



CITY OF MILWAUKIE

City of Milwaukee
Public Works Department

HIGH PRIORITY INDUSTRIAL FACILITY STORMWATER INSPECTIONS

Standard Operating Procedure #10.05

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Approved:

Public Works Director

Date

Climate and Natural Resources Supervisor

Date

TABLE OF CONTENTS

1.0	ACRONYMS AND DEFINITIONS	3
2.0	PURPOSE & APPLICABILITY	4
3.0	METHOD SUMMARY	4
4.0	HEALTH & SAFETY CONCERNS	5
5.0	PERSONNEL QUALIFICATIONS	5
6.0	EQUIPMENT & SUPPLIES	6
7.0	PROCEDURAL STEPS	6
8.0	RECORDS MANAGEMENT	8
9.0	SOP REVISIONS.....	9
	APPENDIX A: 1200Z Permit Qualified Facilities.....	10

1.0 ACRONYMS AND DEFINITIONS

TERM	DEFINITION
BMP	Best Management Practices
COM	City of Milwaukie
DEQ	Oregon Department of Environmental Quality
ESC	Environmental Services Coordinator – City of Milwaukie staff
Industrial Stormwater Discharge Permit (1200Z Permit):	A DEQ permit that regulates industrial facilities that discharge stormwater to surface waters or to conveyance systems that discharge to surface waters.
Inspector	The designated city staff member assigned with performing onsite or remote evaluations within the city.
MS4	Municipal Separate Storm Sewer System - the City's dedicated system for conveying stormwater runoff to receiving streams.
NAICS	North American Industrial Classification System - standard used to classify businesses for federal agencies in collecting, tabulating, analyzing and presenting statistical information on the US economy.
NPDES	National Pollutant Discharge Elimination System – Created by the Clean Water Act, the NPDES is a federal regulatory permitting program for point-source pollutant discharges into qualified waters of the United States .
PPE	Personal protective equipment
Point Source Pollution	Any single identifiable source of pollution from which pollutants are discharged, such as a pipe, ditch, ship or factory smokestack. Factories and sewage treatment plants are two common types of point sources.
SIC	Standardized Industrial Classification - standardized method of classifying business/industrial activity, representing principal segments of an economy with a numerical code
SOP	Standard Operating Procedure
Stormwater Management Plan (SWMP):	Stormwater Management Plan - COM's comprehensive plan to reduce and prevent pollution from entering Milwaukie's rivers and streams and meet state and federal stormwater permits and regulations.

2.0 PURPOSE & APPLICABILITY

The purpose of this Standard Operating Procedure (SOP) is to establish uniform procedures pertaining to the preparation for, the performance of, and the reporting of inspections at high priority and industrial facilities as performed by the City of Milwaukie Public Works Department. The inspections are performed as a means of evaluating the compliance of stormwater discharges from applicable high priority and industrial facilities to the City of Milwaukie's stormwater system, with City stormwater rules and regulations.

This SOP shall also serve as a guide for how the City of Milwaukie (COM) will satisfy the requirements of the City's NPDES MS4 permit and the City's Stormwater Management Plan (SWMP) by monitoring local stormwater systems and assisting the Oregon Department of Environmental Quality (DEQ) with their [industrial stormwater NPDES discharge \(1200Z\) permit](#) compliance in the city.

The policies and procedures of this SOP are applicable to all City of Milwaukie personnel involved in the planning, preparation, conducting, and reporting of inspecting high priority and industrial facilities within City of Milwaukie city boundaries.

The inspector may deviate from these procedures when necessary due to unexpected or unique circumstances that may occur in the field. Any deviation must be appropriately documented in inspection reports and/or other regulated reporting documents impacted by the deviation.

3.0 METHOD SUMMARY

COM will screen new and existing industrial facilities located within city limits to assess whether they have the potential to be subject to a DEQ 1200Z permit or have the potential to contribute a significant pollutant load to the MS4 permit boundary. The Environmental Services Coordinator (ESC) receives notifications of new businesses that have located within Milwaukie and have registered to pay the annual Milwaukie business tax. The ESC will review the new business registration list and will formally notify the listed contact(s) for a business if the facility may require 1200Z permit through applicable SIC or NAICS codes or is listed as a type of industrial source required to obtain permit coverage in the current 1200Z permit and MS4 permit. After ESC review of the business registration list, the city will notify the business and DEQ of potential permit applicability within 30 days.

