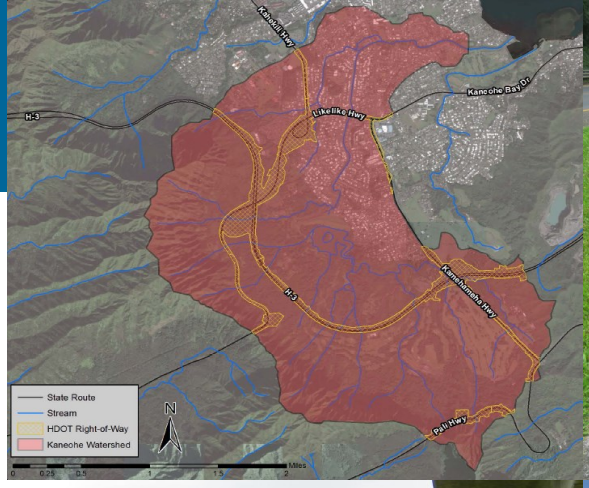

Implementation and Monitoring Plan
Kaneohe Stream Watershed

PROTECT OUR WATER
MĀLAMA I KA WAI
STATE OF HAWAII DEPARTMENT OF TRANSPORTATION
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Hawaii State Department of Transportation
Highways Division, Oahu District
Storm Water Management Program
NPDES Permit No. HI S000001
April 2015

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Total Maximum Daily Load
Implementation and Monitoring Plan
Kaneohe Stream Watershed Waste Load Allocations

State of Hawaii Department of Transportation
Highways Division, Oahu District

April 2015
Version: Final

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Record of Revision

Revision No.	Revision Date	Description	Sections Affected
Original Document	October 2014	Original	N/A
1	February 2015	Formatting	All
2	April 2015	Draft Finalized. Date changed.	All

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TABLE OF CONTENTS

LIST OF FIGURES

LIST OF TABLES

ACRONYMS AND ABBREVIATIONS

BMP	Best Management Practice
CM	Curb mile
CY	Cubic yard
DCA	Debris Cleaning Assessment
DOH	State of Hawaii Department of Health
DOT-HWYS	State of Hawaii Department of Transportation, Highways Division, Oahu District
EDOP	Effective date of permit
EPA	United States Environmental Protection Agency
GISB	Grated inlet skimmer box
HWY-OM	DOT-HWYS Oahu District Maintenance Section
I&M	Implementation & Monitoring
IC Program	Industrial and Commercial Activities Discharge Management Program
IDDE Program	Illicit Discharge Detection and Elimination Program
KG	Kilograms
MEP	Maximum Extent Practicable
MS4	DOT-HWYS' Municipal Separate Storm Sewer System
MS4 Permit	DOT-HWYS' NPDES Permit No. HI S000001
NPDES	National Pollutant Discharge Elimination System
NSBB	Nutrient separating baffle box
PID	Point Identification Number
PBMPs	Permanent Best Management Practices
PS&E	Plans, Specifications & Estimates
ROW	Right-of-way
SWMP	Storm Water Management Program
SWMPP	Storm Water Management Program Plan
TMDL	Total Maximum Daily Load
TMK	Tax map key
TN	Total nitrogen
TP	Total phosphorus
TSS	Total suspended solids
USDA	United States Department of Agriculture
WLA	Waste load allocation
WQBEL	Water quality based effluent limits

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EXECUTIVE SUMMARY

On February 9, 2010, the United States Environmental Protection Agency (EPA) approved a total maximum daily load (TMDL) for Kaneohe Stream that contains wasteload allocations (WLAs) for the State of Hawaii Department of Transportation, Highways Division, Oahu District's (DOT-HWYS') municipal separate storm sewer system (hereinafter referred to as "the MS4"). Part F.3 of DOT-HWYS' National Pollutant Discharge Elimination System (NPDES) Permit No. HI S000001 (hereinafter referred to as "MS4 Permit") requires that DOT-HWYS submit an Implementation and Monitoring Plan (I&M Plan) within one year of the effective date of the MS4 Permit (by October 28, 2014) for the attainment of associated load reductions in Kaneohe Stream Watershed.

This I&M Plan documents the activity tracking necessary to demonstrate efforts to comply with the WLA reductions assigned to DOT-HWYS. To meet its WLA reduction goals, DOT-HWYS has taken a comprehensive approach by using established Best Management Practices (BMPs), including street sweeping, cleaning of MS4 structures, retrofitting permanent BMPs, erosional area repairs, construction site runoff management, illicit discharge detection and elimination, industrial and commercial discharge management, and public education and outreach to reduce total nitrogen (TN) and total phosphorus (TP) discharges to Kaneohe Stream.

The following is a brief summary of each section included in this I&M Plan:

- Section 1 - Provides a brief summary of the TMDL document for Kaneohe Stream and the WLA reductions assigned to DOT-HWYS.
- Section 2 - Broadly describes the BMPs currently implemented by DOT-HWYS.
- Section 3 - Presents a quantitative analysis, where appropriate, of how specific DOT-HWYS' programs reduce seasonal loads of TN and TP in Kaneohe Stream Watershed. Table 3-10 (reproduced below as Table ES-1) presents an overview of the seasonal pollutant load reductions calculated in Section 3.
- Section 4 - Documents how DOT-HWYS will monitor and report compliance with the WLA reductions assigned in the Kaneohe Stream TMDL.

Table ES-1. Anticipated Seasonal Pollutant Load Reduction for TMDL Compliance

Best Management Practice (BMP) Program	Anticipated Total Nitrogen (TN) Reduction (KG/season)		Anticipated Total Phosphorus (TP) Reduction (KG/season)	
	Dry Season	Wet Season	Dry Season	Wet Season
Street Sweeping (Existing)	62.35	55.31	46.92	41.61
Street Sweeping (Additional)	31.9	27.55	24	20.74
Cleaning of MS4 Structures	7.35	5.61	2.16	1.66
Permanent BMPs	2.73	4.47	0.23	0.37
Erosion Control Program	--[a]	--[a]	--[a]	--[a]
Construction Site Runoff Control	--[a]	--[a]	--[a]	--[a]
Industrial and Commercial Activities Discharge Management and Illicit Discharge Detection and Elimination Programs	--[a]	--[a]	--[a]	--[a]
Public Education and Outreach	--[a]	--[a]	--[a]	--[a]
TOTAL ANTICIPATED REDUCTION:	104.33	92.94	73.31	64.38
REDUCTION REQUIRED:	24.86	82.59	11.39	28.04

Notes:
[a] These programs have resulted in pollutant load reductions in the Kaneohe Stream Watershed. These reductions have not been quantified at this time and are therefore considered qualitatively in this I&M Plan.

Wet Season = 181 days (November 1 – April 30); Dry Season = 184 days (May 1 – October 31)

1. SUMMARY OF TOTAL MAXIMUM DAILY LOAD AND WASTE LOAD ALLOCATION REDUCTIONS ASSIGNED

This Implementation and Monitoring Plan (I&M Plan) is submitted to satisfy Part F.3 of the State of Hawaii Department of Transportation, Highways Division, Oahu District's (DOT-HWYS') National Pollutant Discharge Elimination System (NPDES) Permit No. HI S000001, effective October 28, 2013 (hereinafter referred to as the "MS4 Permit"). Part F.3 requires that DOT-HWYS submit an I&M Plan for attainment of pollutant load reductions in Kaneohe Stream Watershed within one year of the effective date of the MS4 Permit (by October 28, 2014).

On February 9, 2010, the United States Environmental Protection Agency (EPA) approved a total maximum daily load (TMDL) for Kaneohe Stream that contains wasteload allocations (WLAs) for DOT-HWYS' municipal separate storm sewer system (hereinafter referred to as "the MS4"). A TMDL is a calculation of the maximum amount of pollutant that a water body can receive from point and non-point sources (including a margin of safety) and still meet applicable water quality standards. It also provides an allocation of that maximum amount divided among the water body's pollutant sources. The Clean Water Act Section 303 requires that States, territories, and tribes identify specific designated uses (e.g., drinking water, contact recreation, and aquatic life support) for each water body in their jurisdiction and identify the scientific water quality standards to support those uses. TMDLs are established for water bodies that fail to meet existing water quality standards for pollutants of concern and generally assign WLAs, which are the portion of a receiving water's loading capacity that is allocated to one of its existing or future point sources of pollution (e.g., the MS4).

