

Draft

ENFORCEMENT RESPONSE PLAN

Storm Water Management Plan

Marine Corps Base Hawaii

NPDES Permit No. HI 000007

Prepared by:

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List of Acronyms and Abbreviations

BMP	Best Management Practice
CCH	City and County of Honolulu
DOE	State of Hawaii Department of Education
DOH	State of Hawaii Department of Health
ENV	Marine Corps Base Hawaii Environmental Department
EPA	United States Environmental Protection Agency
ERP	Enforcement Response Plan
GIS	Geographic Information System
JBPHH	Joint Base Pearl Harbor-Hickam
MCB Hawaii	U.S. Marine Corps Base Hawaii
MCCS	Marine Corps Community Services
MCD	Facilities Maintenance Control Division
MS4	Municipal Separate Storm Sewer System
MS4 Permit	U.S. Marine Corps Base Hawaii's NPDES Permit No. HI S000007
NAVFAC	Naval Facilities Engineering Command
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
O&M	Operation and Maintenance
PPV	Public-Private Venture (Housing)
ROICC	Resident Officer in Charge of Construction
sf	Square Feet
SWMP	Storm Water Management Plan
SWPCP	Storm Water Pollution Control Plan
SWPPP	Storm Water Pollution Prevention Plan
U.S.	United States

1 Introduction

As of the effective date, October 15, 2014, the Marine Corps Base Hawaii (MCB Hawaii) is required to comply with the conditions of the National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit No. HIS000007 (referred to hereinafter as the “MS4 Permit”). The MS4 Permit includes authorized storm water and specified non-storm water discharges into Kaneohe Bay, Nuupia Ponds, Kailua Bay, and the Mokapu Central Drainage Channel (MCDC). Per the MS4 Permit, Part D.1.d.(6) MCB Hawaii is required to provide an Enforcement Response Plan. The MS4 Permit states:

Construction Site Runoff Control, Part D.1.d.(6)

“Enforcement – Within one (1) year from the effective date of this permit, the Permittee shall:

- (i) Establish policies for enforcement and penalties for those in non-compliance with Part D.1.d.(2) [Requirement to implement BMPs] requiring the implementation of standards, and*
- (ii) Develop and implement an Enforcement Response Plan to include written procedures for appropriate corrective and enforcement actions, and follow-up inspections when an inspected project is not in full compliance with its requirements, other permits, and any other applicable requirements under the NPDES permit program.”*

Enforcement is also required within other parts of the MS4 Permit as follows:

Illicit Discharge Detection and Elimination (IDDE), Part D.1.c.(5)

“Enforcement – Within one (1) year after the effective date of this permit, the Permittee shall:

- (i) Establish policies for enforcement and penalties for entities found to be in noncompliance with requirements developed in accordance with Part D.1.c.(1) [Connection Permits for private drain connections], including for persons illegally discharging pollutants to its MS4, and*
- (ii) Pursue enforcement actions against entities in non-compliance with its requirements, with illegal drain connections, and illegally discharging pollutants to its MS4 without direct connections.”*

Industrial and Commercial Activities Discharge Management Program, Part D.1.g.(7)

“Enforcement Policy for Industrial and Commercial Facilities and Activities - Within one (1) year of the effective date of this permit, the Permittee shall establish and implement its own polices for enforcement and penalties for industrial and commercial facilities which have failed to comply. The policy shall be part of an overall escalating enforcement policy and must consist of the following:

- Conducting inspections.*
- Issuance of written documentation to a facility representative within 30 calendar days of storm water deficiencies identified during inspection. Documentation must include copies of all field notes, correspondence, photographs, and sampling results, if applicable.*
- A timeline for correction of the deficiencies.*

