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**From:** Kendra Skellenger <[kskellenger@anchoragea.com](mailto:kskellenger@anchoragea.com)>  
**Sent:** Friday, March 27, 2020 3:44 PM  
**To:** Greene, Angelica <[Angelica.Greene@portlandoregon.gov](mailto:Angelica.Greene@portlandoregon.gov)>  
**Cc:** Bob Wyatt <[rjw@nwnatural.com](mailto:rjw@nwnatural.com)>; Jen Mott <[jmott@anchoragea.com](mailto:jmott@anchoragea.com)>  
**Subject:** Response to Enforcement Actions Cited in BES Warning Letter - NW Natural Gasco Property

Angelica –

On behalf of Bob Wyatt, I'm submitting NW Natural's response to the enforcement actions cited by BES in the March 5, 2020 stormwater inspection warning letter.

Have a nice weekend.

Thank you,  
Kendra

**Kendra Skellenger, P.E., LEED® AP**

Managing Environmental Engineer

**ANCHOR QEA, LLC | Portland Office | [kskellenger@anchorqea.com](mailto:kskellenger@anchorqea.com)**

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Angelica Greene  
Industrial Stormwater Program  
City of Portland Environmental Services  
6543 N. Burlington Avenue, Building 217  
Portland, Oregon 97203

Re: Response to Enforcement Actions Cited in BES Warning Letter  
Stormwater Inspection – NW Natural Gasco Property  
DEQ File #25181

Dear Angelica,

NW Natural is providing the following responses to the enforcement actions cited by the City of Portland Bureau of Environmental Services (BES) in the Warning Letter dated March 5, 2020, based on your annual inspection of the NW Natural property (site) stormwater facilities on March 3, 2020. NW Natural received the letter on March 13, 2020. Where appropriate, our responses provide the corrective actions that NW Natural is proposing to implement to address the items noted in the inspection. The enforcement actions in the Warning Letter are reproduced below in standard font, and NW Natural's responses are italicized.

**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.

*Due to recent site staff turnover, the 30-day training was not conducted during some Liquefied Natural Gas (LNG) Plant staff hires. Those staff will be trained by April 12, 2020. Moving forward, administrative procedures have been put in place to ensure 1200-Z employee training occurs during the onboarding process for all new hires.*

- 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.

*Moving forward, monthly inspection team members will prompt the LNG Plant staff to cycle the stormwater pump during each monthly site inspection, unless Anchor QEA or LNG Plant staff observe the water level below the pump. If this is the case, it will be documented on the Monthly Preventative Maintenance Inspection Form.*

**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.

*Our records show that the Monthly Visual Discharge Observation Form and associated text in the SWPCP were revised on April 24, 2019. The revised observation forms in the SWPCP require input on all the required pollutant indicators. Observation forms for June 2019 through the present (February 2020) are included for your review.*

- 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 4th and April 19th (approximately nine days) and likely produced a discharge from the site.

*According to the on-site rain gage, there was limited precipitation at the site during this period on weekdays between 7:00 a.m. and 3:30 p.m. and not enough precipitation to generate a consistent discharge. Anchor QEA staff routinely check the outfall during rain events to determine if there is any discharge. Observations were made, and there was no discharge observed in April. This was an unusually dry spring, and as a result, the second stormwater sample could not be collected until June. Moving forward, Anchor QEA will begin documenting the days outfall inspections are made but no discharge was observed on the Monthly Visual Discharge Observation Form.*

**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.

*Moving forward, we will add a section to document preventative maintenance actions on the Monthly Preventative Maintenance Inspection Forms, including contractor invoices as appropriate, as well as tracking maintenance schedules on an in-house form. The inspection forms will document any line or catch basin cleaning work, geotextile replacement at D10 and D11, and catch basin filter insert replacement at D15 and D16, plus the replacement of CleanWay filters.*

**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.

*Comment noted. The filter cartridges in the LNG StormFilter catch basin will be scheduled for replacement before August 2020 (last replacement was August 23, 2017) and will be documented on the Monthly Preventative Maintenance Inspection Form when it occurs.*

NW Natural is committed to meeting the obligations of its 1200-Z permit. As such, please let me know if you have any questions or concerns about our proposed path forward to address the enforcement actions noted in your letter.