DOT-HWYS' prior MS4 Permit (effective from March 31, 2006 to September 8, 2009, and administratively extended thereafter until the issuance of the current permit) required DOT-HWYS to submit an I&M Plan for attainment of load reductions in Kaneohe Stream Watershed within one year of the 2010 TMDL approval date. DOT-HWYS requested an extension on this deadline in accordance with the anticipated requirements of the new MS4 Permit. The State of Hawaii Department of Health (DOH) approved this extension on January 3 2011.

As described in the Fact Sheet accompanying DOT-HWYS' current MS4 Permit:

> *[The State of Hawaii Department of Health] is directly implementing the TMDL wasteload allocations (WLAs) applicable to the MS4 as water quality-based effluent limits (WQBELs). To demonstrate consistency with the assumptions and requirements of applicable WLAs, it is expected that DOT-HWYS will quantify pollutants removed from DOT-HWYS MS4. The quantity of a given pollutant removed on an annual or seasonal basis in a given watershed can then be compared to the WLA reductions required in that watershed. [As such, compliance with WLAs will be demonstrated] through meeting the WLA reductions on an annual or seasonal basis as specified in the permit.*

Table 1-1 presents where each of the minimum required elements of the I&M Plan is presented in this report.

Table 1-1. MS4 Permit Requirements and Corresponding Plan Sections

MS4 Permit Reference	Plan Section Where Requirement is Addressed
Part F.3.a.(1) *Detailed information on the activities proposed to be implemented.*	Section 2
Part F.3.a.(2) *Actual or literature documentation of the estimated effectiveness of the activities targeted to reduce the pollutants of concern such as total nitrogen, total phosphorus, total suspended solids, and turbidity in the watershed, as applicable, to demonstrate consistency with the annual or seasonal WLA reductions consistent with the assumption of the associated TMDL document.*	Section 3
Part F.3.a.(3) *A detailed and quantitative analysis which demonstrates that the proposed activities would ensure consistency with the annual or seasonal WLA reductions consistent with the assumption of the associated TMDL document.*	Section 3
Part F.3.a.(4) *Information from pre and post monitoring activities to quantitatively demonstrate consistency with the annual or seasonal WLA reductions consistent with the assumption of the associated TMDL document.*	Section 4
Part F.3.a.(5) *A monitoring plan which shall identify activities to demonstrate consistency with the annual or seasonal WLA reductions consistent with the assumption of the associated TMDL document.*	Section 4

The State of Hawaii Department of Health (DOH) determined that DOT-HWYS' existing discharge in Kaneohe Stream Watershed is not expected to comply with the new WLA reductions based on current activities. Therefore Part F.3.c.(4) also stipulates a schedule of compliance, presented as Table 1-2[1], to manage and effectively schedule and track DOT-HWYS' activities to comply with the WLA reductions.

[1] At the time of the preparation of this I&M Plan, the MS4 Permit included a Schedule of Compliance that was limited to 5 years. However, this matter is pending a Contested Case hearing. The most recent negotiations between DOH and DOT-HWYS have included an agreement, though informal, that increased the duration to 13 years. The duration set forth in this I&M Plan and presented in Table 1-2 is based on that agreement.

Table 1-2. Schedule of Compliance for Kaneohe Stream Watershed

Due No Later Than:	Milestone/Deliverable
0.5 Years After Effective Date of Permit (EDOP)	**Debris Cleaning Assessment (DCA):** Finalize DCA Plan
1 Year After EDOP	Finalize Implementation & Monitoring Plan **DCA:** Commence DCA Data Collection **Necessary Permanent Best Management Practices (PBMPs):** Complete watershed review and site selection for PBMPs
2 Years After EDOP	**DCA:** Interim DCA Data Collection Report **PBMPs:** Commence with securing project funding
3 Years After EDOP	**DCA:** Complete DCA Data Collection
4 Years After EDOP	**DCA:** Complete Analysis of DCA Data **PBMPs:** Notice to proceed to design consultant for anticipated PBMPs
5 Years After EDOP	**PBMPs:** Complete 60% plans, specifications & estimates (PS&E)
6 Years After EDOP	**PBMPs:** Complete 100% PS&E
7 Years After EDOP	**PBMPs:** Advertise / bid opening / award
8 Years After EDOP	**PBMPs:** Commence construction
9 Years After EDOP	**PBMPs:** 50% construction completion report
10 Years After EDOP	**PBMPs:** Complete construction
11 Years After EDOP	**PBMPs:** Commence performance monitoring
12 Years After EDOP	**PBMPs:** Complete performance monitoring
13 Years After EDOP (Final Compliance Date)	Finalize WLA Completion Report

The schedule of compliance includes a Debris Cleaning Assessment (DCA) to better quantify removal rates for debris cleaning activities and better predict future pollutant removal rates needed to meet the required pollutant load reduction in TMDL watersheds. In order to normalize the DCA data for variations in rainfall quantity, intensity, and seasonality, studies of this type require multiple years to complete. However, the time constraints of the schedule of compliance and deadline for this I&M Plan require the DCA study activities to be condensed. The MS4 Permit and compliance schedule require that this I&M Plan be submitted before completing the DCA data collection. As a result, this I&M Plan includes certain assumptions that will be revisited and may be modified based on the results of the DCA.

The following sections provide a brief summary of the TMDL document for Kaneohe Stream and the WLA reductions assigned to DOT-HWYS.

1.1 TMDL FOR KANEOHE STREAM

As described in the TMDL document, the Kaneohe Stream watershed (Figure 1-1), located on the windward side of the island of Oahu, covers 3,655 acres (5.7 square miles) and flows into the southern portion of Kaneohe Bay. Rainfall is orographic in the watershed and occurs predominantly in the winter months. Other sources of rainfall are island-wide storm fronts associated with North Pacific lows, subtropical storms, and hurricanes. Early Hawaiians developed extensive irrigation systems in the watershed including taro and fish pond complexes along the streams and shoreline, remnants of which persist today. Waikalua Loko, which is situated between the mouths of Kaneohe and Kawa streams, is the only fishpond remaining, and no longer receives the freshwater input formerly delivered from these two streams. The few remaining irrigated taro fields and their associated *auwais* are located on the grounds of the Hawaii State Hospital and used for research at the adjacent Windward Community College. Two golf courses, a banana plantation, a botanical garden, and forest reserve lands occupy the upper Kaneohe Stream Watershed, which is bisected by three major highways and drains into a flood control reservoir. While much of the arable watershed land was devoted to agriculture through the early twentieth century, the lower portions of the southern Kaneohe Bay watershed have become one of the more heavily urbanized areas in the Koolaupoko region. Biological assessments of three locations within the stream network revealed habitats of "not supporting" to "partially supporting" quality, and "impaired" to "moderately impaired" biotic integrity, when compared with high-quality reference stream conditions keyed to the presence of native fish, mollusks, and crustaceans (Burr 2003). Water quality impairment has been linked primarily to heavily urbanized and agricultural areas.

DOT-HWYS owns and operates approximately ten miles of highways in the Kaneohe Stream Watershed, including portions of Interstate H-3 and State Routes 61 (Pali Highway), 63 (Likelike Highway), 65 (Kaneohe Bay Drive), and 83 (Kamehameha Highway and Kahekili Highway) (Figure 1-1). A portion of the runoff from DOT-HWYS' right-of-way (ROW) for these highway segments drains to the MS4.

