



CITY OF PORTLAND ENVIRONMENTAL SERVICES



Water Pollution Control Laboratory

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

February 7, 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 January 26, 2023 to assess compliance with the 1200-Z National Pollutant Discharge Elimination System Industrial Stormwater 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:

1200-Z Inspection Findings

Narrative Technology-Based Effluent Limits, *Schedule A.1*: At the time of the inspection, the facility met the standards set forth in the permit for narrative technology based effluent limits. Exposure of manufacturing, processing, material storage areas, loading and unloading areas, disposal, cleaning, and maintenance were being minimized to stormwater to the extent technologically available and economically practicable and achievable in light of best industry practice.

Inspections, *Schedule B.12.a*: Monthly inspections of areas where industrial materials or activities are exposed to stormwater and where stormwater control measures, structures, catch basins, and treatment facilities are located were conducted on schedule and no deficiencies were noted.

Inspections, *Schedule B.12.a.vii*: Monthly visual observations for the presence of floating, suspended or settleable solids, color, odor, foam, visible oil sheen, or other indicators of pollution in the facility's stormwater discharge at all discharge points were conducted on schedule and no deficiencies were noted.

Employee Education, *Schedule A.1.j*: Employee education for the 2022/23 permit year was conducted on July 20, 2022 and within 30 days for new employees. No deficiencies were noted regarding the training program content.

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 and clear of sediment and was last maintained in July 2020. Based on facility records and the preventative maintenance frequency detailed in the SWPCP, the filter in this catch basin is due for replacement this summer.
- The StormFilter vault is in good working condition and was last maintained in January 2022.

The City appreciates NW Natural's commitment to protecting water quality in the Portland Harbor. Please contact me at 503-865-6555 if you have any questions.

Sincerely,



Angelica Greene
Industrial Stormwater Program