CITY OF PORTLAND
ENVIRONMENTAL SERVICES

Water Pollution Control Laboratory

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

September 15, 2020

*Delivered Via Email: robe@hahnenv.com*

Rob Ede
NW Natural Gas
7900 NW St Helens Road
Portland, OR 97210

**RE: July 2020 Industrial Permitting Inspection – IWDP 500.022**

To Rob Ede:

The City of Portland (the City), Industrial Permitting Section, conducted an inspection of NW Natural Gas located at 7900 NW St Helens Road Portland, OR 97210 on July 21, 2020. The purpose of the inspection was to evaluate NW Natural Gas's compliance with Industrial Wastewater Discharge Permit (IWDP) 500.022. There were no deficiencies noted during the inspection that will require action.

If you have any questions or need additional information, please contact me at 503-823-5538 or Timothy.Brooks@portlandoregon.gov.

Very Respectfully,

Tim Brooks
Permit Manager, Industrial Permitting Section
City of Portland, Bureau of Environmental Services



The City of Portland complies with all non-discrimination laws including Title VI (Civil Rights) and Title II (ADA).
To request a translation, accommodation or additional information, please call 503-823-7740, or use City TTY 503-823-6868, or Oregon Relay Service: 711.

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# Pretreatment Inspection Form

**Date:** 7/21/2020 Arrival Time: _____ (Announced) or Unannounced (circle one) ☐ Annual ☒ Biennial ☐ Pre-permit

**Permittee:** NW Natural Gas
**Site Address:** 7900 NW St Helens Road
**Permit Number:** 500.022
**Business Type:** Groundwater treatment and Disposal

**Contact Info:** Bob Wyatt 503-226-4211
Rob Ede 503-796-0717
**Sewer System Type:** (Separate) or Combined?
**Expiration Date:** 2/15/2022
**Permit Manager:** Tim Brookes

| | Pre-Inspection Notes |
|---|---|
| **Review Permit:** yes | Permit expires 2/15/2022. Permittee is authorized to discharge treated groundwater from the remediation of a former oil gas manufacturing site. |
| **Review Application:** yes | Total water use 343,827 gpd. Domestic use 62 gpd, Process Water Discharged 340,000 Backwash Water 1850 gpd, Plant Cleanup/Washing 1915 gpd |
| **ASPP Current/Compliant** yes | ASPP is compliant. Last revision and update on July 25, 2018. |
| **Review Monitoring and Analyte History Trends:** | In the event treated process wastewater is discharged to the City sanitary sewer the permittee must monitor for the following pollutants parameters (schedule B) during each month of the discharge. |
| **Enforcement Actions Since Last Inspection:** **Review of Onsite Corrective Actions:** | No enforcement actions since last inspection on 11/1/2018. There were no required actions discussed during the exit conference of the inspection. |
| **Signatory Authority Current? Meets Rule Criteria?** | Received 4/20/2017. Robert Ede is signatory authorization designee Robert Wyatt is responsible corporate official. |
| **Required Management Plan/ Special Conditions:** *(i.e. SW Reduction, Hauled Waste, Waste Acceptance, O&M, TOMP)* | Stormwater Permit 100J, 1500A<br>The Permittee must notify the City 48 hours in advance of commencing a planned, scheduled discharge to the sanitary sewer. The notification must include the reason for diverting the discharge to the City, and the projected duration of the discharge. The Permittee shall maintain a log documenting all pH meter calibrations and checks. |
| **Review Submeter:** *(if in submeter program complete Submeter Program Inspection Form)* | Discharge Meter # P7S754489 (Pacific Terminals) Last read 2/12/2020 : 168661<br>Discharge Meter # P456C5182 (SES GTS) last read 2/12/2020 : 608480 |
| **Average Daily Flow:** Process Only or Total Flow? | Current: N/A<br>Previous: N/A<br>% Change: N/A<br>No discharges in 2018<br>No discharges in 2019<br>Explain changes +/- 20%<br>Last discharge was in 2015 May 18-21 of 2015 |
| **Permitted Waste Streams** (if multiple POCs list for each WS) | The permittee is authorized to discharge treated groundwater from the remediation of a former oil gas manufacturing site to the City of Portland's sewer system on a contingency basis, when discharge to the Willamette River is not possible. The preferential route for this treated groundwater is the Willamette River under an NPDES permit |
| **Permitted Pretreatment System:** | ☐ BMPs ☐ Chemical Precipitation ☐ Clarifier<br>☐ DAF ☒ Filtration (Type: Bag filters)<br>☒ OWS ☒ pH Adjustment ☐ Screening<br>☒ Other: EQ Tank<br>Two treatment systems on site<br>Groundwater from the Siltronic site<br>Groundwater from the NW Natural Wells<br>Wastewater is treated through an O/W separator, air stripper and EQ Tank prior to being co-mingled |