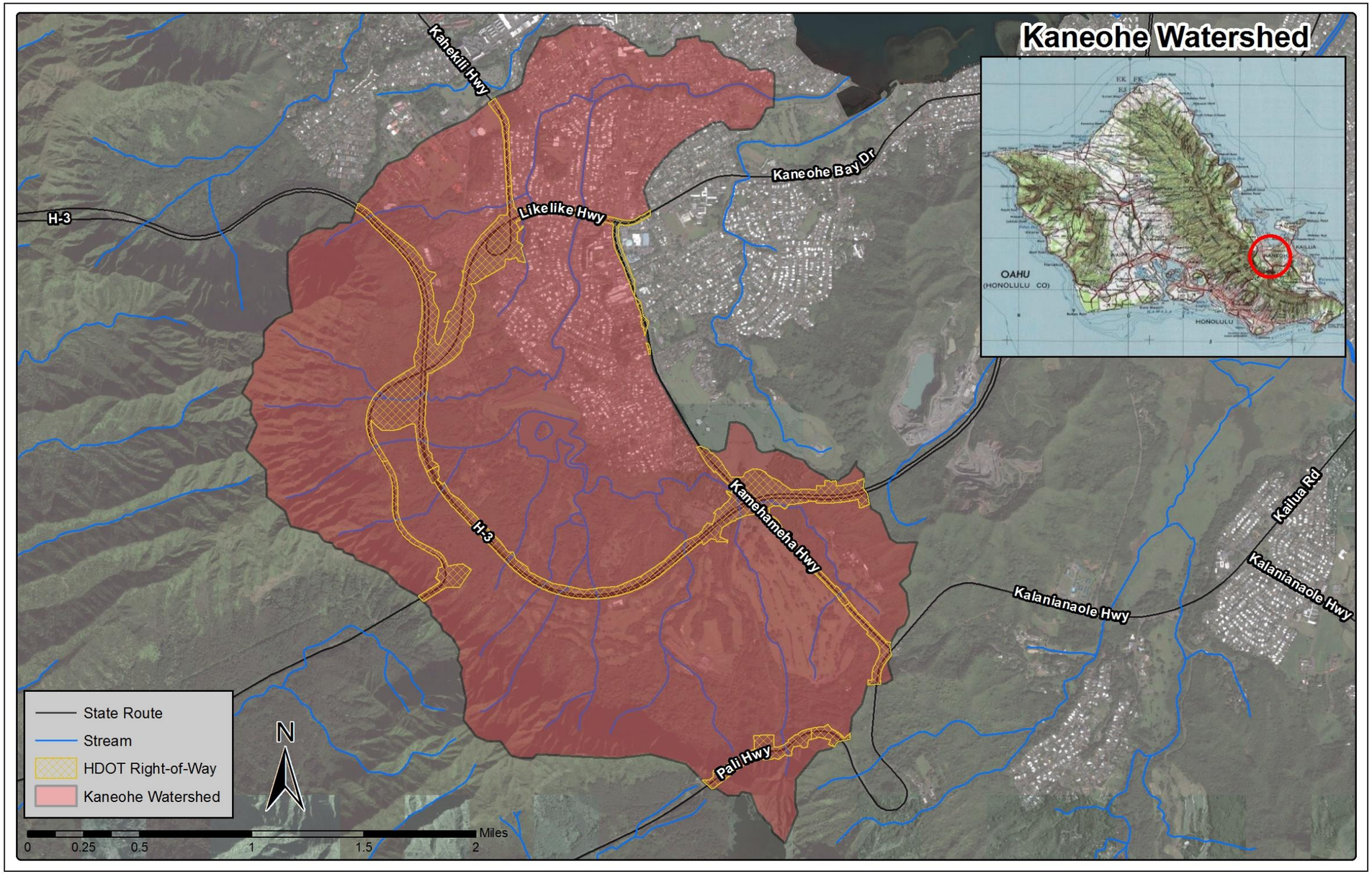

Figure 1-1. Kaneohe Stream Watershed Map

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1.2 DOT-HWYS' WLA REDUCTIONS FOR KANEOHE STREAM

The approved TMDL assigned WLAs for total suspended solids (TSS), total nitrogen (TN), and total phosphorous (TP) during the 10% and 2% storm events during the wet and dry seasons. Each WLA was divided among the NPDES-regulated permit holders in the Kaneohe Stream Watershed. These permit holders include:

- State of Hawaii Department of Defense;
- State of Hawaii Department of Education;
- State of Hawaii Department of Health;
- State of Hawaii Department of Transportation;
- City and County of Honolulu Department of Environmental Services; and
- University of Hawaii Windward Community College.

For the Kaneohe Stream Watershed, the TMDL estimated that DOT-HWYS is responsible for a total of 103 acres, or approximately 3%, of the 3,655-acre watershed. To calculate existing loads from DOT-HWYS' ROW, the TMDL combined the Soil Conservation Service runoff formulation (United States Department of Agriculture [USDA] 1986) with rainfall data from a climatic statistical model. Characteristic storm runoff concentrations were developed from event mean concentration data reported by EPA's National Urban Runoff Program (EPA 1983, Pitt et al. 2003) and other estimates of nonpoint source loading rates (Shannon and Brezonik 1972, Uttermark et al. 1974). These initial estimates were then adjusted according to the wet weather water quality data and the calibrated stream assimilation rates.

As presented in Part F.3.b.(4) of the MS4 Permit, consistent with the assumptions of the Kaneohe Stream Watershed TMDL, DOT-HWYS is required to comply with the seasonal WLA reductions presented in Table 1-3. There are no TSS reductions required from any major sources in Kaneohe Stream Watershed; accordingly this I&M Plan documents only reductions in loads of TN and TP.

Table 1-3. Kaneohe Stream Watershed WLA Reductions - Permit Part F.3.b.(4)

Season	TSS (KG per season)	TN (KG per season)	TP (KG per season)
Wet Season Reduction	0	82.59	28.04
Dry Season Reduction	0	24.86	11.39

Wet Season = 181 days (November 1 – April 30)
Dry Season = 184 days (May 1 – October 31)

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2. DOT-HWYS' STORM WATER MANAGEMENT PROGRAM ACTIVITIES

To meet its WLA reduction goals, DOT-HWYS intends to take a comprehensive approach by using established best management practices (BMPs). As used in this document, the term BMP refers to operational activities or physical controls applied to storm water and other runoff to reduce pollution. BMP programs currently implemented by DOT-HWYS include:

- Street sweeping;
- Cleaning of MS4 structures;
- PBMPs;
- Erosional area repairs;
- Construction site runoff management;
- Illicit discharge detection and elimination;
- Industrial and commercial activities discharge management; and
- Public education and outreach.

Each of these BMP programs continues to reduce TN and TP discharges from DOT-HWYS' ROW to the Kaneohe Stream Watershed. These BMP programs are discussed below and more detail about each program can be found in the comprehensive DOT-HWYS Storm Water Management Program Plan (SWMPP).

2.1 STREET SWEEPING (DEBRIS CONTROL PROGRAM)

Street sweeping has been identified as one of the most cost-effective methods of removing particulate debris from streets and roadways. Street sweeping removes particulate pollutants on roads before they are introduced to the MS4 by runoff events. The removal of fine particulate will also remove pollutants such as nutrients that are associated with particulates (Schueler and Holland 2000). Traditionally, street sweeping has focused on the removal of litter, leaves, and other large debris, but effective street sweeping will remove/reduce pollutant loads associated with fine particulates.

DOT-HWYS' personnel and service contractors regularly sweep highways on the island of Oahu. DOT-HWYS Oahu District Maintenance Section (HWY-OM) and service contractors are responsible for removing any litter, debris, sediment or other matter that accumulates within DOT-HWYS' ROW, including the MS4. Pollutants typically found on roadways that could enter the MS4 include:

- Material from illegal dumping;
- Runoff from construction activities within and adjacent to DOT-HWYS' ROW;
- Litter from motorists and pedestrians;
- Debris from vehicles;
- Loose paving materials and aggregate from cracked pavements and potholes;
- Vegetative debris; and
- Sediment accumulation.

Service contractors conduct much of the street sweeping on Oahu. Debris Control Program personnel conduct inspections of these activities. HWY-OM personnel conduct their own inspections and street sweeping on various routes.

2.2 CLEANING OF MS4 STRUCTURES (DEBRIS CONTROL PROGRAM)

Catch basins typically include an inlet grate and/or drop structure that is connected to a drainage outfall. Manholes are structures where drainage pipes meet or change direction and often have a sump that accumulates solids and sediment. The cleaning of these structures has proven to be a cost-effective method to capture and remove gross pollutants in the MS4. Removing debris from storm drainage structures reduces the amount of pollutant material flushed into receiving waters by storm water runoff.

DOT-HWYS clears debris and other materials that accumulate in drainage structures through mechanical (e.g., vacuuming) or manual means. High priority inlets and their associated catch basins are inspected at least once every six months. Portions of selected State routes have been classified as low priority due to their relatively low traffic volume. These low priority drains are inspected once per year and cleaned if necessary. Similar to the sweeping schedule, the inspection schedule of drainage infrastructure is evaluated annually for possible changes. Large debris (e.g., wood or trash) accumulating on top of or blocking drainage structures is removed promptly. Cleaning activities are observed by an inspector who records the amount of material removed from the drainage structure, including the percentage of organic matter, trash, and sediment.

2.3 PBMPs

DOT-HWYS has developed an Action Plan for retrofitting PBMPs into its existing MS4 system. The purpose of the Action Plan is to reduce storm water pollution by designing and constructing/installing appropriate and cost-effective BMPs (retrofits) in strategic locations and structures within the DOT-HWYS' existing MS4. Potential retrofit sites were selected from a review of previous studies that identified potential sites and a review of data collected during routine MS4 monitoring and maintenance activities.

