APPENDIX M

TOXIC POLLUTANT CONTROL PROGRAM DESCRIPTION

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I. BACKGROUND AND EXISTING REQUIREMENTS

A. Description of Existing Program

The Regulatory Control Branch is responsible for the development and implementation of the federally mandated pretreatment program. The pretreatment program standards and requirements are applied island wide. With specific regard to toxic pollutants, Oahu is fortunate in that we do not have large industrial dischargers with the potential to discharge toxic pollutants to the POTW. This is evidenced in our wastewater and biosolids priority pollutant testing results. Oahu is a tourist-based economy with most businesses focused on servicing the hospitality industry. The pretreatment programs few Significant Industrial Users (SIUs) consist of laundries, caterers, food & drink processors, photo processors and printers with one small categorical metal finisher. In light of this, our primary objective has been to control Fats, Oil and Grease (FOG) dischargers in order to minimize FOG related sanitary sewer overflows and collection system maintenance efforts.

The City and County of Honolulu (CCH) is required by the EPA to implement all requirements of its Pretreatment Program set forth in Title 40 of the Code of Federal Regulations, Section 403.8. The Department of Environmental Services is responsible for implementing the CCH's approved Pretreatment Program (EPA approval date: July 29, 1982). The Division of Environmental Quality, Regulatory Control Branch is tasked with administering the program. The purpose of the Pretreatment Program is to prevent and/or minimize the introductions of pollutants into the CCH's wastewater collection system whose concentrations may result in:

1. Upset, pass-through, or interference at the wastewater treatment plant.
2. Adverse impacts to public health and/or the environment.
3. Interference with wastewater and/or biosolids disposal methods.
4. Interference with opportunities to recycle and reclaim municipal and/or industrial wastewater and biosolids.

Under the Pretreatment Program, several individual subprograms have been implemented, which identify potential dischargers, regulate the types of discharge, monitor compliance and track industrial users discharging into the CCH's wastewater collection system. One of the functions of the Regulatory Control Branch is to identify and determine the compliance status of industrial dischargers and to initiate, track and escalate enforcement action, when appropriate.

The Industrial User Survey (IUS) program was implemented as part of the approved pretreatment program. This program, in compliance with the 309 Consent Decree and federal regulations, continuously identifies possible discharges to the City's sewer system in an effort to maintain current information in the IWDP database.

The Industrial Wastewater Discharge Permit (IWDP) program processes permits and manages all the discharger's information on an IWDP database. An IWDP is issued to a discharger, requiring compliance with pretreatment regulations based on the Revised Ordinances of Honolulu (ROH), State Department of Health statutes, and EPA pretreatment regulations. The database is used to track Industrial User (IU), Liquid Waste Hauler (LWH), and Significant Industrial User (SIU) permits as well as provides a compilation of information to conduct special investigations, compliance evaluations and track enforcement.

The Pretreatment Device Inspection (PDI) program monitors and inspects industrial user's pretreatment devices. This program entails conducting compliance evaluations of grease interceptors, oil interceptors, neutralization systems, silver recovery units and other pretreatment devices. However, the semi-annual grease interceptor inspection requirement, outlined in the 309 Consent Decree, has made it difficult to inspect a significant number of other pretreatment devices. We were able to conduct some compliance evaluations on other pretreatment devices (our goal is 15%) and perform numerous special investigations in response to complaints or other POTW related problems. The City and County of Honolulu intends to continue investigating, developing and implementing creative alternatives of personnel management and pretreatment policy to insure pretreatment program compliance.

The Liquid Waste Hauler (LWH) program manages wastewater dischargers that are introduced by tanker truck into the CCH's treatment works. This program conducts periodic compliance evaluations, wastewater sampling, and reviews and tracks discharge reports.

The Significant Industrial User (SIU) program monitors those industrial users that are classified as significant non-categorical or categorical industrial users. Upon characterization, these significant industrial users are admitted into the program and are required to follow specific conditions for monitoring, sampling, and reporting. In addition this program conducts slug discharge surveys as a part of every facility compliance evaluation, as well as providing assistance to other regulatory agency investigations.

