UNITED STATES MARINE CORPS
MARINE CORPS BASE HAWAII
BOX 63002
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IN REPLY REFER TO
5090
LFE/009-25
January 28, 2025

Mr. Darryl Lum, P.E., Chief
Clean Water Branch
State of Hawaii Department of Health
2827 Waimano Home Road
Pearl City, Hawaii 96782

Dear Mr. Lum:

SUBJECT: MARINE CORPS BASE HAWAII STORM WATER MANAGEMENT PROGRAM ANNUAL REPORT – FISCAL YEAR 2024

INTRODUCTION

In accordance with Part G.1 of National Pollutant Discharge Elimination System (NPDES) Permit No. HI S000007, Marine Corps Base Hawaii (MCBH) has prepared the following Annual Report. This Annual Report summarizes MCBH's compliance with Municipal Separate Storm Sewer (MS4) permit requirements for Fiscal Year (FY) 24 (October 1, 2023 – September 30, 2024). MCBH's Storm Water Management Program (SWMP) is largely driven by the SWMP Plan which was revised and published in March 2023. The SWMP Plan was designed to address the requirements of the permit and reduce to the Maximum Extent Practicable (MEP) the discharge of pollutants to and from MCBH's MS4 to protect water quality and to satisfy the appropriate water quality requirements of the Clean Water Act (CWA). Additionally, the SWMP Plan incorporates all requirements established in the Federal Facilities Compliance Agreement (FFCA) between MCBH and the U.S. Environmental Protection Agency, Region 9 (EPA).

NPDES Permit No. HI S000007 and FFCA requirements are outlined in Chapters 2 through 12 of the SWMP Plan. This report describes the status of compliance with conditions of this permit (Part G.1.b) and other commitments set forth in the SWMP Plan. Additionally, it outlines the activities undertaken during the FY 24 reporting period, highlighting the progress made towards achieving specific measurable goals, standards, and milestones. This report includes an assessment of the SWMP Plan [Part G.1.b.(2) of the Permit] and a summary of planned activities to be undertaken during the FY 24 reporting period to achieve full NPDES Permit [Part G.1.b.(3)] and FFCA compliance.

A summary of significant events and major milestones for FY 24 is summarized below. Some outreach events were specifically dedicated to the SWMP (*e.g.*, Clean Water Ohana), and some focus on other environmental program areas (*e.g.*, natural/cultural resources). However, at all outreach events, ECPD has storm water personnel present to interact with community members, pass out fact sheets, and other supporting material specific to storm water pollution prevention and waste minimization. Additional event/milestone details are provided in the respective program effectiveness assessment sections below.

Summary of FY 24 Storm Water Program Events and Milestones

October

- Welcome Aboard Brief *
- Environmental Compliance Coordinator (ECC) Training*
- Semi-Annual Industrial & Commercial Facilities inspection reports*
- 4th Quarter DMR*
- FFCA 37.b.c Inventory for BMP Retrofits*
- Weed Warrior's Volunteer Event
- Mokapu Elementary STEM Fest

November

- Welcome Aboard Brief *
- Weed Warrior's Volunteer Event at Camp Smith
- Mālama I Ka ʻĀina: Week-long ECPD directed base-wide cleanup*
- FFCA 41. Implantation Status of Compliance Program Elements*

December

- Welcome Aboard Brief *
- ECC Training*
- Weed Warrior's Volunteer Event
- MCBH Christmas parade

January

- Welcome Aboard Brief*
- Annual Report and Annual Monitoring Report FY 23*
- 1st Quarter DMR*
- IDDE staff training*
- MCCS Volunteer Fair
- Mokapu Elementary School 4th Grade Talks (111 Students)
- FFCA 35.b.i/ii. IDDE-storm sewer system inspection, reporting and record keeping

February

- Welcome Aboard Brief*
- Weed Warrior's volunteer event
- ECC Training*
- Developed the Storm Water Stewardship Program*
- FFCA 34.a.vii. GIS-based Asset Management System Mapping*

March

- Welcome Aboard Brief*
- Kailua Intermediate School "Community Day" Assemblies (774 students)

April

- 4/3 Clean Water Ohana: Volunteer storm drain marking campaign and trash cleanup*
- 4/13 Mokapu Central Drainage Channel (MCDC) trash cleanup*
- 4/13 & 4/27 Weed Warriors: Volunteer invasive red mangrove removal
- 4/2 & 4/9 Brief Provost Marshal's Office (PMO) Personnel- focus: Oil Spill Response and Endangered Water Birds* (129 people)
- Mālama I Ka ʻĀina: 4/15-19 ECPD directed base-wide cleanup*
- 4/20 Mokapu Cultural Sites: Earth Day Bike Tour
- Welcome Aboard Brief*
- ECC Training*
- Mokapu Elementary Kindergarten Nu'upia Ponds Tour and Stormwater Display (96 students)
- Semi-Annual Industrial & Commercial Facilities inspection reports*
- 2nd Quarter DMR*
- FFCA 41. - Implementation Status of Compliance Program Elements*

May

- Welcome Aboard Brief *
- Mokapu Elementary Kindergarten Nu'upia Ponds Tour and Stormwater Display (72 students)

June

- Welcome Aboard Brief *
- ECC Training*
- Weed Warrior's Volunteer Event
- 6/4 DEFY (Drug Education For Youth) Day Camp – Spill Response Activity, Protected Species Talk (65 participants) *
- 6/6 DEFY (Drug Education For Youth) Day Camp – Ft Hase Beach Clean-Up (65 participants) *
- 6/18 & 6/25 Brief PMO Personnel - focus: Sea Turtle Nesting and Conservation Law Enforcement Officers (165 participants)
- 6/27 RIMPAC Environmental Brief (300 participants)

July

- Welcome Aboard Brief*
- 7/1-7/2 RIMPAC Environmental Brief (600 participants)
- 3rd Quarter DMR*

August

- Welcome Aboard Brief *
- ECC Training*
- Weed Warrior's Volunteer Event
- FFCA 34.a.vii. GIS-based Asset Management System – Implementation*
- FFCA 37.c.v. Retrofits of Recently Completed Projects - DD Form 1391*
- National Night Out Resource Fair (Over 400 people)
- 3rd MLR Resource Fair (over 100 people)

September

- Welcome Aboard Brief *
- FFCA 38.e.iii. Audit - Industrial and Commercial Activities Discharge Management Program*
- Mālama I Ka ʻĀina: Week-long ECPD directed base-wide cleanup*
- 9/17 & 9/24 Brief PMO Personnel - focus: Sea Bird Fallout, Spill Response, Fishing

* Events and Milestones that were specifically dedicated to the SWMP.

To determine the compliance status and measure the effectiveness of MCBH's SWMP (including SWMP Plan implementation), the Program Effectiveness Assessment Plan (PEAP) developed by MCBH in February 2022 (LFE/022-22) was used. The PEAP is used to measure progress of permit compliance and implementation of Best Management Practice (BMP)s, track program component effectiveness over the permit period, and set the framework to link program implementation with environmental improvements over time.

