

Storm Water Pollution Prevention Plan

Young Brothers, LLC and Foss Maritime Company, LLC
Headquarters:
1331 North Nimitz Highway
Piers 39 and 40
Honolulu, Hawaii 96817

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SWPPP Certification

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 person or 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.



Megan Rycraft Director, Health, Safety, Quality, and Environment July 11, 2022

1. Introduction

The purpose of this Storm water Pollution Prevention Plan (SWPPP) is to document the selection, design, and installation of control measures to meet the Permit's requirements at each Young Brothers, LLC (Young Brothers, YB) facility (herein referred to as Facility or Facilities) including the Facility at Honolulu Pier 21, co-operated with Foss Maritime Company, LLC. For purposes of this plan, only Young Brothers is further referenced in relation to this Facility.

This plan identifies potential sources of pollution that may reasonably be expected to adversely affect the quality of storm water discharges associated with industrial activity; schedules and procedures to utilize control measures; inspection and assessments of the Facilities; and monitoring and reporting requirements. This SWPPP follows the guidelines set forth in the <u>Code of Federal Regulations (CFR) Title 40, Part 122</u>, and <u>Hawaii Administrative Rules (HAR)</u>
Chapter 11-55, Appendix B and Chapter 11-54.

2. Scope

This SWPPP covers operations at the following Young Brother's Facilities. Operations at the Facilities are generally the same. Any information specific to a Facility is noted.

Facility	Address	NGPC File Number
	Pier 4	
Hilo, Hawai'i	72 Kumau Street	R80A120
	Hilo, HI 96720-4726	
	Pier 21	
Honolulu Pier 21, Oʻahu	499 North Nimitz Highway	R80F200
	Honolulu, HI 96817	
	Pier 40	
Honolulu Piers 39 and 40, Oʻahu	1331 North Nimitz Highway	R80A119
	Honolulu, HI 96817	
	Pier 2	
Kahului, Maui	80 Wharf Street	R80F201
	Kahului, HI 96732	
Kaumalapau, Lānaʻi	Kaumalapau Pier	R80B338
Radifialapad, Laffa i	Kaumalapau, HI 96763	1000000
Kaunakakai, Molokaʻi	Kaunakakai Wharf	R80A122
Radilakakai, Moloka I	Kaunakakai, HI 96748	ROUATZZ
Kawaihae, Hawai'i	Pier 2	R80A124
Rawaiilae, Hawaii	Kawaihae, HI 96743	N60A124
	Pier 3	
Nāwiliwili, Kauaʻi	3020 Waʻapa Road	R80A123
	Līhu'e, HI 96766	

3. Storm Water Pollution Prevention Team

The Facilities storm water pollution prevention team is led by the Director of Health, Safety, Quality, and Environment, with the respective Port Managers responsible for monitoring, inspections, repair, and maintenance of storm water related equipment. The team is responsible for, but not limited to, overseeing development of the SWPPP, any modifications to it, and for implementing and maintaining control measures and taking corrective actions when required. Each member of the storm water pollution prevention team has ready access to either an electronic or paper copy of applicable portions of the NPDES Multi-Sector General Permit for Storm Water Discharges Associated with Industrial Activity (MSGP) (HAR 11-55 Appendix B), the most updated copy of the SWPPP, and other relevant documents or information that is required to be kept with the SWPPP. A current list of site contacts is available in the shared drive and attached for reference.

4. Site Description

4.1 Facility Descriptions

Each of the Facilities share common operations and facility descriptions except for the Facility at Honolulu Pier 21. That Facility's primary purpose is to manage the towing vessel operations and repair. See Section 4.2 for more specific information. The remaining Facilities primary function are loading and unloading cargo from barges that are used to transport the cargo among the Hawaiian Islands. Containerized, palletized, roll-on roll-off, and other types of cargo are loaded and unloaded using industrial trucks having various load capacities. The Facilities have a maintenance area varying in size and capabilities for servicing hi-lifts and other equipment. Additional areas include fueling, storage of equipment and materials, and other light industrial activities.

The hours of operations for each port Facility are posted on Young Brother's website and are subject to change – https://htbyb.com/contact-us/

4.2 Site Specific Description

Hilo

The Facility is a shared use facility. The Facility occupies approximately nine acres on Pier 4 at Hilo Harbor. It is bordered on the north by the Pacific Ocean, on the south by an industrial area, on the west by a mixed-used commercial/residential area, and on the east by the Hilo harbor main entrance and asphalt paved parking lot that includes other industrial activities. The vehicle maintenance area is located in the southeast corner of the Facility, adjacent to the main harbor entrance along Kuhio Street. The fuel storage area is located west of the vehicle maintenance area.

Honolulu Pier 21

The Facility is a shared use facility. The Facility occupies approximately three acres at the end of Pier 21 at Honolulu Harbor. The towing vessels, which are used to transport unmanned barges in Honolulu Harbor and among the Hawaiian Islands, are berthed at this Facility. Routine maintenance and repair work is done on the harbor tugs and towing tugs

while alongside the pier. Oil and bilge slops are removed directly from the tugs by off-site vendors using mobile transfer vehicles.

A dispatch and operations office is located at the Facility. Fabrication, maintenance, and repairs to equipment are performed under cover in the welding and maintenance shop. The Facility has two covered storage areas for portable containers containing lubricating and used oil. Cargo is not handled or stored at this Facility.

Honolulu Piers 39 and 40

The Facility is not a shared use facility. The Facility occupies approximately forty acres on Piers 39 and 40 at Honolulu Harbor. The Facility is bordered on the south side by Honolulu Harbor, on the east side by a drainage canal, on the north by Nimitz Hwy, and on the west by industrial and commercial buildings. The maintenance and fuel loading and storage areas are located at the north end of the Facility. The drum and tote storage areas are located near the maintenance area. A trench drain and sump are located along the west side of the maintenance building and the covered wash facility.

Kahului

The Facility is a shared use facility. The Facility occupies approximately twenty-one acres at Kahului Harbor. The Facility is located at Piers 2 and 3, at the north end of Wharf Street. It is bordered on the north by the ocean, on the west by North Puunene Avenue, on the south by Ka'ahumnau Avenue, and on the east by Ala Luina Street. The vehicle repair area is located near the middle of the Facility, west of the fuel storage area and is uncovered. The fuel storage area is located near the middle of the Facility.

Kaumalapau

The Facility is a shared use facility, open to the public at any time outside of hours of operation by Young Brothers. The Facility occupies approximately 2.5 acres located at the end of Kaumalapau Highway at Kaumalapau Harbor. The Facility is bordered on the east by the Lanai Oil Company, and on the north, west, and south by the Pacific Ocean. The vehicle repair area is located on the northeast side of the Facility.

The Facility handles one sand barge per week. The barge arrives on Wednesday and is unloaded the same day. The barge is then back loaded and departs that same day (Wednesday afternoon).

Kaunakakai

The Facility is a shared use facility. The Facility occupies approximately three acres of the Kaunakakai Wharf, approximately 60% of the total surface area of the Wharf. The wharf is approximately eight hundred feet long and is bordered to the north, east, south, and west by Kaunakakai Harbor and to the northeast by an access road. The vehicle repair area is on the northwest side of the general cargo shed. The fuel storage area is located south and adjacent to the emergency repair area.

Kawaihae

The Facility is a shared use facility. The Facility occupies approximately 14.75 acres on Piers 2A and 2B, at Kawaihae Harbor. The Facility is bordered on the north by a concrete lined drainage canal and Par Hawaii Kawaihae Terminal, on the west by Kawaihae Commercial Harbor, on the south by Matson, and on the east by a concrete lined drainage canal and

Kawaihae Road. The vehicle maintenance area is located near the northwest corner of the Facility. The fuel storage area is located near the northwest corner of the Facility, next to the vehicle maintenance area.

Nāwiliwili

The Facility is a shared use facility. The Facility occupies approximately ten acres at Nāwiliwili Harbor. The Facility is located at Pier 3, along Waapa Road. It is bordered on the south by the Nāwiliwili Small Boat Harbor and on the north by the gas company yard. Hawaii Gas Company conducts transfers of liquefied petroleum gas (LPG or propane) from barges to a manifold at the end of Pier 3. Pier 3 is also occasionally used as a cruise ship terminal. The emergency repair area is located near the southwest corner of the general cargo shed. The fuel storage area is located on the northeast side of the Facility.

4.3 Site Maps

Site maps for each Facility's location are provided as attachments. The site-specific descriptions and/or site maps include:

- Boundaries of the property and the size of the property in acres.
- Location and extent of significant structures and impervious surfaces.
- Directions of storm water flow.
- Locations of storm water control measures.
- Locations of receiving waters, including wetlands, in the immediate vicinity of the facility, including which waterbodies are listed as impaired.
- Locations of storm water conveyances including ditches, pipes, and swales.
- Locations of potential pollutant sources.
- Locations where significant spills or leaks have occurred.
- Locations of storm water monitoring points.
- Locations of storm water inlets and outfalls, with a unique identification code for each outfall and an approximate outline of the areas draining to each outfall.
- MS4s and where storm water discharges to them.
- Locations of the following activities where such activities are exposed to precipitation:
 - Fueling stations.
 - o Vehicle and equipment maintenance and/or cleaning areas.
 - Loading/unloading areas.
 - Locations used for the treatment, storage, or disposal of wastes.
 - Liquid storage tanks.
 - Processing and storage areas.
 - o Immediate access roads used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility.
 - o Transfer areas for substances in bulk.
 - o Machinery.
 - Locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants.

5. Summary of Potential Pollutant Sources

5.1 Operational Areas and Activities

The following industrial activities are exposed to storm water at Young Brothers Facilities:

5.1.1 Vehicle, Machinery, and Equipment Operations

Vehicles at the Facilities include hustlers, golf carts, and work trucks. Machinery at the Facilities include hi-lifts and forklifts. Equipment at the Facilities include, but are not limited, to chassis, containers, g-vans, flat racks, and reefers.

5.1.2 Maintenance Areas

The maintenance areas are used to conduct general maintenance and repairs to vehicles and machinery at the Facilities. Typical minor repairs and servicing include but are not limited to changing fluids and tires, lubricating, repairing broken or damaged hydraulic lines, electrical work, and welding. Major repairs to equipment are completed at the Honolulu Maintenance facility. Whether areas are covered or uncovered is notated in section 5.2 below.