The Temporary User program monitors the discharge of wastewater into the treatment works that is considered a short term or intermittent discharge. The source of these waste streams, usually from water line hydro test projects, has also included discharges from pond cleaning, gray water, and other discharges not acceptable by the separate storm drain system. These discharges require the issuance of an Industrial Wastewater Discharge Permit for Temporary Users and must comply with all city, state and federal regulations.

The following table summarizes the pretreatment programs activities and production over the past 5 years with staffing levels remaining relatively unchanged:

Year	IU Surveys	Permits Issued	Inspections	Enforcement Actions	Education Events	Budget
2002	5,029	917	6,846	2,257	23	$521,172
2001	4,487	1,318	7,405	2,502	48	$447,683
2000	1,179	1,118	7,103	2,220	29	$507,715
1999	2,522	772	7,057	1,177	19	$448,886
1998	6,444	1,120	7,875	1,979	10	$475,665

1. Personnel

The Regulatory Control Branch consists of 4 civil engineer positions, 1 engineering support technician, 1 supervising source control specialist and 9 source control specialists. Staff

experience in pretreatment ranges from 3 years to 10+ years. Average experience is about 7 years. Detailed information about staff responsibilities is provided annually in Chapter 2 of our Pretreatment Annual Assessment Report submitted to EPA and the State Department of Health.

2. Budget

The Regulatory Control Branch budget has remained relatively unchanged over the past 5 years in spite of expanded program services. Budget increases are typically attributed to vehicle replacements, permit mandated projects or other special projects. Budget amounts are summarized in a table provided in Part I.A above. A more detailed description of the Regulatory Control Branch budget is provided in Chapter 9 of our Pretreatment Annual Assessment Report submitted to EPA and the State Department of Health.

3. Permitting Activities

As of December 31, 2002, the Industrial User database consisted of 3,911 active Industrial Wastewater Discharger Permits of which, 833 were issued in 2002.

The Significant Industrial User (SIU) requires compliance with 40 CFR 403.3(t). The program has twenty-six (26) classified SIUs and one (1) Categorical Industrial User, all subject to specific monitoring, sampling, and discharge requirements set upon them for compliance with Federal, State and local laws and regulations. This program also manages the slug survey program, carefully monitoring and taking necessary steps to guide the SIU towards compliance or taking effective enforcement actions against non-compliance.

The Liquid Waste Hauler (LWH) Program issues Industrial Wastewater Discharge Permits (IWDPs) and maintains mechanisms to monitor and determine the compliance status of companies responsible for discharging hauled domestic and specialized waste, as well as, treated effluent from grease rendering/recycling facilities discharging directly to the sewer system. The specialized waste LWH IWDP is issued to companies servicing cesspools, septic tanks, holding tanks, and privately owned package treatment plants. Wastewater that does not meet the cesspool/septic tank definition must be tested in accordance with IWDP requirements to demonstrate compliance with the ROH and may be discharged via direct connection or by tanker truck. In year 2002 there were thirty-five (35) new LWH IWDPs issued for specialized and grease waste.

Permits are also issued to other dischargers such as: automotive repair shops, restaurants, dentists, photo processors. These dischargers are categorized as industrial users and they make up the remainder of the permits on the active database.

A detailed summary of the program permits issued is provided below:

	1998	1999	2000	2001	2002
IU	1,051	726	1,073	1,236	833
LWH	16	16	6	25	35
SIU	0	9	5	17	3
Temp User	53	21	34	30	49
TOTALS	1,120	772	1,118	1,308	920

[IU-Industrial User; LWH-Liquid Waste Hauler; SIU-Significant Industrial User]

4. Inspections

The Pretreatment Device Inspection (PDI) program monitors and inspects pretreatment devices at industrial user facilities. This program encompasses several aspects to ensure compliance with pretreatment standards, while educating the public on program requirements and environmental issues. Source Control Specialists of the PDI program are responsible for the periodic compliance evaluations of all non-significant dischargers, more commonly known as industrial users (IUs), and their associated pretreatment devices. The PDI program's compliance evaluations encompass a wide variety of industrial operations such as restaurants, automobile repair shops, photo processors, dental clinics and medical facilities. The pretreatment devices that may be required to treat a facility's wastestream may include grease interceptors, oil interceptors, silver recovery systems, and neutralization systems, to name a few. Significant Industrial Users (SIUs) are also inspected in accordance with 40 CFR Part 403 requirements. SIUs typically operate and maintain pretreatment devices but may also be required to conduct periodic self-monitoring of their industrial wastestream to demonstrate compliance with applicable pretreatment standards. The Liquid Waste Hauler and Temporary User programs also conduct periodic inspections and may require laboratory analysis to characterize wastewater and verify compliance with pretreatment standards prior to approving discharges. A summary of the program inspection activities is provided in Part I.A above.