In addition to using the PEAP, MCBH contracted with an independent, third-party in FY 23 to complete a full compliance audit of the base's SWMP in accordance with Section 41 of the FFCA (LFE/132-23). No critical or major deficiencies were identified during the third-party evaluation; however, several potential permit violations were documented along with positive/commendable program elements and other recommendations for improvement. The findings of the third-party audit are incorporated into the following assessment of MCBH's SWMP. Compliance status and effectiveness of program elements are presented in the following sections and are organized by the corresponding chapters of the SWMP Plan.

- Public Education and Outreach (Chapter 2)
- Illicit Discharge Detection and Elimination (Chapter 3)
- Construction Site Runoff Control (Chapter 4)
- Post-Construction Management in New Development and Redevelopment (Chapter 5)
- Pollution Prevention and Good Housekeeping (Chapters 6-9)
- Industrial and Commercial Discharge Management (Chapters 10-11)

MCBH's storm water monitoring program is outlined in Chapter 12 of the SWMP Plan, and the Annual Monitoring Report for FY 24 is provided under separate cover (LFE/008-25).

The compliance assessment process for individual assessment measures is a systematic evaluation of how well each measure meets established standards. The criteria may cover a variety of factors, such as the measure's validity, reliability, fairness, and accuracy. As presented below, each measure is assigned a color code based on its level of compliance. **GREEN** indicates that the measure is fully compliant with all NPDES Permit and FFCA requirements. **ORANGE** indicates that the measure is compliant, but there are some areas where the program could be improved. **RED** indicates that the measure is not compliant and additional work is needed. The use of color codes makes it easy for stakeholders to quickly understand the results of the compliance assessment. This helps to improve communication and decision-making about the assessment measures. Where applicable, assessment measures also include quantitative assessment of the program's effectiveness (*e.g.*, number of trainings, events).

PUBLIC EDUCATION AND OUTREACH

The goal of the Public Education and Outreach Program is to raise awareness and effect behavior change by involving the community in the overall goals and implementations of the SWMP Plan. Greater

knowledge of the program will garner greater public support for the program, as well as a more willingness to comply with the BMPs put forth in the program. The program should create positive changes in attitude, knowledge, and awareness; BMP implementation; pollutant load reduction; and an improvement in discharge and receiving water quality.

Objective 1: Increase public support, interest, knowledge, and awareness of the Storm Water Management Program.

Assessment Measures

Confirmation	***Status***
Distribute brochures/pamphlets to new arrivals in orientation materials.	
Provide storm water pollution prevention information to Base staff during general storm water awareness training	
Implement outreach through community newsletters and the Base website	
Stencil a minimum of 50 storm drains per year, with priority given to industrial and commercial areas, and areas with pedestrian traffic.	
Tabulation	***Number***
Number of brochures/pamphlets distributed to new arrivals.	75*
Number of training classes and attendees.	129
Number of unique page views on the Base website.	2300*
Number of volunteer hours.	354
Number of storm drains stenciled.	51
Annual survey.	129*
Number of public informational/training meetings.	20

*Estimated.

Objective 2: Increase public participation in special events.

Assessment Measures

Tabulation	***Number***
Number of events.	55
Number of volunteers.	113
Number of volunteer hours.	354
Number of participants in special events each year.	3690

FY 24 Public Education and Outreach Summary

In January 2023, ECPD hired a contractor dedicated to managing the environmental outreach programs which has significantly improved the public outreach component of MCBH's SWMP Plan. In the independent, third-party audit, MCBH's outreach program was identified as a positive program element, and conversations with EPA suggest MCBH's outreach program could serve as a model example to other military installations throughout Hawaii.

ECPD carried out the functions of compliance, pollution prevention, conservation, installation restoration, and training, education, and outreach at MCBH such that we contribute to the combat readiness of our Marines and protect human health and the environment. Throughout FY 24, ECPD hosted and participated in outreach events with the Marine Corps Community Services (MCCS), Hunt Ohana Base Housing and Mokapu Elementary School on many occasions. Some events were specifically dedicated to the SWMP (e.g., Clean Water Ohana), and some focus on other environmental program areas (e.g., natural/cultural resources). However, at all events, ECPD has storm water personnel were present to

interact with community members, pass out fact sheets, and other supporting material specific to storm water pollution prevention and waste minimization. A summary of selected events is presented below. A full list of storm water outreach events is presented above in the calendar.

ECPD produces a Household Hazardous Waste Disposal Pamphlet for distribution to all housing residents at MCBH. These pamphlets are also distributed at the New Arrivals Brief and is available on the MCBH website. The pamphlet identifies the various types of household hazardous materials that require proper disposal as household hazardous waste, and it provides locations where residents may drop these materials off for proper disposal.

The MCBH Housing Department provides residents with information regarding the base household Hazardous Material Re-use Center. The Re-use Center accepts residents' excess household hazardous materials and reissues the items as needed. Household hazardous materials that are not reissued are turned into the 90-day Hazardous Waste Accumulation site for disposal.

MCBH Instagram (@MCB_Hawaii) has over 32 thousand followers to shared information regarding storm water pollution prevention and other environmental concerns. This social media outlet allows sharing of temporary story of different environmental outreach events such as, operation clean water 'ohana volunteer events to get volunteers, and shared photos and information after the events.

The Orientation for New Arrivals to MCBH is held on the first Wednesday of each month. Information and hand-out materials exploring the environmental topics of Cultural Resources, Marine & Wildlife Natural Resources, Storm Water Runoff Pollution Prevention, Oil Spill Response Awareness & Reporting, Recycling & Waste Disposal Guidance, and Hazardous Material/Waste Management are presented and provided monthly to Active-Duty personnel who arrive to Marine Corps base Hawaii.

EPCD briefs the Provost Marshals Office (PMO) to equip personnel with the necessary knowledge and skills to effectively police environmental issues. In FY 24 ECPD provided three briefs, each with a "quarterly focus" and a general overview of information aimed at empowering. PMO personnel to play a proactive role in safeguarding the environment and upholding environmental regulations. The April brief focused on endangered water bird nesting season, and the June brief focused on sea turtle nesting season, and the October brief covered Seabird fallout season. All briefings covered a range of critical topics including responding to oil spills, implementing containment measures, illegal dumping, abandoned vehicles, and proper enforcement of the Endangered Species Act. At each briefing we shared the contact information of program managers and information about the programs.

In preparation for the International Maritime Exercise Rim of the Pacific (RIMPAC) ECPD conducted three informational briefs, reaching over 900 individuals from participating naval forces, including those from Australia, Canada, Chile, Japan, South Korea, Mexico, and the Philippines. These briefs focused on key environmental protection protocols to ensure compliance and minimize ecological impact during the exercise. Topics covered included wildlife and vegetation protection, restrictions on base activities such as no-digging orders, and management of sensitive wildlife areas. The sessions also addressed critical spill prevention measures, including the use of drip pans, secondary containment, spill kits, and the importance of proper waste disposal. Additionally, contact information for reporting spills and emergencies was provided to ensure rapid response and mitigation. These efforts supported a commitment to environmental stewardship during the multinational maritime operations.