- *Provisions for re-inspection and pursuing enforcement actions, if necessary.*

In the event the Permittee has exhausted all available sanctions and cannot bring a facility or activity into compliance with its policies and this permit, or otherwise deems the facility or activity an immediate and significant threat to water quality, the Permittee shall provide e-mail notification to cleanwaterbranch@doh.hawaii.gov, Attn: Enforcement Section Supervisor within one (1) week of such determination. E-mail notification shall be followed by written notification and include a copy of all inspection checklists, notes, photographs, and related correspondence in pdf format (300 minimum dpi) in accordance with Part A.6 within two (2) weeks of the determination. In instances where an inspector identifies a facility that has not applied for the General Industrial Storm Water permit coverage or any other applicable NPDES permit, the Permittee shall provide email notification to the DOH within one (1) week of such determination.”

The primary objectives of the ERP are to:

1. Ensure base-wide compliance with the MS4 Permit and updated Storm Water Management Plan (SWMP).
2. Improve records and tracking information to create an updated inventory of construction projects, and to facilitate routine and follow-up inspections which will ultimately help to prevent illicit runoff from reaching receiving surface waters.

2 Existing Policy and Standards

MCB Hawaii is unique from most MS4s in that within its property boundary, it owns the property and almost all of the facilities, and provides funding for a majority of work. For the purpose of this document, the term “tenants” will be used to describe all individuals and organizations present within MCB Hawaii. This includes, but is not limited to military personnel and their dependents, construction and maintenance contractors, civilian employees, commercial businesses, industrial facilities, schools, and recreational facilities.

All tenants on base are subject to the rules and regulations of the new MS4 Permit, and the subsequent SWMP. The revised permit and plans supersede previous versions of these documents.

Due to the nature and internal structure of MCB Hawaii, the most effective means for enforcement is escalation of unaddressed violations to the next higher authority. Although unaddressed violations can be escalated as high as the Base Commander, this has not been an issue in the past due to the inherent threat of discharge or eviction from MCB Hawaii.

2.1 Management of MS4 Compliance at MCB Hawaii

MS4 Permit violations can be reported through various inspection procedures or through formal complaints by tenants. The entity responsible for standard inspection procedures is dependent on the type of facility or project, organized as follows:

- **General Base-wide Inspections:** Routine inspections are carried out by the Base Inspector and crew. These are intended to promote overall compliance with all established rules and regulations. The Base Inspector is also responsible for following up with all written or verbal complaints received via mail, email, or the complaint hotline.
- **Construction/Post-Construction Sites:** Oversight for MS4 compliance of construction projects will comply with the “Reporting and Corrective Procedures for Construction Storm Water Inspections, January 2015,” submitted by MCB Hawaii to meet the requirements in Section D.1.d.(5)(iv) of the MS4 Permit (see attached). Construction projects are split into two main categories at MCB Hawaii, contracted projects and in-house and maintenance construction.

1. Contract Projects:

Projects contracted by the Navy Facilities Engineering Command (NAVFAC) are managed through the Resident Officer in Charge of Construction (ROICC), Kaneohe. In these situations the ROICC manages required inspections for safety issues and environmental compliance. Inspection records are tracked internally at the ROICC Office and are available to the MCB Hawaii Environmental Department (ENV).

The Department of Education (DOE), Marine Corps Community Services (MCCS), and Housing Public Private Venture (PPV) Forest City also contract construction projects and are responsible for ensuring communication and enforcement of contractor compliance with MS4 Permit regulations. Inspection records are tracked internally by the entity involved and are available to the ENV. In accordance with the MS4 Permit requirements, ENV will conduct monthly inspections of construction projects completed by these tenants.

2. In-house and Maintenance Construction Projects:

These projects are managed by the Facilities Maintenance Control Division (MCD) and are typically less than 5,000 square feet (sf) and/or related to emergency repairs. ENV will conduct monthly inspections, and tracking as required by the MS4 Permit. At the ENV's discretion, special consideration will be given to emergency projects to account for the urgent nature of these projects.

