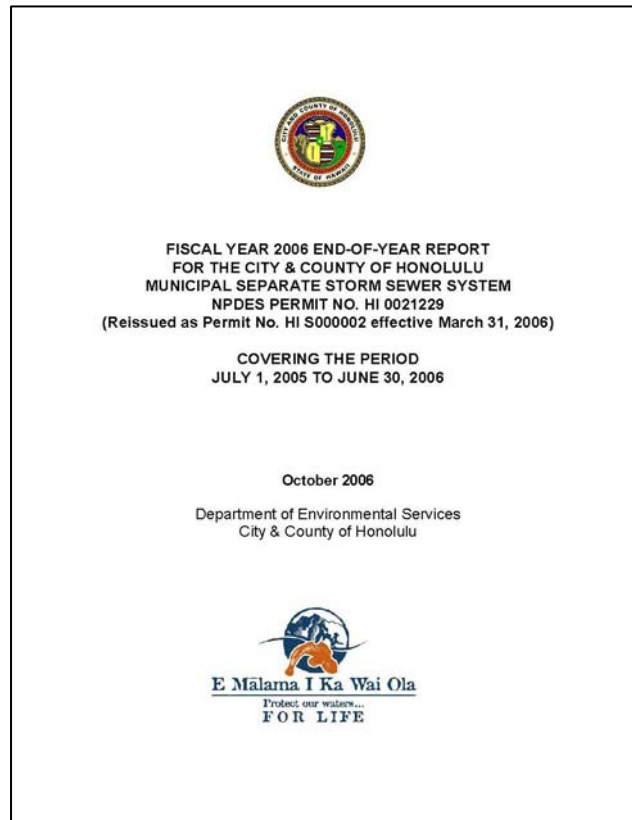


# CHAPTER 11

## REPORTING REQUIREMENTS



*Annual Report*



## Chapter 11.0 – Reporting Requirements

The City is required to file various reports and documents to comply with Part F of the NPDES Permit No. HI S000002. The City’s NPDES permit identifies three reports or documents that must be filed with the Department of Health. They include:

- Annual Report;
- Annual Monitoring Report; and
- Memorandum of Understanding.

Specifically, Part F of the Permit states:

*“F. REPORTING REQUIREMENTS*

*1. Annual Report*

- a. The Permittee shall submit the Annual Report by October 31<sup>st</sup> of each year. The Annual Report shall cover the past fiscal year.*
- b. The Permittee shall revise its SWMP to include a description of reporting procedures and activities, including schedules and proposed content of Annual Reports such that, at a minimum, the following is reported for each storm water program component in each Annual Report:*
  - (1) Requirements: Describe what the Permittee was required to do (describe status of compliance with conditions of this permit and other commitments set forth in the SWMP).*
  - (2) Past Year Activities: Describe activities over the reporting period in comparison to the requirements, including, where applicable, progress accomplished toward meeting specific goals, standards and milestones or other specific performance requirements. When requirements were not fully met, include a detailed explanation as to why the Permittee did not meet its commitments for the reporting period. Also describe an assessment of the SWMP, including progress towards implementing each of the SWMP program components.*
  - (3) Future Activities: Describe planned activities, including, where applicable, specific activities to be undertaken during the next reporting period toward accomplishing specific measurable goals, standards and milestones or other specific performance requirements.*



3. *Memorandum of Understanding (MOU) – Roles and Responsibilities of the City*
  - a. *The City shall continue to maintain and comply with the “Memorandum of Understanding Between the Department of Transportation Highways Division, State of Hawaii, and the Department of Environmental Services and the Department of Facility Maintenance, City and County of Honolulu,” signed by the Department of Environmental Services on December 19, 2001; by the Department of Facility Maintenance on December 27, 2001; and the State Department of Transportation, Highways Division on February 1, 2002. Amendments to the MOU, if any, shall be summarized in the End-of-Year Report.*
  - b. *The Permittee shall continue to maintain and comply with the “Memorandum of Understanding between the Department of Health, Environmental Management Division, State of Hawaii, and Department of Public Works, City and County of Honolulu,” signed by the Department of Public Works on September 28, 1995, and the Department of Health on October 11, 1995. The Permittee shall coordinate MOU revisions to reflect the reorganization of the City’s departments.*

The following sections describe the City’s approach to compliance with Part F of the Permit.

### **11.1 Annual Report**

The City has submitted and will continue to submit an annual End-of-Year Report in compliance with the requirements of this NPDES permit.

The annual End-of-Year report will be submitted to the DOH by October 31<sup>st</sup> of every year. The content of the report will cover the prior fiscal year.

The annual End-of-Year Report will describe three main components of SWMP activities undertaken over the previous fiscal year including:

- Compliance requirement and past and future activities;
- Modifications to the SWMP and MS4 system; and
- Program Effectiveness Reporting.

