



CITY OF PORTLAND ENVIRONMENTAL SERVICES



Water Pollution Control Laboratory

6543 N Burlington Avenue, Bldg 217, Portland, Oregon 97203 ■ Mingus Mapps, Commissioner ■ Michael Jordan, Director

March 21, 2022

Gage Martin
Standard Steel Companies
gmarting@standardsteelnw.com

RE: **NPDES Industrial Stormwater Discharge General Permit 1200-Z Required**
Stormwater Inspection – Standard Steel Companies, 1745 NE Columbia Blvd.

Dear Gage Martin:

The City of Portland (City) inspected Standard Steel Companies on March 14, 2022. The purpose of the inspection was to determine if the site is required to obtain a National Pollutant Discharge Elimination System (NPDES) [General Industrial Stormwater Permit No. 1200-Z](#) (stormwater permit). In addition, the City inspected the stormwater management facilities that are covered under [Portland City Code 17.38](#). Correspondence related to this portion of the inspection will be sent in a separate letter.

Stormwater regulations for the Columbia Slough watershed require businesses with specific Standard Industrial Classification (SIC) codes or the exposure of certain industrial activities to rainfall and discharge to surface waters to apply for a stormwater permit. The SIC code for your business is [5051-Metal Service Centers and Offices](#), a SIC code that does not require stormwater permit coverage; however, the recent visit confirmed that activities that require stormwater permit coverage per Table 2 of the 1200-Z stormwater permit are taking place onsite and are exposed to stormwater in areas that discharge to the Columbia Slough. Standard Steel Companies is required to apply for a 1200-Z stormwater permit. The activities requiring a permit are:

- Outdoor storage of steel
- Outdoor storage of scrap metal containers

Drainage Description

The site has two infiltration basins on the western edge of the property. Both infiltration basins receive sheet flow from the central portion of the lot. In addition, the southern infiltration basin receives stormwater from the conveyance swale and landscaped area. The northern swale also receives stormwater from the trench drain located at the northwest driveway and from two catch basins located in the northern portion of the site. Each infiltration basin is equipped with overflow pipes that discharge to subgrade rock infiltration galleries designed for the 10-year storm event. During rain events larger than the 10-year event, a ditch inlet (which was not observed during the inspection) allows water to bypass the rock galleries and discharge into the City's storm sewer system on NE 17th Ave. which discharges to the Columbia Slough.

A sedimentation manhole, located in the central portion of the site, receives roof runoff from the west half of the original building and from the roof of the new north storage building via underground piping. The sedimentation manhole discharges to an underground gravel infiltration trench, also referred to as a rock infiltration gallery, which is located adjacent to the original building. The sedimentation manhole has an overflow pipe that discharges to the City's storm sewer on NE 17th Ave.

A catch basin located in the employee/customer parking lot discharges directly to the City's storm sewer system on NE Columbia Blvd. Another catch basin located at the gated entrance area in the southeastern portion of the site and was completely clogged with sediment. The discharge location for this catch basin is unknown. Information from the Oregon Department of Environmental Quality's (DEQ) [Environmental Cleanup Site Information](#) indicates that this catch basin is not a drywell and is not connected to the City's storm sewer system. This catch basin appears to have been inadvertently omitted from Standard Steel's 2015 redevelopment as-built drawings. DEQ's website also indicates that drywells may still exist on the site receiving drainage from the original building roof and possibly interior floor drains. Please note that interior floor drains should not discharge to drywells due to the potential for groundwater contamination. Standard Steel should investigate this further and decommission any interior floor drains that are not piped to the City's sanitary sewer system.

Stormwater from the eastern portion of the lot, near the diesel above-ground storage tank, sheet flows to the vegetative area between properties.

The following actions are **recommended** by the City to protect water quality:

- State regulations require facilities to register their Underground Injection Control (UIC) facilities with the Oregon Department of Environmental Quality's (DEQ) [Underground Injection Control Program](#). The north and south swale are considered UICs because of the depth of the gravel infiltration gallery. The underground infiltration gallery adjacent to the original building is also considered a UIC and must be registered with DEQ. The link above includes registration and contact information.

The attached stormwater permit application packet contains:

- 1) The 1200-Z Stormwater Permit application with instructions.
- 2) A Land Use Compatibility Statement to be approved by the City's Bureau of Development Services.
Please note this process can take several weeks so it is imperative to get this process started immediately.
- 3) A Stormwater Pollution Control Plan (SWPCP) checklist. A SWPCP must be developed and submitted as part of your permit application as both a hard copy and an electronic copy, preferably as a PDF file.
- 4) A laboratory and consultant list.

Please submit your permit application by May 2, 2022. If the application package is not received by the due date, the matter may be referred to Oregon Department of Environmental Quality for enforcement. Please submit the application to and contact Angelica Greene at Angelica.Greene@portlandoregon.gov or 503-823-7554 if you have any questions or need any assistance.

Sincerely,



Kathy Balogh
Industrial Stormwater Program

C: Loren Koplan, President, Standard Steel Companies
Christine Svetkovich, Oregon Department of Environmental Quality
Derek Sandoz, DEQ UIC Program
Angelica Greene, City of Portland, BES Industrial Stormwater Program

Encl: 1200-Z Stormwater Permit Application