- Housing PPV: Forest City is responsible for communicating and enforcing MS4 Permit requirements with all tenants of the PPV Housing. The Base Inspector conducts regular inspections of the PPV Housing areas, as part of the general base-wide inspections, to ensure compliance of residents.
- Illicit Discharge: The ENV currently conducts annual illicit discharge inspections of all industrial areas listed in Part E of the MS4 Permit.
- Commercial: Commercial sites within MCB Hawaii are managed by MCCS. The Base Inspector conducts regular inspection of these facilities as part of the general base-wide inspections.
- Industrial: The ENV conducts annual inspections of industrial areas listed in Part E of the MS4 Permit.
- Schools: Mokapu Elementary's storm water program is managed and funded by the DOE. The Base Inspector conducts regular inspection of school facilities as part of the general base-wide inspections.
- Formal Complaints: Written or verbal complaints received via mail or the complaint hotline are followed-up by the Base Inspector.

At the discretion of the ENV, all facilities are subject to additional periodic inspection by an ENV qualified inspector(s). See Table 1 for the Organization of MCB Hawaii's Oversight for MS4 Compliance.

Table 1: Organization of MS4 Compliance Oversight

Source of Storm Water Runoff	Responsible for Corrective Action	Responsible for Inspections	Required Permits/ Agreements	Recordkeeping and Tracking
General Basewide Storm Water Issues	Varies	Base Inspector, ENV	None	Varies
NAVFAC Construction by Outside Contractor	Contractor	ROICC	Contract documents, including plans & specifications Project-specific NPDES Permit or connection/discharge permit (if applicable)	ROICC
Construction & Maintenance – In-house	MCD	MCD, ENV	Project-specific NPDES Permit or connection/discharge permit (if applicable) None (If no permits needed)	ENV
DOE – Mokapu Elementary School	DOE (State)	DOE, ENV	Lease Agreement Project-specific NPDES Permit or connection/discharge permit (if applicable)	DOE
PPV Housing	Resident (Residential Lots) Forest City (Common Areas)	Base Inspector, ENV	Lease Agreement Project-specific NPDES Permit or connection/discharge permit (if applicable)	Forest City
MCCS – Commercial Areas	Commercial Tenant	ENV	Lease Agreement Project-specific NPDES Permit or connection/discharge permit (if applicable)	MCCS
Industrial Areas	Facility Manager	ENV	Facility-specific Pollution Control Plan	ENV
Written/Verbal Complaints	Varies	Base Inspector, ENV	Varies	Varies

3 Tenant Agreements

The DOE, commercial, and PPV Housing tenants are required to follow updated MCB Hawaii SWMP requirements through primary lease agreements with MCB Hawaii. Secondary tenants, that have leases with any of these three entities, are responsible for complying with the more stringent requirements of either the MCB Hawaii SWMP or their secondary lease, as applicable. In all cases the primary lease holder is accountable for all communications and enforcement of MCB Hawaii MS4 Permit regulations among its tenants. Commercial businesses are overseen by MCCA. The PPV Housing area is managed by Forest City, which signs secondary lease agreements with all residents. The DOE manages and funds MS4 compliance for Mokapu Elementary School. It is noted that the Mokapu Elementary School is not part of the DOE MS4 and is subject only to the MCB Hawaii MS4 permit.

MCB Hawaii ENV will coordinate with MCB Hawaii Real Estate to receive an inventory of the existing properties and the points of contact for any observed MS4 Permit violations.

Regular operations and maintenance (O&M) activities in school, commercial, and residential areas will continue to be monitored through routine general base-wide inspections. For contracted construction projects, it is the primary lease holder's responsibility to ensure communication and enforcement of MCB Hawaii MS4 Permit regulations with contractors. These construction projects are also subject to the "Reporting and Corrective Procedures for Construction Storm Water Inspections, January 2015" and applicable contract requirements; in the event of a discrepancy, the more stringent requirement will apply. Periodic site inspections will be conducted by an ENV-qualified inspector, at the discretion of the ENV. The ENV will work directly with DOE, MCCA, Forest City, or a corresponding representative, where applicable.