5.1.3 Cargo Operations

Cargo movement throughout the Facilities is governed by Tariff 5A and the established schedule posted on the Young Brothers website. Cargo is delivered to Young Brothers for temporary staging, barge loading, and shipment to neighbor island ports. The transported cargo includes but is not limited to automobiles and other roll-on roll off equipment such as trailered boats, tractors, all-terrain vehicles, livestock, construction materials and equipment, scrap materials, dry and refrigerated food products such as consumer goods, produce and dairy products, aviation gasoline, hot asphalt, used oil, welding gases, paint, explosives, etc. Hazardous materials are shipped in various size containers ranging from one-quart cans to 5,000-gallon intermodal shipping tanks. Hazardous material cargo is staged in a designated area in the Facilities' yards.

5.1.4 Fuel Storage and Loading

The fuel storage areas are used to load, store, and dispense diesel fuel (and gasoline in Honolulu) for the vehicles and machinery at the Facilities. Honolulu Pier 21 does not have a fuel storage or loading area.

5.2 Site Specific Operational Activities

Hilo

The maintenance area is uncovered. Petroleum products stored include up to five 55-gallon drums (i.e., new and used motor oil and hydraulic oil) used for vehicle maintenance and servicing.

A steel single-wall 1,000-gallon diesel fuel aboveground storage tank (AST) is stored in a covered container with secondary containment.

Honolulu Pier 21

The public access roadways running through the Facility are commonly used by vehicles and machinery from neighboring facilities.

The maintenance area is covered. Petroleum products such as new and used motor oil, lubrication, and hydraulic oil are stored in 55-gallon drums in two covered areas of the Facility.

Additional operational activities at this Facility include contractors used to remove bilge water and other waste products from the vessels.

Honolulu Piers 39 and 40

The maintenance area is mostly covered. Petroleum products are stored in several types of aboveground bulk storage containers at the Facility (e.g., ASTs, drums, totes, gen-sets). Totes and a variable stock of drums containing various lubricating oils are stored in the drum and tote storage area and wash bay. The Facility's Spill Prevention Countermeasures and Controls (SPCC) Plan provides detailed information about the quantity and location of the ASTs, totes, and drums on site.

Barges are berthed at Piers 39 and 40. Routine barge maintenance and repair work is done alongside Piers 39 and 40 and at the maintenance shop. Maintenance and repair work for freight containers, powered industrial trucks, and transportation equipment is done in the maintenance shop. Major repairs are completed in a shipyard.

The maintenance area trench drain and sump collect wash water and any potential oil spills from the maintenance shop and wash facility. Material collected in the trench drain and sump is passed through the oil/water separator before being discharged to the sanitary sewer per the City and County Industrial Wastewater Discharge Permit (IWDP).

The Facility's wash water recycling system (Tank 6 and oil/water separator) has a capacity of six hundred gallons. Oil collected in the oil/water separator (typically less than 1 pint per month) is manually removed using absorbent pads once per month or as needed. Spent absorbent pads are disposed as municipal waste in the dumpster on-site. Recycled water that has gone through the filtration system is stored in two small water tanks and reused at the wash rack. Excess post-treatment water is disposed into the industrial wastewater system as allowed by the IWDP. Residual oil and heavy solids generated from the recycle water treatment system are removed and properly disposed of by a service contractor.

Kahului

The maintenance area is uncovered. Petroleum products such as new and used motor oil, lubrication, and hydraulic oil are stored in 55-gallon drums near the fuel storage area.

A steel double-wall 1,000-gallon diesel fuel AST is stored in a covered container.

Additional operational activities at this Facility include cement dust produced and operated by Hawaiian Cement, located in the center of the Facility.

Kaumalapau

The maintenance area is uncovered. Petroleum products stored include up to five 55-gallon drums (i.e., new and used motor oil and hydraulic oil) used for vehicle maintenance and servicing.

Fuel is transported in a portable fuel storage tank by barge from Honolulu. The storage tank is left onsite until a refill is needed.

Other activities stemming from the shared use nature of the Facility are public vehicles leaking oil and other fluids, garbage left on site from public use, and shipments from Pulama Sand Barges. The sand barge operations offloads sand onto the Facility, loads it onto to trucks, and hauls it away. To prevent and minimize the potential pollution from the sand shipments, Young Brothers works with Pulama Sand Barges to ensure best management practices and control measures are implemented and followed.

Kaunakakai

The maintenance area is uncovered. Petroleum products stored include one to two 55-gallon drums (i.e., new and used motor oil and hydraulic oil) used for vehicle maintenance and servicing.

A steel double-walled 787-gallon diesel fuel AST and several small 5-gallon buckets of petroleum products are stored in this area. The AST is fueled in Honolulu and shipped to the Facility as needed.

Other activities include Department of Land and Natural Resources (DLNR), State of Hawaii harbor policing. The DLNR and local boat owners perform maintenance on their watercrafts such as sanding, painting, and fiberglass repairs.

There are numerous feral cats located on the wharf that leave feces along the edges of the pier.

Kawaihae

The maintenance area is uncovered. Petroleum products stored include up to five 55-gallon drums (i.e., new and used motor oil and hydraulic oil) used for vehicle maintenance and servicing.

A steel single-wall 1,000-gallon diesel fuel AST is stored in a covered container with secondary containment.

Other activities include dust from Par Hawaii operations, directly adjacent to the Facility.

Nāwiliwili

The maintenance area is uncovered. Petroleum products stored include up to five 55-gallon drums (i.e., new and used motor oil and hydraulic oil) used for vehicle maintenance and servicing.

A steel single-wall 1,081-gallon diesel fuel AST is stored in secondary containment in this area.

A decommissioned wash rack is located in the northeast area of the Facility adjacent to the fuel storage area. The area consists of a concrete pad surrounded by a concrete curb and a chain linked fence. A sump drain is located in the middle of the concrete pad. Any storm water that accumulates in the area eventually evaporates.

The pier surface is experiencing structural issues including a gradual sinking of the pier. As a result, the uneven surfaces were filled and paved with asphalt in an attempt to restore the original grade. Because the asphalt pavement is prone to damage during barge loading and unloading (unlike concrete surfaces), the Facility uses steel plates to help prevent further damage to pier surfaces.

5.3 Potential Pollutants

The following potential pollutants are associated with each identified Facility operational area and activities in sections 5.1 and 5.2 which could be exposed to rainfall and discharged from the Facilities. This includes where potential spills or leaks may occur and the corresponding outfall(s) that would be affected. Outfalls are defined as the point where discharge from a Facility enters a receiving body of water. The Facilities are largely paved, however Hilo, Kaumalapau, Kahului, and Nāwiliwili have limited exposed dirt or landscaping that contribute to erosion and sediments.

Vehicles, Machinery, and Equipment			
Corresponding Outfall Affected by Spills and Leaks:			
Due to the nature of operat	Due to the nature of operations any outfall at each Facility may be affected by the potential		
pollutants below.			
Potential Pollutants:			
	Oil and lubricants		
	Antifreeze		
	Transmission fluid		
Spills or Leaks	Hydraulic fluid		
	Windshield wiper fluid		
	Diesel fuel		
	Gasoline		
	Iron (rust, flaking, shavings)		
Metals	Zinc		
	Break dust		
Maintenance Areas			
Corresponding Outfall Affected by Spills and Leaks:			
Hilo	Outfall 2		
Honolulu Pier 21	Outfalls 2 and 3		
Honolulu Piers 39 and 40	Outfall 1		
Kahului	Outfalls 1 and 3		
Kaumalapau	Outfall 1		
Kaunakakai	Outfall 1		

Nawiliwili	Kawaihae	None	
Spills or Leaks Antifreeze Transmission fluid Hydraulic fluid Paints Solvents Windshield wiper fluid Diesel fuel Gasoline Iron (rust, flaking, shavings) Zinc Welding slag Break dust Cargo Operations Corresponding Outfall Affected by Spills and Leaks: Due to the nature of operations any outfall at each Facility may be affected by the potential pollutants below. Potential Pollutants: Lubricating oils Diesel fuel Gasoline Livestock waste Various cargo materials Iron (rust, flaking, shavings) Zinc Brake dust Fuel Storage and Loading Area Corresponding Outfall Affected by Spills and Leaks: Hilo Outfall 3 Pake dust Fuel Storage and Loading Area Corresponding Outfall Affected by Spills and Leaks: Hilo Outfall 1 Honolulu Piers 39 and 40 Outfall 1 Kamalapau Outfall 1 Kaumalapau Outfall 1 Kawailae Outfall 1 Kawailae Outfall 1 Kawailae Outfall 1 Notor oil	Nāwiliwili	Outfall 1	
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Second Parameter		Gasoline	
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Potential Pollutants: Spills or Leaks Motor oil	Nāwiliwili	Outfall 1	
Spills or Leaks	Potential Pollutants:		
Spills or Leaks Waste and used oil	On illa and and	Motor oil	
	Spills or Leaks	Waste and used oil	

	Hydraulic oil
	Lubricants
	Diesel fuel
	Gasoline
M-A-I-	Iron (rust, flaking, shavings)
Metals	Zinc

5.4 Unauthorized Non-Storm Water Discharges

The presence of unauthorized non-storm water discharges is continually evaluated as part of the inspection requirements of the Permit. Evaluation criteria includes an inspection of the entire Facility identifying any spills, leaks, or discharges not related to storm water, utilizing an inspection form to record any instances of noncompliance. Facility outfalls and onsite drainage points are observed during the inspection. Below are the dates of the most recent evaluations and any actions taken relating to non-storm water discharges.

Facility	Date of Evaluation	Actions Taken
Hilo	02/03/2022	
Honolulu Pier 21	06/23/2022	
Honolulu Piers 39 and 40	06/19/2022	
Kahului	11/30/2021	No compositive estimate required
Kaumalapau	07/01/2022	No corrective actions required.
Kaunakakai	11/03/2021	
Kawaihae	02/04/2022	
Nāwiliwili	04/19/2022	

6. Control Measures to Meet Technology-Based and Water Quality-Based Effluent Limits

6.1 General Control Measures

- Monitor and maintain the areas along pier and wharf surfaces, and areas draining to inlets. Ensure that these areas are clean and free of debris or other sources of pollution.
- Perform routine inspections of each storm drain inlet onsite. If debris or other sources of
 pollution are discovered on grates or around them, immediately remove these to prevent
 them from entering storm drains and harbor waters.
- Ensure that storm drain inlets are fitted with filter fabric or other adequate protective devices to capture any debris and sediments. Inspect and maintain the protective devices on a routine basis.
- Clean up releases of petroleum product or other industrial chemicals immediately by using materials provided in spill kits located at the Facilities. Spill kit locations are shown on the Site Map.
- Train employees and ensure that they understand proper cleanup procedures.

- Label hazardous materials containers on-site and store under cover in a protected area away from drains.
- Clean catch basins when the depth of debris reaches two-thirds (2/3) of the sump depth and keeping the debris surface at least six inches below the lowest outlet pipe.
- Utilize ecology blocks, berms, and booms for erosion control as applicable.
- Divert, infiltrate, contain, and allow runoff to evaporate to minimize the discharge of pollutants to the extent practicable.