### 11.1.1 Reporting Procedures and Activities

The annual End-of-Year report will be organized in the same format as the permit and include descriptions of each storm water program component such as reporting procedures, activities and schedules. Program components to be included in reporting activities are:

- **Public Education and Outreach.** Typical activities conducted to date have included initiation of the E Malama I Ka Wai Ola logo branding, storm drain stenciling, phone survey of island residents, Adopt-a-Stream and Adopt-a-Block campaigns, participation in Earth Month, preparation of handouts and fact sheets, purchase of media such as print and air time, participation in school events to raise awareness of schoolchildren and sponsorship of Train the Trainer workshops;
- **Public Involvement and Participation.** The Annual Report will describe posting of the proposed SWMP on the City’s website for public review, publication of a notice of public hearing on the draft SWMP in local print media coupled with the results of a public meeting soliciting input on the draft SWMP;
- **Illicit Discharge Detection and Elimination.** The Annual Report will describe field screening activities industrial areas seeking illicit discharges through the inspection of outfalls. Previous Annual Reports described such efforts in the Pearl City Industrial Park;
- **Construction Site Runoff Control.** The Annual Report will describe training activities conducted during the past fiscal year, describe structural BMPs installed in the recent past, efforts to review plans, permits or land use documents as well as follow up inspections and enforcement actions for permit violations;
- **Post-construction Storm Water Management in New Development and Redevelopment;**
- **Pollution Prevention and Good Housekeeping; and**
- **Industrial and Commercial Activities Discharge Management.** Previous Annual Reports described surveys of the Pearl City and Campbell Industrial Parks. The FY06 Annual Report presented a schedule for future surveys of the Kaneohe Industrial Park, the Aiea/Pearl City area and the Waipahu Business Center.

Four elements will be included in reporting activities for each program component. These elements will be:

1. **Requirements:** The End-of-Year Report will describe NPDES permit requirements for that program component as well as the state of compliance with permit conditions and other conditions set forth in the SWMP.

2. **Past Year Activities:** The End-of-Year Report will describe activities undertaken over the past year to comply with permit requirements, and (where applicable) progress accomplished towards meeting specific measurable goals, milestones or performance requirements. Should the City not fully meet its commitments established in the SWMP, the End-of-Year Report will provide a detailed explanation for its failure to meet its commitments. In addition, the review of past year activities will provide an assessment of each SWMP program component that discusses the City's progress towards implementation of each SWMP program component.
3. **Future Activities:** The End-of-Year Report will describe planned activities to be undertaken for the upcoming year for each component. The report will provide (where applicable) schedules, specific activities, measurable goals or milestones for each program component.
4. **Resources:** The End-of-Year Report will provide a status of the City's resources for implementing the requirements of this NPDES permit during the current reporting year. The report will also provide an estimate of resources required for the next reporting period.

### **11.1.2 Modifications to SWMP or MS4 System**

The annual End-of-Year Report will include a description of any modifications to the SWMP and major modifications to the MS4 system for the prior year. Justification will be provided for any modification to the SWMP and MS4 system.

Modifications to the SWMP may include alterations to programs, implementation schedules or monitoring efforts. Modifications to the MS4 system may include addition or removal of outfalls, drainage lines or treatment facilities.

### **11.1.3 Program Effectiveness Reporting**

Attached as Appendix A.2 is the plan for program effectiveness of the SWMP. This document describes how the City will measure the effectiveness of their activities related to the SWMP and the reporting mechanisms of their progress.

## **11.2 Annual Monitoring Report**

The City has submitted and will continue to submit an annual monitoring report in compliance with the requirements of this NPDES permit.

The annual monitoring report will be submitted to the DOH by October 31<sup>st</sup> of every year. The content of the report will cover the prior fiscal year.

Three elements will comprise the annual monitoring report. Descriptions of these elements are as follows:

1. Written narrative of the past year’s objectives, activities and coordination with other agencies. Current objectives include:
  - Monthly sampling in the Waiakeakua, Waihi and Manoa Streams in an attempt to identify specific pollution sources in the Ala Wai watershed;
  - Suspended sediment and total suspended solids sampling in the Waiakeakua, Waihi and Manoa Streams to develop a mathematical relationship that will allow more cost effective sampling of these streams to allow evaluation of the impact of urban and forested areas on the Ala Wai watershed;
  - Biotic and habitat assessment of a selected stream;
  - BMP survey of transportation and refuse collection providers serving the Waikiki Business District
  - Identification of other monitoring related activities such as intergovernmental agreements with the US Geological Survey or Memorandums of Understanding with DOT and others.
2. Publication of data gathered throughout the year for pollutants identified in the Annual Monitoring Plan described previously in Section 10.0.
3. Evaluation of rainfall events, measured pollutant loads and discharge volumes from the Ala Wai watershed. These same requirements will apply to other watersheds that may be identified from time to time by the DOH as subject to monitoring.