The Post-Construction Storm Water Management in New Development and Redevelopment Program (Post-Construction Program) institutes procedures to incorporate the installation of appropriate PBMPs for certain new development and significant redevelopment projects that DOT-HWYS undertakes (e.g., contract projects), as well as certain types of encroachment projects. PBMPs are designed to be installed and remain in place as part of a project to provide for long-term storm water quality or quantity control. New development and significant redevelopment projects include, but are not limited to, new roadways and roadway and intersection improvements or modifications, such as widening.

Specific elements of the Post-Construction Program include:

- Revising DOT-HWYS' standards for addressing post-construction PBMPs to include Low Impact Development requirements;

- Instituting PBMP considerations throughout the life-cycles of both DOT-HWYS' and encroachment projects;
- Implementing an Asset Management System to track the frequency of inspections and maintenance of PBMPs; and
- Supporting a training program and providing outreach materials so that people involved in DOT-HWYS-related new developments or significant redevelopments (e.g., DOT-HWYS' and utility company personnel, design consultants, contractors, etc.) are familiar with PBMP criteria, methods, specifications, and permitting requirements.

2.4 EROSION CONTROL PROGRAM

The function of the Erosion Control BMPs Program (Erosion Control Program) is to implement permanent erosion control improvements, ensuring that erosional areas with the potential for significant water quality impact, but with limited public safety concerns, are also addressed.

The Erosion Control Program is responsible for implementing the following BMPs:

- Identify erosional areas with the potential for significant water quality impact for the purpose of implementing erosion control improvements.
- Submit to DOH a list of projects with an implementation schedule for permanent erosion control improvements.
- Implement temporary erosion control measures on erosional areas (i.e., highway-adjacent eroded slopes) within DOT-HWYS' ROW with the potential for significant water quality impact, if a permanent solution is not immediately possible.
- Provide DOH with an Action Plan to address erosion at DOT-HWYS' storm drain system outlets with significant potential for water quality impacts.
- Develop a maintenance plan for vegetated portions of the drainage system used for erosion and sediment control.

2.5 CONSTRUCTION SITE RUNOFF CONTROL PROGRAM

The objective of the Construction Site Runoff Control Program (Construction Program) is to reduce, to the Maximum Extent Practicable (MEP), the discharge of pollutants from both private and public construction projects. The program includes the following components:

- Plan review and approval process, which includes reviewing site-specific BMP plans and storm water pollution prevention plans;
- An inspection program to ensure that construction BMPs are properly installed for contract, in-house, maintenance, and encroachment permit projects; and
- A program to provide annual training on elements of the Construction Program to DOT-HWYS' staff with construction storm water responsibilities.

2.6 INDUSTRIAL AND COMMERCIAL ACTIVITIES DISCHARGE MANAGEMENT (IC PROGRAM) & ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE PROGRAM)

Storm water flowing from industrial and commercial areas may be a significant source of pollutants that enter the MS4. Therefore, the Industrial and Commercial Activities Discharge Management Program (IC Program) is designed to reduce, to the MEP, the discharge of pollutants from industrial and commercial facilities and activities that initially discharge into the MS4. While listed as separate programs in the SWMPP, in practice, this program is related to the Illicit Discharge Detection and Elimination Program (IDDE Program), because industrial and commercial facilities activities are susceptible to causing illicit discharges. DOT-HWYS takes a proactive approach in reducing illicit discharges by identifying industrial and commercial areas that drain into the MS4 for priority inspections.

The IC Program consists of:

- Developing a comprehensive database to track industrial and commercial facilities and activities whose storm water runoff initially discharges into the MS4;
- Developing prioritized areas for inspection of industrial and commercial facilities and activities;
- Ranking the commercial facilities and activities according to relative risk of discharge of contaminated runoff to the MS4;
- Conducting inspections or investigations of industrial and highly ranked commercial facilities and parcels within the designated prioritized areas; and
- Supporting a training program so that those involved in this program have the necessary knowledge and skills to conduct investigations.

DOT-HWYS requires a connection permit for all properties initially discharging storm water into the MS4. Owners of properties adjacent to DOT-HWYS' ROW were required to self-report connections to the MS4 in a mail survey. If unpermitted connections are discovered during routine field investigations, these property owners are required to obtain a connection permit. Additionally, any new construction that involves private connections to the MS4 requires a connection permit. To obtain a connection permit, property owners are required to describe the

size of connection, type of discharge and flow rate, as well as other characteristics of the property (e.g., industrial land uses) which may require further review by DOT-HWYS.

DOT-HWYS has developed a Prioritized Area Plan that designates priority areas for industrial and commercial facility and activity inspections according to the relative risk that any discharge may be contaminated with pollutants. The Prioritized Area Plan includes an inspection schedule that establishes inspection frequencies for industrial and commercial facilities and activities. All highly ranked commercial facilities are inspected at least once every five years. If an industrial facility or activity on the prioritized list does not have NPDES permit coverage, this facility or activity would be subject to inspection at least twice every five years. If an industrial facility has NPDES permit coverage, this facility or activity would be subject to inspection at least once every five years.

The IDDE Program screens for and addresses any illicit discharge that drains into the MS4 within the watershed, including discharges sourced from industrial, commercial, and residential land uses. In addition to administering a connection and discharge permitting program, the IDDE Program conducts investigations of parcels suspected of illicit discharges or illegal connections identified through:

- Routine inspections of parcels designated by the industrial and commercial database and inventory list;
- Field screening of major and minor outfalls;
- Public complaints; and
- Complaints from DOH.

2.7 PUBLIC EDUCATION AND OUTREACH PROGRAM

The Public Education and Outreach Program (Public Education Program) addresses the need to inform the general public about how their daily activities may affect the quality of receiving waters. The Public Education Program is a community involvement program that focuses on informing the public about MS4 pollution issues and provides citizens with the tools and ideas to help eliminate the causes of pollution. The purpose of the Public Education Program is to motivate the community to control pollution at the source by increasing public awareness of storm water pollution issues. By educating the public on methods to reduce the generation of pollutants, public participation can reduce the quantity of pollutants introduced into the MS4.

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3. QUANTITATIVE ANALYSIS OF PROPOSED ACTIVITIES IN KANEOHE STREAM WATERSHED

This section describes the quantitative analysis of specific DOT-HWYS' programs to document compliance with the required WLA reductions. The anticipated seasonal pollutant reductions for specific programs are quantitatively analyzed and aggregated to provide the total anticipated seasonal pollutant reduction for each pollutant. This total anticipated seasonal mass reduction is then compared to the seasonal reductions required in Table 1-3 to assess consistency with the WLA reductions assigned to DOT-HWYS.

The TMDL document assessed DOT-HWYS' existing pollutant loads based on storm runoff concentrations collected in the early 1980's as part of the EPA's National Urban Runoff Program (EPA 1983, Pitt et al. 2003). To be consistent with the assumptions and data used in the TMDL decision document, DOT-HWYS has set 1980 as the baseline condition for DOT-HWYS' pollution reduction program, and the quantitative analyses presented here measure pollution reduction efforts from the 1980 baseline.

The following sub-sections present a quantitative analysis, where appropriate, of how specific DOT-HWYS' programs reduce seasonal loads of TN and TP in Kaneohe Stream Watershed. Section 3.8 summarizes the average anticipated seasonal reductions of TN and TP in kilograms (KG). While some of the programs and activities lend themselves to direct measurement and estimation of pollutant reduction, pollutant reductions from several of the programs and activities have instead been considered qualitatively in this I&M Plan.

3.1 STREET SWEEPING IN KANEOHE STREAM WATERSHED

Anticipated seasonal reductions in TN and TP loads due to street sweeping were calculated by assessing data from DOT-HWYS' 2009-2013 street sweeping operations in Kaneohe Stream Watershed in conjunction with literature data on concentrations of nutrients per KG of debris collected. This data will serve as a basis for projecting future seasonal reductions.

3.1.1 Data on Street Sweeping Operations

DOT-HWYS tracks debris removed through street sweeping operations for all DOT-HWYS' routes intersecting the Kaneohe Stream Watershed. At the end of each street sweeping event, inspectors record the total cubic yards (CY) of debris removed and estimate a rough percentage of sediment, organic matter, and trash found in the street sweeping hopper. DOT-HWYS averaged data from 2009-2013 (with the highest value for sediment and organic matter excluded from each seasonal average to generate a conservative estimate) to provide a representative estimate of anticipated debris removal to use on a seasonal basis. A summary of the data is provided in Figures 3-1 and 3-2. Averaging data from these years yields an average anticipated dry season removal of 55 CY of sediment and 46.49 CY of organic matter and an average anticipated wet season removal of 48.37 CY of sediment and 42.10 CY of organic matter.

