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## **Useful Tips for Pollution Control at Commercial and Industrial Facilities**

February 24, 2008

### **Background**

The National Pollutant Discharge Elimination System (“NPDES”) Permit issued by the State Department of Health (DOH) to the City and County of Honolulu for its municipal separate storm sewer system provides in pertinent part as follows:

- g. **Industrial and Commercial Activities Discharge Management Program**  
The Permittee shall develop and implement an industrial and commercial discharge management program to reduce to the Maximum Extent Practicable (“MEP”) the discharge of pollutants from all industrial and commercial facilities and activities which initially discharge into the Permittee’s MS4.

Inspectors shall determine compliance with local ordinances and the terms of the City’s NPDES permit, assess potential sources of pollutants to the City’s MS4, identify deficiencies, evaluate the appropriateness and effectiveness of deployed Best Management Practices (“BMPs”) and Storm Water Pollution Control Plans (“SWPCPs”), if applicable, and assess potential impacts to receiving waters.

### **Useful Tips**

Here are some useful tips to reduce polluted runoff from commercial and industrial areas and similar facilities designated as industrial use by the EPA. While not extensive, these Best Management Practices address areas that the Storm Water Quality Branch has frequently found lacking in past inspections.

#### **Outside Areas**

1. Observe the natural flow pattern of storm/rain water on property to determine the best area to store materials and avoid contamination of storm water. Direct runoff from

paved areas to landscaped areas. Pollutant discharge associated with storm water runoff into the City's MS4 is a violation<sup>1</sup>.

2. Regularly clean and maintain drain inlets on property. If catch basins and/or drain inlets are connected to the City's MS4, you need to have a private storm drain connection license<sup>2</sup>.
3. Keep materials and stockpiles covered or contained to prevent contamination of storm/rain water system.
4. Keep dumpster lids closed storm water contaminated by contact with trash could lead to a violation. Replace leaking dumpsters.
5. Keep outside areas organized and clean. Dispose of empty containers, sweep regularly, remove scrap material, clean up spills, oil, and hydraulic fluid leaks promptly.
6. Conduct vehicle maintenance under covered areas. Use drip pans and absorbent materials.
7. Washing vehicles is allowed only if:
  - a) Vehicle wash water is kept on property so it does not flow into City's MS4.
  - b) Water is discharged into the sewer however, pretreatment is required and is subject to approval by ENV's Regulatory Control Branch, at: 768-3262.

### **Chemical Storage and Handling**

1. Store batteries under roof and dispose of properly.
2. Chemicals, fuel, and oil should be stored in marked, covered containers in a well-ventilated area under roof, use secondary containment (e.g. containment pallet) if applicable.
3. Provide clearly labeled spill response kits near chemical storage area that is easily accessible, not in locked rooms.
4. Schedule employee training for spill response, proper handling and disposal, and pollution prevention on a regular basis.

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<sup>1</sup> ROH 14-12.23 Environmental quality control-Violation.

<sup>2</sup> ROH 14-12.12 Connection to city-owned separate storm sewer system-Violation.