In the future MCB Hawaii may work with the Navy legal department to develop contract language for new and renewing tenants that will facilitate inspection procedure tracking and overall SWMP compliance.

4 Inspections and Reporting Procedures

Outside of its own inspections, the ENV will be notified of MS4 Permit violations detected during routine inspections if:

1. The Base Inspector identifies a violation during general base-wide inspections.
2. A MS4 Permit violation is not internally, and promptly resolved by processes in place through construction contracts with the ROIC, MCCA, PPV or DOE.

Upon ENV notification, the violation will be classified according to severity of the offense, as follows:

Critical Deficiency: A deficiency that poses an immediate risk of discharge of pollutants to a storm drain MS4 system, surface waters or State waters. Critical deficiencies include, but are not limited to, the following examples:

- Any evidence or observed discharge of non-storm water to the storm drain system, surface waters, or State waters generated by construction activity;
- No Storm Water Pollution Prevention Plan (SWPPP) document or NPDES permit;
- Absence of perimeter controls and/or linear barriers required by the SWPPP document;
- There are identified storm drain inlets, surface waters, or State waters within or adjacent to the project site in close proximity to disturbed soil areas without control measures in place that pose an immediate threat of untreated storm water discharges;
- Work in an active stream channel or other surface water body without proper implementation of required BMPs; and
- Any presence of any spilled oil or hazardous materials near to unprotected storm drain inlets, surface waters, or State waters.

Major Deficiency: A deficiency that is a significant issue that could result in the discharge of pollutants to the storm drain system, surface waters or State waters. Major deficiencies include, but are not limited to, the following examples:

- Linear barriers and/or perimeter controls in areas tributary to a water body or drain inlet that are installed as required by the SWPPP document, but are not functional, such as silt fences that are not anchored properly, have collapsed, or are overwhelmed by accumulated sediment;
- Hazardous materials or waste stored within a project without containment or implementation of BMPs;
- Any fluid spills covering more than one square yard and/or are adjacent to protected storm drain inlets, surface waters, or State waters;
- Sediment tracking more than 50 feet from project entrance/exit location(s);
- Expansion of the active disturbed soil area limit without written approval;

- Soil stabilization and sediment controls are not installed in accordance with the current SWPPP document/ BMP site map;
- Sediment controls are installed in accordance with the SWPPP document, but there is a large unstabilized disturbed soil area with insufficient controls down gradient to prevent the discharge of untreated storm water to the storm drain system, surface waters, or State waters if a rain event generates runoff; and
- Dust from project site visibly blowing off the site and into storm drain conveyances or adjacent surface water bodies.

Minor Deficiency: A deficiency that does not pose a threat of discharge of untreated storm water or pollutants to the storm drain system, surface waters, or State waters, but are not in direct conformance with the SWPPP document. Minor deficiencies include, but are not limited to, the following examples:

- BMPs are not deficient, but are not consistent with the SWPPP plan;
- SWPPP does not reflect current operations and an amendment is recommended;
- Linear barriers and/ or perimeter controls are properly installed according to the SWPPP document, but require minor maintenance;
- Sediment controls are installed per the SWPPP, but not properly maintained;
- Site inspections by project staff are not being conducted at the required frequencies;
- Non-storm water or waste management BMPs that are improperly maintained;
- Any fluid spills covering less than one square yard and not adjacent to storm drain inlets, surface waters, or State waters;
- Evidence of active wind erosion on unstabilized slopes/stock piles;
- Minor tracking less than 50 feet from project entry/exit locations; and
- Major deficiencies which are corrected prior to the inspector leaving the site.

