



# CITY OF PORTLAND ENVIRONMENTAL SERVICES



Water Pollution Control Laboratory

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

March 28, 2024

Gage Martin  
Standard Steel Companies  
1745 NE Columbia Blvd  
Portland, OR 97211  
[gmartin@standardsteelnw.com](mailto:gmartin@standardsteelnw.com)

Re: **Warning, Schedule B**  
**Warning with Opportunity to Correct, Schedule A.11**  
Stormwater Inspection – Standard Steel Companies, 1745 NE Columbia Blvd, EPA  
#ORRZ00020

Dear Gage Martin:

The City of Portland (City) conducted an inspection of Standard Steel (facility) on March 14, 2024 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 Meet Inspection Requirements, Schedule B.12:** The facility failed to properly conduct inspections in accordance with permit requirements:
  - The visual observation form includes 1) a field for confirming the presence of any indicators of pollution (odor, foam, color, sheen, floating solids, settleable solids), and 2) a field for documenting the nature of the discharge (rain or snow). Between November through January of 2024, the indicator of pollution field was left blank. In January and February 2024, the nature of discharge field was left blank. Without a complete form, the City cannot verify that visual observations were conducted properly. Moving forward, ensure that all fields of the form are completed.
  - If there is not sufficient rainfall in the month to produce a discharge, then the facility must write explicitly on the visual observation form that there was “no discharge this month.” The facility must wait until the last business day of the month to make this determination.
- **Failure to Keep Records, Schedule B.16:** The facility failed to maintain records of catch basin cleaning. Section 3.9 of the SWPCP states that catch basins will be cleaned annually. As discussed during the inspection, the facility may document maintenance on the monthly inspection form with a

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handwritten note that includes the date of cleaning, and which catch basins were serviced. Alternatively, the facility may retain vendor invoices to use as documentation. All preventative maintenance must be documented in this manner to ensure that the SWPCP is being implemented as written. This includes changing of catch basin filters, sweeping, maintenance of the infiltration basins, and cleaning of the sedimentation manhole.

**WARNING WITH OPPORTUNITY TO CORRECT:**

Failure to correct any of the violations noted below will result in a referral to DEQ Office of Compliance and Enforcement (OCE) for formal enforcement.

- **Failure to Prepare a Tier 1 Corrective Action Response, *Schedule A.11*:** The facility failed to complete a Tier 1 corrective action response within 30 days following receipt of laboratory results for total copper, total phosphorus, and TSS, which exceeded benchmarks for the sample collected on December 5, 2023. A Tier 1 report for the December 5, 2023 exceedances must be submitted within 30 days that meets permit requirements, including the date the corrective action(s) are completed or are expected to be completed. The facility stated during the inspection that they have increased the catch basin filter replacement frequency. This type of increased preventative maintenance would be an appropriate Tier 1 corrective action response; the SWPCP would need to be updated to reflect the new frequency.

The following items are required to ensure compliance with the permit:

- **Employee Education, *Schedule A.1.j*:** The permit requires facilities to train personnel responsible for the storage and handling of materials that may contribute pollutants to stormwater. The facility conducted employee education on August 31, 2023, but only to those who assist with monthly inspections and visual observations. The facility must do the following:
  - Moving forward, expand the training to all employees that work in the exterior storage and processing areas. Ensure that training is conducted within 30 days of hire and annually thereafter. Maintain records of both new hire training and annual training.
  - Provide the City with the content of the training within 30 days. The content can be in the form of an outline of topics if the training is given verbally. The permit requires that education cover specific onsite control measures including spill response and housekeeping, as well as an overview of monitoring, inspection, reporting, and documentation requirements.
- **Implementation of the Stormwater Pollution Control Plan (SWPCP), *Schedule A.8*:** The sedimentation manhole receives roof drainage from the storage shed, and Section 3.9 of the SWPCP states that it will be cleaned annually. The facility confirmed that the sedimentation manhole has not been cleaned since the previous annual inspection. Moving forward, ensure that preventative maintenance is conducted at the frequency described in the SWPCP. Please see the attached list of contractors that service sedimentation manholes.
- **Stormwater Pollution Control Plan (SWPCP), *Schedule A.10*:** The SWPCP for this facility was submitted on September 28, 2023. The SWPCP was reviewed by the City for compliance with the permit and revisions must be made to incorporate required information. Please submit the revised SWPCP within 30 days. The SWPCP must be signed in accordance with 40 CFR 122.22. Please submit the SWPCP revisions with the required original signatory certification.
  - *Schedule A.10.b*: Update Section 2.6.1 to state that the sedimentation manhole discharges into the infiltration gallery, but also overflows to ML-001.

