

# MILWAUKIE

*Dogwood City of the West*

City of Milwaukie  
Public Works Department

## HIGH PRIORITY INDUSTRIAL FACILITY STORMWATER INSPECTIONS

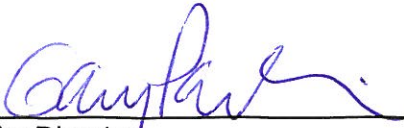
Standard Operating Procedure #10.05

June 13, 2013

By

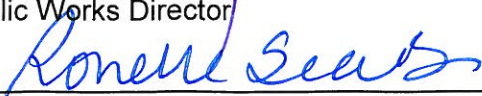
Rob Livingston  
Environmental Services Coordinator

Approved:

  
\_\_\_\_\_  
Public Works Director

8-20-13

Date

  
\_\_\_\_\_  
Stormwater/Wastewater Supervisor

9-8-13

Date

## Table of Contents

1.0	Purpose and Applicability.....	p.3
2.0	Method Summary.....	p.3
3.0	Definitions.....	p.4
4.0	Health and Safety Concerns.....	p.4
5.0	Personnel Qualifications.....	p.4
6.0	Equipment and Supplies.....	p.4
7.0	Procedural Steps.....	p.5
8.0	Records Management.....	p.6
9.0	References.....	p.6

## 1.0 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 high priority and industrial facilities to the City of Milwaukie's stormwater system, with City stormwater rules and regulations MMC 13.14.010-.130.

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 Schedule A.4.b and the City's Stormwater Management Plan Element #2.

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 explained in the report.

## 2.0 METHOD SUMMARY

COM will screen new and existing industrial facilities to assess whether they have the potential to be subject to a stormwater permit or have the potential to contribute a significant pollutant load to the MS4. The Environmental Services Coordinator receives a weekly e mail listing new businesses that have located within Milwaukie. If it is determined that the facility will be subject to an industrial stormwater NPDES permit through applicable SIC or NAICS codes or is listed as a type of industrial source required to obtain permit coverage in *Table 1: Sources Covered* within the 1200Z Industrial Stormwater permit, the facility and DEQ will be notified within 30 days.

Once during the permit term, the City of Milwaukie will review the existing business tax receipt inventory to determine whether any existing or new facilities will be subject to an industrial stormwater NPDES 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 annually update and maintain 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 of Milwaukie staff two times during the permit term. The City will make use of the DEQ database for identification of current 1200Z permit holders prior to scheduling industrial facility inspections.

Industrial facilities that hold 1200Z Industrial Stormwater 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 are under their jurisdiction. The inspections are the City of Milwaukie's strategy to reduce pollutants in stormwater discharges to the MS4 from industrial & commercial facilities.

### **3.0 DEFINITIONS**

- 3.1 MS4: Municipal Separate Storm Sewer System - the City's dedicated system for conveying stormwater runoff to receiving streams
- 3.2 SIC: Standardized Industrial Classification - standardized method of classifying business/industrial activity, representing principle segments of an economy with a numerical code
- 3.3 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
- 3.4 BMP: Best Management Practices

### **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 at a minimum. Also the inspector should follow whatever PPE requirements the facility has for visitors to wear for their protection. Many times these items are provided by the facility.

The inspector may be subject to loud noises, dusts, unpleasant odors, unstable footing, heat or cold, moving machinery, flying debris or other nuisances.

### **5.0 PERSONNEL QUALIFICATIONS**

Inspections will primarily be performed by the Environmental Services Coordinator, but may also be performed by other Public Works staff in the absence of the Coordinator. City staff performing inspections needs to be familiar with City stormwater rules and regulations. Inspectors must have knowledge of industrial manufacturing processes, raw and finished product storage, proper BMPs for industrial settings and have good observational skills.

