



CITY OF PORTLAND ENVIRONMENTAL SERVICES



Water Pollution Control Laboratory

6543 N Burlington Ave, Bldg 217, Portland, Oregon 97203 ■ Mingus Mapps, Commissioner ■ Dawn Uchiyama, Director

November 30, 2023

Robert Wyatt
Northwest Natural Gas Company
7900 NW St Helens Rd
Portland, OR 97210
rjw@nwnatural.com

Re: Stormwater Inspection – Northwest Natural Gas Company, 7900 NW St Helens Rd, DEQ
File #62231

Dear Robert Wyatt:

The City of Portland (City) conducted an inspection of Northwest Natural Gas Company (facility) on November 14, 2023, to assess compliance with the 1200-Z National Pollutant Discharge Elimination System Industrial Stormwater General Permit (permit) and the requirements of the City Code 17.38 for the maintenance and operation of private stormwater facilities.

The following pertains to the 1200-Z Permit:

The following items are **required** to ensure compliance with the permit:

- **Spill Prevention & Response, *Schedule A.1.h*:** All hazardous substances, petroleum/oil liquids and other chemical solid or liquid materials that have the potential to contaminate stormwater must be stored within berms or other secondary containment devices to prevent leaks and spills. During the inspection, the City observed 5-gallon buckets of hydraulic oil without containment in the storage shed north of the main groundwater treatment plant. Despite being stored in the shed these materials have the potential to contaminate stormwater based on their proximity to the stormwater system. The facility must place these buckets on a secondary containment pallet or move them to an area of the site that does not discharge to the stormwater conveyance system **within 30 days**.
- **Stormwater Pollution Control Plan (SWPCP), *Schedule A.10*:** The SWPCP for this facility was submitted on August 31, 2021. The SWPCP was reviewed by the City for compliance with the Permit and revisions must be made to incorporate required information. Please submit the revised SWPCP **within 30 days**. The SWPCP must be signed in accordance with 40 CFR 122.22. Please submit the SWPCP revisions with the required **original** signatory certification.
 - *Schedule A.10.b.vi*: The facility must make the following changes to reflect the control measures and maintenance frequencies that are currently in place:
 - Add a description of the berm on the northern border of the facility to Section 3.1. This berm was constructed to prevent erosion and overland flow to surface waters. The facility must also add this berm to the facility map.
 - In Section 3.3, update the frequency of cleaning for catch basins F1, F2, and F3. Currently, the cleaning frequency is annual, but the facility has elected to instead

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measure the sediment depth annually and clean when the sump is one-third full of sediment.

The City recommends the following actions to protect water quality:

- During the inspection, the City observed some minor gravel accumulation in catch basin D3, which is a flow-through catch basin. The City recommends that the facility install a riser to prevent gravel from entering the catch basin.

The following pertains to the Maintenance and Operation of Private Stormwater Management Facilities – City Code 17.38:

The City has a Maintenance Inspection Program that inspects stormwater management facilities installed on private property per Portland City Code 17.38. The purpose of conducting these inspections is to ensure that the operations and maintenance (O&M) plan recorded with Multnomah County and on file with the City is being implemented by the current property owner or designee.

The stormwater management facilities at this site are a StormFilter catch basin and a StormFilter vault.

Observations:

- The StormFilter catch basin is free of sediment and was last maintained in July 2023.
- The City observed that one of the filter cartridges in the StormFilter vault was dislodged and on its side. The filter likely became dislodged during recent heavy rainfall.

Comments:

- The facility must have the filter cartridge properly placed/reinstalled and submit documentation to substantiate this **within 30 days.** Ensure the vault is inspected following heavy rain events in the future.

The City appreciates Northwest Natural Gas Company's commitment to protecting water quality in Portland Harbor. Please contact me at melanie.roy@portlandoregon.gov or 503-865-6929 if you have any questions.

Sincerely,



Melanie Roy
Industrial Stormwater Program

Cc: Kendra Skellenger, consultant