EPCD provided a two-day ECC training bi-monthly had a total of 129 attendees in FY 24. This training included classes from the program managers of Storm Water, Spill Response, Hazardous Materials and Waste, Spill Prevention Control, and Countermeasure (SPCC), Oil Water Separators (OWS) and Tanks, National Environmental Policy Act (NEPA), Natural Resources, Cultural Resources,

Recycling and Landfill, and Environmental Management System (EMS). As part of the ECC Training, the Storm Water program manager provides training on Storm Water Pollution Prevention, Illicit Discharge Detection Elimination (IDDE), industrial sites, SWPPPs, and BMPs. The personnel that work on Waterfront Operations are trained on spill response procedures, to ensure they are prepared to promptly respond in the event of any spills. The Hazardous Waste Team collects and properly disposes of produced toxic and hazardous wastes, and the Material Re-use Center continues to accept materials from residents.

The MCBH Environmental Training Center conducts a Hazardous Waste Accumulation Point Management Course for all personnel (military, civilian, and contractors) who generate, package, handle, store, transport, manage and/or supervise those who manage hazardous waste in the performance of their duties at MCBH. This 8-hour course and annual refresher are mandatory for personnel assigned/ designated as a Unit ECC, Command Level Coordinator, Shop Level Coordinator (SLC), or Alternate SLC. Topics covered are: Hazardous Waste (HW) management; Hazardous Material (HM) Minimization (HAZMIN) Center services; HM/HW Training requirements; First Responder Awareness level for emergency spill response; and OWS management.

ECPD organizes weekly division and regular ECC meetings. These meetings are opportunities to present new clean water objectives, budgeting, and response to challenges in implementation of the MCBH SWMP Plan, keeping the information exchange fresh and relevant. These meetings have been a successful means of presenting clean water objectives, identified issues, and organizing cooperative solutions amongst divisions and units across the base.

ECPD Storm Water Program staff promote initiatives and compliance through attendance at recurring meetings, project proposal reviews, construction status updates, and tracking post-construction BMPs. The MCBH SWMP Plan, MS4 Permit, educational materials aimed at residents and commercial tenants, such as good housekeeping practices and disposal of household hazardous wastes, and base policies addressing pollution prevention have all been posted on the MCBH website.

FY 24 special events included:

Operation Clean Water ‘Ohana

03 April 2024

The volunteers helped mark storm drains and picked up trash which is critical to the success of our SWMP. Working alongside civilian volunteers and ECPD staff to mark storm drains around base reminds community members of the integral connection between our everyday activities and the health of the oceans that surround the beautiful base we call MCBH.

- 4 volunteers
- 41 storm drains labeled
- Neighborhood cleared of miscellaneous litter and debris

Mālama I Ka ‘Āina Base-Wide Cleanups and Mokapu Central Drainage Channel (MCDC) Cleanups

13 April 2024

MCDC cleanup debris collected for disposal/recycling:

- 8 bags of trash
- 7 tactical vehicle tires
- 2 ½ chairs
- 2 metal pipes
- Several pieces of wood
- Several pieces of scrap metal
- 1 ironing board
- 1 fire extinguisher
- 1 ammo box
- 1 small motor
- 1 large piece of sheet metal

15-19 April 2024

MCBH first mandatory base-wide cleanup of the year and collected the following:

- 20 POV tires (with rims) were turned into Base Motor-T for disposal via Defense Logistics Agency Disposition Services
- 48.8 tons of waste hauled to base landfill for disposal.
- 7.5 tons of wood/green waste hauled to base landfill (ground up for landfill cover)
- 1,700 pounds of painted wood (tested negative for lead and hauled to base landfill)
- 46,080 pounds of scrap steel turned into the Recycle Center
- 725 pounds of other metals (aluminum, stainless steel, etc) turned into the Recycle Center
- 95 pounds of other recyclables (such as HI-5 beverage containers and cardboard) turned into the Recycle Center
- 29,980 pounds of solid waste hauled off-base via roll-offs provided by Perry Management via contract.

3-6 September 2024

MCBH second mandatory base-wide cleanup of the year and collected the following:

- 12,420 pounds of mixed waste generated from the cleanup were disposed of via contract.
- 2,850 pounds of scrap metal were collected and recycled.
- Ten pounds of other recyclables (cardboard and HI-5 containers) were also recycled.
- Approximately 4,570 pounds of wood and green waste were hauled to the base landfill to be ground-up and used as landfill cover.

28 September 2024

MCDC cleanup debris collected for disposal/recycling:

30 large bags of trash (approximately 300 pounds total).

Mokapu Elementary STEM Fest

04 October 2024

Base Environmental participated in the STEM Fest at Mokapu Elementary School (located on-base),

providing an interactive activity for students along with signage about our stormwater system, solid waste disposal, and local plants and animals. More than 150 students joined in our trash relay race, where they first learned how to properly sort recyclables, green waste, and trash for the landfill. Afterward, they were given unsorted waste and tasked with sorting and "throwing away" as much as they could in a given time. Students discovered Hawai'i's unique recycling rules, and parents shared that they learned something new while observing their children. In addition, students engaged with our interactive coastal stormwater display, learning about pollutants, the impact of rainfall, and the effects on local coastal ecosystems. We encouraged students to suggest types of point source and non-point source pollutants and apply them to the display before demonstrating what happens during a rainstorm.

Mokapu Elementary Kindergarten Field Trip: Tour of Nu'upia Ponds

11 April 2024, 15 April 2024, 28 May 2024

ECPD hosted field trip through the Nu'ūpia Ponds for Kindergarten students from Mokapu Elementary, and engaging 158 participants, including students, teachers, and chaperones. The event, organized by the Environmental Compliance and Pollution Division (ECPD), featured three interactive educational stations designed to raise awareness about stormwater management and environmental protection. The first station, a Recycling Relay Race, taught students about sorting trash into landfill, green waste, and recycling categories, followed by a competitive relay race. Afterward, the presenter reviewed the results, explaining the environmental impact of proper waste sorting. The second station focused on coastal storm water pollution, where students learned about point and non-point source pollution. By placing different pollutants on a display of a coastal town, students identified types of pollution and traced their origins. The display then simulated rainfall, demonstrating how pollutants wash into ecosystems and the ocean. The final station was a walk along the ponds, where students participated in a scavenger hunt to identify various species, including endangered birds and sea turtles, fostering an understanding of local wildlife conservation. This hands-on experience educated the students about environmental stewardship and strengthened the community's connection to local ecosystems.

DEFY (Drug Education For Youth)

4 June 2024, 6 June 2024

Base Environmental hosted the DEFY camp students for two days during their summer programming, with 46 students and 19 adults participating in a day of learning. On the first day, students visited Waterfront Operations, where they learned about oil spill cleanup from the team responsible for the work. They used absorbent materials to soak up sesame oil from water, demonstrating the process of removing oil from the ocean. Afterward, students toured the facilities, observing the booms and various boats used in oil spill response. The day concluded with a discussion on the native and invasive species of the Mokapu Peninsula and the importance of protecting biodiversity. On the second day, the group participated in a beach cleanup at Ft. Hase, where some students were tasked with finding and collecting large pieces of litter including: plastic, baby dolls, and fishing nets, while others sifted the sand to remove microplastics. This hands-on activity allowed students to directly contribute to preserving the local environment and learn about the impact of pollution on marine ecosystems.