A detailed summary of the program inspections is provided below:

	1998	1999	2000	2001	2002
Permits	124	48	88	106	-
IU	7,556	6,900	6,866	7,180	6,797
LWH	110	23	60	55	25
SIU	29	33	37	27	26
Special Investigation	56	53	52	37	47
TOTALS	7,875	7,057	7,103	7,405	6,846

[IU-Industrial User; LWH-Liquid Waste Hauler; SIU-Significant Industrial User]

5. Compliance Record

Enforcement actions are initiated in accordance with our EPA approved Enforcement Response Plan. Verbal Warning, Letters of Warning, Notices of Violation and fines are utilized to ensure compliance with federal, state and local laws. Enforcement activities are tracked on a database to ensure the violators are responsive and mitigate noncompliances. Considerable effort has also been invested in expanding our public education and outreach activities. This effort is intended to provide industrial and commercial dischargers with important information about City programs, regulations and other concerns that will assist them in maintaining compliance in their operations.

Facilities determined to be in significant noncompliance (as defined by federal regulation), have been fairly rare and have not been deemed as adversely impacting the POTW. Over the past

5 years there has been 1 significant noncompliance in the Sand Island WWTP tributary every year except 2001 when there were none. Each case was associated with violations of our local limit for silver. However, our 2001 Urban Area Pretreatment Program study indicated that there is no technical basis for a local limit for silver thus, these violations, although appropriate based on the current ordinance, lack a technical basis. We unable to modify the current local limits without EPA and DOH approval of the Urban Area Pretreatment Program Study submitted on or about November 2001. Our proposal is to adopt the Silver Code of Management Practices developed by the Silver Council as part of our ordinance.

6. Enforcement

A detailed summary of the program enforcement actions is provided below:

	1998	1999	2000	2001	2002
Permits	1,387	707	1,437	1,789	1,321
IU	456	389	701	660	890
LWH	98	57	54	22	30
SIU	36	23	20	29	16
Temp User	2	1	8	1	0
TOTALS	1,979	1,177	2,220	2,502	2,257

[IU-Industrial User; LWH-Liquid Waste Hauler; SIU-Significant Industrial User]

7. Reporting

Reporting requirements for the pretreatment program are defined in Part G.5 and G.6 of the Sand Island WWTP NPDES Permit No. HI 0020117.

8. Education/Technical Assistance

The Department of Environmental Services participates in numerous public events every year in which environmental displays are setup and educational material is distributed. The educational materials promote the protection of the environment by implementing best management practices and encouraging behavior change. The display consists of numerous photos depicting environmental problems and cleanup efforts as well as information about the City & County of Honolulu's environmental programs. Additional information about point and non-point source pollution control is available at www.honolulupretreatment.com and www.cleanwater.org. The City & County of Honolulu also conducts a Household Hazardous Waste collection and disposal program on a quarterly basis. This program has resulted in the consistent collection of pesticides, herbicides and other toxic chemicals and cleaners from residents that may have otherwise been improperly discarded. Information about this program is available at www.opala.org.

The pretreatment program, storm water program and recycling program have all enlisted the help of local and international celebrities as spokesperson or partners with the environment. These celebrities volunteer their time for public service announcement productions, community clean up projects, special events and photo shoots for educational brochures and posters. Celebrities include: Jackie Chan, Richard Chamberlain, Jason Scott Lee and John Denver, to name a few. Over the past 10 years we have retained a public outreach/marketing consultant to assist in securing venues and other opportunities to make information available to the public. Our Department of Customer Service has also been assisting in this effort.

In addition, the Regulatory Control Branch produced a national award winning educational video called, "Fats, Oil and Grease Control" and conducted a fats, oil and grease public education campaign through the cooperation of the Star Market grocery store chain. This month long effort was conducted prior to the Thanksgiving and Christmas holidays. It involved the distribution of thousands of flyers, inserted in customer grocery bags, instructing the public on proper disposal methods for fats, oil and grease generated during cooking and clean –up activities.

