bag surrounding
- Maintenance
- Witches hat
Entrance/Exit BMPs
Exposed Soils

Dust Control - Watering site

Hydroseed

Temporary or permeant matting
Material Storage
Material Storage
Concrete Waste Management
Concrete Waste Management
Spill Prevention
Spill Kits
During Inspections

- Ask questions like:
  - Is it the right BMP for the application?
  - Is the BMP installed correctly?
  - Is the BMP maintained?

- If answer is “NO”, make necessary BMP adjustments
  - BMP not working as desired
  - Improper installation
  - Damaged BMP
  - Make prompt fixes and repairs

- Note any BMP changes/modifications in your ESCP and SWPPP
Changes to ESCP during Construction

- **Minor Changes**
  - Changes must be noted on the Site copy and initialed by City inspector

- **Major Changes**
  - Changes must be proposed to DPP Director in writing and approved before work resumes
During Inspections

- Fill checklist as you go
  - Recommend to use a pen to fill out

- Note deficiencies observed
  - Take photos

- Anticipate what activity will happen next and prepare for it

- Communicate findings with other Site workers
  - Goal: to improve work practices
BMP Deficiencies - July 1, 2017 - June 30, 2018

- WM-9 Sanitary/Septic Waste Management: 14%
- WM-8 Concrete Waste Management: 8.3%
- WM-6 Hazardous Waste Management: 12%
- WM-5 Solid Waste Management: 9.6%
- WM-4 Spill Prevention and Control: 7.9%
- WM-3 Stockpile Management: 8.3%
- WM-10 Liquid Waste Management: 7.9%
- TR-1 Stabilized Construction Entrance/Exit: 7.9%
- SE-1 Silt Fence: 12%
- SE-10 Storm Drain Inlet Protection: 12%
- SE-11 Chemical Treatment: 9.6%
- SE-12 Location of Potential Source Sediment: 7.9%
- SE-2 Sediment Basin: 7.9%
- SE-7 Street Sweeping and Vacuuming: 7.9%
- SE-8 Sandbag Barrier: 7.9%
- SE-16 Compost Socks and Berms: 7.9%
- Documentation: 7.9%
- EC-5 Soil Binders: 7.9%
BMP Deficiency Categories
**Minor Deficiencies** - Do not pose a threat of discharging pollutants to the MS4 or surface waters, but are not in strict conformance with ESCP

<table>
<thead>
<tr>
<th>Level of Severity</th>
<th>Examples include, but are not limited to:</th>
</tr>
</thead>
</table>
| Minor             | • ESCP does not reflect current operations and an amendment is needed  
|                   | • BMPs are not deficient, but are not consistent with the ESCP  
|                   | • **Site inspections by the ESCP Coordinator are not being conducted at the required frequencies**  
|                   | • Hazardous materials or waste stored within the project area in improper locations  
|                   | • Oil, fuel, or brake or transmission fluid spills covering less than one (1) square yard  
|                   | • Evidence of active wind erosion on exposed slopes/stockpiles  
|                   | • Minor tracking on public roadway (less than 50 feet from project from defined ingress/egress locations) |

Must be corrected **within 7 calendar days or before the next forecasted rain event**, whichever is sooner
Minor Deficiencies - Examples

Must be corrected within 7 calendar days or before the next forecasted rain event, whichever is sooner.
Major Deficiencies - Indicate a lack of good-faith efforts to comply and could reasonably result in the discharge of pollutants to the MS4 or surface waters under rain conditions.

<table>
<thead>
<tr>
<th>Level of Severity</th>
<th>Examples include, but are not limited to:</th>
</tr>
</thead>
</table>
| Major             | • Failure to obtain an approved ESCP before land disturbance activities  
|                   | • Erosion and Sediment Control BMPs and/or Good Housekeeping BMPs that are improperly installed or which are not functional or effective  
|                   | • Oil, fuel, or brake or transmission fluid spills covering more than one (1) square yard  
|                   | • Sediment tracking more than 50 feet from the project ingress/egress in any direction or 25 feet from the project perimeter in any direction  
|                   | • Dust from project site visible blowing off the site |

Must be corrected within 5 calendar days or before the next forecasted rain event, whichever is sooner.
Major Deficiencies - Examples

Must be corrected *within 5 calendar days or before the next forecasted rain event*, whichever is sooner
Critical Deficiencies - Result in or pose an immediate threat of pollutant discharges to the storm drain inlets or surface waters.

<table>
<thead>
<tr>
<th>Level of Severity</th>
<th>Examples include, but are not limited to:</th>
</tr>
</thead>
</table>
| Critical          | • Any observed discharge, or evidence of discharge, of untreated storm water or non-storm water to the storm drain system or surface waters  
|                   | • Missing Erosion and Sediment Control BMPs and/or Good Housekeeping BMPs  
|                   | • Work in an active stream channel or other surface water body without proper implementation of required BMPs |

Must be corrected immediately by close of business
Critical Deficiencies - Examples

Must be corrected **immediately** (by close of business)
Critical Discharge- What to do?

- Stop construction activities that are contributing to the discharge
- Is the discharge a threat to Public Health or Safety?
- Report to DOH-CWB
- Report to MS4 owner (City and County of Honolulu)
- Isolate and contain discharge, implement BMPs
- Clean up discharge
- Investigate and determine the extent of discharge  
  - Example: gallons/minute
- Inspect all BMPs and repair as necessary
- Document the discharge and corrective actions taken
Self Reporting

- You are required to notify the DOH of **ALL** instances of non-compliance with the NPDES permit
  - Tel: 808-586-4309

- Critical Discharges require reports to both DPP and DOH
  - Stormwater
  - Non-stormwater
Useful Resources:

- www.cleanwaterhonolulu.com
- www.health.hawaii.gov/cwb/
- City and County of Honolulu BMP Manual (2011)
DOH CWB Contacts

- DOH-CWB Email: cleanwaterbranch@doh.hawaii.gov
- DOH Phone: (808) 586-4309
Questions?

Jennifer Little
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808-440-0236