Resource Fairs

Throughout the FY we participated in 5 different resource fairs for different organizations, reaching over 541 members of the base community. These resource fairs supplied the base community with information on solid waste management, stormwater management, endangered species, fishing regulations, non-point source pollution, coastal watersheds, invasive species management, marine life

management and volunteer opportunities.

Weed Warrior's Service Project

In FY 24 ECPD hosted 8 separate volunteer events with 96 volunteers consisting of Marines, Sailors, Soldiers, Civilian employees and their families providing 327 hours of work in the Nu'upia Ponds. Volunteers alongside the Environmental Division's Natural Resources staff helped clear invasive red mangrove (*Rhizophora mangle*), ironwood (*Casuarina equisetifolia*), other invasive species and trash from Nu'upia Ponds Wildlife Management Area. This service project greatly improves endangered species habitat and the health of our watershed. Removing invasive vegetation also allows the environment to facilitate regrowth of native Hawaiian vegetation.

Mokapu Cultural Sites Earth Day Bike Tour

20 April 2024

The base community was invited to join ECPD Cultural Resource managers on a 3-mile bike tour of protected historical sites on MCBH. Participants got to see an archeological site of an ancient Hawaiian village, 1930s beach cottages, and a discussion on Mokapu burial sites at the Pyramid Rock beach pavilion.

- 18 participants including Marines, spouses, government employees and consulting parties.
- Cultural Resources Senior Manager led the tour and gave a history and background of each historic site.
- Participants visited an ancient native Hawaiian village, the Pyramid Rock beach pavilion, and 1930s beach cottages.

FY 25 Public Education and Outreach Goals

MCBH will continue to run the Storm Water program in accordance with permit HI S000007 Part D as addressed in MCBH's SWMP Plan. During the next FY MCBH will continue to work on Public Education and Outreach, and Public Involvement/Participation with the following events currently scheduled:

- Malama I ka 'aina base-wide cleanup
- Conduct Quarterly PMO Briefings with an overview of Environmental issues with a different focus for each quarter. One quarter will focus on Storm Water.
- STEM Fest at Mokapu Elementary – interactive Storm Water display
- Operation Clean Water 'Ohana
- Military Family Housing – Create a postcard with Quick-Response (QR) code to Storm Water webpage
- 3 Nu'upia Ponds tours – Discuss wetland plants and animals and the steps we take to protect them
- Develop and distribute flyer discussing responsible cat ownership and the threat of toxoplasmosis on our water ways and ocean mammals
- Kindergarten field trip to Nu'upia ponds – 7 classes in April
- Mokapu Elementary 4th grade - presentations to all classes
- DEFY camp
- Stormwater Stewardship Program: Nānā Wai Ola

Beginning the Storm Water Stewardship Program “Nānā Wai Ola” which loosely translates to “take care of the living waters.” The goal of this program is to improve the water quality on our base as well as increase community outreach and awareness. The "Nānā Wai Ola" will be a yearlong commitment for all volunteer groups for Calendar Year (CY) 25. Each volunteer group will be assigned one area on base. At a minimum these areas will require a clean-up once per quarter. Depending on the area, clean-up will include:

- Picking up and properly disposing of any trash or unauthorized items in the area (both land and water)
- Clearing any Storm Drains and Outfalls of any trash or green waste debris
- Identifying and reporting any needed maintenance (structural or lawn) in the area
- Taking before and after pictures
- Filling out Clean-up forms

EPCD will perform periodic checks on all areas to judge Environmental Unit of the Quarter and the Year. Participants will be judged on the following: The condition of the assigned area - free of trash and debris; and the number of clean-ups completed, and the amount of trash and debris removed.

ILLICIT DISCHARGE DETECTION AND ELIMINATION

The goal of MCBH’s Illicit Discharge Detection and Elimination Program is to eliminate improper discharge activities. This is accomplished through maintenance of up-to-date records and maps of the storm drain system; training and implementation of Marine Corps instructions prohibiting illicit storm water discharges; advertising and providing locations for turn-in of household waste materials; continuing the review and approval process for new storm drain connections; responding to complaints; and inspections of facilities and the storm drain system.

All tenants, contractors, and residents on MCBH property are prohibited from illegally discharging pollutants to its MS4 through lease agreement, contract language, permit language, and regulation (Base Order).

Objective 1: Encourage and facilitate public involvement in identifying and reporting illicit discharges.

Assessment Measures

Confirmation	***Status***
Maintain base hotline and respond to complaints.	
Tabulation	***Number***
Number of complaints.	50*

*Estimated

Objective 2: Decrease the number of improper discharge activities.

Assessment Measures

Confirmation	***Status***
Maintain base hotline and respond to complaints.	
Advertise and provide locations for turn-in of household waste materials.	
Inspection of facilities and the storm drain system.	
Tabulation	***Number***
Number of complaints	50*
Number of illicit discharge investigations.	50*

Number of follow-up visits.	3
Number of corrective actions completed including distribution of educational materials.	3

*Estimated

Objective 3: Continue to maintain an educated Base staff regarding illicit discharge detection and elimination.

Assessment Measures

Confirmation	***Status***
Provide training to ECC and all pertinent Base personnel on IDDE program policies at least annually. Include training on Marine Corps Order 5090.2 that prohibits non-storm water discharges into the Base storm drain system.	
Tabulation	***Number***
Number of complaints	50*
Number of illicit discharge investigations.	50*
Number of follow-up visits.	3
Number of corrective actions completed including distribution of educational materials.	3

*Estimated.

Objective 4: Continue review and approval of new storm drain connections through use of the Digging Work Clearance Permit application form.

Assessment Measures

Confirmation	***Status***
Maintain up-to-date map of storm water system components in GIS-based Asset Management System (AMS).	
Tabulation	***Number***
Number of new drain connection agreements approved each year, as required	0*

*During FY 24 there were several redevelopment projects that included renovating or repairing storm drain connection. Some demolition projects included removing storm drain connections; however, no new connections were made.

FY 24 Illicit Discharge Detection and Elimination Summary

MCBH ECPD has developed a review and approval process for any construction project on base regarding connection to the MS4. All construction projects with ground-disturbing activities are required to submit a dig permit and NPDES permit (if construction area is greater than 1 acre) to ECPD for review and approval, prior to construction starting date. The review process is outlined in Appendix 4-3 of the SWMP Plan.

ECPD tracks connections to MS4, illicit discharge, and spills; these reports include type of discharge, responsible party, investigation reports, response actions, follow up activities and resolution of the issue, and spill reports.

ECPD staff conducted general base-wide inspections regularly with both scheduled and unscheduled construction site inspections and industrial/commercial site inspections to ensure MS4 compliance. Any violation was identified and recorded in one of three categories: Critical Deficiency, Major Deficiency, and Minor Deficiency. Following the inspection, an Inspection Report is sent to the

responsible party noting all non-compliance and deficiencies observed at the time of the inspection. The responsible party then has a corrective action time requirement dependent on the severity of the violation. If the same violations are observed repeatedly, MCBH reserves the right to suspend construction activity until the deficiency is corrected and adequate storm water BMPs are in place.