The Regulatory Control Branch has also produced a brochure and bus poster educating the public on the proper handling and disposal of Fats, Oil and Grease brochure. The brochures are distributed at public events and other activities where environmental displays are set up. The bus posters have been displayed in city buses and will continue to be periodically displayed as space becomes available. These efforts serve as educational tools to promote best management practices, proper handling and disposal of fats, oil and grease generated during food preparation and clean up activities.

The Fats, Oil and Grease control efforts have resulted in about a 50% reduction in grease related sanitary sewer overflows over the past 3 years. Reducing sanitary sewer overflows contributes to minimizing the potential adverse impact to public health and the environment.

A listing of public education/outreach efforts is provided in Chapter 11 of our Pretreatment Annual Assessment Reports submitted to EPA and the State Department of Health.

9. Existing Permit Requirements and Compliance

We have complied with the requirements of Part G.4 of NPDES Permit No. HI 0020117 (i.e. Sand Island WWTP) by completing and submitting our Urban Area Pretreatment Program Report (Local Limits Evaluation) in November 2001. However, we have been unable to effect the recommendation of this report without the approval of EPA and the State Department of Health as required by Part G.4.d(3) & G.4.f(3) of NPDES Permit No. HI 0020117.

10. Toxic Pollutant Monitoring

The presence of toxic pollutants in the wastestream is monitored in accordance with the requirements outlined in our NPDES permit. Toxic pollutant monitoring of specific industrial dischargers is requested prior approving any industrial wastewater discharges of unknown origin or if the wastewater origin indicates that it may contain pollutants of concern.

11. Industrial Source Control Program and Permitting

A description of the industrial source control program and permitting requirements are provided in 40 CFR Part 403 and in Part G of the Sand Island WWTP NPDES Permit No. HI 0020117. A description of the existing pretreatment program is provided in Part I.A above.

12. Non-industrial Source Control Program

A description of the non-industrial source control program requirements are provided in 40 CFR Part 125 and in Part G of the Sand Island WWTP NPDES Permit No. HI 0020117. A description of the existing non-industrial source control program is provided in Part I.A.8 above.

II. PROPOSED CHANGES

A. Description of Required Program Changes

1. Personnel

We do not anticipate any changes in the number of personnel responsible for developing and implementing the pretreatment program. We do, however, anticipate filling all vacant positions (currently 3) over the next 5 years.

2. Budget

Budget increases will be associated with filling vacancies, program streamlining upgrades and complying with NPDES permit requirements.

3. Permitting Activities

We are in the process initiating a consultant study to evaluate our entire program with the objective of developing and implementing a more efficient and effective integrated data management system.

4. Inspections

We are proposing to develop a paperless inspection program associated with the integrated data management system described in #3 above. Our goal is to have program data accessed and collected electronically in the field. This should result in increased efficiency, minimize data inputting errors, maximize data accessibility, enable more effective system evaluations and expedite program functions and modifications.

4. Compliance Record

We anticipate that our program's level of compliance will continue to be strong as it has been in over the past 5 years. We propose to continue to monitor our compliance status and make whatever adjustments may be necessary to maintain this status.

6. Enforcement

We do not anticipate any changes to our current enforcement activities. We will continue to adhere to our EPA approved Enforcement Response Plan.

7. Reporting

The proposed integrated data management system, described in #3 above, would enable data availability to be more readily accessible for reporting requirements.

8. Education/Technical Assistance

We are proposing to maintain a strong public education/technical assistance program particularly in the area of non-industrial source control. We are continuing to develop website capabilities for education and information distribution as well as linking other valuable information from other program websites. We will continue working cooperatively with internal

programs, our customer service department and state pollution prevention programs in order to maintain a well coordinated, efficient and effective outreach program that targets pollutants of concern.

B. Description of Elective and Special Programs

1. Waste Minimization

We have been developing and implementing a recycling program as part of the City & County of Honolulu's mission of sustainability. Our tourist-based economy depends heavily on maintaining a pristine environment. This fact demands that we remain extremely sensitized to the condition of our environment (both aquatic and land) and its preservation.

2. Non-industrial Source Control

A detailed description of the City & County of Honolulu's non-industrial source control program is provided in Part B.3 above.