Sincerely,



Robert J. Wyatt  
Director, Legacy Environmental Program

cc:

**Attachment**

Attachment 1 NW Natural Gasco Property Monthly Visual Discharge Observation Forms, June 2019 – February 2020

**Monthly Visual Discharge Observation Form  
NW Natural Gasco Property**

**Visual inspection of stormwater monitoring point(s) MUST BE completed monthly during a discharge event.  
If no discharge event occurs during the month, write "NO DISCHARGE" on the last business day of the month.**

<b>Date:</b> 6-7-19	<b>Weather Conditions:</b> cloudy, Lt. rain, 61°F, light wind SW with gusts
<b>Time:</b> 1200-1330	<b>Inspector:</b> Dary Luffoon

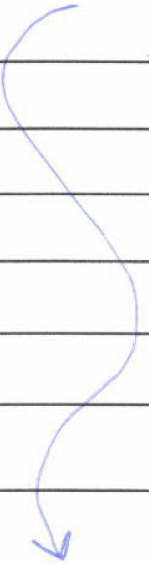
	Yes	No	Observations/Notes	If YES: Describe Corrective Actions Needed <sup>1</sup>	Date Completed
<b>Monitoring Location 001 (Outfall 107)</b>					
Discharge observed	✓				
Floating, suspended, or settleable solids		✓			
Odor		✓			
Oil and grease sheen		✓			
Foam		✓			
Discoloration		✓			
Obvious indicators of pollution		✓			
Evidence of pollutants discharging		✓			
Was a stormwater sample collected?	✓		D107-02-060719	NA	

**Note:**

1. If visual observation shows presence of floating, suspended or settleable solids, color, odor, foam, visible oil sheen, or other obvious indicators of pollution at the discharge point, a Tier I report will be required as described in Section 5.4 of the Stormwater Pollution Control Plan.

**Monthly Visual Discharge Observation Form  
NW Natural Gasco Property**

<b>Visual inspection of stormwater monitoring point(s) MUST BE completed monthly during a discharge event. If no discharge event occurs during the month, write "NO DISCHARGE" on the last business day of the month.</b>	
<b>Date:</b> 7-31-19	<b>Weather Conditions:</b> Sunny, Dry, 77°F      Wind from NE
<b>Time:</b> 1420-1425	<b>Inspector:</b> Casey Montgomery


	Yes	No	Observations/Notes	If YES: Describe Corrective Actions Needed <sup>1</sup>	Date Completed
<b>Monitoring Location 001 (Outfall 107)</b>					
Discharge observed			No Discharge 		
Floating, suspended, or settleable solids					
Odor					
Oil and grease sheen					
Foam					
Discoloration					
Obvious indicators of pollution					
Evidence of pollutants discharging					
Was a stormwater sample collected?					

**Note:**

1. If visual observation shows presence of floating, suspended or settleable solids, color, odor, foam, visible oil sheen, or other obvious indicators of pollution at the discharge point, a Tier I report will be required as described in Section 5.4 of the Stormwater Pollution Control Plan.

**Monthly Visual Discharge Observation Form**  
**NW Natural Gasco Property**

<b>Visual inspection of stormwater monitoring point(s) MUST BE completed monthly during a discharge event.</b> <b>If no discharge event occurs during the month, write "NO DISCHARGE" on the last business day of the month.</b>	
Date: 8-30-19	Weather Conditions: Cloudy, 75°F, light wind from NE
Time: 1500-1505	Inspector: Casey Montgomery

	Yes	No	Observations/Notes	If YES: Describe Corrective Actions Needed <sup>1</sup>	Date Completed
<b>Monitoring Location 001 (Outfall 107)</b>					
Discharge observed			No Discharge 		
Floating, suspended, or settleable solids					
Odor					
Oil and grease sheen					
Foam					
Discoloration					
Obvious indicators of pollution					
Evidence of pollutants discharging					
Was a stormwater sample collected?					