ENV will evaluate the reported violation and classify it is a critical, major, or minor deficiency. At this time the ENV will provide a recommendation and deadline for corrective action, as well as required follow-up activities/inspections. Deadlines and follow-up procedures are dependent on the severity of the offense, as follows:

- **Critical Deficiencies:** ENV will immediately provide verbal notification to the responsible tenant/manager. ENV will document the issue using the approved inspection checklist, photograph log and internal project tracking system, and send a written notification with an attached inspection checklist containing photographs to the responsible tenant and MCB Hawaii project manager(s), if applicable, to explain the site nonconformities. ENV will ensure that corrective actions for all critical deficiencies are initiated immediately and completed as soon as possible. Deficiencies that result in discharge to receiving waters will be adequately corrected by close of business on the day the deficiency is identified. The tenant and project manager(s), if

applicable, will provide ENV daily updates and submit daily progress reports documenting the corrective actions taken and the progress made until completion. ENV will complete a final inspection to verify that the corrective actions have been completed and adequately address the deficiencies.

ENV will immediately notify DOH if work is being completed without appropriate permits or if there is a discharge to State waters that exceeds reportable quantities or exceeds water quality standards.

- Major Deficiencies: ENV will immediately provide verbal notification to the responsible tenant/manager. ENV will document the issue using the approved inspection checklist, photograph log and internal project tracking system and send a written notification with an attached inspection checklist containing photographs to the responsible tenant and MCB Hawaii project manager(s), if applicable, to explain the site nonconformities. ENV will follow-up to ensure all major deficiencies are addressed or corrected as soon as possible, but in no event later than five (5) calendar days after the deficiency is identified or before the next forecasted rain event, whichever is sooner. The tenant and project manager(s), if applicable, will document the corrective actions taken and submit a response report to the ENV within five (5) calendar days of completion. ENV will complete a final inspection to verify that the corrective actions have been completed and adequately address the deficiencies.
- Minor Deficiencies: ENV will document the issue using the approved inspection checklist, photograph log and internal project tracking system. The responsible tenant and MCB Hawaii project manager(s), if applicable, will be notified verbally of any non-conformities at the end of the inspection and provided an emailed copy of the inspection form (with attached photographs) within 48 hours of the inspection (normal business days). A response from the tenant and project manager(s), if applicable, documenting the corrective action taken to address the identified issues is expected within five (5) calendar days from receiving the completed inspection form.

All inspection forms will be tracked internally by ENV for monitoring of follow-up activities. Problems that have not been sufficiently addressed within the time period will become subject to MCB Hawaii's enforcement policy.

After deficiencies have been properly addressed, follow-on inspections will be completed at least monthly to ensure that all deficiencies will continue to be addressed. Inspections will also be conducted based on public complaints. Upon three successive monthly site inspections that indicate, in total, no critical or major project BMP and storm water control deficiencies or less than six minor deficiencies with no more than three minor deficiencies in one month, the ENV may decrease inspection frequency to quarterly per the permit. This will be at the discretion of the ENV qualified inspector(s). However, if under quarterly inspection frequency, a critical deficiency is observed or three (3) or more minor deficiencies are detected, inspection frequency shall return to no less than monthly.

5 Enforcement Procedure

MS4 Permit violations that have been observed and are not adequately addressed within the specified time period, will be subject to the base enforcement procedure. The ENV enforcement procedures vary depending on whether the job is contracted or in-house.

Contracted Work: Violations related to contracted projects, such as construction projects initiated by NAVFAC, MCCS, or Forest City, or day-to-day commercial activities, etc., will use contract language to hold contractors accountable for oversight and compliance with conditions of MCB Hawaii's MS4 Permit. In these cases, the contract will be written to meet the intent of the MS4 regulations. The ENV will immediately be notified of any violations that are not addressed promptly, as required by MCB Hawaii's SWMP and/or the contract. The contracting entity will be given formal notice by the ENV Director with an appropriate deadline for action. IF the problem remains unchanged, the situation will be brought to the attention of the next higher authority.