ECPD inspected all outfalls in accordance with the Outfall Inspection and Field Screening Plan and FFCA requirements. All outfall inspections were conducted by ECPD Storm Water personnel and coordinated with Marine Corps Air Station (MCAS) personnel and Waterfront Operations (WFO) personnel to obtain site access and utilize equipment. Data collected from the inspections was uploaded and stored into the management system.

As required by the FFCA, MCBH is in the process of conducting base-wide storm sewer system inspections to establish a baseline for all storm water components (inlets, grates, etc.), identify high priority areas, retrieve geographic coordinates, and build up the AMS. Because construction projects are ongoing across MCBH, the storm water system will be continually updated by the GIS branch in the GIS database.

ECPD has a dedicated spill hotline. Spill response personnel are dispatched as soon as possible to the incident site. The type of discharge, responsible party (if identified), and the response, follow-up activities and resolution of each reported spill incident are tracked in a database. As stated in the Public Education and Outreach section PMO have been brief about spill response procedures. Contacting PMO is one of the main ways to report spills on MCBH.

FY 25 Illicit Discharge Detection and Elimination Goals

During FY 25 the ECC training will be updated to incorporate IDDE program policies that are tailored to the ECC and their responsibilities. EPCD is exploring alternative options for the base hotline for complaints. The updates to the website along with the QR codes provide information about turning in of household waste materials.

The geospatial location and information about MCBH storm water features is documented in a GIS. The GIS data include a unique code which can be joined to Maximo and iNFADS to create an AMS. A contract has been initiated to review and correct the geographic coordinates and tabular details of the storm water system in GIS using survey data of above ground infrastructure and MCBH as-builts. This will greatly improve the GIS of the storm water system. While the contract is underway MCBH GIS branch will not be able to change the storm water GIS database. Therefore, GIS efforts will focus on coordinating with the contractors to ensure data are collected and input to meet permit requirements and MCBH needs.

A newly developed outfall inspection platform will be implemented in FY 25. This will streamline the inspection process allowing for improved ability to track issues and status of the outfalls. The Storm Water Program Manager will evaluate this program in FY 25 and modify the SWMP Plan as needed.

CONSTRUCTION SITE RUNOFF CONTROL

The Construction Site Runoff Control Program focuses on storm water discharges from construction projects that drain to drainage facilities and natural drainage ways for which MCBH has ownership and responsibility. Construction projects on MCBH include smaller projects completed by Facilities Maintenance Control Division (MCD), larger projects completed by Naval Facilities Engineering Command (NAVFAC), and other projects by the Department of Education (DOE), MCCS,

and Housing Public Private Venture (PPV) Forest City. MCBH tracks the implementation of BMPs to minimize polluted runoff through design drawing review and completing inspections of active construction sites. All tenants, contractors, and residents on MCBH are prohibited from illegally discharging pollutants to its MS4 through MCBH Enforcement Policies, lease agreements, contract language, and Base Orders.

Objective 1: Continue to maintain an effective plan review program to ensure proper permits are obtained and followed.

Assessment Measures

Confirmation	***Status***
BMP Checklist for Construction Site Plan Approval is completed.	
Construction sites of one or more acres will submit a notice of intent (NOI) for coverage under DOH's general permit for construction activities or an individual NPDES permit application.	
Plan review will ensure new developments meet Federal and State regulations, NPDES permit conditions, and building and landscape design criteria.	

Objective 2: Continue to maintain an effective construction site inspection program.

Assessment Measures

Confirmation	***Status***
Construction sites inspected in accordance with established frequencies.	
Scheduled follow-up inspections are conducted.	
Construction Site BMP Checklists are completed for all inspections.	
Appropriate enforcement actions are taken when warranted.	

Objective 3: Continue to maintain an educated and trained staff.

Assessment Measures

Confirmation	***Status***
Provide training for employees responsible for plan review.	
Provide training for employees responsible for construction site inspections.	

Objective 4: Increase contractor effectiveness.

Assessment Measures

Tabulation	***Number***
Number of written notices issued.	94
Number of stop work orders issued.	0
Number of contract enforcement provisions applied.	1
Number of DOH referrals.	0
Number of repeat violations.	17
Response time for corrective actions.	On-time rate 88%**

*Repeat violations are calculated by identifying a specific deficiency that is repeated from one monthly inspection to the next (for example, inspectable item "General Housekeeping" for project X is marked deficient in both March and April)

**Response time for corrective actions is calculated as meeting or not meeting requirements in Enforcement Action Procedure, see Enforcement Action Procedure Summary table.

Objective 5: Continue to maintain inventory of construction sites.

Assessment Measures

Confirmation	***Status***
All approved projects added to database.	
Inspection data recorded.	

Objective 6: Continue review and approval of new storm drain connections through use of the Digging Work Clearance Permit application form.

Assessment Measures

Confirmation	***Status***
Maintain up-to-date map of storm water system components in GIS-based AMS	
Inspection data recorded.	
Tabulation	***Number***
Number of new drain connection agreements approved each year, as required	0*

*During FY 24 there were several redevelopment projects that included renovating or repairing storm drain connection. Some demolition projects included removing storm drain connections; however, no new connections were made.

FY 24 Construction Site Runoff Control Summary

MCBH published an updated SWMP Plan that includes Construction BMP manuals to provide comprehensive guidance for implementing storm water and erosion control measures and maintenance procedures for construction activities. All BMP manuals were provided to the MCBH Facilities Department for further distribution to contractors and necessary parties. All manuals were updated, tailored to MCBH and are now being implemented into the pre- and post-construction process.

ECPD actively maintains a Construction Site Inspection Database to track current construction sites, associated NPDES permit for each of the sites if applicable, the dates of inspections, and any deficiencies identified. All inspections were followed-up with a Construction Inspection Report sent to the unit's POC and/or corresponding FEAD Construction Manager. The Construction Inspection Report outlines the contractor's responsibility to ensure corrective actions are completed as well as the deadline for completion. All Inspection Reports are kept in the ECPD storm water construction inspection inventory.

ECPD Storm Water Program Staff reviewed Storm Water Pollution Prevention Plans (SWPPP)s for new projects within MCBH permitted areas. Construction Projects SWPPP documents were reviewed to verify compliance with Hawai'i Administrative Rule (HAR), Chapter 11-55, Appendix C and NPDES permit requirements. For new projects, the SWPPP was reviewed by ECPD staff to ensure effective BMPs are chosen. To standardize the process, a Storm Water Permit Guidelines Fact Sheet and new SWPPP Review Checklist were created as part of the SWMP, Appendix 4-3.

ECPD conducted regular inspections on construction sites to ensure adequate BMPs are in place and properly maintained. Inspections were performed prior to ground disturbing activities, on a monthly/quarterly schedule, randomly after rain events, and following project completion. Additionally, sites are inspected in response to complaints and regularly monitored for changes in activity and BMP performance in-between routine inspections. ECPD conducted a total of 93 inspections at various construction sites. Excel spreadsheets were used to track the number of constructions sites, inspections,

deficiencies, and activity status.