Note:

1. If visual observation shows presence of floating, suspended or settleable solids, color, odor, foam, visible oil sheen, or other obvious indicators of pollution at the discharge point, a Tier I report will be required as described in Section 5.4 of the Stormwater Pollution Control Plan.



**Monthly Visual Discharge Observation Form  
NW Natural Gasco Property**

<b>Visual inspection of stormwater monitoring point(s) MUST BE completed monthly during a discharge event. If no discharge event occurs during the month, write "NO DISCHARGE" on the last business day of the month.</b>	
<b>Date:</b> 9/10/19	<b>Weather Conditions:</b> Cloudy, Raining, 65°F Wind from East
<b>Time:</b> 1350-1355	<b>Inspector:</b> Casey Montgomery

	Yes	No	Observations/Notes	If YES: Describe Corrective Actions Needed <sup>1</sup>	Date Completed
<b>Monitoring Location 001 (Outfall 107)</b>					
Discharge observed	✓				
Floating, suspended, or settleable solids		✓			
Odor		✓			
Oil and grease sheen		✓			
Foam		✓			
Discoloration		✓			
Obvious indicators of pollution		✓			
Evidence of pollutants discharging		✓			
Was a stormwater sample collected?		✓			

**Note:**

1. If visual observation shows presence of floating, suspended or settleable solids, color, odor, foam, visible oil sheen, or other obvious indicators of pollution at the discharge point, a Tier I report will be required as described in Section 5.4 of the Stormwater Pollution Control Plan.

**Monthly Visual Discharge Observation Form  
NW Natural Gasco Property**

<b>Visual inspection of stormwater monitoring point(s) MUST BE completed monthly during a discharge event. If no discharge event occurs during the month, write "NO DISCHARGE" on the last business day of the month.</b>	
<b>Date:</b> 10-16-19	<b>Weather Conditions:</b> Cloudy, Rain 54° F Wind From ESE
<b>Time:</b> 1050-1055	<b>Inspector:</b> Casey Montgomery

	Yes	No	Observations/Notes	If YES: Describe Corrective Actions Needed <sup>1</sup>	Date Completed
<b>Monitoring Location 001 (Outfall 107)</b>					
Discharge observed	X				
Floating, suspended, or settleable solids		X			
Odor		X			
Oil and grease sheen		X			
Foam		X			
Discoloration		X			
Obvious indicators of pollution		X			
Evidence of pollutants discharging		X			
Was a stormwater sample collected?		X			

**Note:**

1. If visual observation shows presence of floating, suspended or settleable solids, color, odor, foam, visible oil sheen, or other obvious indicators of pollution at the discharge point, a Tier I report will be required as described in Section 5.4 of the Stormwater Pollution Control Plan.

**Monthly Visual Discharge Observation Form  
NW Natural Gasco Property**

Visual inspection of stormwater monitoring point(s) MUST BE completed monthly during a discharge event. If no discharge event occurs during the month, write "NO DISCHARGE" on the last business day of the month.	
Date: 11-19-19	Weather Conditions: light Rain, Cloudy 41°F
Time: 0820-0825	Inspector: Casey Montgomery

	Yes	No	Observations/Notes	If YES: Describe Corrective Actions Needed <sup>1</sup>	Date Completed
<b>Monitoring Location 001 (Outfall 107)</b>					
Discharge observed	X				
Floating, suspended, or settleable solids		X			
Odor		X			
Oil and grease sheen		X			
Foam		X			
Discoloration		X			
Obvious indicators of pollution		X			
Evidence of pollutants discharging		X			
Was a stormwater sample collected?	X		Sample ID: 0107-01-111919		

**Note:**

1. If visual observation shows presence of floating, suspended or settleable solids, color, odor, foam, visible oil sheen, or other obvious indicators of pollution at the discharge point, a Tier I report will be required as described in Section 5.4 of the Stormwater Pollution Control Plan.