In-house Work: Violations related to in-house work, that exceed the allotted mitigation time period will fall under enforcement by escalation through the chain of command for the base. Unaddressed issues are initially brought to the attention of the ENV Director, after which the responsible party will be given formal notice with an appropriate deadline for action. If the problem remains unchanged, the situation will be brought to the attention of the next higher authority.

Regardless of the type of project, the ultimate penalty for non-compliance of MS4 Permit regulations is eviction or discharge of the responsible party from MCB Hawaii. This is placed at the discretion of the Base Commander.

Table 2 displays a summary of the enforcement action procedure for MCB Hawaii.

Table 2: Enforcement Action Procedure Summary

OBSERVED DEFICIENCY	CRITICAL		MAJOR	MINOR
Immediate Response by ENV	Notify DOH (written and verbal) if there is a discharge to State waters that exceeds reportable quantities or exceeds water quality standards	Notify Responsible Party (verbal notice)	Notify Responsible Party (verbal notice at time of inspection, and written notice incl. photo documentation)	Notify Responsible Party (verbal notice at time of inspection; followed by written notice incl. photo documentation within 2 business days)
Maximum Allotted Time for Corrective Action ¹		Same day (close of business)	5 calendar days from written notice -OR- prior to storm event (whichever comes first)	5 calendar days from verbal notice
Follow up Inspection Frequency		Minimum once a month for 3 months	Minimum once a month for 3 months	Minimum once a month for 3 months
Reduced Inspection Frequency ²		Quarterly ²	Quarterly ²	Quarterly ²

Notes:

1. ENV will document all issues using the approved inspection checklist, photograph log and internal project tracking system.
2. Insufficient action from the responsible party during the specified time will be elevated to the MCB Hawaii ENV Director. This will be escalated as needed until either the deficiency has been mitigated or the Base Commander is involved.
3. If no critical or major deficiencies or less than 6 minor deficiencies (no more than three in one month) inspections can be reduced from monthly to quarterly at the discretion of ENV.

6 References

Reporting and Corrective Procedures for Construction Storm Water Inspections (2015). Prepared for the Marine Corps Base Hawaii by Environmental Compliance & Protection Department, Marine Corps Base Hawaii. January 2015.

APPENDIX A

Reporting and Corrective Procedures for Construction Storm Water Inspection

January 2015

REQUIREMENT

In accordance with the Marine Corps Base (MCB) , Hawaii Municipal Separate Storm Sewer System (MS4) Permit Number HI S000007 effective October 15, 2014, Part D.1.d.(5)(iv), MCB Hawaii is required to submit reporting and corrective procedures for construction site inspections. This document establishes construction site inspection, corrective actions, tracking and reporting procedures to ensure compliance with the MS4 permit requirements.

DEFINITIONS

The terms minor, major and critical when relating to deficiencies in this document are defined as the following:

Critical Deficiency: A deficiency that poses an immediate risk of discharge of pollutants to a storm drain MS4 system, surface waters or State waters. Critical deficiencies include, but are not limited to, the following examples:

- Any evidence or observed discharge of non-storm water to the storm drain system, surface waters, or State waters generated by construction activity
- No SWPPP document or NPDES permit
- Absence of perimeter controls and/or linear barriers required by the SWPPP document
- There are identified storm drain inlets, surface waters, or State waters within or adjacent to the project site in close proximity to disturbed soil areas without control measures in place that pose an immediate threat of untreated storm water discharges;
- Work in an active stream channel or other surface water body without proper implementation of required BMPs; and
- Any presence of any spilled oil or hazardous materials near to unprotected storm drain inlets, surface waters, or State waters

Major Deficiency: A deficiency that is a significant issue that could result in the discharge of pollutants to the storm drain system, surface waters or State waters. Major deficiencies include, but are not limited to, the following examples:

- Linear barriers and/or perimeter controls in areas tributary to a water body or drain inlet that are installed as required by the SWPPP document, but are not functional, such as silt fences that are not anchored properly, have collapsed, or are overwhelmed by accumulated sediment;
- Hazardous materials or waste stored within a project without containment or implementation of BMPs;
- Any fluid spills covering more than one square yard and/or are adjacent to protected storm drain inlets, surface waters, or State waters;
- Sediment tracking more than 50 feet from project entrance/exit location(s);
- Expansion of the active disturbed soil area limit without written approval

- Soil stabilization and sediment controls are not installed in accordance with the current SWPPP document/ BMP site map;
- Sediment controls are installed in accordance with the SWPPP document, but there is a large unstabilized disturbed soil area with insufficient controls down gradient to prevent the discharge of untreated storm water to the storm drain system, surface waters, or State waters if a rain event generates runoff; and
- Dust from project site visibly blowing off the site and into storm drain conveyances or adjacent surface water bodies.

Minor Deficiency: A deficiency that does not pose a threat of discharge of untreated storm water or pollutants to the storm drain system, surface waters, or State waters, but are not in direct conformance with the SWPPP document. Minor deficiencies include, but are not limited to, the following examples:

- BMPs are not deficient, but are not consistent with the SWPPP plan;
- SWPPP does not reflect current operations and an amendment is recommended;
- Linear barriers and/ or perimeter controls are properly installed according to the SWPPP document, but require minor maintenance
- Sediment controls are installed per the SWPPP plan, but not properly maintained;
- Site inspections by project staff are not being conducted at the required frequencies;
- Non-storm water or waste management BMPs that are improperly maintained;
- Any fluid spills covering less than one square yard and not adjacent to storm drain inlets, surface waters, or State waters;
- Evidence of active wind erosion on unstabilized slopes/stock piles;
- Minor tracking less than 50 feet from project entry/exit locations and
- Major deficiencies which are corrected prior to the inspector leaving the site

PROCEDURES

Permit Citation	Permit Requirement	MCB Hawaii Environmental Procedure
Part D.1.d(4)	Plan review and approval	MCB Hawaii Environmental will review all project SWPPP's and supporting documents. MCB Hawaii Environmental will verify that all documents meet HAR, Chapter 11-55, Appendix C, section 7 and approved BMP manual requirements by using an approved SWPPP document checklist. Comments and notes will be made to the document preparer if any SWPPP elements are omitted or any portion is believed insufficient. Deficiencies will be noted with the date comments were addressed by the document preparer to the satisfaction of MCB Hawaii Environmental.
Part D.1.d(5)i	Inspections	<p>Prior to the start of any ground-disturbing activities, except for activities associated with the installation of BMPs at a site, the qualified MCB Hawaii Environmental inspector will inspect the site to verify BMPs have been properly installed to the SWPPP specifications. The inspector will document any site conditions having the potential for erosion and sediment runoff as a result of the project's construction activities.</p> <p>A spreadsheet will be used to verify all comments made by MCB Hawaii Environmental during the review process have been properly resolved.</p>
Part D.1.d(5)ii,	Inspection frequency	<p>All contract, in-house and maintenance construction projects greater than one acre will be inspected at least monthly by an independent MCB Hawaii Environmental qualified construction inspector(s), who is familiar with the project SWPPP. Initial inspections will verify BMPs have been properly installed prior to the start of earth disturbing activities.</p> <p>The inspector(s) will use the attached "Construction Oversight Field Inspection Checklist" that will document any BMP deficiencies and inconsistencies between the approved SWPPP and project site conditions. The inspection form will include the date, inspection observations with photographs, potential noncompliance issue(s) and any necessary corrective actions needed to be addressed. Inspection forms will be sent (via email) to the construction contractor and the MCB Hawaii project manager(s) within 48 hours of the inspection (working business days). A photographic log will be kept to document all minor, major and critical issues observed on site. A response (via email) from the contracting project manager to MCB Hawaii Environmental verifying (with photographs, maps.ect) appropriate corrective action was taken to address the identified deficiencies is expected within 5 calendar days of receiving the inspection form.</p>