6.2 Area and Activity Specific Control Measures

Vehicles, Machinery, and Equipment			
Potential Pollutant	Control Measures Used to Meet Effluent Limits – BMPs		
 Oil and lubricants Antifreeze Transmission fluid Hydraulic fluid Windshield wiper fluid 	 Inspect vehicles and machinery on a daily basis, checking for obvious leaks, rust, metal flakes, and other potential pollutants. If pollutants are identified, take the equipment out of service for repair. Perform routine preventive maintenance on company-owned vehicles and machinery to prevent leaks from occurring. To the extent possible, maintenance is conducted indoors. Park vehicles and machinery in designated areas overnight and during breaks. Place drip pans, petroleum absorbent pads under expanded metal, or some other equivalent type of operational best practice, on the ground under the equipment to minimize the potential for pollution. Immediately clean up releases of petroleum product or other 		
 Zinc Iron (rust, flaking, shavings) Brake dust	 automotive fluids from vehicles and machinery using spill kits onsite. Wash vehicles, equipment, and machinery on a routine basis to prevent the buildup of sediment and prevent rusting. Take proper precautions to ensure wash water does not enter any storm drains if conducted on site. Sweep up and remove metal flakes from rusty equipment stored outdoors on a routine basis to prevent metals from discharging into harbor waters with storm water runoff. Remove any rusty equipment or equipment observed to be causing excessive metal flaking from service. Repair and restore equipment prior to being put back in service. Temporarily cover any rusty metal equipment (e.g., ramps, freight containers) that is not actively used or has been decommissioned with tarps and secured to prevent exposure to the elements until the equipment can be removed from the Facility. Inventory and assess the need for equipment on a routine basis and remove any equipment that is no longer used or that has been deemed 		

• Drain fluids from equipment and vehicles that will be decommissioned, and, for any equipment and vehicles that will remain unused for extended periods of time, inspect for leaks.

Maintenance Areas			
Potential Pollutant	Control Measures Used to Meet Effluent Limits – BMPs		
Spills or Leaks Oil and lubricants Antifreeze Transmission fluid Hydraulic fluid Windshield wiper fluid Solvents Paints Metals Zinc Iron (rust, flaking, shavings) Welding slag Brake dust	 Monitor the area on a routine basis to ensure that the paved pad and general area are kept clean. Use drip pans and petroleum absorbent pads during maintenance and repair work. Place 55-gallon drums and other portable containers on secondary containment such as spill pallets. Label portable drums, totes, and containers for hazard communication and identification of contents. Sweep up and remove any metal shavings and welding slag using a broom and dustpan. Keep paint related material under shelter when not in use. Dispose of waste products through a qualified waste disposal contractor. Immediately clean up releases of petroleum product or other automotive fluids from vehicles and machinery using spill kits onsite. Wash vehicles, machinery, and equipment only in designated areas ensuring wash water is properly segregated, collected, and disposed of. Place tires off the ground and under cover to prevent contact with rain and runoff. Schedule tire pick up regularly for recycling. Cover stored equipment and materials to prevent contact with storm water. Use dry cleanup methods only. Hosing down of maintenance area 		
floors are prohibited.			

Cargo Operations

Potential Pollutant	Control Measures Used to Meet Effluent Limits – BMPs
Petroleum	Cargo that is so damaged as to permit the escape of its contents or
Products	that appears to have leaks or showing evidence of failure to properly
 Lubricating 	contain the contents (e.g., crushed scrap metal, livestock waste, etc.) is
oils	not acceptable for shipment. Prior to acceptance, Facility personnel
Fuels	inspect cargo shipment to confirm that it does not contain potential
Metals	pollutants that could enter harbor waters during transport.

• Zinc	Immediately clean up any oil staining observed on exposed cargo
 Iron (rust, 	equipment or the surrounding impervious surfaces using dry absorbent
flaking,	methods (i.e., absorbent pads or kitty litter) to prevent oil from co-
shavings)	mingling with storm water runoff and entering harbor waters.
15	Reposition small containers which are leaking to stop or slow the flow.
Livestock waste	Minimize shipments of cargo known to leach aluminum and zinc and,
Maniaura annua	when possible, request that the shipper wrap and cover cargo materials
Various cargo	with shrink wrap or plastic wrap.
materials	Monitor possible sources of metals such as oil staining, excessive dirt,
	and scrap metal bins during normal work activities. If such pollutant
	sources are identified, immediately notify management and take action
	to remove the pollutant source using dry cleanup methods.

Fuel Storage and Loading Areas

Tuoi otorago una Louding Arodo		
Potential Pollutant	Control Measures Used to Meet Effluent Limits – BMPs	
Petroleum products Motor oil Waste oil Hydraulic oil Lubricants Diesel fuel Gasoline Metals Iron (rust, flaking, shavings)	 Stationary diesel and gasoline tanks are double walled. Portable fuel tanks and containers are stored within adequate secondary containment that consists of a steel basin. The tanks and containments are stored on racks and under shelter to prevent storm water from coming into contact with the containers. Closely supervise fueling to prevent release of petroleum products from overfilling or spills. Place drip pans and/or petroleum absorbent pads on the ground beneath vehicles and machinery during fueling. Immediately cleanup releases of petroleum product from vehicles and machinery by using spill kits onsite. Properly label ASTs, drums, totes, and containers for hazard communication and identification of contents. 	

7. Schedules and Procedures

Below are the general housekeeping and maintenance procedures in place at the Facilities. Additional operationally specific housekeeping and maintenance items are addressed as applicable in the control measures outlined in section six above.

7.1 Good Housekeeping

- Sweep the Facilities on a routine basis to mitigate the amount of road dust, sediment, and excess rust particles.
- Store materials in appropriate containers.
- Minimize the potential for waste, garbage, and floatable debris to be discharged by keeping exposed areas free of such materials, or by intercepting them before they are discharged.
- Separate waste streams for proper disposal.
- Do not overfill trash receptacles on-site and keep lids closed when not in use. Do not

- leave trash outside of these receptacles to ensure that it will not commingle with storm water runoff. Reduce waste wherever possible.
- Remove and properly dispose of litter and debris on a regular basis. Waste materials are disposed of by standard waste transporters on a scheduled basis. To assist in the determination of proper waste disposal, employees follow procedure P033 Manage Material and Waste Products.
- Conduct inspections of tanks, drums, totes, and containers for leaks, condition of the equipment and other items for maintenance and repair.
- Conduct routine cleaning of the Facilities surface, equipment, and storm drains.

7.2 Maintenance

Control measures that are used to achieve effluent limits are kept in effective operating condition, as well as industrial equipment and systems, to minimize pollutant discharges. Maintenance at the Facility includes:

- Routine maintenance of control measures to minimize pollutant discharges.
- Performing inspections and preventive maintenance of storm water drainage, source controls, and systems that could fail and result in contamination of storm water based on the schedules outlined in section eight below.
- Diligently maintaining non-structural control measures such as spill response supplies and personnel training.
- Immediately repair or replace control measures and take reasonable steps to prevent or minimize the discharge of pollutants until the final repair or replacement is implemented, including cleaning up any contaminated surfaces so that the material will not be discharged during subsequent storm events.
- Final repairs/replacement of storm water controls are completed as soon as feasible but no later than 14 days from the time the issue is identified, or if that is infeasible, within 45 days. If the completion of storm water control repairs/replacement will exceed the 45-day timeframe, notify Department of Health (DOH) of the intention to exceed 45 days, and document the rationale for the modified maintenance timeframe.
- If a control measure was never installed, was installed incorrectly or not in accordance with the Permit, or is not being properly operated or maintained, a corrective action is taken.

Note:

- "Immediately" requires Young Brothers, on the same day it is identified that a control measure needs to be addressed, take reasonable steps to minimize or prevent the discharge of pollutants until a permanent solution is implemented. If, however, a problem is identified at a time in the workday when it is too late to act, the problem will be addressed the following workday.
- "All reasonable steps" means Young Brothers has undertaken initial actions to assess and address the condition causing the corrective action. "All reasonable steps" may include documenting why a corrective action is unnecessary.

7.3 Spill Prevention and Response Procedures

There is a defined hierarchy of responsibility for managing spill prevention at the Facilities. Members of this hierarchy are familiar with the SWPPP, its implementation, and contingency measures. The Young Brothers Director of Health, Safety, Quality, and Environment oversees environmental aspects of the Facilities including spill prevention and response. The Port Managers, with assistance from the Barge Superintendents, are responsible for spill prevention and for coordinating spill prevention programs and activities at the Facilities.

Specific procedures and plans are outlined below. Control measures such as material handling and storage, container labeling requirements, and secondary containment are addressed in section six above.

7.3.1 Procedures for Preventing Spills and Leaks

Oil Spill Prevention and Control Plan

Young Brothers has developed a plan to prevent new, used, or recycled oil, or petroleum-contaminated wastewater from being discharged or allowed to enter sewers, drainage systems, surface or groundwater, water courses, marine waters, or onto the ground. A copy of the plan can be found on the shared drive.

Spill Prevention Control and Countermeasure Plan

The Honolulu Piers 39 and 40 Facility has a Spill Prevention Control and Countermeasure (SPCC) Plan that is certified by a professional engineer. The plan is the basis for the spill prevention measures addressed below as well as detailing potential spill predictions, volumes rates, and control; and prevention measures such as drainage control, bulk storage tanks, secondary containment, facility transfer operations, spill control equipment, and training. A copy of the plan can be found on the shared drive.

7.3.2 Procedures for Responding to Spills and Leaks

Hazardous Materials Spill Response Procedures

Spill response procedures for spills, unanticipated releases of petroleum-based products, and hazardous materials are posted at each Facility where the potential for such occurrences exists. Spill response procedures are included in the YB Hazardous Materials Release Response Plan located on the shared drive.

7.3.3 Notification Procedures

An emergency notification list indicating the Facility personnel to whom spills and unanticipated releases are reported to is available on the shared drive.

As part of the emergency notification list, the appropriate federal and state agencies are notified (i.e., Department of Health – Clean Water Branch, United States Coast Guard, Department of Transportation – Harbors Division, etc.). In the event of large uncontrolled releases that may have the potential to impact the ocean, a contractor is on-call 24 hours a day to respond.

Where a leak, spill, or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under either 40 CFR Part 110, 40 CFR Part 117, or 40 CFR Part 302, occurs during a 24-hour period, Young Brothers will notify the Clean Water Branch (CWB) at (808) 586-4309 during regular office hours (Monday through Friday (excluding holidays) from 7:45 a.m. until 4:15 p.m.) or the Hawaii State Hospital Operator at (808) 247-2191 outside of regular office hours. Contact information is posted locations that are readily accessible and available.