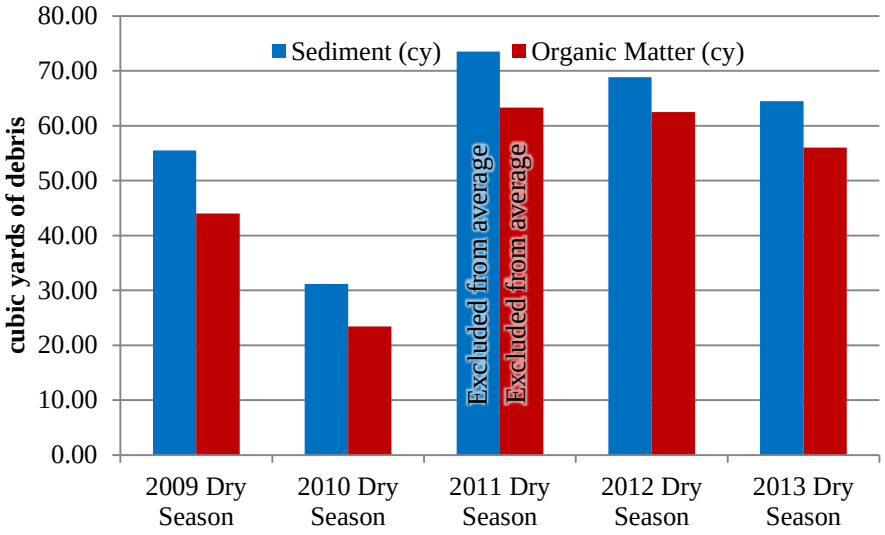

Figure 3-1. Cubic yards of street sweeping debris collected in Kaneohe Stream Watershed, 2009-2013 Dry Seasons

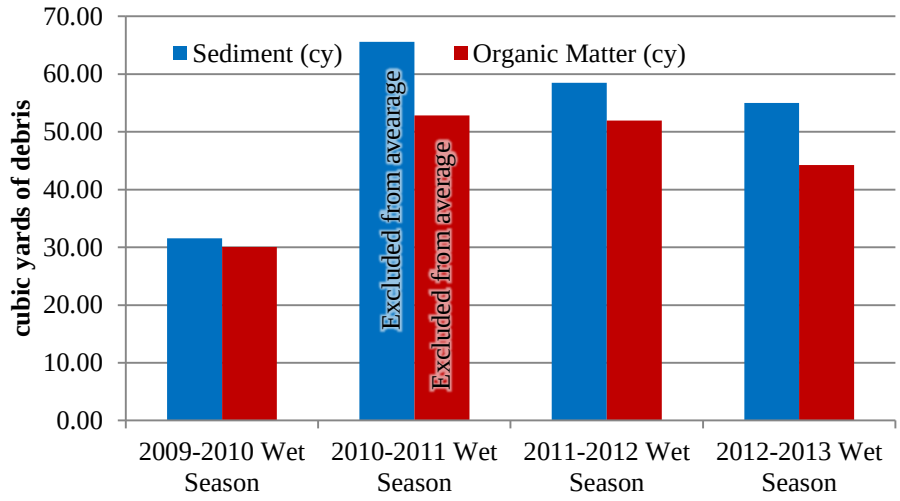

Figure 3-2. Cubic yards of street sweeping debris collected in Kaneohe Stream Watershed, 2009-2013 Wet Seasons

3.1.2 Literature Data on Concentrations of Nutrients per Kg of Debris Collected

DOT-HWYS reviewed existing literature on the concentration of nutrients in debris removed through street sweeping and MS4 structure cleaning. A 2011 study in Florida summarized results from 14 MS4s and 459 individual samples to establish concentrations of nutrients per KG of debris recovered in street sweeping and catch basin cleaning (Berretta et al. 2011). These data were specific to highway land use and unique concentrations were presented for street sweeping and catch basin cleaning, respectively.

In the absence of highway-specific data in Hawaii, these literature values were used to convert dry-equivalent debris into KG of TP and TN recovered. DOT-HWYS is carrying out a sampling effort during the DCA study to confirm that results from the Berretta et al. (2011) study are applicable to conditions in Hawaii. As part of the WLA Completion Report, these literature values will be re-evaluated and adjusted as necessary to reflect the results of the DCA data collected. Final compliance calculations will also be revised as necessary.

Tables 3-1 and 3-2 present the conversion from an average anticipated seasonal wet-weight volume of debris removed to a dry mass of TN and TP removed from Kaneohe Stream Watershed through street sweeping on a seasonal basis. In these tables, the wet-weight volume of debris is multiplied by three constants (bulk density, moisture content, and nutrient content) to calculate the dry mass of TN and TP.

Table 3-1. Conversion Calculations for TN Removal through Street Sweeping Operations

	DRY SEASON			WET SEASON		
	Sediment	Organic matter	TOTAL	Sediment	Organic matter	TOTAL
Average anticipated seasonal debris removed (CY)	55	46.49		48.37	42.10	
Bulk density (KG/CY)	1039 [a]	497 [b]		1039 [a]	497 [b]	
Moisture content conversion factor for street sweeping debris (%)	94 [a]	94 [a]		94 [a]	94 [a]	
TN conversion factor for street sweeping debris (KG TN/KG dry mass)	0.0008266 [a]	0.0008266 [a]		0.0008266 [a]	0.0008266 [a]	
Average anticipated seasonal TN removed through street sweeping (KG)	44.4	17.95	62.35	39.05	16.26	55.31

[a] Source: Berretta et al. (2011)
[b] Source: Government of Saskatchewan Ministry of Agriculture (2008) presented as wet bulk density of compost

Table 3-2. Conversion Calculations for TP Removal through Street Sweeping Operations

	DRY SEASON			WET SEASON		
	Sediment	Organic matter	TOTAL	Sediment	Organic matter	TOTAL
Average anticipated seasonal debris removed (CY)	55	46.49		48.37	42.10	
Bulk density (KG/CY)	1039 [a]	497 [b]		1039 [a]	497 [b]	
Moisture content conversion factor for street sweeping debris (%)	94 [a]	94 [a]		94 [a]	94 [a]	
TP conversion factor for street sweeping debris (KG TP/KG dry mass)	0.000622 [a]	0.000622 [a]		0.000622 [a]	0.000622 [a]	
Average seasonal TP removed through street sweeping (KG)	33.41	13.51	46.92	29.38	12.23	41.61

[a] Source: Berretta et al. (2011)
[b] Source: Government of Saskatchewan Ministry of Agriculture (2008) presented as wet bulk density of compost

3.2 CLEANING OF MS4 STRUCTURES IN KANEOHE STREAM WATERSHED

DOT-HWYS tracks debris removed through the cleaning of MS4 structures for all routes intersecting Kaneohe Stream Watershed. At the end of each cleaning event, inspectors record the total CY of debris removed and estimate a rough percentage of sediment, organic matter, and trash removed. DOT-HWYS averaged data from 2009-2013 (with the highest value for sediment and organic matter excluded from each seasonal average to generate a conservative estimate) to provide a representative estimate of debris removal to use on a seasonal basis for Kaneohe Stream Watershed. This data will serve as a basis for projecting future seasonal reductions.

A summary of the data is provided in Figures 3-3 and 3-4. Averaging data from these years yields an average anticipated dry season removal of 3.77 CY of sediment and 1.85 CY of organic

matter and an average anticipated wet season removal of 3.02 CY of sediment and 1.10 CY of organic matter.