A new Enforcement Response Plan (ERP) (SWMP Plan Appendix 3-4) was created as part of the SWMP Plan update. If MCBH encounters a situation where continued failure to resolve an observed deficiency has resulted in Base Commanding Officer's (CO's) determination that the contractor or tenant be evicted, ECPD will notify HDOH within one (1) week of the decision. In FY 24, one contractor was issued a letter of non-compliance; however, no contractors involved in construction activities were referred to HDOH.

Construction contractors were required to take the online Environmental Compliance Assessment, Training, and Tracking System (ECATTS) training through NAVFAC for construction contracts. This training includes various modules that discuss storm water BMPs, soil erosion, construction site pollution control prevention, SWPPPs, and vegetative stabilization. The training certificate is a pre-construction submittal requirement for each construction contract that is verified by the Construction Manager of each project.

FY 25 Construction Site Runoff Control Goals

MCBH will continue Construction Site Runoff Control as laid out in MCBH's SWMP Plan. The Storm Water Program Manager will review all construction projects for the appropriate SWPPP and other pollution prevention measures. ECPD staff with Construction Site Runoff Control Program responsibilities will attend annual training to keep up with trends in the technology and to better understand developments in BMPs in the MS4 Community. ECPD will implement an ongoing education program directed at all parties subject to the requirements of the Construction Program, including project applicants, contractors, developers, and property owners. New inspection method was developed with the use of Power Apps. This will allow for easier tracking of violations and over all compliance at construction sites. Storm Water Program Manager will evaluate this program in FY 25 and modify the SWMP Plan as needed.

POST CONSTRUCTION MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

Post-construction storm water discharges can impact receiving waters by increasing the type and quantity of pollutants in storm water, and by increasing the overall quantity of storm water delivered to the receiving water body during storms. The objective of post-construction runoff controls is to improve storm water quality by installing and maintaining post-construction BMPs, both structural and non-structural, in applicable development and redevelopment projects that have the potential to discharge pollutants into the MS4.

MCBH's Post-Construction Storm Water Management Program (Chapter 4 and Appendix 5-3) is a critical part of the SWMP Plan because it defines the permanent measures that will be taken to protect nearby receiving waters from any potential storm water pollution that could be generated onsite in the future. As such, the Post-Construction Program has perhaps the most lasting impact on the continued effectiveness of SWMP Plan. The primary goal of this program is to ensure that permanent controls are incorporated into all applicable construction projects to the MEP, to prevent or minimize negative water quality impacts.

Objective 1: Continue to maintain an effective plan review program to ensure post-construction runoff controls are incorporated into new development and redevelopment projects.

Assessment Measures

Confirmation	***Status***
BMP Checklist for Construction Site Plan Approval is completed.	
Plan review will ensure new developments meet Federal and State regulations and NPDES permit conditions.	

Objective 2: Continue to maintain an effective post-construction BMP inspection and maintenance program.

Assessment Measures

Confirmation	***Status***
Post-construction BMPs inspected for operation and maintenance (O&M) in accordance with established frequencies.	
Scheduled follow-up O&M inspections are conducted.	
Permanent BMP Inspection Reports are completed for all inspections.	
O&M completed in accordance with established frequencies.	
Tabulation	***Number***
Number of post-construction BMP O&M inspections.	77*
Number of follow-up O&M inspections.	0*

* MCBH contracted Element Environmental (E2) to perform a BMP/LID inspection and inventory, it was initiated during FY 24.

Objective 3: Continue to maintain an educated and trained staff.

Assessment Measures

Confirmation	***Status***
Provide training for employees responsible for plan review.	
Provide training for employees responsible for post-construction BMP O&M inspections.	

Objective 4: Increase awareness of post-construction facility responsibilities.

Assessment Measures

Confirmation	***Status***
Education/outreach to facilities with post-construction BMPs	
Tabulation	***Number***
Number of O&M inspections with missing or incomplete inspection and maintenance logs.	0
Number of inspections with corrective actions required.	0
Number of O&M inspections requiring follow-up inspections.	0

FY 24 Post-Construction Management in New Development and Redevelopment Summary

The SWMP Plan has standardized the review process to ensure that post-construction BMPs and LID measures are incorporated into projects in the early stages of design and planning (Appendix 4-3). EPCD staff has promoted awareness of SWMP Plan among all parties involved in any component of the Post-Construction Program through annual training, and education and outreach materials.

All projects during FY 24 were reviewed by ECPD to ensure that all were meeting the requirements identified in the SWMP Plan, including storm water pollution prevention BMPs and NPDES

permit applications. The review included checking that SWPPP addressed Hawai'i Administrative Rules (HAR) 11-55 Appendix C Section 7.2.10.3, for post-construction measures.

ECPD contracted E2 to inventory and inspect all post-construction BMPs and LID features and to create a database for the known features on base. ECPD also initiated action with the GIS section to best incorporate these features into the current Asset Management System. LID inspections on all known features are being tracked under this database as well. Maintenance being conducted on all swales and maintenance status for all structural post-construction BMPs is also tracked.

As required by FFCA Section 34, MCBH is required to enhance and update the Asset Management System for full implementation within 24 months of the Effective Date of the Agreement with required submittals along the way to track progress. MCBH ECPD is actively working on this requirement and meeting all deadlines.

FY 25 Post-Construction Management in New Development and Redevelopment Goals

MCBH will continue Post-Construction Storm Water Management in New Development and Redevelopment Programs as laid out in MCBH's SWMP Plan. The creation of a unique identifier allows the GIS database (tracking and management of storm water features) and Maximo (tracking maintenance) to be linked creating a functional AMS for all storm water assets including BMPs and LIDs. During FY 25 MCBH will perusing contracting the maintenance of all LIDs. The Storm Water Program Manager will evaluate this program in FY 25 and modify the SWMP as needed.

POLLUTION PREVENTION AND GOOD HOUSEKEEPING

The objective of the Pollution Prevention/Good Housekeeping Program is to reduce the amount of pollutants entering receiving bodies of water through both education and proper procedures. It requires examination and subsequent alternation of actions to help ensure a reduction in the type of pollution that: collects on streets, parking lots, open spaces, and storage and vehicle maintenance areas and is discharged into local waterways; and results from actions such as environmentally damaging land development and flood management practices or poor maintenance of storm sewer systems.

MCBH's Trash Reduction Plan (SWMP Plan, Appendix 6-1) which assesses the issues, identifies and implements control measures, and monitors the control measures to reduce trash loads from the MS4. The plan includes:

- Quantitative estimate of the debris currently being discharged from the MS4, including methodology used to determine the load.
- Description of control measures currently being implemented.
- Short-term plan and proposed compliance deadline for reducing debris discharge from the MS4 by 50% from the baseline load.
- Long-term plan and proposed compliance deadline for reducing debris discharges from the MS4 to zero.
- Geographical targets for trash reduction activities.
- Trash-reduction related education activities.

MCBH's Action Plan for Retrofitting Structural BMPs (SWMP Plan, Appendix 6-2) requires a base-wide survey to identify existing structural BMPs and entering the existing BMPs into the asset management system. This will allow for the areas of concern to be identified and an evaluation of all BMPs to find the high, medium, and low priorities.