7.3.4 Cleanup Equipment

Equipment needed for emergency response to spills, leaks, and unanticipated releases of petroleum-based products and hazardous substances is located within a close distance from Facility areas where there is a potential for such occurrences (see Facilities site maps). There are two types of spill response kits:

- 1) General spill response kit (Gray Spill Kit) used by Facility personnel for general cleanup.
- 2) Large spill response kit (G-Van Spill Kit) used for larger uncontrolled releases that may potentially impact the ocean.

Emergency spill response equipment includes but is not limited to sorbent materials, buckets, and moveable booms. These materials are listed in the YB Spill Response Plan located on the shared drive.

7.3.5 Spill Log

Spill events are managed in the company-wide software program.

7.4 Employee Training

Employees are trained annually on this SWPPP, including members of the storm water pollution prevention team. A log of the dates on which specific employees received training is maintained on the shared drive.

Personnel Required to be Trained:

- Personnel who are responsible for the design, installation, maintenance, and/or repair of controls (including pollution prevention measures).
- Personnel responsible for the storage and handling of chemicals and materials that could become contaminants in storm water discharges.
- Personnel who are responsible for conducting and documenting monitoring and inspections.
- Personnel who are responsible for taking and documenting corrective actions.

Training Topics:

- An overview of what is in the SWPPP.
- Spill response procedures, good housekeeping, maintenance requirements, and material management practices.
- The location of control measures at the Facility and how they are maintained.
- Pollution prevention procedures and requirements.

- When and how to conduct inspections, record applicable findings, and take corrective actions
- Hazardous materials management (e.g., used batteries, used oil, spent solvent, vessel wastewaters).
- Fueling procedures.

8. Inspections and Assessments

8.1 Routine Facility Inspections

Inspections are conducted during normal Facility operating hours of the following areas and items:

- Areas where industrial materials or activities are exposed to storm water.
- Areas identified in this plan and those that are potential pollutant sources.
- Areas where spills and leaks have occurred in the past three years.
- Discharge points.
- Control measures used to comply with effluent limits.

Inspections are conducted at least quarterly. At least once each calendar year, the inspection is conducted during a period when a storm water discharge is occurring.

Inspections are performed by qualified personnel, as defined in the Permit, with at least one member of the storm water pollution prevention team participating. The results of visual and analytical monitoring (if any) for the past year are considered when planning and conducting inspections.

8.1.1 Routine Facility Inspection Procedure

During the inspection, the following is examined or looked out for:

- Industrial materials, residue or trash that may have or could come into contact with storm water.
- Leaks or spills from industrial equipment, drums, tanks, and other containers and cargo.
- Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site.
- Tracking or blowing of industrial materials, cargo, or waste materials from areas of no exposure to exposed areas.
- Control measures needing replacement, maintenance, or repair.
- Facility outfalls and areas of the Facilities with sheet flow off of the pier discharging to the ocean.
- The following operational areas:
 - Painting areas
 - Material storage areas
 - Engine maintenance and repair areas
 - Material handling areas
 - General yard area

Inspections occurring during a storm water event or discharge:

- The functionality of control measures implemented to meet the requirements of the Permit are observed (e.g., filter fabric, witches' hats)
- Discharge points, as defined below, are also observed during this inspection. If the discharge locations are inaccessible, nearby downstream locations are inspected.

Discharge Point – the location(s) where storm water leaves the facility either directly or through a separate storm sewer system to a water body.

8.1.2 Routine Facility Inspection Documentation

The findings of facility inspections are documented and maintained as a report on the shared drive. The findings of the inspections are summarized in the annual report to DOH as required.

Inspection findings are documented, including but not limited to, the following information:

- The inspection date and time.
- The name(s) and signature(s) of the inspector(s).
- Weather information.
- Observations relating to the implementation of control measures at the facility, including:
 - A description of any discharges occurring at the time of the inspection.
 - Any previously unidentified discharges from and/or pollutants at the site.
 - o Any evidence of, or the potential for, pollutants entering the drainage system.
 - Observations regarding the physical condition of and around outfalls, including any flow dissipation devices, and evidence of pollutants in discharges and/or the receiving water.
 - Any control measures needing maintenance, repairs, or replacement.
- Any additional control measures needed to comply with Permit requirements.
- Any incidents of noncompliance.
- A statement, signed and certified in accordance with <u>HAR Chapter 11-55</u>, <u>Appendix A</u>, <u>Subsection 15</u>.

8.2 Quarterly Visual Assessments

8.2.1 Quarterly Visual Assessment Procedure

A storm water sample is collected and assessed by the Port Manager or a member of the storm water pollution prevention team quarterly from each outfall (except as noted in Section 8.2.3 below) and a visual assessment is conducted of each of these samples. These samples are not required to be collected consistent with 40 CFR Part 136 procedures but are required to be collected in such a manner that the samples are representative of the storm water discharge.

Visual assessment requirements:

- Collect the sample in a clean, colorless glass or plastic container, and examine in a welllit area.
- Collect the sample within the first 30 minutes of an actual discharge from a storm event.
 If it is not possible to collect the sample within the first 30 minutes of discharge, the
 sample must be collected as soon as practicable after the first 30 minutes, and the
 reason why it was not possible to take the sample within the first 30 minutes is required
 to be documented.

 Ensure discharge occurs at least 72 hours (three days) from the previous discharge. The 72-hour (three-day) storm interval does not apply if it is documented that less than a 72-hour (three-day) interval is representative for local storm events during the sampling period.

The sample is visually inspected for the following water quality characteristics:

- Color
- Odor
- Clarity (diminished)
- Floating solids
- Settled solids
- Suspended solids
- Foam
- Oil sheen
- Other obvious indicators of storm water pollution

Whenever the visual assessment shows evidence of storm water pollution, corrective action procedures are required.

8.2.2 Quarterly Visual Assessment Documentation

Visual assessment findings are documented and maintained as a report on the shared drive. The findings of the assessment are summarized in the annual report to DOH. The documentation of the visual assessment includes, but is not limited to:

- Sample location(s) (note the substantially identical outfall exception in Section 8.2.3 below).
- Sample collection and visual assessment date and time for each sample.
- Personnel collecting the sample and performing visual assessment and their signatures.
- Nature of the discharge (i.e., runoff).
- Results of observations of the storm water discharge.
- Probable sources of any observed storm water contamination.
- Any corrective actions taken.
- If applicable, why it was not possible to take samples within the first 30 minutes.
- A statement, signed and certified in accordance with HAR Chapter 11-55, Appendix A, Subsection 15.

8.2.3 Exceptions to Quarterly Visual Assessments

Adverse Weather Conditions:

When adverse weather conditions prevent the collection of samples during the quarter, a substitute sample is taken during the next qualifying storm event. Documentation of the rationale for no visual assessment for the quarter is included with SWPPP records as described above. Adverse conditions are those that are dangerous or create inaccessibility for personnel, such as local flooding, high winds, or situations that otherwise make sampling impractical.

Climates with Irregular Storm Water Runoff:

For Facilities located in an area where limited rainfall occurs (e.g., arid, semi-arid climate, tropical savanna climate) preventing storm water runoff for extended periods, samples for the quarterly visual assessments may be distributed during seasons when runoff occurs.

Substantially Identical Outfalls:

For Facilities that have two or more outfalls that discharge substantially identical effluents (see section 9.1), quarterly visual assessments of the discharge are conducted at just one of the outfalls. The report states that the results apply to the substantially identical outfall(s). When this exception is used, visual assessments are conducted on a rotating basis of each substantially identical outfall throughout the period of coverage under this permit.

If storm water contamination is identified through visual assessment performed at a substantially identical outfall, the control measures implemented for each outfall is assessed and modified as appropriate to reduce or eliminate the contamination.

9. Monitoring

The Monitoring program involves taking storm water samples and having them analyzed by a lab. This analysis is used for determining the concentrations of pollutants (parameters) discharged in storm water associated with industrial activity at the Facilities and adjusting control measures as needed to reduce exceedances and overall amounts of pollutants in the discharge. There are two types of analytical monitoring required at Young Brothers Facilities:

- 1) Benchmark Monitoring industrial sector-specific parameters.
- 2) Impaired Waters Monitoring parameters listed on the EPA's 303(d) list of pollutants in state waters.

Both monitoring programs have specific monitoring requirements including sampling locations, frequency, procedures, reporting, recordkeeping, and photographic documentation of the monitored storm event.

9.1 Storm Water Drainage, Outfalls, and Sampling Locations

Discharge from the Facilities consists entirely of storm water runoff associated with industrial activity, as defined in 40 CFR 122.26(b). The drainage areas and storm water flow for each Facility is shown in the respective site maps. Sampling locations are indicated for each Facility with the rationale for choosing that location and for any determination that two or more outfalls are substantially identical.

For the substantially identical outfall exception to apply, it must be based on these three factors:

- 1) The similarities of the general industrial activities and control measures.
- 2) Exposed materials that may significantly contribute pollutants to storm water.
- 3) Runoff coefficients of the drainage areas.

When this applies, samples are taken from one location and the report will indicate that the results also apply to the substantially identical outfall. The runoff coefficient, i.e., the fraction of total rainfall that runs off the property, for each of the Facilities is high because they are mostly paved.

Hilo

There are two drainage areas at the Facility which direct storm water runoff to the Pacific Ocean at Hilo Harbor (Reeds Bay).

Drainage Area A - Storm water runoff from Pier 4 and a portion of the cargo handling area comprises this drainage area. Storm water sheet flows into a trench drain and from the drain into the harbor through Outfall 1.

Drainage Area B - Storm water runoff from Pier 4, the vehicle maintenance area, fuel storage and loading area, the chassis yard, and a portion of the cargo handling comprises this drainage area. Storm water sheet flows into a catch basin to the harbor through an offsite Outfall 2.

Outfall 1 is not accessible for sampling because it is underneath the pier. Outfall 2 is not accessible because it is not located on the Facility. Sampling sheet flow prior to the runoff passing through the trench drain, which has a layer of sediment filters, would not be a representative sample of what is flowing into Reeds Bay.

During a measurable storm event, storm water samples are collected from the sample point, SD-1, indicated on the site map. This location was chosen as it collects storm water from both drainage areas of the Facility and is most representative of the overall discharge of storm water of the Facility. General industrial activities and control measures, exposed materials that may significantly contribute pollutants to storm water, and runoff coefficients of the drainage areas are similar throughout the Facility and are most representative at the sampling point. Because the drainage areas convey similar storm water discharges, storm water samples will not be collected from the other substantially identical outfalls.

Honolulu Pier 21

There are two drainage areas at the Facility which direct storm water runoff to the Pacific Ocean at Honolulu Harbor.

