



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND, PACIFIC REGION
HEADQUARTERS, UNITED STATES ARMY GARRISON, HAWAII
851 WRIGHT AVENUE, WHEELER ARMY AIRFIELD
SCHOFIELD BARRACKS, HAWAII 96857-5000

31 MAY 2011

IMPC-HI-ZA

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: United States Army Garrison, Hawaii Enforcement Policy For the Illicit Discharge Detection and Elimination Program

1. United States Army Garrison, Hawaii (USAG-HI) holds a National Pollutant Discharge Elimination System (NPDES) permit, issued by the Hawaii State Department of Health, Clean Water Branch. Within the permit, USAG-HI must develop, implement and enforce a program to detect and eliminate illicit discharges. The enclosed enforcement policy document describes the enforcement procedures and actions of the USAG-HI program for the detection and elimination of illicit discharges and satisfies the requirements of the NPDES permit.
2. The point of contact for this action is Directorate of Public Works, Environmental Division, attention: Jim Rice, PE who can be reached at 656-3317 or james.c.rice1@us.army.mil.

Encl


DOUGLAS S. MULBURY
COL, IN
Commanding

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(IMPC-HI-PWO)

ENFORCEMENT PROCEDURES AND ACTIONS FOR THE ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM

as required by State Department of Health, Clean Water Branch

in accordance with

the U.S. Army Garrison, Hawaii

National Pollutant Discharge Elimination System Permit No. S000090



Prepared by

Directorate of Public Works, Environmental Division

April 2011

**ENFORCEMENT PROCEDURES AND ACTIONS FOR THE ILLICIT
DISCHARGE DETECTION AND ELIMINATION PROGRAM**

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BACKGROUND

The State Department of Health (SDOH), Clean Water Branch (CWB) issued U.S. Army Garrison, Hawaii (USAG-HI) a National Pollutant Discharge Elimination System (NPDES) permit effective February 7, 2007. The NPDES permit allows USAG-HI to discharge storm water runoff associated with industrial activities and certain non-storm water discharges (e.g. air condition condensate, fire hydrant testing, dechlorinated pool water, individual car washing, etc.) from the storm sewer outfalls in accordance with the permit. Those non-storm water discharges not identified in the permit are unauthorized. These are termed illicit or prohibited discharges.

Part C, Section 2.c. of the NPDES permit requires USAG-HI to perform the following:

“The Permittee shall develop, implement, and enforce a program to detect and eliminate illicit discharges that, at a minimum, includes the following:

- i. Establishment of installation-wide instructions, directives, or other regulatory mechanisms, including enforcement procedures and actions that prohibit non-storm water discharges into the Army storm water system.”*

PURPOSE

The purpose of this enforcement policy is to ensure that industrial facilities and activities are in compliance with the requirements of the NPDES permit. As a result, once illicit discharges to the storm sewer are identified they should be corrected immediately in accordance with the NPDES permit requirements.

In 2008 and 2009, illicit discharge surveys were completed for Schofield Barracks, Wheeler Army Air Field, Helemano Military Reservation, Aliamanu Military Reservation, Fort Shafter, and Tripler Army Medical Center. Corrective action is on-going in accordance with the plan of action and milestones.

This enforcement policy will be updated annually or as needed.

ENFORCEMENT

1. An Environmental Compliance Officer (ECO), or other individual, who witnesses a violation of the NPDES permit, specifically an illicit discharge, shall do the following:

- a) Communicate the finding to the Clean Water Act Program Manager within 24 hours of discovery.

ENFORCEMENT PROCEDURES AND ACTIONS FOR THE ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM (cont)

b) The Clean Water Act Program Manager will issue a written finding to the ECO or Facility Manager within one week of the notification. The written finding will include copies of field notes, correspondence, photographs and sampling results, if applicable.

c) The ECO or Facility Manager will provide a timeline for the facility or activity to correct its violation within one week of receiving the written finding.

d) The Clean Water Act Program Manager shall schedule a re-inspection to ensure that the deficiency has been corrected.

2. If the Clean Water Act Program Manager witnesses or receives a report of an illicit discharge, the same schedule outlined above in Items 1.b. through 1.d. will be followed.

3. If the deficiency has not been corrected, after utilizing the chain of command, and all avenues have been exhausted, then the Clean Water Act Program Manager will notify the SDOH, CWB (568- 4309) and report the violation.

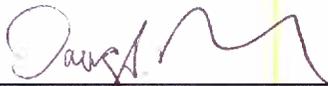
RECORD KEEPING

Inspection reports shall be kept on file with the Directorate of Public Works, Environmental Division. Records shall be kept for five (5) years in accordance with the permit.

ENFORCEMENT PROCEDURES AND ACTIONS FOR THE ILLICIT DISCHARGE
DETECTION AND ELIMINATION PROGRAM (cont)

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 gathered and evaluated 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 or imprisonment for knowing violations."



DOUGLAS S. MULBURY
COL, IN
Commanding

31 MAY 11

Date