The Chemical Application Program (SWMP Plan Chapter 7) applies to all elements of the MCBH MS4, including structural and vegetated BMPs, and related appurtenances. The goal of the program is to reduce the contribution of pollutants associated with applications, storage, and disposal of pesticides, herbicides, and fertilizers to the MS4.

Implementation of the Chemical Applications Program is predominantly the responsibility of MCD/MRO and the MCCS Klipper Golf Course Maintenance, as these departments are the main applicators of chemicals on MCBH. All pesticide applicators from the facilities pest control shop and the golf course are required to attend pesticide applicator training for pesticide applicator certification (or recertification) to ensure that pesticides are applied properly and safely, in accordance with DODINST 4150.7.

Objective 1: Continue to maintain an educated and trained staff.

Assessment Measures

Confirmation	***Status***
Inspect industrial and commercial facilities included in the Permit.	
Train maintenance personnel annually and have new maintenance employees trained as part of the orientation program.	

Objective 2: Decrease potential for storm water impact from street debris.

Assessment Measures

Confirmation	***Status***
Complete street sweeping.	
Conduct cleaning and debris removal from drainage structures.	*
Stencil a minimum of 50 storm drains or LIDs per year, with priority given to industrial and commercial areas, and areas with pedestrian traffic.	
Tabulation	***Number***
Number of storm drains stenciled.	51
Number of curb miles swept.	1,500
Volume of trash collected.	2303.9 Tons

* Not all debris was removed in FY 24, but most of the MS4 was cleaned out during the outreach events during the year.

Objective 3: Decrease potential storm water impact from chemical applications.

Assessment Measures

Confirmation	***Status***
Develop an Authorized Use List of chemicals used.	
Monitor fertilizer and pesticide application in application logs and reduce usage where feasible.	
Periodically collect and dispose of unused pesticides, herbicides, and fertilizers according to manufacturer's instruction.	
Conduct annual training for personnel on proper maintenance activities.	
Conduct annual training for personnel and contractors applying pesticides, herbicides or fertilizers.	
Tabulation	***Number***
Volume of excess/unused chemicals collected for disposal.	0
Number of facilities inspected annually.	3

Number of training sessions, and/or number of attendees to training sessions.	3*

*Estimated

Objective 4: Improve implementation of temporary or post-construction BMPs to reduce pollutants to the MS4.

Assessment Measures

Confirmation	***Status***
Develop, implement, and maintain up-to-date site specific BMPs and SWPPPs developed and implemented, as needed.	
Tabulation	***Number***
Number of facilities inspected annually.	3

Objective 5: Improve condition and utility of storm water system through inspection and maintenance program.

Assessment Measures

Confirmation	***Status***
Conduct cleaning and debris removal from storm drainage structures, at least once during the term of the permit.	
Tabulation	***Number***
Number of inlets/catch basins cleaned or maintained.	*
Number of inlets/catch basins inspected.	*
Number of inspections resulting in recommendations of additional maintenance.	*
Volume of debris removal.	*

*Exact numbers are unknown. Storm water program manager will develop a tracking system in FY 25.

Objective 6: Continue to maintain an updated inventory of the MS4.

Assessment Measures

Confirmation	***Status***
Maintain an up-to-date map of storm water system components in GIS-based AMS	*

*Updates to the storm water system maps will continue during FY 25.

Objective 7: Reduce discharge of pollutants to the MS4 by Retrofitting Structural BMPs.

Assessment Measures

Confirmation	***Status***
Develop and implement an Action Plan for Retrofitting Structural BMPs	

Objective 8: Reduce discharge of trash into and out of the MS4.

Assessment Measures

Confirmation	***Status***
Develop and implement a Trash Reduction Plan	*

*Trash plan was published in FY 23; however, MCBH has not met the timelines outlined in the plan. The Storm Water Program Manager has implemented the Nānā Wai Ola under the Storm Water Stewardship Program for CY25. This program is a cleanup of sensitive areas on base to reduce the amount of trash.

Objective 9: Reduce effects of erosion on storm water quality.

Assessment Measures

Confirmation	***Status***
Develop and implement an Erosion Control BMPs Program Plan	*

*Current Erosion Control BMPs Program Plan has been determined to be infective and will be revised.

FY 24 Pollution Prevention and Good Housekeeping Summary

During FY 24 MCBH published the SWMP Plan which outlines all aspects of the Pollution Prevention and Good Housekeeping program (Chapters 6-9).

MCBH has hosted several outreach cleanup and Base wide cleanup events during FY 23 that have reduced the amount of trash in the MS4. However, the implementation schedule has not kept with, the data for baseline load survey not been collected, due to short staffing the storm water program did not have a dedicated manager for most of this FY. This deadline has been moved to next FY. During the outreach events that took place during this FY MCBH personnel and residents prevented the following from entering the MS4.

- 20 POV tires (with rims) were turned into Base Motor-T for disposal via Defense Logistics Agency Disposition Services
- 48.8 tons of waste hauled to base landfill for disposal.
- 11.5 tons of wood/green waste hauled to base landfill (ground up for landfill cover)
- 1,700 pounds of painted wood (tested negative for lead and hauled to base landfill)
- 46,080 pounds of scrap steel turned into the Recycle Center
- 2.5 tons of other metals (aluminum, stainless steel, etc) turned into the Recycle Center
  105 pounds of other recyclables (such as HI-5 beverage containers and cardboard) turned into the Recycle Center
- 29,980 pounds of solid waste hauled off-base via roll-offs provided by Perry Management via contract.
- 12,420 pounds of mixed waste generated from the cleanup were disposed of via contract.

Removed the following from the MCDC:

- 38 bags of trash
- 7 tactical vehicle tires
- 2 ½ chairs
- 2 metal pipes
- Several pieces of wood
- Several pieces of scrap metal
- 1 ironing board
- 1 fire extinguisher
- 1 ammo box
- 1 small motor
- 1 large piece of sheet metal

The outreach events have been a major success during FY 24 in trash and pollution reduction aboard MCBH. MCBH has a dedicated manager for the pesticide program. The manager inspects the

following all employees that spray pesticides to have valid, up-to-date, Pesticide Applicator Certification. MCBH's existing Integrated Pest Management Plan (IPMP) contains the following lists that satisfy the requirement for the Authorized Use List:

- Pesticide Management (IPMP 3.4)
- List of Standard Pesticides Available to DOD Component (IPMP 3.4.1)

MCBH IPMP contains detailed information regarding various BMPs specific to the application, storage and disposal of pesticides, herbicides, and fertilizer. The topics includes:

- Pesticide Procurement (IPMP 3.4.2) Pesticide Storage (IPMP 3.4.3)
- Pesticide Spill and Remediation (IPMP 5.3.4) Pollution Prevention (IPMP 5.3.1)
- Contracts (IPMP Appendix E)
- Hazardous Materials and Hazardous Waste management (IPMP 5.3.5)

FY 25 Pollution Prevention and Good Housekeeping Goals

MCBH will continue the Pollution Prevention/Good Housekeeping Program as laid out in MCBH's SWMP Plan. During the next FY, EPCD will continue the outreach events to reduce trash and pollution aboard MCBH. The Storm Water Program Manager will revise Erosion Control BMPs Program Plan to ensure that it is effective for MCBH. Inspection of all outfalls will be performed to establish a base line for erosion, regular outfall inspections will occur to identify areas of concern. The Storm Water Program Manager will evaluate this program in FY 25 and modify the SWMP Plan as needed.