Drainage Area A - The majority of storm water runoff at the Facility collects in storm drains SD-1 and SD-4. These storm drains receive runoff from the paved public roadways connecting Pier 21 and Pier 22 and a materials storage area. Storm water runoff sheet flows off the edge of the pier to the harbor from the paved strip along the side of the offices. Runoff discharges to Honolulu Harbor through Outfall 1 and Outfall 4.

Drainage Area B - Storm water runoff from the paved strip along the welding shop collects in storm drains SD-2 and SD-3. Both of these storm drains are under cover from the welding

shop roof. Runoff discharges to Honolulu Harbor through Outfall 2 and 3, with a minor amount of sheet flow directly off of the pier into the harbor.

Drainage Area C – The majority of storm water runoff from this area flows away from the harbor back toward the drain that is located on neighboring property. There is minimal material storage and operational activity in this drainage area.

During a measurable storm event, storm water samples are collected from the sample point, SD-1, indicated on the site map. The samples are collected from sheet flow after it passes through an oil absorbing and heavy metal boom as it enters the drain inlet. This location was selected for sampling as sheet flows towards this point from the major operational areas of the Facility which are representative of the volume and nature of the total discharge at the Facility. SD-1 is substantially identical to SD-4 based on operational activities in the drainage area, while SD-2 and SD-3 are under cover and exposed to limited storm water runoff. Because the drainage areas convey similar storm water discharges, storm water samples will not be collected from the other substantially identical outfalls.

Honolulu Piers 39 and 40

There are two drainage areas at the Facility which direct storm water runoff to the Pacific Ocean at Honolulu Harbor.

Drainage Area A – Storm water runoff in the northern area of the Facility collects in the storm drains near the Annex and maintenance building and in the open grated trench drain that transects the Facility in a generally east to west direction. The grated, open trench drain provides storm water drainage for approximately 70 percent of the total Facility area. This drainage area receives runoff from employee parking, the maintenance area, ro-ro cargo handling area, cargo loading area, and the fuel storage and loading areas. The trench drain discharges to Outfall 1 into Honolulu Harbor in the slip between Piers 39 and 40.

Drainage Area B – Storm water runoff from Piers 39 and 40 comprises this drainage area. The pier aprons are mostly flat and do not drain toward the trench drain. The pier edge around Piers 39 and 40 is protected by an 8-inch curb with small scuppers to allow storm water to run off. Approximately 1,900 linear feet of this curb has been removed to allow for the placement of the barge loading ramps. In this area, storm water sheet flows off the edge of the pier into Honolulu Harbor.

During a measurable storm event, storm water samples are collected from the sample point, TD-1, indicated on the site map. The samples are collected as close as possible to the discharge point in the trench drain while remaining safe during operations. This location was chosen as it collects storm water from both drainage areas of the Facility and is most representative of the overall discharge of storm water of the Facility, including similarities of the general industrial activities and control measures, exposed materials that may significantly contribute pollutants to storm water, and runoff coefficients of the drainage areas. Because the drainage areas convey similar storm water discharges, storm water samples will not be collected from the other substantially identical outfalls.

Kahului

There are four drainage areas at the Facility which direct storm water runoff to the Pacific Ocean at Kahului Harbor.

Drainage Area A - Storm water runoff from the middle portion of the Facility is directed to the catch basin in this area. This drainage area receives runoff from the cargo handling area, cargo staging area, vehicle maintenance area, fuel storage and loading area, hazardous cargo storage area, and east of the comfort station. Hawaiian Cement, a separate facility, operates in this drainage area. As such, surface runoff from this area is representative for the entire Facility. Runoff discharges to Kahului Harbor through Outfall 1.

Drainage Area B - Storm water runoff from Pier 2 surfaces is directed to the catch basins in the middle of the pier. This drainage area receives runoff from container and chassis storage and forklift parking. This area discharges to Outfall 6 and 7 and sheet flows to Kahului Harbor. Note: Portions of the surface of Pier 2 would drain to SD 2, but that drain is blocked with sand, causing flooding during heavy storm events.

Drainage Area C - Storm water runoff from the western area of the Facility is directed to the open drainage canal which transects the Facility in a generally north to south direction. This drainage area receives runoff from mixed and less than container load (LCL) cargo area, vehicle parking, and chassis yard. Runoff discharges to the beach through Outfall 3 and sheet flows to Kahului Harbor.

Drainage Area D - Storm water runoff from the northern portion of Pier 3 is directed to the catch basin in this area. This drainage area receives runoff from livestock transfer area, reefer staging, and potentially from Hawaiian Cement. Runoff discharges to Kahului Harbor through Outfall 4.

During a measurable storm event, storm water samples are collected from the sample point, SD-1, indicated on the site map. The samples are collected from sheet flow as it enters the drain inlet. The sample location is located within Drainage Area A which receives runoff from the cargo handling area, cargo staging area, vehicle maintenance area, and fuel storage and loading area. As such, surface runoff from this drainage area is representative of the overall storm water discharges from the Facility. Because the drainage areas convey similar storm water discharges, storm water samples will not be collected from the other substantially identical outfalls.

Kaumalapau

The entire Facility is one drainage area which directs storm water runoff to Kaumalapau Harbor. Storm water runoff from the entire Facility sheet flows in a generally south direction off the edge of the pier to the harbor, with a sample point at the southwest corner of the pier at Outfall 2. This drainage area receives runoff from operational areas at the Facility. Some runoff discharges to the Pacific Ocean through a drainage hole in the wall on the western side of the Facility Outfall 1.

During a measurable storm event, storm water samples are collected from the sample point Outfall 2 indicated on the site map. The samples are collected from sheet flow as it flows off the edge of the pier. This sample point was chosen as it receives runoff from operational areas at the Facility and is substantially identical to Outfall 1. Because the drainage areas convey similar storm water discharges, storm water samples will not be collected from the other substantially identical outfalls.

Kaunakakai

The entire Facility is one drainage area which directs storm water runoff to the center of the wharf to a drainage system that flows to Kaunakakai Harbor. This drainage area receives runoff from operational areas at the Facility. There are a series of catch basins that direct storm water into a trench that spans length of the wharf. Outfall 1 is submerged under water depending on the tide, therefore the trench under the pier is often filled with ocean water backflowing under the wharf. Along the southeastern edge of the pier are three outfalls that discharge storm water directly to Kaunakakai Harbor.

During a measurable storm event, storm water samples are collected from the sample point SD-3 indicated on the site map. The samples are collected from sheet flow as it enters the storm drain between the Vehicle Repair Area and the General Cargo Shed. Because the drainage areas convey similar storm water discharges, storm water samples will not be collected from the other substantially identical outfalls.

Kawaihae

There are two drainage areas at the Facility which direct storm water runoff to Kawaihae Harbor.

Drainage Area A – The majority of storm water runoff from the surfaces of the western half of the Facility is directed to two trench drains, one of which has three dry wells, and the other has two dry wells. The northwestern portion of the drainage area discharges to Outfall 1. The southwestern portion of the drainage area sheet flows off the edge of the pier (Outfall 2) into the harbor. This drainage area receives runoff from container and chassis storage, ice house, the fuel storage and loading area, and the cargo handling areas. Par Hawaii, a separate facility, operates adjacent to this drainage area.

Drainage Area B – Storm water runoff from the surfaces of the northeastern half is directed towards a trench drain that connects to a dry well. Storm water runoff in the southeastern half is directed to a concrete lined drainage canal along Kawaihae Road. Runoff discharges to the canal through Discharge Points 1 and 2 that discharges to an offsite storm water system. This drainage area receives runoff from the maintenance area, covered oil and tire storage area, hazardous cargo storage area, palletized cargo area, less than container load areas, forklift parking, vehicle parking, and chassis and inbound/outbound container parking areas.

During a measurable storm event, storm water samples are collected from sheet flow as it enters the sample point, Outfall 1, indicated on the site map. The sample location is located within Drainage Area A which receives runoff from the fuel storage and loading area and the cargo handling and staging areas. Storm water from the maintenance area flows into a trench

drain then to a dry well. There is no significant difference in operations that provides runoff to Outfalls 1 and 2 or Discharge Points 1 and 2. Surface runoff to Outfall 1 is representative for the overall storm water discharges from the Facility. Because the drainage areas convey substantially identical storm water discharges, storm water samples will not be collected from the other Facility outfalls.

Nāwiliwili

There are three drainage areas at the Facility which direct storm water runoff to Nāwiliwili Harbor.

Drainage Area A – Storm water runoff in the northwestern, western, and southern areas of the Facility is directed to eight catch basins and seven curb drains that discharges to an offsite storm water system. This drainage area receives runoff from container and chassis storage, emergency repair area, and vehicle parking.

Drainage Area B – Storm water runoff in the northern area of the Facility is directed to a series of storm drains that discharges to Outfall 1. This drainage area receives runoff from roro, less than container load cargo, hazardous cargo, and the fuel storage and loading area.

Drainage Area C – Storm water runoff in the eastern area of the Facility down to the southern area of the Facility is directed to a trench drain that discharges to Outfall 3. This drainage area receives runoff from barge loading and unloading operations.

The grated open trench drain transects the eastern edge of the Facility in a generally north to south direction. The majority of the Facility is designed so that rainwater would flow east toward the trench drain, however the Facility pier has shifted so that the trench drain no longer functions to its original design.

During a measurable storm event, storm water samples are collected from the sample point, SD-17, indicated on the site map. Samples are collected from a curb drain. In addition to sheet flow from the immediate area, the onsite storm water drainage system drains to this curb drain rendering it substantially identical to the other outfalls at the Facility. Because the drainage areas convey similar storm water discharges, storm water samples will not be collected from the other substantially identical outfalls.

9.2 Measurable Storm Events

Required monitoring is performed on a storm event that results in an actual discharge from a Facility (measurable storm event) that follows the preceding measurable storm event by at least 72 hours (three days). The 72-hour (3-day) storm interval does not apply if a less than a 72-hour (3-day) interval is representative for local storm events during the sampling period. Documentation of this exception is required.

9.3 Monitoring Procedures

Due to active operations that are taking place during business hours, it is often impractical and unsafe to lift the catch basin drain in order to take a representative sample after the runoff has passed through a control measure, such as a storm drain filter. In the instances where a sample

cannot be obtained after the control measure, it is passed through a representative filter of the exact same make and model, to more adequately represent the storm water being discharged. If visual observation deems the existing storm drain filter is no longer adequately functioning, the sample is passed through a representative filter and instead the sample is placed directly into the sample bottles. The control measure in the sample point will be replaced as soon as practicable prior to the next storm event.