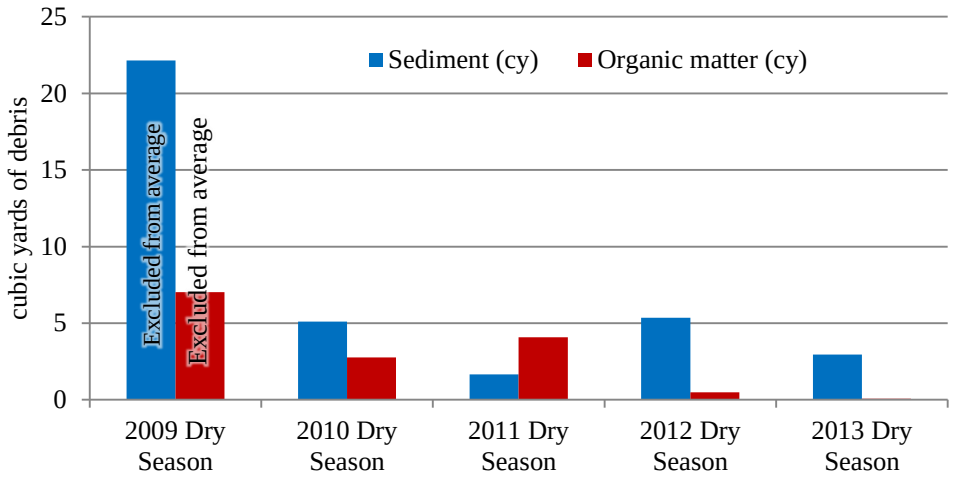

Figure 3-3. Cubic yards of debris removed from inlets and manholes in Kaneohe Stream Watershed, 2009-2013 Dry Seasons

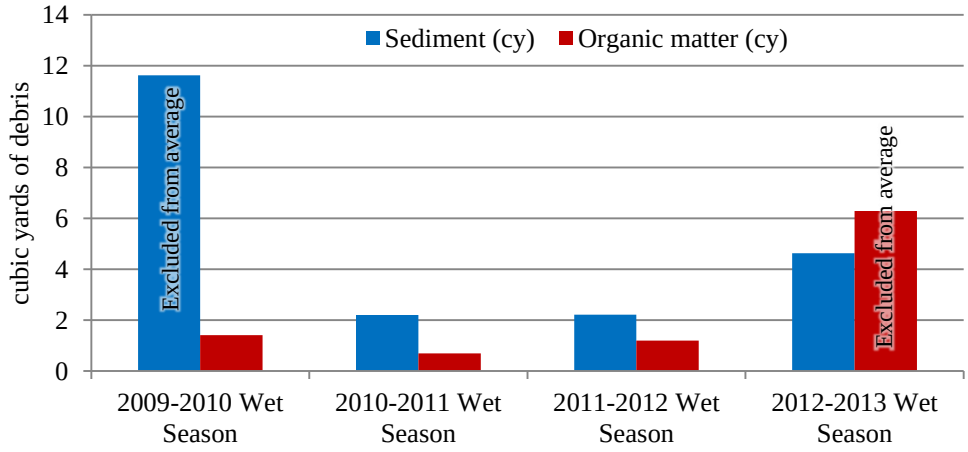

Figure 3-4. Cubic yards of debris removed from inlets and manholes in Kaneohe Stream Watershed, 2009-2013 Wet Seasons

Tables 3-3 and 3-4 present the conversion from an average anticipated seasonal wet-weight volume of debris removed to a dry mass of TN and TP removed from Kaneohe Stream Watershed through cleaning of MS4 structures.

Table 3-3. Conversion Calculations for TN Removal through Cleaning of Inlets and Manholes

	DRY SEASON			WET SEASON		
	Sediment	Organic matter	TOTAL	Sediment	Organic matter	TOTAL
Average anticipated seasonal debris removed (CY)	3.77	1.85		3.02	1.10	
Bulk density (KG/CY)	1039 [a]	497 [b]		1039 [a]	497 [b]	
Moisture content conversion factor for catch basin debris (%)	79 [a]	79 [a]		79 [a]	79 [a]	
TN conversion factor for catch basin debris (KG TN/KG dry mass)	0.0019263 [a]	0.0019263 [a]		0.0019263 [a]	0.0019263 [a]	
Average anticipated seasonal TN removed through MS4 cleaning (KG)	5.96	1.39	7.35	4.78	0.83	5.61

[a] Source: Berretta et al. (2011)
[b] Source: Government of Saskatchewan Ministry of Agriculture (2008) presented as wet bulk density of compost

Table 3-4. Conversion Calculations for TP Removal through Cleaning of Inlets and Manholes

	DRY SEASON			WET SEASON		
	Sediment	Organic matter	TOTAL	Sediment	Organic matter	TOTAL
Average anticipated seasonal debris removed (CY)	3.77	1.85		3.02	1.10	
Bulk density (KG/CY)	1039 [a]	497 [b]		1039 [a]	497 [b]	
Moisture content conversion factor for catch basin debris (%)	79 [a]	79 [a]		79 [a]	79 [a]	
TP conversion factor for catch basin debris (KG TP/KG dry mass)	0.0005666 a	0.0005666 [a]		0.0005666 [a]	0.0005666 [a]	
Average anticipated seasonal TP removed through MS4 cleaning (KG)	1.75	0.41	2.16	1.41	0.25	1.66

[a] Source: Berretta et al. (2011)
[b] Source: Government of Saskatchewan Ministry of Agriculture (2008) presented as wet bulk density of compost

3.3 PBMPS IN KANEOHE STREAM WATERSHED

No new development or significant redevelopment projects have occurred in Kaneohe Stream Watershed that would necessitate the construction of PBMPs. Should any such development or redevelopment take place along DOT-HWYS' ROW within Kaneohe Stream Watershed, DOT-HWYS will follow their MS4 Permit requirements to implement appropriate PBMPs.

DOT-HWYS has identified several locations in Kaneohe Stream Watershed where retrofitting PBMPs may be appropriate. DOT-HWYS intends to build seven PBMPs shown in Figure 3-5.

3.3.1 Reduction Calculations

The Simple Method (Schueler 1987) was used to estimate the anticipated seasonal pollutant removal achieved by installing the PBMPs described in Table 3-6. Concentrations of TN and TP in DOT-HWYS' runoff were calculated as geometric mean values of all available sampling data from Kaneohe Watershed (162 grab and automatic samples from 2009-2013).

3.3.2 Literature Data on Pollutant Removal Efficiencies for Selected PBMPs

DOT-HWYS reviewed existing literature to determine characteristic pollutant removal efficiencies for various PBMPs. Results of this review are presented in Table 3-5. Where appropriate, the lowest and highest removal efficiencies were averaged to provide an average value. Characteristic removal efficiencies may be confirmed through in-situ sampling following installation of selected representative PBMPs (described further in Section 4.2).

Table 3-5. Literature Data on Pollutant Removal Efficiencies for Selected PBMPs

PBMP Type	TN (% removal)			TP (% removal)			Source
	Lowest	Highest	Average	Lowest	Highest	Average	
Bioswale	39	89	**64**	29	80	**54.5**	[1]
Grate Inlet Skimmer Box (GISB)	--	--	**56**	--	--	**57**	[2]
Nutrient Separating Baffle Box (NSBB)	43	63	**53**	18	70	**44**	[3]

Sources:
[1] State of Oregon Department of Environmental Quality (2003)
[2] BioClean Environmental (2000)
[3] SunTree Technologies Inc. (2006)

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Table 3-6. PBMP Projects in Kaneohe Stream Watershed

Site #	Associated PID	Proposed BMP	**A** area (acres)	**Ia** impervious fraction (%)	**Rv** Runoff coefficient	**P_W** Wet season rainfall (inches)	**P_D** Dry season rainfall (inches)	**R_W** Wet season runoff (inches)	**R_D** Dry season runoff (inches)	**TNRed%** TN removal efficiency (%)	**TPRed%** TP removal efficiency (%)	**TN_W** Wet season TN load reduction (KG)	**TN_D** Dry season TN load reduction (KG)	**TP_W** Wet season TP load reduction (KG)	**TP_D** Dry season TP load reduction (KG)
1	104155	Bioswale	1.83	45	0.46	51	33	21.06	13.48	64.0	54.5	1.42	0.91	0.11	0.07
2	505398	NSBB	17.59	3	0.08	43	26	2.90	1.74	53.0	44.0	1.55	0.93	0.12	0.07
3	106986	GISB	1.87	10	0.14	40	23	5.03	2.93	56.0	57.0	0.30	0.18	0.03	0.02
4	105924	GISB	2.73	5	0.10	40	23	3.42	1.99	56.0	57.0	0.29	0.17	0.03	0.02
5	105923	GISB	4.85	7	0.11	40	23	4.02	2.35	56.0	57.0	0.63	0.37	0.06	0.03
6	104995	GISB	0.99	8	0.12	43	26	4.75	2.87	56.0	57.0	0.15	0.09	0.01	0.01
7	104997	GISB	0.63	13	0.16	43	26	6.36	3.84	56.0	57.0	0.13	0.08	0.01	0.01
											Total	4.47	2.73	0.37	0.23