INDUSTRIAL AND COMMERCIAL DISCHARGE MANAGEMENT

The Industrial and Commercial Activities Discharge Management Program addresses environmental compliance at industrial and commercial facilities within the Base. The program focuses on documenting the inspection efforts, raising awareness among private commercial and industrial facility personnel, and increasing use of BMPs by these personnel.

MCBH is the owner of several industrial facilities and MS4. Industrial facilities at MCBH are covered under the MS4 Permit HI S000007. All drainage connections to MS4, including connections from industrial and commercial facilities, require review and approval from ECPD through dig permit application. The drainage connection approval requires industrial and commercial facilities and activities to implement BMPs that will be subject to inspection and enforcement.

Objective 1: Increase use of BMPs among industrial and commercial facilities to reduce possible spills, illegal connections, and illicit discharges.

Assessment Measures

Confirmation	***Status***
Inspect industrial facilities included in the Permit annually.	
Require a permit or written equivalent approval for drainage connections and discharge of surface runoff into the MS4.	
Provide all facilities educational/BMP handouts or other outreach materials.	
Deficiencies corrected by facilities issued a non-compliance notice.	
Conduct annual training for inspectors (to identify deficiencies, assess potential impacts to receiving waters, and evaluate the appropriateness and effectiveness of deployed BMPs.	

Tabulation/Inspection	*Number*
Number of inspections conducted	73*
Number of revisits completed	0
Number of deficiencies issued	0
Number of inspector training sessions, and/or number of attendees to inspector training sessions.	73

*Inspections for all facilities including industrial and commercial

Objective 2: Improve implementation of temporary or post-construction BMPs at industrial and commercial facilities to reduce pollutants to the MS4.

Assessment Measures

Confirmation	*Status*
Develop, implement, and maintain up-to-date site-specific BMPs and SWPPPs developed and implemented, as needed.	
Require a permit or written equivalent approval for drainage connections and discharge of surface runoff into the MS4.	
Conduct annual training for inspectors (to identify deficiencies, assess potential impacts to receiving waters, and evaluate the appropriateness and effectiveness of deployed BMPs).	
Inspections	***Number***
Number of facilities implementing temporary or post-construction BMPs.	73
Number of inspector training sessions, and/or number of attendees to inspector training sessions.	73

Objective 3: Improve monitoring and tracking of industrial and commercial discharge management.

Assessment Measures

Confirmation	*Status*
Maintain up-to-date inventory/database of industrial facilities and activities.	
Maintain up-to-date inventory/database of commercial facilities and activities, sorted by priority area.	
Require a permit or written equivalent approval for drainage connections and discharge of surface runoff into the MS4.	
Develop and maintain database of permits/written approvals for drainage connections and discharge of surface runoff into the MS4.	

FY 24 Industrial and Commercial Discharge Management Summary

No additional industrial facility connection permits were completed during this FY. New SWPPP's were created for all industrial sites and provided to tenants with instructions on new requirements. Inspections of industrial and commercial facilities and activities are conducted by ECPD for the purpose of reducing pollutants from entering the MS4 to MEP. The inspections include:

- Assessment of the appropriateness and effectiveness of the BMPs implemented at a facility.
- Identification of illegal connections and illicit discharges into the MS4, potential sources of pollution, and deficiencies in BMP and/or SWPPP implementation
- Education of facility owners about storm water-related issues and proper source control measures
- Identification of required corrective actions when deficiencies are identified.

ECPD inspected 73 annual facilities including industrial and commercial during this FY. Inspection results were documented in the Industrial and Commercial Database. Inspection reports (along with field photographs) were submitted to DOH in the Semi-Annual Industrial and Commercial Facilities Inspection Reports.

MCBH has an Enforcement Response Plan (ERP) for industrial and commercial activities and facilities. Appendix 3-4 of the SWMP Plan outlines the requirements of the ERP. The primary objective of the ERP is to:

1. Ensure base-wide compliance with the MS4 Permit and updated Storm Water Management Program (SWMP) Plan.
2. Improve documentation to create and maintain an up-to-date inventory of construction projects on MCBH.
3. Facilitate routine and follow-up inspections to help prevent illicit runoff from reaching receiving surface waters.

MCBH published the ERP and continued to make improvements to the industrial and commercial database. The database tracks inspection dates, deficiencies found, inspection reports and all correspondences between inspector and tenants.

Enforcement Action Procedure Summary

Observed Deficiency	**Critical**		**Major**	**Minor**
Immediate Response by ECPD	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		Same day (close of business)	5 calendar days from verbal notice –OR- prior to storm event (whichever comes first)	5 calendar days from written 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		Quarterly	Quarterly	Quarterly

FY 25 Industrial and Commercial Discharge Management Goals

MCBH will continue to implement the Industrial and Commercial Actives Discharge Management Program as laid out in MCBH's SWMP Plan. With the incorporation of a unique identifier in the GIS database this FY, MCBH personnel will be able to submit inspection and repair requests for MS4 assets. This will allow for identifying problem areas and any asset in need of maintenance. EPCD will continually perform a base wide assessment to identify any changes to the status of facilities, both industrial and commercial. The outcome from these assessments will be included in the Semi-Annual Industrial & Commercial Facilities inspection reports. The Storm Water Program Manager will evaluate this program in FY 25 and modify the SWMP Plan as needed.

STORM WATER PROGRAM MANAGEMENT RESOURCES

MCBH ECPD did have continuity in the full-time Storm Water Program Manager position and full-time GIS Program Manager during FY 24. But due to staffing limitation the Storm Water Program manager is running multiple programs and is not able to dedicate full attention to this program.

CONCLUSTION

MCBH has made significant improvements to the Storm Water Management Program despite the lack of a dedicated program manager. There were many great accomplishments during FY 24, including continuing to implement the all-encompassing SWMP Plan that not only addresses all requirements of the NPDES permit but identifies areas in which there can be improvements. These improvements have been incorporated to reduce the pollution to the environment and keeping with the intent of the CWA. The Public Education and Outreach Program was particularly successful in FY 24 and was highlighted by the EPA during update meetings for the FFCA, and could be a model for other military installations on Oahu. Education is the basis for the entire Storm Water Program, because without educating people on pollution prevention and the regulations there would be no possibility for compliance and pollution prevention. This is why MCBH's Publication Education and Outreach Program addressed aspects of the remaining five programs outlined in the NPDES permit. Efforts to continually improve the Storm Water Program will be made throughout FY 25.

Should you have any questions regarding this submittal, please contact Ms. Katy Smith of the MCBH Environmental Compliance and Protection Division at (808) 496-4359 or Katherine.Smith.CIV@usmc.mil.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted, Based on my inquiry of the persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

HART.JEFFRY.P.1242350568
Digitally signed by HART.JEFFRY.P.1242350568
Date: 2025.01.28 13:38:39 -10'00'

J. P. HART
By Direction

Copy to: Andrew Zellinger, Sara Goldsmith (EPA)