Once during the permit term, the City of Milwaukie will review the existing business registration inventory to determine whether any existing or new facilities will be subject to a 1200Z permit. This determination will occur based on a review of the facilities processes, proposed activities and the applicable SIC or NAICS codes related to the 1200 series NPDES permit plus any available guidance from DEQ for determining permit issuance. If a facility is identified that would be subject to an industrial stormwater

NPDES permit, the facility and DEQ will be notified within 30 days of making the determination a permit is needed.

The City of Milwaukie will maintain and routinely update an inventory of all industrial facilities in the permit area that are covered by a 1200Z permit. Onsite inspections of industrial facilities holding 1200Z permits will be performed by city staff two times during the permit term. The City will refer to the DEQ database for identification and/or verification of current 1200Z permit holders prior to scheduling industrial facility inspections.

Industrial facilities that hold 1200Z permits will be inspected for the potential to discharge pollutants to Milwaukie's MS4 only and not for permit compliance. The 1200Z permits are issued by Oregon Department of Environmental Quality and permit enforcement is within their jurisdiction. The inspections are the City of Milwaukie's strategy to reduce pollutants in stormwater discharges to the MS4 from industrial & commercial facilities.

4.0 HEALTH & SAFETY CONCERNS

Health and safety concerns will vary greatly depending on what type of facility the inspector is visiting. Personal Protective Equipment (PPE) such as safety glasses and appropriate footwear should be worn for most industrial facilities. The inspector should discuss PPE requirements with their supervisor ahead of inspections if needed and follow PPE requirements the facility has for visitor safety. PPE should be discussed when contacting a facility to schedule an inspection.

The inspector may be subject to loud noises, dusts, unpleasant odors, unstable footing, heat or cold, moving machinery, flying debris or other nuisances. The inspector should follow current city policy to mitigate and protect against these exposures.

5.0 PERSONNEL QUALIFICATIONS

1200Z inspections will be an assigned responsibility of the Environmental Services Coordinator (ESC) but may be performed by other city staff as appointed or approved by the Public Works Director. City staff performing 1200Z inspections must be informed and aware of the current City stormwater code, applicable NPDES and 1200Z permit requirements, and signs and indications of pollutant discharges at industrial facilities.

6.0 EQUIPMENT & SUPPLIES

Administrative Materials

The inspector needs to have sufficient inspection forms and a pen to fill them out with. A digital or cell phone camera should be carried to document the condition of the facility and the surrounding property. A copy of the COM MS4 permit, SWMP and current stormwater code and regulations should be available to the inspector. A site map of the facility with stormwater infrastructure overlays should be printed ahead of the inspection for use during the inspection to verify MS4 service to the facility.

Sampling Materials

Clean sample bottles should be brought to the inspection by the inspector if there is a suspected discharge of pollutants from the facility. A cooler with ice should be prepared for transport of collected samples to a laboratory. pH and conductivity meters should be calibrated prior to the inspection and may be used to determine if the discharge from the facility exceeds pollutant parameter action levels set by the City. The inspector should have the ability to properly label the samples and document their collection with a chain of custody.

7.0 PROCEDURAL STEPS

- 7.1 Review the business registration list maintained by COM finance department identifying payment or renewal of business tax payments. Screen for business located in Milwaukie city limits that have described the type of facility that would likely discharge pollutants to the City's MS4.
 - 7.1.1 Compare SIC code or applicable NAICS code of the registered business to current 1200Z permit instructions. See Appendix A for the current 1200Z qualified facility list.
 - 7.1.2 Review business operation description to evaluate potential polluting activities. Activities include use and storage of chemicals and/or high potential for spills or leaching of hazardous materials, heavy metals, or other pollutants of concern.
 - 7.1.3 If a determination of permit applicability or pollutant activities cannot be made based on available information, contact the new business via email or in writing to discuss potential processes, storage issues, discharge potential, vehicle maintenance, and/or any operations that may contribute to pollutants entering the City's MS4.
 - 7.1.3 If the business requires a 1200Z permit based on description of business operations, notify the business and DEQ within 30 days of review.

7.2 One time during MS4 permit term, the city will screen the current business registration database within city limits to verify if qualified facilities have been notified by the city of 1200Z applicability. If facilities are identified that have not received notification, DEQ and the facility will be notified within 30 days or review. The same procedural steps incorporated in steps 7.1 will be used for screening facilities.

7.3 Facility Selection. COM staff will select high priority facilities to inspect based upon the potential and type of pollutant discharge from the facility to the MS4. This may include 1200Z permit holders. Staff should make facility selections based on MS4 and SWMP requirements and should prioritize facilities with remaining inspection needs.

7.4 Facility Notification and preparation. After selecting a facility for inspection, COM staff will notify the business of the need for inspection and requirement to contact the City for inspection scheduling. The assigned city inspector will work with the business to schedule a date/time within 90 days for notification. Once a date/time is selected, a written confirmation of scheduled inspection should be sent to the business by email or in writing. If a business needs to reschedule a previously scheduled inspection, the city may provide an alternate time within 30 days of originally scheduled inspection if inspectors are available.

If a business does not reply to city request for inspection, the ESC will contact the city's code compliance team for enforcement proceedings including citations and/or fines.

In preparation for the inspection, the inspector should:

- Review the storm connection of the facility using current system maps
- Review available information on the facility's core operations/processes
- Review past inspections of facility (if available)
- Review any documented spill responses at the facility or due to facility operations
- Review past Dry Weather Field Screening reports in area for potential indications of discharge
- Assemble and prepare appropriate inspection and safety equipment

7.5 Facility Inspection Procedures

7.5.1 Field procedures will begin by presenting the appropriate credentials to the responsible official in charge of the facility.

7.5.2 The inspector need only provide identification and must not sign a release of liability. If the facility requires sign-in for safety/security reasons, make sure that it is not a waiver of any rights. If unsure, do not sign anything and contact the appropriate supervisor for further discussion. The inspection may be rescheduled until the city can review the waiver language.

7.5.3 Follow the facility representative throughout the tour of the facility. Take notes/photos of any products/processes that may come in contact with stormwater runoff or precipitation or impact MS4 infrastructure.

- 7.5.4 Inspect the surrounding grounds/property for storage of any raw/finished/waste materials that may come in contact with precipitation. Document any spill or contamination concerns.
- 7.5.5 Inspect the discharge outfall or MS4 connection from the facility for flow, obvious sheen, solids, floatables or visible pollutants. Note any detectable odors present.
- 7.5.6 If flow is present from facility, collect an aliquot from the pipe/outfall. Measure the sample with a pH and conductivity meter and compare the readings against COM Pollutant Parameter Action Levels. Collect samples for laboratory analysis if it is suspected that pollutants may be present.
- 7.5.7 Alert the facility representative of any noted deficiencies found at the facility. Discuss findings and corrections if required.
- 7.5.8 If corrections are required to be made at the facility, COM will send a letter to the facility stating the deficiencies found and the corrections needed. The letter will specify a timeline for completing the corrections and enforcement procedures.
- 7.5.9 The inspector will prepare a formal report for city records to document the inspection findings which will contain:
- Heading: Industrial Commercial Stormwater Inspection Report
 - Facility ID: name, location, contact information
 - Participants: name and title of inspection participants and responsible facility supervisors or pollutant prevention staff
 - Intro: purpose of inspection date & timeframe, weather
 - Facility Description: business processes, SIC, any pollution control equipment in use and/or policies in practice
 - Summary/recommendations: findings and/or corrections needed with enforcement timelines
 - Attachments: photos, diagrams, meter readings, sample results

8.0 RECORDS MANAGEMENT

Each inspection will generate an inspection report. The facility owner/manager may request a copy of the report after COM staff have compiled the report notes and completed the report. The inspector will enter all information from the field report into CityWorks and complete the work order generated. After completing the work order, copies of the report will be retained in accordance with the current City of Milwaukie records retention policy and Oregon Administrative Rules 166-200-120.

9.0 SOP REVISIONS

Revision #	DESCRIPTION OF REVISION	DATE	AUTHOR
#1	Revised industrial/commercial stormwater inspection SOP to meet adopted 2021 Clackamas County MS4 Phase-1 permit and reflect current procedures.	10/17/23	N. Rogers

APPENDIX A: 1200Z Permit Qualified Facilities

Permit Number: 1200-Z
 Issuance: March 25, 2021
 Modification: Aug. 17, 2022
 Effective: July 1, 2021
 Expiration: June 30, 2026
 Page 3 of 143

Table 1: Sources Covered

Industrial Sources Covered Under this Permit
Facilities with the following primary Standard Industrial Classification (SIC) codes: 10 Metal Mining 12 Coal Mining 13 Oil and Gas Extraction 20 Food and Kindred Products 21 Tobacco Products 22 Textile Mill Products 23 Apparel and Other Finished Products Made From Fabrics and Similar Material 24 Lumber and Wood Products, Except Furniture (Activities with SIC 2411 Logging that are defined in 40 CFR §122.27 as silvicultural point source discharges are covered by this permit.) 25 Furniture and Fixtures 26 Paper and Allied Products 27 Printing, Publishing and Allied Industries 28 Chemicals and Allied Products Manufacturing and Refining (excluding 2874: Phosphatic Fertilizers) 29 Petroleum Refining and Related Industries (excluding 2951, covered by 1200-A) 30 Rubber and Miscellaneous Plastics Products 31 Leather and Leather Products 32 Glass, Clay, Cement, Concrete and Gypsum Products (excluding 3273, covered by 1200-A) 33 Primary Metal Industries 34 Fabricated Metal Products 35 Industrial and Commercial Machinery and Computer Equipment 36 Electronic and Other Electrical Equipment and Components, Except Computer Equipment 37 Transportation Equipment 38 Measuring, Analyzing, and Controlling Instruments; Photographic, Medical and Optical Goods; Watches and Clocks 39 Miscellaneous Manufacturing Industries 4221 Farm Product Warehousing and Storage 4222 Refrigerated Warehousing and Storage 4225 General Warehousing and Storage 5015 Motor Vehicle Parts, Used 5093 Scrap and Waste Materials
Facilities with the following primary SIC codes that have vehicle maintenance shops (including vehicle rehabilitation, mechanical repairs, painting, fueling, and lubrication), equipment cleaning operations, or airport deicing operations ¹ : 40 Railroad Transportation 41 Local and Suburban Transit and Interurban Highway Passenger Transportation 42 Trucking and Courier Services, Except Air (excluding 4221, 4222, and 4225) 43 United States Postal Service 44 Water Transportation 45 Transportation by Air 5171 Petroleum Bulk Stations and Terminals, except petroleum sold via retail method
Steam Electric Power Generation including coal handling sites
Landfills, land application sites and open dumps
Hazardous Waste Treatment, storage and disposal facilities
Treatment works treating domestic sewage or any other sewage sludge or wastewater treatment device or system, used in the storage, recycling, and reclamation of municipal or domestic sewage (including land dedicated to the disposal of sewage sludge that are located within the confines of the facility) with the design flow capacity of 1.0 mgd or more, or required to have a pretreatment program under 40 CFR §403

¹Eligibility based on auxiliary operations; however, once covered all stormwater discharge associated with industrial activities are regulated under this permit.

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 Page 4 of 143

Facilities that discharge stormwater into the Columbia Slough or Portland Harbor that is exposed to any of the industrial activities listed in Table 2 below, are eligible to obtain permit coverage under the NPDES 1200-Z permit.

Table 2: Additional Industrial Activities Covered

Discharges to Columbia Slough and Portland Harbor
Maintenance of vehicles, machinery, equipment, and trailers (including repairs, servicing, washing, testing and painting)
Storage of vehicles, machinery, equipment (including disposal/refuse containers stored by a disposal/refuse contractor/vendor), and trailers (including rental, sales, wrecked vehicles, fleet, and general storage)
Materials storage (including raw materials; bulk fuels, chemicals, detergents, and plastic pellets; finished materials; lumber and food products; wholesale gravel, sand, and soil stockpiles; and bulk liquids other than water)
Waste handling (including recycled product storage, composting, tires, and bulk hazardous waste)
Commercial animal operations (such as kennels, race tracks, and veterinarians not covered under a Confined Animal Feeding Operation permit)
Fuel distribution and sales (including bulk stations, fuel oil dealers, manned and unmanned retail stations, fleet fueling, mobile fueling, and truck stops)
Any former activity that resulted in significant materials (as defined in Schedule D) remaining on-site

Source: DEQ 1200Z General Permit – Accessed 10/17/23

<https://www.oregon.gov/deq/FilterPermitsDocs/waqp1200zPermit.pdf>