### **6.0 EQUIPMENT & SUPPLIES**

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 City of Milwaukie stormwater rules and regulations should be readily available to the inspector. A GIS generated diagram 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. 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. Appropriate PPE for the anticipated environment should be brought to the inspection by the inspector.

## 7.0 PROCEDURAL STEPS

7.1 Review the weekly e mail sent from COM finance department identifying new business tax receipts. Screen for type of facility that would likely discharge pollutants to the City's MS4.

7.1.1 If more information is needed, contact new business to discuss potential processes, storage issues, discharge potential, vehicle maintenance, and/or any operations that may contribute to pollutants entering the City's MS4.

7.1.2 Compare SIC code of business to Table 1 in 1200Z permit.

7.1.3 If it is determined that the business requires an industrial stormwater permit, notify the business and DEQ within 30 days.

7.2 One time during MS4 permit term, screen entire business database within city limits to determine if industrial stormwater permits would be needed at facilities. If facilities are identified, DEQ and the facility will be notified within 30 days. The same procedural steps incorporated in steps 7.1.2 and 7.1.3 would be used for screening facilities.

7.3 Facility Selection. COM will select high priority facilities to inspect based upon the potential for pollutant discharge from the facility to the MS4. This may include 1200Z permit holders.

7.3.1 Preparation for the inspection should include:

- \* Reviewing the storm connection of the facility w/MS4- from GIS
- \* Reviewing the facility's core operations/processes
- \* Reviewing past inspections of facility (if available)
- \* Reviewing any spill responses at facility or in area
- \* Reviewing past Dry Weather Field Screening reports in area
- \* Review BMPs for industrial/commercial facilities
- \* Assemble and prepare appropriate inspection and safety equipment

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

7.3.3 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.

7.3.4 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.

7.3.5 Inspect the surrounding grounds/property for storage of any raw/finished materials that may come in contact with precipitation.

7.3.6 Inspect the discharge outfall or MS4 connection from the facility for flow, obvious sheen, solids, floatables or visible pollutants. Note any detectable odors present.

7.3.7 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.

7.3.8 Alert the facility representative of any noted deficiencies found at the facility. Discuss findings and corrections if required.

7.3.9 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.

7.3.10 The inspector will prepare a formal report to document the inspection findings which will contain:

- \* Heading: Industrial Commercial Stormwater Inspection Report
- \* Facility ID: name, location, phone #
- \* Participants: name & title of all involved in inspection
- \* Intro: purpose of inspection date & timeframe, weather
- \* Facility Description: processes, SIC, any pollution control equipment
- \* Summary/recommendations: findings and/or corrections needed
- \* 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 the Hansen database and complete the work order generated. After completing the work order, staff will file the report hard copy in the appropriate Compliance Data binder for the year being monitored. The report hard copies will be retained in accordance with the current City of Milwaukie records retention policy and Oregon Administrative Rules 166-200-120.

## 9.0 REFERENCES

- 9.1 City of Milwaukie Stormwater Management Plan (2012) Brown & Caldwell and City of Milwaukie
- 9.2 Jurries, Ratliff. *Industrial Stormwater Best Management Practices Manual* (Feb 2013) Oregon Department of Environmental Quality
- 9.3 NPDES General Stormwater Discharge Permit, #1200-Z (July 1, 2012) Oregon Department of Environmental Quality
- 9.4 Municipal Stormwater Program Guidance, *Screening Industrial Facilities to Assess Potential for Industrial Stormwater NPDES Permit Applicability* (June 11, 2013) Benjamin Benninghoff, Oregon Department of Environmental Quality
- 9.5 NPDES MS4 Discharge Permit # 101348 (March 16, 2012) Oregon Department of Environmental Quality