Extreme care is taken to collect samples using standard EPA sampling guidelines. Samples are collected by a member of the Storm Water Pollution Prevention Team and are properly stored and shipped to ensure that the integrity of the sample is maintained. Point source sampling at the sampling locations involves the filling of clean laboratory-supplied bottles.

Immediately after collection, samples are placed in a cooler with ice and delivered to the laboratory. Appropriate chain-of-custody procedures will track the samples from collection to final disposition.

When more than one type of monitoring for the same pollutant at the same outfall applies (e.g., total aluminum once per quarter for benchmark monitoring and once per year for impaired waters monitoring at a given outfall), a single sample is used to satisfy both monitoring requirements (i.e., one sample satisfying both the impaired waters monitoring sample and one of the four quarterly benchmark monitoring samples).

9.4 Storm Event Data Log

For each monitoring event, the following is recorded in the Storm Event Data Log located on the shared drive:

- The date and duration (in hours) of the rainfall event
- Rainfall total (in inches) for that rainfall event
- Time (in days) since the previous measurable storm event

9.5 Photographic Documentation of Control Measures

Photographic documentation of control measures and/or pollution control measures documented in this Plan is recorded and retained when conducting any required storm water sampling. The photographs:

- Clearly depict the presence or absence of physical control measures that are required.
- Are wide angle and representative of the Facility/site conditions present at the time the storm water samples are taken.
- Maintained and submitted consistently with the analytical data required per monitoring requirements.

9.6 Sample Type

Grab samples are collected within the first 30 minutes of a storm event discharge. If it is not possible to collect the sample within the first 30 minutes of a measurable storm event, the sample must be collected as soon as practicable after the first 30 minutes. Documentation is kept with the SWPPP explaining why it was not possible to take samples within the first 30 minutes. Sampling is performed at a point before storm water runoff comingles with any with other waste streams and unauthorized discharges to the extent practicable.

9.7 Adverse Weather Conditions

When adverse weather conditions prevent the collection of samples, a substitute sample is taken during the next qualifying storm event. Adverse weather conditions are not an exemption from filing a benchmark monitoring report. Any failure to monitor, including due to adverse weather conditions, is electronically reported using a "no data" or "NODI" code.

9.8 Alternate Monitoring Schedule for Climates with Irregular Storm Water Runoff

The following Facilities are located in areas where limited rainfall occurs during parts of the year that prevent runoff from occurring for extended periods. Accordingly, monitoring events are distributed as follows during seasons when precipitation occurs. The required number of samples will still be collected, and as applicable the electronic reporting method to report using a "no data" or "NODI" code is used for any of the regular reporting periods that there was no monitoring.

Facility	Precipitation Seasons	Alternate Monitoring Periods	
Honolulu	Wet Season:	November 1 – December 15	
Kahului	November 1 – April 30	December 16 – January 31	
Kaumalapau	Dry Season:	February 1 – March 15	
Kaunakakai	May 1 – October 31	March 16 – April 30	

Kawaihae is extremely hot and dry year-round with limited precipitation. Samples will be taken when any amount of discharge is observed throughout the year.

9.9 Monitoring Periods

Monitoring requirements begin in the first full quarter following either 90 days after Permit issuance or the date of discharge authorization, whichever date comes later.

- **Benchmark Monitoring**: Required on a quarterly basis; at least once in each of the following 3-month intervals:
 - January 1 March 31
 - April 1 June 30
 - July 1 September 30
 - October 1 December 31

This monitoring schedule may be modified in accordance with section 9.8 above (Schedule for Alternate Monitoring Periods for Climates with Irregular Storm Water Runoff). See section 9.10.1 below for additional monitoring period frequency considerations.

Impaired Waters Monitoring: Required on an annual basis.

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9.10 Benchmark Monitoring

Benchmark monitoring is based on industrial sector-specific parameters. Young Brothers falls under Sector Q – Water Transportation. Benchmark monitoring data is primarily used to determine the overall effectiveness of control measures and to assist in determining when additional corrective actions may be necessary to comply with effluent limitations. Benchmark concentrations are not effluent limitations; a benchmark exceedance, therefore, is not a permit violation. But, if a corrective action is required as a result of a benchmark exceedance, failure to conduct required corrective action is a permit violation.

9.10.1 Schedules and Frequency of Monitoring

As noted in section 9.9 Monitoring Periods above, benchmark monitoring is required on a quarterly basis, with any modification due to climates with irregular storm water runoff documented. When conditions prevent four samples being taken in four consecutive quarters, monitoring will continue until four samples required for calculating the benchmark monitoring average is obtained.

Data Not Exceeding Benchmarks:

After collection of four quarterly samples, if the average of the four monitoring values for any parameter does not exceed the benchmark, the monitoring requirements for that parameter have been fulfilled for the Permit term. More than four samples may be taken during separate runoff events and used to determine the average benchmark parameter concentration for facility discharges.

Data Exceeding Benchmarks:

After collection of four quarterly samples, if the average of the four monitoring values for any parameter exceeds the benchmark, corrective actions are taken including review of the selection, design, installation, and implementation of control measures to determine if modifications are necessary to meet the effluent limits. After this review, the following is required:

 Make the necessary modifications and continue quarterly monitoring until four additional quarters of monitoring have been completed for which the average does not exceed the benchmark

Or

Make a determination that no further pollutant reductions are technologically available
and economically practicable and achievable in light of best industry practice to meet the
technology-based effluent limits or are necessary to meet the water-quality-based
effluent limitations. In this case monitoring is still required once per year. The rationale
for concluding that no further pollutant reductions are achievable is documented and
records are retained related to this documentation with this SWPPP.

Mathematically Certain Exceedance:

Control measures are reviewed, and any required corrective actions are performed immediately (or document why no corrective action is required), without waiting for the full four quarters of monitoring data, when an exceedance of the four-quarter average is mathematically certain (i.e., the sample result exceeds the monitoring concentration limit by a large enough margin,

additional sampling to average it down below the limit is practically impossible). If after modifying control measures and conducting four additional quarters of monitoring, the average still exceeds the benchmark (or if an exceedance of the benchmark by the four-quarter average is mathematically certain prior to conducting the full four additional quarters of monitoring), control measures must again be reviewed and one of the two actions above are taken.

Natural Background Pollutant Levels:

Following the first four quarters of benchmark monitoring (or sooner if the exceedance is triggered by less than four quarters of data), if the average concentration of a pollutant exceeds a benchmark value, and it is determined that exceedance of the benchmark is attributable solely to the presence of that pollutant in the natural background, corrective action is not required to be performed or additional benchmark monitoring is not required provided that:

- The average concentration of the benchmark monitoring results is less than or equal to the concentration of that pollutant in the natural background.
- The supporting rationale for concluding that benchmark exceedances are attributable solely to natural background pollutant levels is documented and maintained with this SWPPP. Any data previously collected by Young Brothers or others (including literature studies) that describe the levels of natural background pollutants in the storm water discharge is required to be included in the supporting rationale.

Natural Background Pollutants – substances that are naturally occurring in native soils and vegetation, wildlife, or ground water. Natural background pollutants do not include legacy pollutants from earlier activity on the site, or pollutants in run-on from neighboring sources which are not naturally occurring, such as other industrial sites or roadways.

DOH may determine that Young Brothers is eligible to discontinue monitoring for pollutants that occur solely from run-on sources.

9.11 Impaired Waters Monitoring

Facilities adjacent to impaired waters are monitored for pollutants for which the waterbody is impaired pursuant to section 303(d) of the Clean Water Act and for which a standard analytical method exists (see 40 CFR Part 136) once per year at each outfall (except substantially identical outfalls).

If the pollutant of concern is not detected and not expected to be present in the discharge, or it is detected but it has been determined that its presence is caused solely by natural background sources, monitoring for that pollutant may be discontinued (similar to the natural background exception for benchmark monitoring). To support a determination that the pollutant's presence is caused solely by natural background sources, the following must be documented and maintain with this SWPPP:

- An explanation of why the presence of the pollutant of concern in the discharge is not related to the activities or materials at the Facility.
- Data and/or studies that tie the presence of the pollutant of concern in the discharge to natural background sources in the watershed. Annual monitoring for pollutants that occur

solely from legacy pollutants from earlier activity on the site, or pollutants in run-on from neighboring sources which are not naturally occurring may be eligible to be discontinued per authorization from DOH.

9.12 Parameters for Sampling

9.12.1 Benchmark Monitoring Parameters

Sector Q – Water Transportation Benchmarks					
Facility	Parameter	Monitoring Concentration Limit			
	Total Aluminum	0.75 mg/L			
All Facilities	Total Iron	1.0 mg/L			
All Facilities	Total Lead	0.21 mg/L			
	Total Zinc	0.09 mg/L			

9.12.2 Impaired Waters Parameters

Facility	Parameter	Monitoring Concentration Limit
	Nitrate + Nitrite	
Lilla	Total Nitrogen	
Hilo	Total Phosphorus	
	Total Suspended Solids (TSS)	
	Ammonium-Nitrogen	
	Enterococci	
	Metals*	
Honolulu Pier 21	Nitrate + Nitrite	
Honolulu Piers 39 and 40	Pathogens*	
Tionolulu Fiers 39 and 40	Total Nitrogen	
	Total Phosphorus	
	Total Suspended Solids (TSS)	No limit. Report results.
	Ammonium-Nitrogen	
	Chlorine	
Kahului	Nitrate + Nitrite	
Kanului	Total Nitrogen	
	Total Phosphorus	
	Total Suspended Solids (TSS)	
Kawaihae	Total Suspended Solids (TSS)	
	Ammonium-Nitrogen	
 Nāwiliwili	Chlorine	
INGMIIIMIII	Nitrate + Nitrite	
	Total Suspended Solids (TSS)	

^{*} In the case of impairment for "pathogens" and "metals," which do not have specific analytical methods in 40 CFR Part 136, the monitoring performed on enterococci, and metals listed in the benchmark monitoring requirements serve the purpose of detecting the presence of pathogens or metals to protect the impaired waterbody.

10. Reporting and Recordkeeping

10.1 Electronic Reporting Requirement

Annual Reports, Discharge Monitor Reports (DMR), and other required information is submitted electronically via the e-Permitting Portal.

The e-Permitting Portal is located here – https://eha-cloud.doh.hawaii.gov/epermit/

10.2 Monitoring Reports

Storm water monitoring results are documented via the DMR format and submitted to DOH along with monitoring data via the e-Permitting Portal. Monitoring data collected is submitted to DOH no later than the 28th day following the month when the samples were taken.

The following changes to monitoring frequency are required to be reported to DOH via the e-Permitting Portal. The changes trigger updates to electronic monitoring requirements:

- Benchmark monitoring requirements have been fulfilled for the Permit term.
- Impaired waters monitoring requirements have been fulfilled for the Permit term.
- A numeric effluent limitation guideline has been exceeded.
- A numeric effluent limitation guideline exceedance is back in compliance.