		<p>MCB Hawaii Environmental will track all inspections using an internal public share drive.</p> <p>Upon three successive monthly site inspections that indicate, in total, no critical or major project BMP and storm water control deficiencies or less than six minor deficiencies with no more than three minor deficiencies in one month, MCB Hawaii Environmental may decrease inspection frequency to quarterly per the permit. This will be at the discretion of the MCB Hawaii Environmental qualified inspector(s). However, If under quarterly inspection frequency, a critical deficiency is observed or three (3) or more minor deficiencies are detected, inspection frequency shall return to no less than monthly.</p>
<p>Part D.1.d(5).ii</p>	<p>Corrective actions and reporting</p>	<p>If any critical deficiencies are observed MCB Hawaii Environmental will immediately notify DOH verbally and in writing. MCB Hawaii Environmental will verbally notify the responsible construction contractor and ensure all critical deficiencies are addressed and adequately corrected before the close of business day on the day the deficiency is identified.</p> <p>In the event a major deficiency is detected, MCB Hawaii Environmental will immediately send a written notification with an attached inspection checklist containing photographs to the responsible construction contractor and MCB Hawaii project manager(s) explaining the site nonconformities. MCB Hawaii Environmental will ensure all major deficiencies are addressed or corrected as soon as possible, but in no event later than five calendar days after the deficiency is identified or before the next forecasted rain event, whichever is sooner.</p> <p>In the event a minor deficiency is detected, MCB Hawaii Environmental will document the issue using the approved inspection checklist, photograph log and internal project tracking system. The responsible construction contractor and MCB Hawaii project manager(s) will be notified verbally of any non-conformities at the end of the inspection and provided an emailed copy of the inspection form (with attached photographs) within 48 hours of the inspection (normal business days). A response from the contractor documenting the corrective action taken to address the identified issues is expected within 5 calendar days from receiving the completed inspection form.</p> <p>Per the permit, the MCB Hawaii Environmental i qualified construction inspector(s) will conduct follow-up inspections as needed, at least monthly to ensure site deficiencies have been properly addressed and all storm water controls are in proper working order. Inspections will also be conducted upon complaints</p>

		<p>from citizens or concerned groups. Unannounced and follow-up inspections will be conducted as necessary.</p> <p>For all projects, if the corrective measures are not completed, then the deficiency will be elevated to the MCB Hawaii Environmental Director.</p>
	Record keeping	<p>Electronic inspection reports, spreadsheets and supporting photographic logs will be kept on file with the MCB Hawaii Environmental Division. Records shall be kept for five (5) years in accordance with the NPDES permit.</p>

management			
Photos Taken: Yes <input type="checkbox"/> No <input type="checkbox"/>	Photo Reference IDs:		
Site Inspections, Monitoring, and Sampling			
Requirement	Comments		
SWPPP/ SSCBMP/NGPC Retained Onsite:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
SWPPP/ SSCBMP/ Site maps Current:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Weekly Inspections Performed:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Amendment log up to date:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Inspections conducted within 24 hours of storm event of < 0.25 inches:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Documented staff training?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Corrective Actions Identified			
Corrective Action:			
Follow-up:	Date correction received: _____ Photo reference: _____ Initials: _____		
Corrective Action:			
Follow-up:	Date correction received: _____ Photo reference: _____ Initials: _____		
Corrective Action:			
Follow-up:	Date correction received: _____ Photo reference: _____ Initials: _____		
Corrective Action:			
Follow-up:	Date correction received: _____ Photo reference: _____ Initials: _____		
Inspector Information			
Inspector Name:			Inspector Title:
Signature:			Date: