



CITY OF PORTLAND ENVIRONMENTAL SERVICES



Water Pollution Control Laboratory

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

August 31, 2023

Gage Martin
Standard Steel Companies
1745 NE Columbia Blvd
Portland, OR 97211
gmarting@standardsteelnw.com

RE: 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 Companies (facility) on June 7, 2023. The purpose of the inspection was to review permit requirements and assess compliance with the 1200-Z National Pollutant Discharge Elimination System Industrial Stormwater Permit (permit) issued to the facility on January 25, 2023.

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

Waste Chemical and Material Disposal, *Schedule A.1.c*: The permit requires that sites cover all waste contained in bins or dumpsters where there is a potential for drainage of stormwater through the waste to prevent exposure of stormwater to these pollutants. This includes small scrap bins. Acceptable covers include storage of bins or dumpsters under roofed areas or use of lids or properly secured temporary covers such as tarps. Please send the City verification that covers have been installed within 30 days.

Spill Prevention and Response Procedures, *Schedule A.1.h*: The permit requires that sites store all hazardous substances, petroleum/oil liquids, and other chemical solid or chemical liquid materials that have potential to contaminate stormwater within berms or secondary containment, under cover, or in an area of the site that does not drain to storm. During the inspection, the City observed several drums stored on the pavement without containment. Please send the City verification that drums have been stored properly within 30 days.

Employee Education, *Schedule A.1.j*: The permit requires that the site develop and maintain an employee education program. Ensure that all the requirements of the permit are included in the training. Specific information regarding the Narrative Technology-Based Effluent Limits and housekeeping practices implemented on site is required. In addition, training regarding monitoring, inspection, reporting and documentation requirements must be provided for staff implementing these tasks. Training must occur within 30 days of hire and annually thereafter, and within 30 days of a change in duties for key personnel.

Stormwater Pollution Control Plan (SWPCP), Schedule A.10: The SWPCP for this facility was submitted in September 2022 and was reviewed by the City for compliance with the permit. Please submit an updated SWPCP with the following revisions **within 30 days**.

- *Schedule A.7.b.iii:* The SWPCP does not address the location and description of areas of known or discovered significant materials from previous operations. Include a discussion of the history and pollutants associated with the Oregon Department of Environmental Quality Environmental Cleanup Site Information (ECSI) number 4144.
- *Schedule A.10.v:* Update the cover page with correct permit and file numbers.
- *Schedule A.10.b.i:* Revisions to the map are necessary. Please make the following changes:
 - ☐ Add any curbing that is used to direct or divert stormwater,
 - ☐ Add directional flow arrows to the storm lines and trench drain,
 - ☐ Include the soakage trench.

Inspection Requirements, Schedule B.12: The permit requires that sites inspect areas where industrial materials or activities are exposed to stormwater and areas where stormwater control measures are located, on a monthly basis. The permit also requires that sites perform visual observations of stormwater discharge during a rain event each month that the site is in operation. Facility inspections and visual observations of stormwater are two separate permit requirements. Please review *Schedule B.12* of the permit closely and ensure that inspections are performed and documented each month.

Recordkeeping, Schedule B.16: The permit requires that the facility maintain a copy of all stormwater records onsite. Please review this section of the permit carefully. Moving forward, the site must begin documenting the maintenance and repair of control measures and corrective actions. This includes, but is not limited to, documenting catch basin cleaning, catch basin filter replacement, pavement cleaning and/or sweeping, and any other source control measure implemented onsite.

The City recommends the following actions to protect water quality:

- The City recommends regular removal of invasive species like Himalayan blackberry from around the site. Blackberry is pervasive and can quickly overrun and out compete natural vegetation, especially in areas with small footprints, like bioswales and infiltration basins.
- The City recommends the site obtain proper lifting tools, like a manhole puller, for accessing and inspecting the facility's discharge point.
- The Permit requires that spill notification information be in locations that are readily accessible and available. The City recommends that the facility post spill notification numbers in areas that have the highest risk for spills, like the hydraulic oil shed. Signage should include the facility's emergency response contact, the City Spill Hotline at 503-823-7180, and Oregon Emergency Response (OERS) at 800-452-0311. All spills that may endanger health of the environment must be reported.

The City appreciates Standard Steel's commitment to protecting water quality in the Columbia Slough. Please contact me at angelica.greene@portlandoregon.gov or 503-865-6555 if you have any questions.

Sincerely,



Angelica Greene
Industrial Stormwater Program