Once monitoring requirements have been completely fulfilled, electronic reporting is no longer required. If monitoring requirements are only partially fulfilled (e.g., the four quarterly sample average is below the benchmark for some, but not all, parameters), electronic reporting will continue to be used to report results, but a "no data" or "NODI" code is used for any monitoring parameters that have been fulfilled.

If samples are collected during multiple storm events in a single quarter (e.g., due to adverse weather conditions or climates with irregular storm water runoff), sampling results are required to be submitted for each storm event to DOH within 30 days of receiving laboratory results for the event. For any of the monitored outfalls that did not have a discharge within the reporting period, a "no data" or "NODI" code for that outfall is required to be reported no later than 30 days after the end of the reporting period.

10.3 Annual Report

The Annual Report is submitted to DOH electronically by January 30th for each year of permit coverage containing information generated from the past calendar year. The following information is required:

- A summary of the past year's routine facility inspection documentation.
- A summary of the past year's quarterly visual assessment documentation.
- For any four-sample (minimum) average benchmark monitoring exceedance, if after
 reviewing the selection, design, installation, and implementation of the control measures
 and considering whether any modifications are necessary to meet the effluent limits, it is
 determined that no further pollutant reductions are technologically available and
 economically practicable and achievable in light of best industry practice, the rationale
 for why no further reductions are achievable is required.

- A summary of the past year's corrective action documentation. If corrective action is not yet completed at the time of submission of the annual report, the report is required to describe the status of any outstanding corrective action(s).
- A description of any incidents of noncompliance in the past year or currently ongoing, or if none, a statement that Young Brothers is in compliance with the Permit.
- The Annual Report must also include a statement, signed and certified in accordance with HAR Chapter 11-55, Appendix A, Subsection 15.

10.4 Additional Reporting

Young Brothers is subject to the standard permit reporting provisions of <u>HAR Chapter 11-55</u>, <u>Appendix A, Subsection 16</u>. Reports are submitted to DOH via the e-Permitting Portal.

The following reports are required to be submitted to DOH and the Department of Transportation Harbors Division (HDOT), because the Facility at Honolulu Piers 39 and 40 discharge to a Municipal Separate Storm Sewer System (MS4) operated by HDOT.

- Immediate Report any noncompliance which may endanger health or the environment. Any information is required to be provided orally within 24 hours from the time the circumstance of the noncompliance is discovered.
- 5-day follow-up reporting to the 24-hour reporting A written submission is also required to be provided within five days from the time the circumstance of the noncompliance is discovered.
- Reportable quantity spills Provide notification as soon as a leak, spill, or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity is discovered. See <u>40 CFR Part 110</u>, <u>40 CFR Part 117</u>, or <u>40 CFR Part 302</u>.
- Planned changes Give notice to DOH promptly, no fewer than 30 days prior to taking any planned physical alterations or additions to the Facility that qualify the Facility as a new source or that could significantly change the nature or significantly increase the quantity of pollutants discharged.
- Anticipated noncompliance Give advance notice to DOH of any planned changes in the Facility or activity which will likely result in noncompliance with permit requirements.
- Compliance schedules Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of the Permit must be submitted no later than 14 days following each schedule date.
- Other noncompliance Report instances of noncompliance not reported in the monitoring reporting, compliance schedule report, or 24-hour report at the time monitoring reports are submitted.
- Other information Promptly submit facts or information if there was a failure to submit relevant facts in the NOI, or that incorrect information was submitted in the NOI or in any report.

10.5 DOH and HDOT Address for Reports

If reports or other documents are required to be delivered to DOH or HDOT via postal mail, they are mailed to the following addresses.

Department of Health	Department of Transportation Harbors Division	
Clean Water Branch		
State of Hawaii Clean Water Branch 2827 Waimano Home Rd #225 Pearl City, HI 96782	State of Hawaii Department of Transportation, Harbors Division Hale Awa Ku Moku Building 79 South Nimitz Highway Honolulu, HI 96813-4898	

10.6 Recordkeeping

Relevant Facility records are retained for a period of at least three years from the date that coverage under the Permit expires or is terminated. Records are maintained in the main office and electronically.

Records include but are not limited to:

- Copies of this SWPPP (including any modifications made during the term of the Permit).
- Additional documentation requirements pursuant to Part 5.5 of the Permit (e.g., NOI, correspondence from DOH, copy of the permit, etc., including documentation related to corrective actions taken).
- Reports and certifications required by the Permit.
- Monitoring data.
- Records of data used to complete the NOI to be covered by the Permit.

11. SWPPP Review, Revision History, and Availability

11.1 Conditions Requiring SWPPP Review and Revision

When any of the following conditions occur or are detected during an inspection, monitoring, or other means or DOH or the operator of the MS4 through which Young Brothers discharges informs Young Brothers that any of the following conditions have occurred, review and revision of the SWPPP is required, as appropriate, so that the Permit's effluent limits are met:

- An unauthorized release or discharge (e.g., spill, leak, or discharge of non-storm water not authorized by any NPDES permit to a state water) occurs at the Facility.
- A discharge violates a numeric effluent limit of the benchmark monitoring.
- Control measures are not stringent enough for the discharge to meet applicable water quality standards or the non-numeric effluent limits in this permit.
- A required control measure was never installed, was installed incorrectly, or is not being properly operated or maintained.
- Whenever a visual assessment shows evidence of storm water pollution (e.g., color, odor, floating solids, settled solids, suspended solids, foam).

11.2 Conditions Requiring SWPPP Review to Determine if Modifications Are Necessary If any of the following conditions occur, a review of the SWPPP is conducted to determine if modifications are necessary to meet the effluent limits in this permit:

- Construction or a change in design, operation, or maintenance at the Facility that significantly changes the nature of pollutants discharged in storm water from the Facility, or significantly increases the quantity of pollutants discharged.
- The average of four quarterly sampling results exceeds an applicable benchmark. If less than four benchmark samples have been taken, but the results are such that an exceedance of the four-quarter average is mathematically certain (i.e., if the sum of quarterly sample results to date is more than four times the benchmark level) this is considered a benchmark exceedance, triggering this review.
- Direction by DOH that the SWPPP fails to adequately address potential pollutant sources identified at the Facility.

Note: A benchmark exceedance does not trigger a corrective action if it is determined that the exceedance is solely attributable to natural background sources, or if a finding is made that no further pollutant reductions are technologically available and economically practicable and achievable in light of best industry practice.

Note: When run-on to the Facility causes a benchmark exceedance, in addition to reviewing and revising, as appropriate, the SWPPP, Young Brothers will notify the other operators contributing run-on to the Facility's discharges to abate their pollutant contribution. Where the other operators fail to take action to address the storm water run-on, DOH is contacted.

11.3 SWPPP Revision History

No.	Date	SWPPP Section	Action	Reviewer
1	02/26/2007	All	Update SWPCP in accordance	Nathan Kapule,
ı	02/20/2007	All	with HAR 11-55, Appendix B	Young Brothers
2 11/25/	11/25/2015	2015 All	Update SWPCP in accordance with HAR 11-55, Appendix B	Robert Chong, ESI Nathan Kapule,
	11/25/2015			Young Brothers
			Review and Update SWPCP	Ariana Chong, ESI
3	08/04/2017	All	(consolidate content, update	Nathan Kapule,
			appendices)	Young Brothers
	05/2019		Review, update, and	
4	-	All	streamline SWPCP: All	Freer Consulting Co.
	11/2019		sections and appendices.	
			Added references to SPCC,	
5	10/2019	2 and 3	update spill contact	Freer Consulting Co.
			information	
			Update SWPCP to new	
6	07/2022	All	SWPPP requirements in	Freer Consulting Co.
			accordance with HAR 11-55	Tree Consulting Co.
			Appendix B	

11.4 SWPPP Availability

A complete copy of this SWPPP is retained at the Facilities in electronic format. This includes any documents incorporated by reference and documentation supporting Young Brothers' permit eligibility, as well as the signed and dated certification page.

The SWPPP is immediately available to Facility employees, EPA, DOH, the operator of an MS4 into which Young Brothers discharges, and representatives of the U.S. Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service (NMFS) at the time of an onsite inspection. DOH may request a copy of the SWPPP at any time. Young Brothers is required to submit the SWPPP to DOH within 14 days of the request.

The current SWPPP is available to the public online – https://htbyb.com/commitment-to-islands/

To remain current, any SWPPP modifications, records, and other reporting elements required for the previous year must be posted at the same URL as above. The SWPPP update is conducted no later than 45 days after conducting the final routine facility inspection for the year.