# CITY OF MILWAUKIE

## Industrial Stormwater Inspection

Date/ Time \_\_\_\_\_ Weather during inspection \_\_\_\_\_

Company Name \_\_\_\_\_

Nature of Business \_\_\_\_\_

Site Address \_\_\_\_\_

City, State, Zip \_\_\_\_\_

Facility Representative \_\_\_\_\_

Representative Title \_\_\_\_\_

Signatory Authority \_\_\_\_\_

Alt. Contact \_\_\_\_\_ Ph: \_\_\_\_\_ Fax: \_\_\_\_\_

Signatory E mail: \_\_\_\_\_ Alt E mail \_\_\_\_\_

Permit # \_\_\_\_\_ SIC Code \_\_\_\_\_

Expiration Date \_\_\_\_\_ Last Review Date \_\_\_\_\_

Other Environmental Permits \_\_\_\_\_

Emergency Contacts \_\_\_\_\_

Safety Considerations \_\_\_\_\_

After Hours Phone \_\_\_\_\_

Business Description \_\_\_\_\_

Has the facility applied for and obtained a state issued industrial stormwater permit?	Yes	No	
If no, does the facility need to apply for and obtain a stormwater permit?	Yes	No	TBD

### Stormwater Pollution Prevention Plan

Does the facility have a stormwater pollution prevention plan?	Yes	No
If no, is one required?	Yes	No
If yes, does the plan contain the following material:		
Names of employees responsible for preparing and implementing the SPPP	Yes	No
Site Map	Yes	No
Existing stormwater sampling data and description of monitoring program?	Yes	No
Identification of all activities and significant materials which may potentially contaminate stormwater?	Yes	No
Non-stormwater discharges (i.e., process water, non-contact cooling water, condensate, etc.) along with a permit or certification for them?	Yes	No
BMPs to control pollutants from various sources/areas where stormwater contamination is likely to occur?	Yes	No
List of chemicals that could possibly contaminate stormwater runoff?	Yes	No
Areas where spills are likely to occur and clean-up procedures for such spills?	Yes	No
List of previous spills?	Yes	No
Employee awareness and training program?	Yes	No
Visual inspection program?	Yes	No
Good housekeeping practices?	Yes	No
Preventive maintenance practices?	Yes	No

## Facility Activities

1. Describe efforts the facility has made to reduce or eliminate the contamination of its stormwater runoff (i.e., implementation of BMPS). \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. Has the facility performed any monitoring of its stormwater runoff? Yes No  
If yes, describe what monitoring was conducted including visual inspections. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3. Does the facility conduct periodic inspections to identify the release of pollutants that may contaminate stormwater runoff? Yes No

If yes:

a. What is the frequency of the inspections? \_\_\_\_\_  
b. Are inspections records maintained? Yes No

4. Have there been instances of past spills or leaks of toxic materials? Yes No  
If yes, describe when, where, how they occurred and whether they resulted in stormwater contamination. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

5. Does there appear to be any stormwater runoff that was in contact with processing, chemical storage, maintenance or other areas having industrial activity? Yes No  
If yes, describe the area's most susceptible to stormwater contamination and the materials involved. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6. Describe the type of stormwater collection and conveyance system the facility has (including destination of stormwater runoff, i.e. directly to local stream, separate municipal storm sewer, industrial storm sewer, drywell, etc.) include name of receiving stream if applicable. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. Describe the facility's general housekeeping practices (look for uncovered/exposed materials, dirty or cluttered surfaces that are exposed to stormwater, oils, grease or other chemicals on the ground, spots/stains/discolorations, leaking equipment, poor chemical storage or transfer operations, floor drains or other conduits that toxic chemicals are likely to enter and suspicious looking puddles). \_\_\_\_\_  
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7. Continued

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8. Does it appear that the facility is in compliance with its stormwater permit?                      Yes      No      NA

9. Does it appear that the facility is properly implementing its stormwater pollutions prevention plan?                      Yes      No      NA

**Other Comments:**

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**Drainage Diagram:**

Name of Inspector: \_\_\_\_\_

## Revision Record

Revision	Date	Author	Description of change
1	10/20/2022	Galen Hoshovsky	Added Industrial Inspection Form