



# CITY OF PORTLAND ENVIRONMENTAL SERVICES



## Water Pollution Control Laboratory

6543 N Burlington Avenue, Bldg 217, Portland, Oregon 97203 ■ Ted Wheeler, Mayor ■ Michael Jordan, Director

March 5, 2020

Robert Wyatt  
NW Natural Gas Company  
220 NW Second Ave  
Portland, OR 97209

Re: **Warning, Schedule A.6, Schedule B.7, and Schedule B.10**  
Stormwater Inspection - NW Natural Gas Company, 7900 NW St Helens Rd, DEQ File #25181

Dear Mr. Wyatt:

The City of Portland (City) conducted an inspection of NW Natural Gas Company (facility) on March 3, 2020 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 City is issuing the following enforcement actions;** if you have additional information to substantiate that the enforcement was issued in error, please submit the information to the City immediately. If the City determines that the enforcement was issued in error, the City will amend or rescind the enforcement action as applicable:

### **WARNING:**

**Failure to Implement the Stormwater Pollution Control Plan (SWPCP), Schedule A.6:** The facility failed to implement specific site controls described in the SWPCP. Site controls are required to meet the Narrative Technology-Based Effluent Limits of the permit (*Schedule A.1 and Schedule E*). Failure to implement any of the control measures or practices described in the SWPCP is a violation.

- The SWPCP (pg. 21) states, and the permit requires, that new employees receive stormwater training within 30 days of hire. However, the facility reported that this has not been done.
- The SWPCP (pg. 21) states that the stormwater pump station is manually cycled monthly, but records indicate this did not occur in July and September 2019.

Please note future instances of failing to implement the same SWPCP site controls may result in a referral to DEQ Office of Compliance and Enforcement for potential formal enforcement.

**Failure to Meet Inspection Requirements, Schedule B.7:** The facility failed to properly conduct inspections in accordance with permit requirements:

- Visual observations that were conducted did not include observations for all pollutant indicators. Ensure the following pollutant indicators are included in the visual observations during each monthly discharge observation: floating, suspended or settleable solids, color, odor, foam, visible oil sheen, or other obvious indicators of pollution.

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NWN-PCI0778277

- The facility reported no discharge for April 2019. According to local rain gauges, it rained consistently during the facility's normal hours of operation between April 4<sup>th</sup> and April 19<sup>th</sup> (approximately nine days) and likely produced a discharge from the site.

Due to the reported intermittent staffing at the site, the City recommends training additional employees to conduct visual observations in the event that regular inspection staff is not onsite during a rain event. If staff hours vary so much that visual observations cannot be performed consistently, the City recommends documenting when a rain event occurs during typical hours of operation, but no one is present onsite. This will help to substantiate that inspections are still being conducted per permit requirements.

**Failure to Keep Records, Schedule B.10.d:** The facility failed to maintain the following records onsite: line jetting and catch basin cleaning for area F. The SWPCP states that catch basins in area F are cleaned annually and the facility's July 8, 2019 Tier I stated that the storm lines would be cleaned by July 26, 2019. The facility did not have documentation of these activities available during the inspection, however, the facility emailed proof of line jetting on March 5, 2020. Ensure all preventative maintenance records are kept in accordance with the permit requirements and to substantiate that the SWPCP/corrective actions are being implemented as written. As a reminder, The SWPCP states that geo textile at D10 and D11 and catch basin filters in D15 and 16 are replaced annually. Please be sure that records reflect this maintenance schedule and are available during inspections.

***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 two StormFilters.

**Observations:**

- The StormFilter vaults were last maintained on September 20, 2018 and August 22, 2017. All filters appeared to be in place and stormwater flows through the vaults as intended.

**Comments:**

- Ensure that the LNG StormFilter is replaced this year to comply with the O&M maintenance schedule.

The City appreciates NW Natural's commitment to protecting water quality in the Willamette River. Please contact me at 503-823-7554 if you have any questions.

Sincerely,



Angelica Greene  
Industrial Stormwater Program