Figure 1: Hilo Site Map

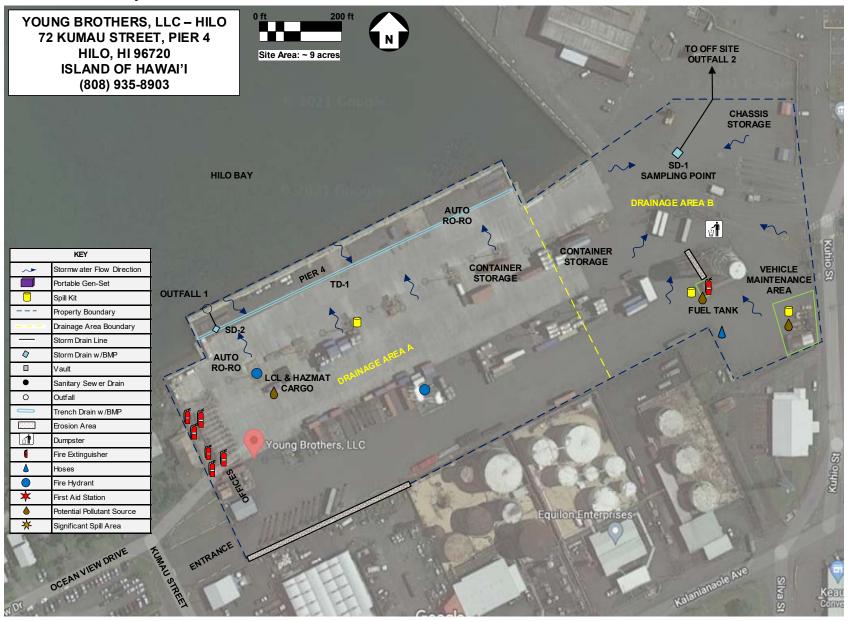


Figure 2: Honolulu Pier 21 Site Map

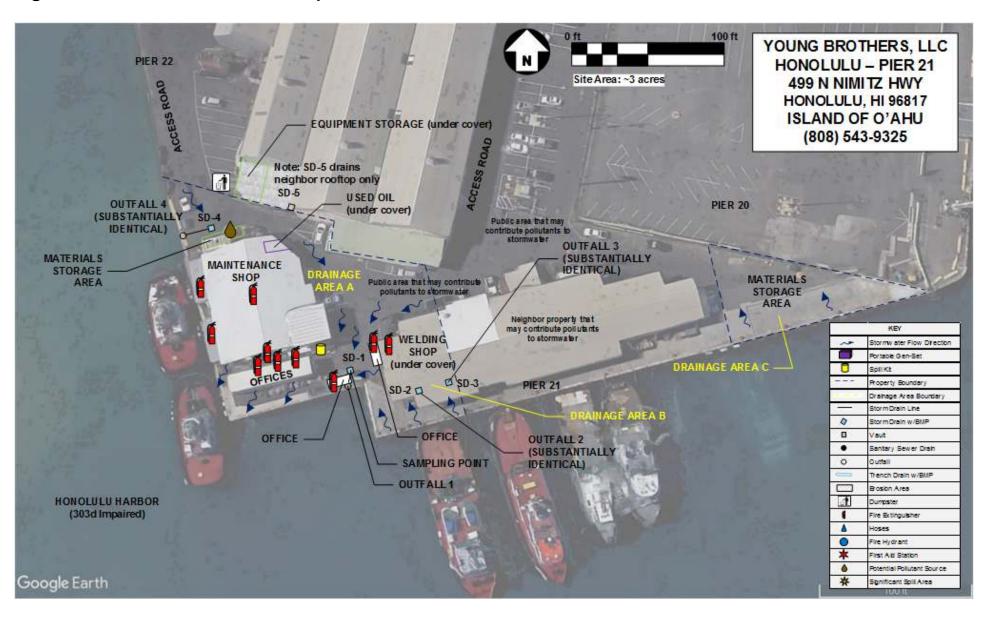


Figure 3: Honolulu Piers 39 and 40 Site Map

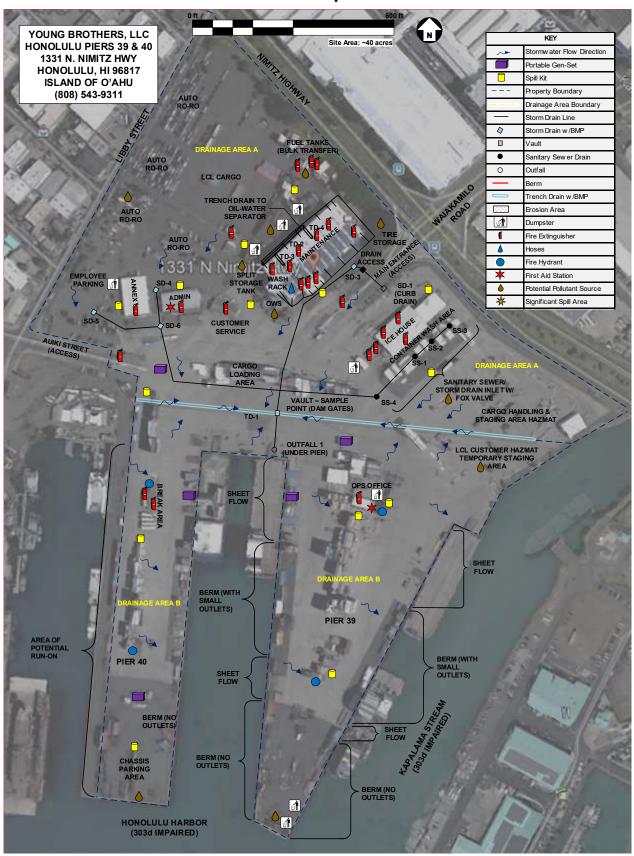


Figure 4: Kahului Site Map

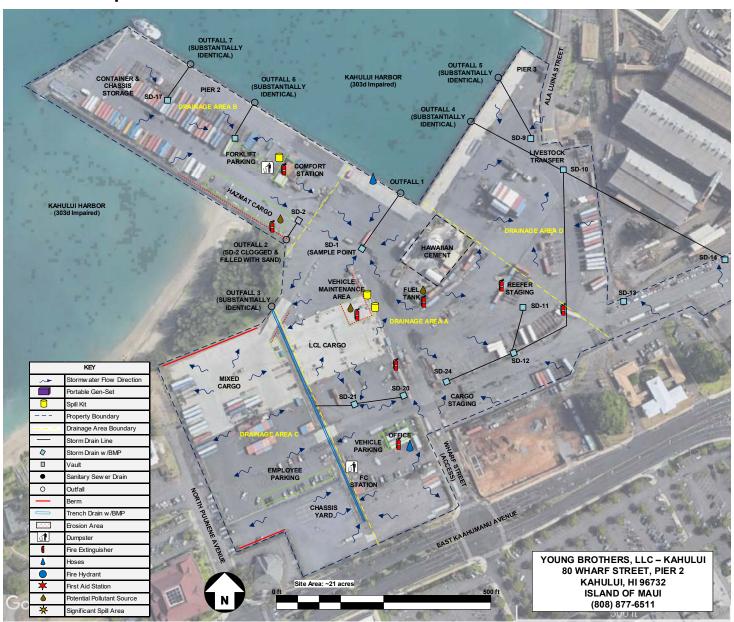


Figure 5: Kaumalapau Site Map

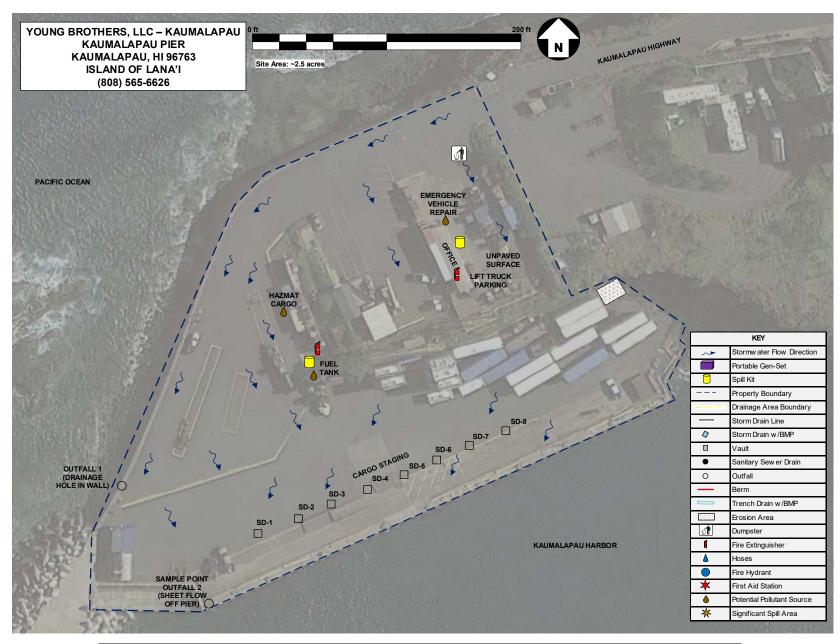


Figure 6: Kaunakakai Site Map

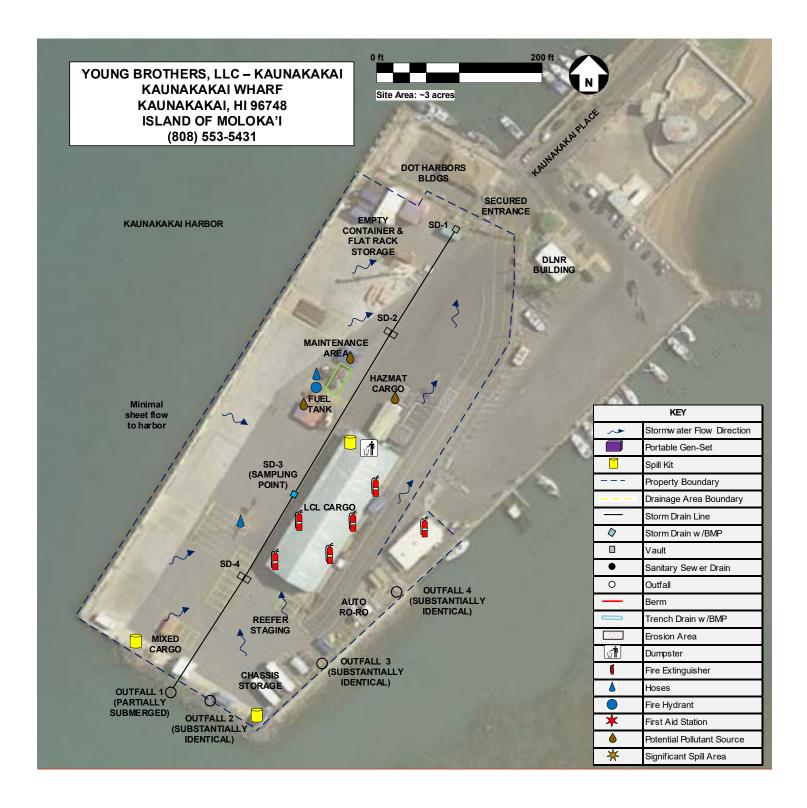


Figure 7: Kawaihae Site Map

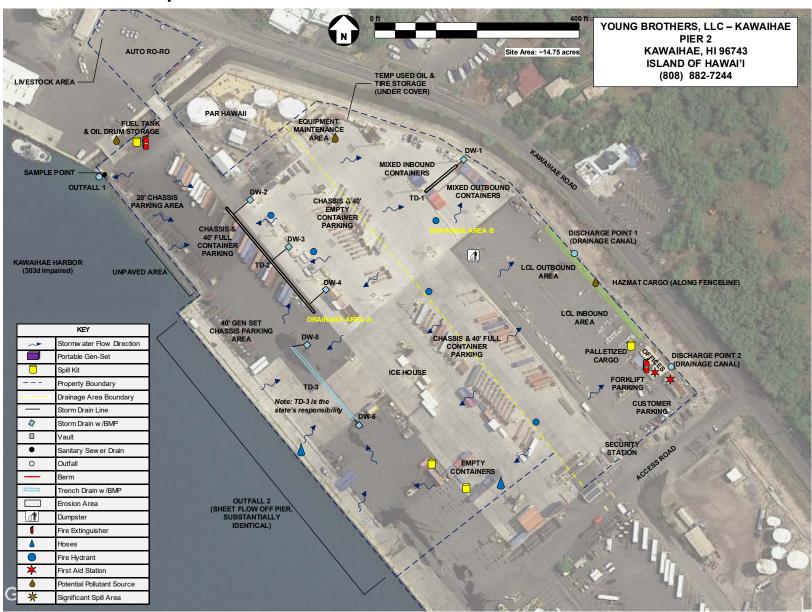


Figure 8: Nāwiliwili Site Map