**Monthly Visual Discharge Observation Form  
NW Natural Gasco Property**

Visual inspection of stormwater monitoring point(s) **MUST BE** completed monthly during a discharge event.  
If no discharge event occurs during the month, write "NO DISCHARGE" on the last business day of the month.

Date: 12-10-19	Weather Conditions: Rain, cloudy 46°F
Time: 1500-1505	Inspector: Casey Montgomery

	Yes	No	Observations/Notes	If YES: Describe Corrective Actions Needed <sup>1</sup>	Date Completed
<b>Monitoring Location 001 (Outfall 107)</b>					
Discharge observed	✓				
Floating, suspended, or settleable solids		✓			
Odor		✓			
Oil and grease sheen		✓			
Foam		✓			
Discoloration		✓			
Obvious indicators of pollution		✓			
Evidence of pollutants discharging		✓			
Was a stormwater sample collected?	✓		Sample ID: 0107-02-121019		

**Note:**

1. If visual observation shows presence of floating, suspended or settleable solids, color, odor, foam, visible oil sheen, or other obvious indicators of pollution at the discharge point, a Tier I report will be required as described in Section 5.4 of the Stormwater Pollution Control Plan.

**Monthly Visual Discharge Observation Form**  
**NW Natural Gasco Property**

Visual inspection of stormwater monitoring point(s) MUST BE completed monthly during a discharge event.  
 If no discharge event occurs during the month, write "NO DISCHARGE" on the last business day of the month.

Date: 1/29/20	Weather Conditions: Rainy, cloudy 49°F wind from SE
Time: 1120-1130	Inspector: Casey Montgomery

	Yes	No	Observations/Notes	If YES: Describe Corrective Actions Needed <sup>1</sup>	Date Completed
<b>Monitoring Location 001 (Outfall 107)</b>					
Discharge observed	X				
Floating, suspended, or settleable solids		X			
Odor		X			
Oil and grease sheen		X			
Foam		X			
Discoloration		X			
Obvious indicators of pollution		X			
Evidence of pollutants discharging		X			
Was a stormwater sample collected?	X		Sample ID: 0107-03-012920		

**Note:**

1. If visual observation shows presence of floating, suspended or settleable solids, color, odor, foam, visible oil sheen, or other obvious indicators of pollution at the discharge point, a Tier I report will be required as described in Section 5.4 of the Stormwater Pollution Control Plan.

**Monthly Visual Discharge Observation Form  
NW Natural Gasco Property**

<b>Visual inspection of stormwater monitoring point(s) MUST BE completed monthly during a discharge event. If no discharge event occurs during the month, write "NO DISCHARGE" on the last business day of the month.</b>	
Date: 2-23-20	Weather Conditions: Cloudy 42°F Wind from W
Time: 0930-0935	Inspector: Casey Montgomery

	Yes	No	Observations/Notes	If YES: Describe Corrective Actions Needed <sup>1</sup>	Date Completed
<b>Monitoring Location 001 (Outfall 107)</b>					
Discharge observed	X				
Floating, suspended, or settleable solids		X			
Odor		X			
Oil and grease sheen		X			
Foam		X			
Discoloration		X			
Obvious indicators of pollution		X			
Evidence of pollutants discharging		X			
Was a stormwater sample collected?		X	Discharge observed not during or immediately after rain event.		

**Note:**

1. If visual observation shows presence of floating, suspended or settleable solids, color, odor, foam, visible oil sheen, or other obvious indicators of pollution at the discharge point, a Tier I report will be required as described in Section 5.4 of the Stormwater Pollution Control Plan.