**Comments:** N/A



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| RECORDKEEPING AND REPORTING | | |
|---|---|---|
| **ASPP Training Records/Spill Signage:** | (Yes) No | ASPP last received in July 2016. IU states that there have been no changes to the ASPP. ASPP Training is conducted quarterly. last training 4/29/2020. |
| **Hauled PT Waste Generation?** | (Yes) No | *(if yes complete Waste Haul Form)* Waste generated from the pretreatment process. |
| **PT Sys O&M Records?** | (Yes) No | O&M plan last received in March 2016. IU states that there have been no changes to the O&M plan. |
| **Self pH Measurement for Compliance?** | (Yes) No | Grab or ~~Continuous?~~ Calibration Log Maintained? pH Meter is calibrated weekly. Complete? last calibration conducted on 7/15/2020. Log being maintained. |
| **Verification of Self-Reported Results including CpH data** | List dates/months reviewed/discrepancies. | CpH data is monitored via SCADA. |
| **Flow:** (Measured) or Estimated | Explain/verify calculations: | Flow is measured with a Sitrans Mag Meter. The meter is calibrated annually. last calibration on 1/31/2020. |
| **Comments:** N/A | | |

| FACILITY TOUR (Reference Site Plan) | |
|---|---|
| **Area(s)** | **Observation** |
| (Un)Loading and Storage | Haz/Non-Haz solids is stored at the Siltronic treatment area. Solids are hauled off. Chemicals are stored at both the Siltronic and NW Natural treatment areas in secondary containment. Main treatment area has chemical storage area and stored waste generated from the pretreatment process. |
| Process | Site contains contaminated ground water that is treated prior to discharging into the Willamette River. Waste water is generated from the ground water remediation system. |
| Pretreatment | Two treatment areas located outside for both Siltronic and NW Natural. Treatment areas have O/W separators, air stripper, and EQ tanks. Additional EQ tanks located between the siltronic and NW Natural treatment areas for back-up. Wastewater is combined from both treatment areas and sent to the main treatment area where flocculent is added and solids are removed as sludge. Wastewater is also filtered prior to discharge. |
| Boiler Room/Cooling Tower | IU states that there is no boiler room or cooling tower. |
| Chemical Storage Area | Chemical storage is located in the main treatment area with secondary containment. There is a drain in the chemical storage area that leads to a blind sump, if a spill occurs, the spilled chemicals are pumped out. |
| Others (i.e. maintenance shop, laboratory) | Maintenance shop is located inside the main treatment building. General maintenance is conducted in the area. There are no drains in the maintenance area. No chemicals or oils stored in the maintenance area. |

Point of Compliance(s) Description (if multiple POCs complete Multiple POC Inspection Form):

Describe physical condition of Point of Compliance: POC is being maintained

| | | |
|---|---|---|
| POC(s) been evaluated for compliance with the MAS Rule? | YES | NO |
| Categorical process monitoring location? | (YES) | NO |
| If yes, any contributing non-categorical process wastewater? | YES | (NO) |
| Any flows/pipes/hoses that have not been accounted for? | YES | (NO) |

If yes, explain: N/A



NWN-PCI0787822

| EXIT CONFERENCE AND DEFICIENCIES NOTED DURING INSPECTION |
|---|
| **Deficiencies Noted During Inspection:** |
| 1. |
| 2. |
| 3. |
| **Additional Comments/Follow Up Items:** N/A |

| ATTENDEE LIST | | |
|---|---|---|
| Facility Representative(s) Present: William Byrd | | |
| Rob Ede | | |
| City of Portland Representative(s) Present: Tim Brooks | | |
| Printed Inspector Name: Tim Brooks | Signature: Timothy Brooks | Date: 7/21/2020 |

Departure Time: _____



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# Waste Haul Form

NWN-PCI0787825

**WASTE GENERATED FOR OFFSITE DISPOSAL ☒ YES ☐ NO**

| Waste Type | Process | Quantity | Hauler | Destination | Frequency |
|---|---|---|---|---|---|
| 1. Waste filter bags | pretreatment | 3-4 tons estimated | West Coast Marine | Hillsboro | Once a year |
| 2. Sludge (filter cake) | pretreatment | 7-8 tons estimated | West Coast Marine | Hillsboro | 3 times a week |
| 3. Wash Solids | pretreatment | 24,000 gallons estimated | West Coast Marine | Arlington | As needed |
| 4. | | | | | |
| 5. | | | | | |
| 6. | | | | | |
| 7. | | | | | |
| 8. | | | | | |
| 9. | | | | | |
| 10. | | | | | |

**Is there 3+ Years of Waste Haul Records?** ☒ **YES** ☐ **NO**
**Is there a significant change in waste generation or frequency?** ☐ **YES** ☒ **NO**
**If yes, Explain:** N/A

**Last Haul Date(s):** N/A

**Comments:** N/A