Notes:

PID = Unique Point Identification Number for MS4 structure
A = Contributing drainage area (acres)
Ia = Impervious fraction (%)
Pj = Fraction of annual rainfall events that produce runoff = 0.9

Rv = Runoff coefficient = 0.05 + 0.9(Ia)

P_W = Wet season rainfall (inches) from Giambelluca et al. (2012)
P_D = Dry season rainfall (inches) from Giambelluca et al. (2012)

R_W = Wet season runoff (inches) = P_W * Pj * Rv
R_D = Dry season runoff (inches) = P_D * Pj * Rv

NSBB = nutrient separating baffle box
GISB = grated inlet skimmer box

TNRed% = TN removal efficiency (%)
TPRed% = TP removal efficiency (%)

TNConc = Characteristic TN concentration in DOT-HWYS runoff in Kaneohe Stream Watershed = 0.56 MG/L
TPConc = Characteristic TP concentration in DOT-HWYS runoff in Kaneohe Stream Watershed = 0.05 MG/L
CF = Unit conversion factor = 6272640 in^2/acre * 0.0163871 L/in^3 * 0.000001 KG/MG = 0.1

TN_W = Wet season TN load reduction (KG) = A * R_W * TNConc * TNRed% * CF
TN_D = Dry season TN load reduction (KG) = A * R_D * TNConc * TNRed% * CF

TP_W = Wet season TP load reduction (KG) = A * R_W * TPConc * TPRed% * CF
TP_D = Dry season TP load reduction (KG) = A * R_D * TPConc * TPRed% * CF

Note: totals may be different from the multiplication of their parts due to rounding.

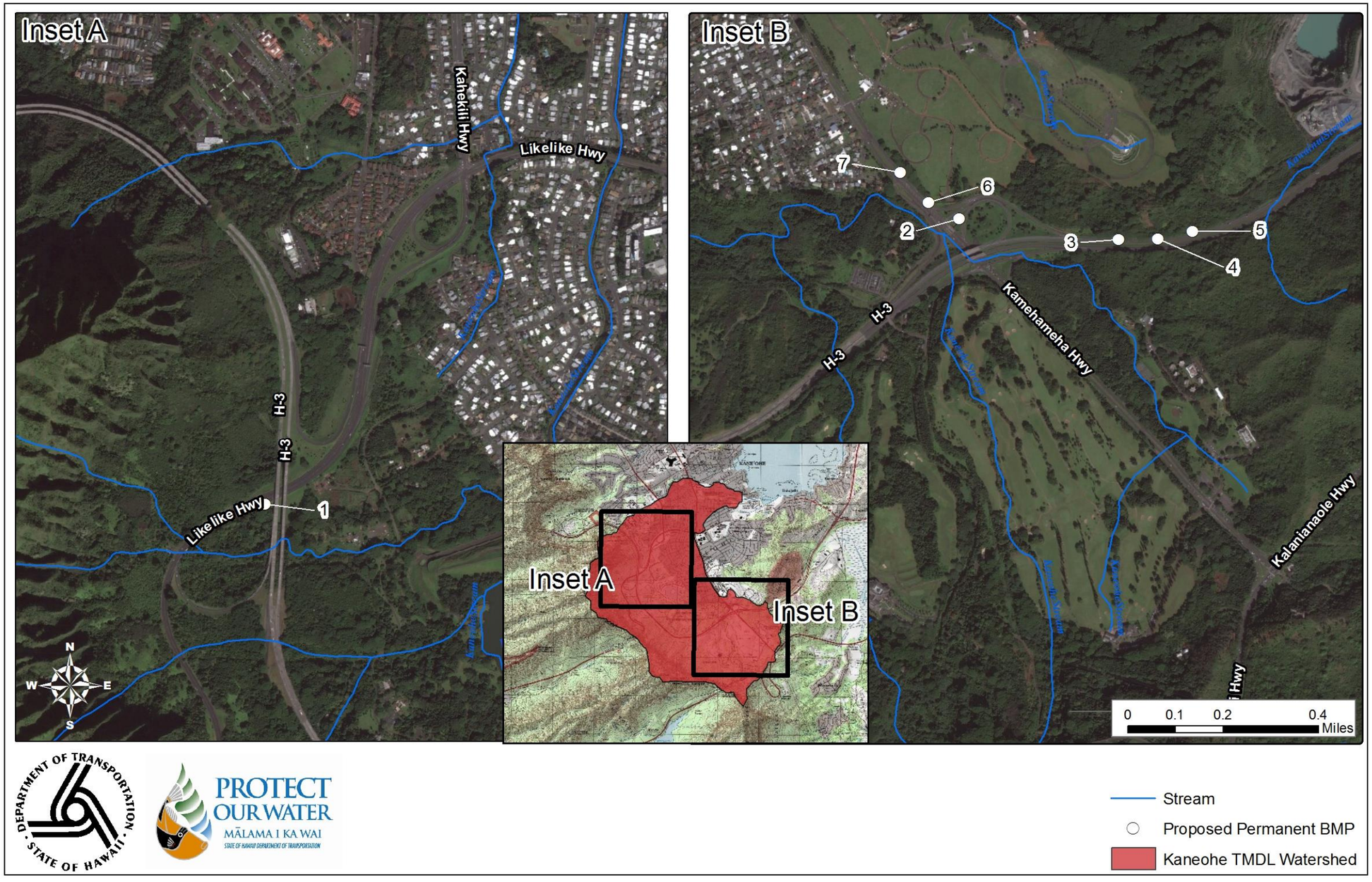

Figure 3-5. Identified PBMP Sites in Kaneohe Stream Watershed

3.4 EROSION CONTROL PROGRAM IN KANEOHE STREAM WATERSHED

The 2007 *Islandwide Assessment of Erosional Areas on the Island of Oahu* identified several erosional areas of concern in Kaneohe Stream Watershed. Table 3-7 identifies the status of each site. Implementing these projects has resulted in reductions in loadings of TN and TP within Kaneohe Stream Watershed. Substantial pollutant reductions in discharges from the MS4 are attributed to the repair of these erosional areas, but these reductions have not been quantified at this time and are therefore considered qualitatively in this I&M Plan.

Table 3-7. Status of Identified Erosion Sites in Kaneohe Stream Watershed

PID	Route	Temporary Projects Completed	Permanent Projects Under Design/ Construction	Permanent Projects Completed
207	H-3	X	X	--
208	H-3	X	X	--
209	H-3	X	X	--
210	H-3	X	X	--
414	63	--	--	X
415	63	--	--	X
473	61	--	X	--
474	61	X	X	--
953	61	--	--	X
1008	83	X	X	--

3.5 CONSTRUCTION SITE RUNOFF CONTROL PROGRAM ACTIVITIES IN KANEOHE STREAM WATERSHED

DOT-HWYS will continue to verify that site-specific BMPs have been installed in accordance with their approved site-specific BMP plans prior to the commencement of any ground disturbing activities. Additionally, independent inspections will continue to be conducted as required in the MS4 permit to ensure BMPs are installed and maintained per the approved plan. DOT-HWYS has developed checklists, inspection forms, and corrective action and reporting procedures for construction projects and has conducted numerous annual construction activities BMP trainings for its staff and contractors. Should any new construction take place along DOT-HWYS' ROW within Kaneohe Stream Watershed, DOT-HWYS will follow their MS4 Permit requirements to implement appropriate construction site runoff control BMPs.

Substantial pollutant reductions in discharges from the MS4 are attributed to the Construction Program, but these reductions have not been quantified at this time and are therefore considered qualitatively in this I&M Plan.

3.6 INDUSTRIAL AND COMMERCIAL ACTIVITIES DISCHARGE MANAGEMENT (IC PROGRAM) AND ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE PROGRAM) IN KANEOHE STREAM WATERSHED

As of October 2014, 22 industrial and commercial facilities were located adjacent to DOT-HWYS' ROW within Kaneohe Stream Watershed. These facilities include restaurants, parking lots, universities, and gas stations. Three of these 22 facilities hold permits to connect to the MS4. Since the tracking of deficiencies began in 2000, there have been eight deficiencies recorded and subsequently addressed in Kaneohe Stream Watershed.

The IC and IDDE Programs have resulted in the identification of a number of sites or facilities that are sources of pollution to the MS4 in Kaneohe Stream Watershed. Owners of the sites or facilities have been required to correct these sources of pollution and have been provided educational material to encourage better practices in the future. Furthermore, previous violations are considered in the prioritization of inspection schedules for industrial and commercial facilities. Substantial pollutant reductions in discharges from the MS4 are attributed to the IC and IDDE Programs, but these reductions have not been quantified at this time and are therefore considered qualitatively in this I&M Plan.