- *Schedule A.10.b.i:* Revisions to the map are necessary. Please make the following changes:
  - Add the underground infiltration gallery that receives drainage from the sedimentation manhole as described in Section 2.6.1. This infiltration gallery is distinct from the galleries beneath the infiltration basins. Please see the attached plan set, in which the infiltration gallery is labelled as “16207.”
  - Add the locations and descriptions of spill prevention and cleanup materials to the map.
- *Schedule A.10.b.ii:* The diesel AST in Drainage Area 2 is used by the facility to fuel forklifts. Update Sections 2.2 and 3.2, which currently state that the diesel AST is not in use and fueling is not conducted onsite. Clarify that the AST is covered and in secondary containment.
- *Schedule A.10.b.vi:* Add specific maintenance frequencies for the following control measures:
  - Add replacement frequencies for all three catch basin filters. As discussed during the inspection, the filter in the CB at ML-003 appears to need more frequent replacement than the other two catch basins due to customer traffic, so ensure that this is reflected in the SWPCP. **Maintain records of this maintenance.**
  - Section 3.9 of the SWPCP only includes a cleaning frequency for the CB at ML-003. Add a cleaning frequency for the trench drain and two catch basins north of the processing building. During the inspection, the facility stated that this is performed annually. **Maintain records of this maintenance.**
- **Monitoring Variance, Schedule B.8:** If the facility does not collect two samples at ML-001 (outlet of the infiltration basins) by the end of the monitoring year on June 30, 2024, then the facility must submit another request for a monitoring variance. Please note the following:
  - The monitoring variance will be due on **August 15, 2024**, and must include documentation to substantiate that discharge did not occur at ML-001.
  - Documentation should include dated and timestamped photographs of ML-001 during rainfall. As previously instructed, the facility **must** target heavy rain events (1” in 24 hours) but should still attempt observations during lighter rainfall in case heavy rainfall does not occur this spring. The City provided instructions for how to anticipate 1” in 24 hours in a previous email.
  - If discharge occurs at ML-001, then the facility **must** collect a stormwater sample and report the results in the DMR, so keep a spare sample kit on-hand.
  - The City recommends that a mat be placed on top of the manhole cover at ML-001 to prevent rainfall from entering through the holes.

**The City recommends the following actions to protect water quality:**

- Section 2.6.3 of the SWPCP states that the facility plans to scope the CB at ML-003 to confirm its discharge point. Currently, the facility assumes that the CB discharges to the City’s storm sewer system and ultimately the Columbia Slough, but this connection has not been verified. The City **strongly** recommends that the facility perform this scope to confirm if stormwater from Drainage Area 3 discharges to the City’s storm system. Update the City with the results of this investigation. Many of the vector contractors in the attached list also offer scoping services.

***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 infiltration basins, a sedimentation manhole, and an underground infiltration gallery.

**Observations:**

- The infiltration basins are mostly well-vegetated with some bare spots. Some minor sediment has accumulated at the north inlet to the north infiltration basin. Metal storage is encroaching on the southern end of the south infiltration basin.
- The sedimentation manhole has not been cleaned in the past year but appears to be functioning as designed.
- The underground infiltration gallery cannot be seen from the surface but appears to be functioning as designed.

**Comments:**

- Remove the metal storage that is encroaching into the south swale.
- Replant the swale this spring to meet the 90% vegetative cover requirement in the O&M plan. Please see the attached native plant list.
- Remove sediment from the north swale if standing water is observed 48 hours after a rain event per the O&M plan.

The City appreciates Standard Steel's commitment to protecting water quality in the Columbia Slough. Please contact me at [melanie.roy@portlandoregon.gov](mailto:melanie.roy@portlandoregon.gov) or 503-865-6929 if you have any questions.

Sincerely,



Melanie Roy  
Industrial Stormwater Program