



CITY OF PORTLAND ENVIRONMENTAL SERVICES



Water Pollution Control Laboratory

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

October 5, 2023

Eric Morillo
Standard Steel Companies
1745 NE Columbia Blvd
Portland, OR 97211
emorillo@standardsteelnw.com

RE: **Pre-Enforcement Referral**, Failure to Meet Monitoring Requirements –
Schedule B.7
Warning with Opportunity to Correct, Failure to Timely Submit DMR –
Schedule B.13
Standard Steel Companies; EPA #ORRZ00020

Dear Gage Martin:

The City of Portland did not receive your company's Industrial Stormwater Discharge Monitoring Reports for the monitoring year July 1, 2022 through June 30, 2023. Reporting procedures and monitoring for pollutants did not meet permit requirements.

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.

Pre-Enforcement Referral

The facility's permit was assigned on January 25, 2023. *Schedules B* and *E* of the permit require permit registrants to collect stormwater samples at each monitoring location identified in the site's Storm Water Pollution Control Plan as described in the permit assignment monitoring requirements letter. Please note the following:

- Based on specific rainfall data collected in the vicinity of your facility, there were sufficient rain events from January 25, 2023 until the end of the 2022-23 permit year to sample the required two storm events at your facility. Rainfall data is available on the City's HYDRA Rainfall Network (<http://or.usgs.gov/non-usgs/bes/precip.html>).
- No samples were collected at MP001 or MP003 for benchmark and impairment parameters.

Warning with Opportunity to Correct

No DMRs were received by the City during the reporting year. Even though monitoring did not take place, the facility must submit the third quarter and fourth quarter DMRs within 30 days. The DMR document contains instructions for how to indicate that no samples were taken. The signature pages must have handwritten signatures, and the DMRs must be mailed to the following address:

Attn: Melanie Roy
Industrial Stormwater Group
6543 N Burlington Ave
Portland, OR 97204

Standard Steel has violated ORS 468B.025(2) and Schedule B condition 7 of the Permit by failing to collect samples during the 2022-2023 monitoring year at MP001 and MP003. This violation is being referred to the Oregon Department of Environmental Quality's Office of Compliance and Enforcement (OCE) for potential formal enforcement.

Please contact me at 503-865-6929 or melanie.roy@portlandoregon.gov if you have any questions.

Sincerely,



Melanie Roy
Industrial Stormwater Program

cc: Nancy Fischer
Gage Martin
DEQ Office of Compliance and Enforcement
Benjamin Benninghoff, Oregon DEQ