3.7 PUBLIC EDUCATION AND OUTREACH IN KANEOHE STREAM WATERSHED

DOT-HWYS will continue to evaluate potential partnerships with agencies and other stakeholders to more effectively promote storm water awareness and affect behavioral change within the watershed.

In addition, DOT-HWYS sponsors an Adopt-A-Highway program that allows volunteers from any organization to pick up litter along Hawaii's State highways. Adopt-A-Highway groups agree to adopt a portion of State highway for a minimum of two years, pick up litter on that highway at least four times a year, and provide safety training for their volunteers before each

cleanup. DOT-HWYS provides all safety materials and trash bags, schedules trash pick-ups and erects highway signs to recognize the sponsoring groups' cleaning efforts. Four Adopt-A-Highway groups are responsible for over three miles of highway within Kaneohe Stream Watershed.

Substantial pollutant reductions in discharges from the DOT-HWYS MS4 are attributed to the Public Education and Outreach Program, but these reductions have not been quantified at this time and are therefore considered qualitatively in this I&M Plan.

3.8 SUMMARY OF ANTICIPATED SEASONAL LOAD REDUCTIONS IN KANEOHE STREAM WATERSHED

Based on DOT-HWYS' projections, after installing the seven proposed PBMPs and at the current frequency of street sweeping and MS4 structure cleaning, there remains a gap of 17.2 KG of TN in the wet season. DOT-HWYS intends to address this gap through increased street sweeping in Kaneohe Stream Watershed. The impact of this increased frequency is presently under investigation in the DCA, but initial estimates indicate that doubling the frequency of sweeping from once to twice every five weeks will bring DOT-HWYS into compliance with required WLA reductions.

These estimates are presented in Tables 3-8 and 3-9. Presently, DOT-HWYS' contractors sweep approximately 109 curb miles in Kaneohe Watershed in each season, removing an average of 48.37 CY of sediment and 42.10 CY of organic matter in the wet season and 55 CY of sediment and 46.49 CY of organic matter in the dry season. This represents a removal efficiency of approximately 0.44 CY sediment and 0.39 CY organic material per curb mile in the wet season and 0.51 CY sediment and 0.42 CY organic material per curb mile in the dry season. In doubling the frequency of sweeping on these routes to 219 curb miles each season, DOT-HWYS conservatively estimates that less debris will be present on the roadways during each sweeping event, reducing the average removal efficiency to ¾ of prior levels. By doubling the frequency of sweeping and assuming a reduced removal efficiency, DOT-HWYS expects to remove an additional 27.55 KG of TN and 20.74 KG of TP in the wet season and an additional 31.90 KG of TN and 24 KG of TP in the dry season, addressing the present gap in compliance.

Table 3-8. Calculation of Additional Pollutant Removal Due to Increased Wet Season Street Sweeping in Kaneohe Stream Watershed

	Current Sweeping Operations	CHANGE	Proposed Sweeping Operations	Additional Removal
Wet Season Curb Miles Swept	109	x2	219	
Average Sediment Removal Efficiency (CY/CM)	0.44	x0.75	0.33	
Average Sediment Removed (CY)	48.37	--	72.27	
Average Organic Matter Removal Efficiency (CY/CM)	0.39	x0.75	0.29	
Average Organic Matter Removed (CY)	42.10	--	63.51	
Average TN Removed in Wet Season (KG) [1]	55.31	--	82.86	**27.55**
Average TP Removed in Wet Season (KG) [2]	41.61	--	62.35	**20.74**

Notes:
[1] This calculation uses the same conversion factor shown in Table 3-1
[2] This calculation uses the same conversion factor shown in Table 3-2

Table 3-9. Calculation of Additional Pollutant Removal Due to Increased Dry Season Street Sweeping in Kaneohe Stream Watershed

	Current Sweeping Operations	CHANGE	Proposed Sweeping Operations	Additional Removal
Dry Season Curb Miles Swept	109	x2	219	
Average Sediment Removal Efficiency (CY/CM)	0.51	x0.75	0.38	
Average Sediment Removed (CY)	55	--	83.22	
Average Organic Matter Removal Efficiency (CY/CM)	0.42	x0.75	0.32	
Average Organic Matter Removed (CY)	46.49	--	70.08	
Average TN Removed in Dry Season (KG) [1]	62.35	--	94.25	**31.90**
Average TP Removed in Dry Season (KG) [2]	46.92		70.92	**24.00**

Notes:
[1] This calculation uses the same conversion factor shown in Table 3-1
[2] This calculation uses the same conversion factor shown in Table 3-2

If the DCA study results indicate otherwise, DOT-HWYS may review other BMP programs to meet required reductions of TN and TP.

Table 3-10 presents a summary of the anticipated seasonal pollutant load reductions calculated in Sections 3.1 to 3.7, where appropriate, and Tables 3-8 and 3-9.

Table 3-10. Anticipated Seasonal Pollutant Load Reduction for TMDL Compliance

Best Management Practice (BMP) Program	Anticipated Total Nitrogen (TN) Reduction (KG/season)		Anticipated Total Phosphorus (TP) Reduction (KG/season)	
	Dry Season	Wet Season	Dry Season	Wet Season
Street Sweeping (Existing)	62.35	55.31	46.92	41.61
Street Sweeping (Additional)	31.9	27.55	24	20.74
Cleaning of MS4 Structures	7.35	5.61	2.16	1.66
PBMPs	2.73	4.47	0.23	0.37
Erosion Control Program	--[a]	--[a]	--[a]	--[a]
Construction Site Runoff Control	--[a]	--[a]	--[a]	--[a]
Industrial and Commercial Activities Discharge Management and Illicit Discharge Detection and Elimination Programs	--[a]	--[a]	--[a]	--[a]
Public Education and Outreach	--[a]	--[a]	--[a]	--[a]
TOTAL ANTICIPATED REDUCTION:	104.33	92.94	73.31	64.38
REDUCTION REQUIRED:	24.86	82.59	11.39	28.04

Notes:
[a] These programs have resulted in pollutant load reductions in the Kaneohe Stream Watershed. These reductions have not been quantified at this time and are therefore considered qualitatively in this I&M Plan.
Wet Season = 181 days (November 1 – April 30); Dry Season = 184 days (May 1 – October 31)

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4. MONITORING PLAN

The following sub-sections document how DOT-HWYS will monitor and report compliance with assigned WLA reductions in the Kaneohe Stream Watershed.

DOT-HWYS is currently reviewing methods to optimize TN and TP removals wherever practicable, such as increasing the frequency of sweeping in TMDL watersheds. Nonetheless, there are natural variables such as the timing, intensity, and duration of precipitation, which influence these removals and are fully outside the control of DOT-HWYS. For example, there is strong evidence that rainfall in Hawaii is affected on a year-to-year time scale by the occurrence of El Niño and La Niña events in the tropical Pacific, which give rise to large year-to-year variability in rainfall in Hawaii (Giambelluca et al. 2012). Corresponding variability in pollutant removals can be seen in Figures 3-1 to 3-4 of this report. As such, DOT-HWYS intends to demonstrate compliance with WLA reductions based on a three-year running average of TN and TP reductions.

4.1 STREET SWEEPING AND MS4 CLEANING

DOT-HWYS will continue to track removals from street sweeping and MS4 structure cleaning, as described in Section 3.1 and 3.2, respectively.

4.2 PBMPs

In accordance with Part F.1 of the MS4 Permit, a detailed Annual Monitoring Plan will discuss any TMDL-related monitoring planned for that year. This will include pre- and post-sampling following the installation of selected representative PBMPs to confirm characteristic removal efficiencies. Per the Schedule of Compliance, this sampling will occur no later than 11 years after the effective date of the MS4 Permit.

Monitoring of seasonal reductions resulting from PBMPs may involve modeling similar to the Simple Method presented in Section 3.3 (for non-structural PBMPs such as bioswales) or by measuring the amount of debris removed (for structural PBMPs such as continuous deflection separator units).

4.3 OTHER BMP PROGRAMS

Other BMP programs whose associated reductions have not been quantified in this report will continue to be documented in the Annual Report.

4.4 OVERALL COMPLIANCE REPORTING

Following the WLA Completion Report (no later than 13 years after the effective date of the MS4 Permit), the results of this monitoring will be reported annually in the SWMP Annual Report.