### **11.3 Memorandum of Understanding (MOU)**

The City previously entered into two separate MOU agreements. These agreements are identified as follows:

- Memorandum of Understanding between the Department of Transportation Highways Division, State of Hawaii and the Department of Environmental Services and the Department of Facility Maintenance City and County of Honolulu (effective 2002); and
- Memorandum of Understanding (MOU) between the Department of Health, Environmental Management Division, State of Hawaii and the Department of Public Works, City and County of Honolulu (effective 1995).

The requirements of this NPDES permit mandate continued maintenance and compliance with these two MOUs. The following describes the City’s approach to maintaining and complying with these documents.

### **11.3.1 MOU Between DOT, Highways Division and the City**

DOH regulations require an interagency agreement between the City and the DOT due to the interconnected nature of the City’s municipal storm sewer system and the state highway drainage system. The document establishes intergovernmental coordination between the DOT and the City. It clearly delineates roles and responsibilities of the DOT, the City’s Environmental Services (ENV) and the City’s Facility Maintenance (DFM) departments. The delineation of responsibilities serves to minimize discharge of pollutants from one municipal system to another while minimizing duplication of effort.

The City will continue to maintain and comply with the “Memorandum of Understanding Between the Department of Transportation Highways Division, State of Hawaii and the Department of Environmental Services and the Department of Facility Maintenance, City and County of Honolulu” signed by ENV on December 19, 2001; by DFM on December 27, 2001; and the DOT on February 1, 2002.

Future amendments to this document, if any, will be summarized in the Annual Report described in Section 11.1 above.

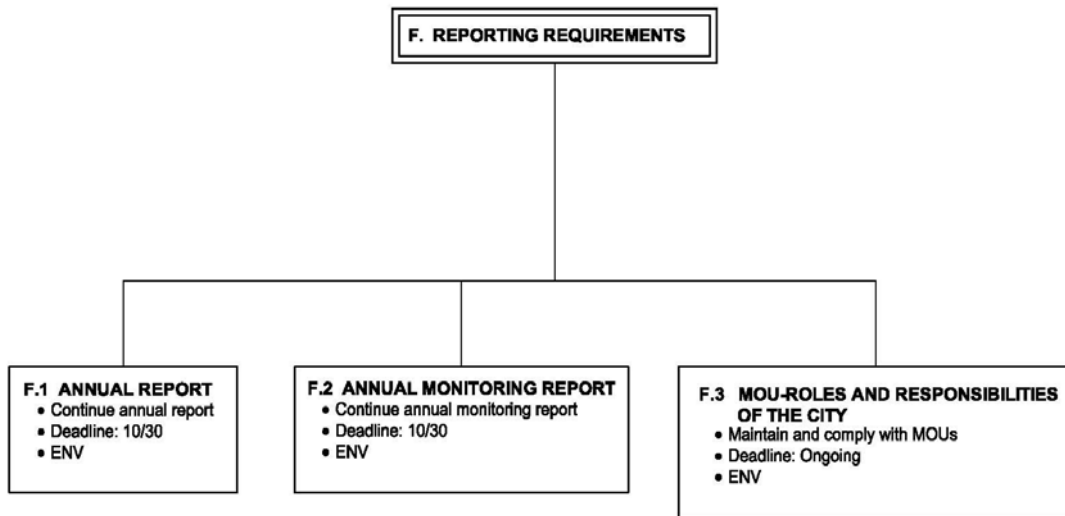
### **11.3.2 MOU Between DOH and DPW**

Although not required by regulations at the time, the DOH and the DPW entered into an interagency agreement to minimize the discharge of any pollutants to the City’s MS4 and state waters to the maximum extent practicable. The intent of this MOU was to delineate agency roles and responsibilities, minimize duplication of efforts and ensure accountability.

The MOU is identified as “Memorandum of Understanding (MOU) between the Department of Health, Environmental Management Division, State of Hawaii and the Department of Public Works, City and County of Honolulu” and became effective in 1995. It remains in effect at the time this SWMP is written.

Subsequent to enactment of the MOU, the City reorganized itself. The result is that the City’s signatory agency (DPW) no longer exists. This creates the need to revise the current MOU with a new document that notes the reorganization of the City’s departments.

The City will create a revised MOU between DOH and the City. The revised document will maintain and comply with the provisions of the “Memorandum of Understanding (MOU) Between the Department of Health, Environmental Management Division, State of Hawaii and the Department of Public Works, City and County of Honolulu” signed by the DPW on September 28, 1995 and the DOH on October 11, 1995. The modified MOU will reflect changes to the City’s departmental organization. It will identify new City signatory agencies. In addition, the MOU will be updated per recent changes in permitting requirements. Figure 11-1 identifies the responsible party for Reporting Requirements.



**FIGURE 11-1**  
Responsible Agency  
Reporting Requirements