

Industrial/Commercial Facility Inspection Program

SWMP BMP PW/CD3

July 1, 2013

BACKGROUND

Consistent with Schedule A.2 of its National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) permit, the City of Wilsonville must reduce the discharge of pollutants from the stormwater sewer system to the maximum extent practicable (MEP). The MEP requirement is met through compliance with the MS4 permit, specifically through implementation of a stormwater management program and associated Stormwater Management Plan (SWMP).

Purpose

The purpose of this document is to fulfill requirements of Schedule A.4.b of the March 16, 2012 MS4 permit by describing the steps the city will follow in order to implement a program to reduce pollutants in stormwater discharges to the MS4 from industrial and commercial facilities

Permit Language

Schedule A.4.b. Industrial and Commercial Facilities: *The co-permittee must continue to implement a program to reduce pollutants in stormwater discharges to the MS4 from facilities the co-permittee has identified as being subject to a Department-issued industrial stormwater NPDES permit, hazardous waste treatment, disposal and recovery facilities, industrial facilities that are subject to section 313 of title III of the Superfund Agreements and Reauthorization Act of 1986, and facilities that have been identified as contributing a significant pollutant load to the MS4. The co-permittee must:*

- i. Screen existing and new industrial facilities to assess whether they have the potential to be subject to an industrial stormwater NPDES permit or have the potential to contribute a significant pollutant load to the MS4.*
 - ii. Within 30 days after the facility is identified, notify the industrial facility and the Department that an industrial facility is potentially subject to an industrial stormwater NPDES permit.*
 - iii. Implement an updated strategy to reduce pollutants in stormwater discharges to the MS4 from industrial and commercial facilities where site-specific information has identified a discharge as a source that contributes a significant pollutant load to the MS4. The strategy must include a description of the rationale for identifying commercial and industrial facilities as a significant contributor, and establish the priorities and procedures for inspection and implementation of stormwater control measures. This strategy must be implemented by Jul 1, 2013, and applied within one calendar year from the date a new source contributing a significant pollutant load to the MS4 has been identified.*
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GENERAL INFORMATION

As of January 2013, the City of Wilsonville had over 1033 active registered businesses. While many of those businesses are related to professional services and work-at-home activities, the City still has a significant number of commercial and industrial businesses that could be included in this program.

As of June 2013, 11 facilities within Wilsonville have active industrial stormwater NPDES permits. A list of the existing permits and permit applications is included as Table 1, attached to this SOP. The permit database is maintained by Oregon DEQ and searchable online. All existing 1200-Z permits were reissued or revisited in 2012 and maintain a 2017 expiration date.

FACILITY SCREENING

The City maintains a database of all business licenses. The database tracks the information provided during the business license application, which includes business name, address, federal identification number (EIN), and four digit Standard Industrial Classification (SIC) code. The business license application also includes several specific questions related to the type of business and whether the business uses hazardous chemicals.

The City's Stormwater Management Coordinator maintains a list of high potential pollutant generating facilities (industrial and commercial). This list was developed in 2013 in order to 1) identify businesses that may be subject to industrial stormwater NPDES permit requirements and 2) identify businesses that have the potential to contribute significant pollutant loads to the MS4 and determine whether those businesses should be included in the City's Industrial/Commercial Facility Inspection Program.

Initial development of the high potential pollutant generating facility list was conducted through a desktop screening process. In conjunction with the business license inventory, the desktop screening process included review of all businesses with 2000 or 3000 series SIC codes (associated with manufacturing activities). The desktop screening process also included review of results of past pretreatment inspections and Tualatin Valley Fire and Rescue (TVFR) Hazardous Substance Information Surveys sent to existing industrial facilities. Finally, the desktop screening process included review of existing 1200-Z permit holders. Through the desktop screening process, a total of 27 industrial/commercial facilities were initially identified as high potential pollutant generating facilities and considered for inclusion in the City of Wilsonville's Industrial/Commercial Inspection Program.

Table 2 summarizes the active list of high potential pollutant generating facilities. This list is updated annually to add new businesses.

Annual Updates and Modifications

Annually, the City's Stormwater Management Coordinator updates the list of high potential pollutant generating facilities based on new business license information. For new business license applicants, a Stormwater Environmental Survey is sent to the business in order to obtain additional stormwater related information that can inform 1) whether the facility is subject to an industrial stormwater NPDES

permit and 2) whether the facility should be considered a high potential pollutant generating facility and subject to possible inspection under the City's Industrial/Commercial Inspection Program.

Annual updates to the list of high potential pollutant generating facilities may also be made based on complaints received by the City, results of the pretreatment inspection program, and results of the TVFR Hazardous Substance Information Surveys.

Once over the permit term, the Stormwater Environmental Survey will be sent to all businesses currently contained on the active list of high potential pollutant generating facilities.

Industrial Stormwater NPDES Permit Notification

Annually, the City's Stormwater Management Coordinator reviews the active high potential pollutant generating facility list to identify any businesses that could be regulated and subject to an industrial stormwater NPDES permit. The City uses SIC codes identified on the business license applications in conjunction with DEQ's guidance document "*Screening Industrial Facilities to Assess Potential for Industrial Stormwater NPDES Permit Applicability*" (dated June 2013) to identify potential facilities. DEQ's guidance document is included as Attachment 1.

In cases where the Stormwater Management Coordinator identifies a potential facility subject to an industrial stormwater permit, the facility is flagged for a formal business site inspection to confirm whether the facility meets the conditions of DEQ's guidance document.

The City is not currently an agent of the industrial stormwater NPDES program. It is ultimately the responsibility of DEQ and the facility owner/operator to determine whether an industrial stormwater NPDES permit is required for a given facility.

An initial screening conducted during initial development of the high potential pollutant generating facility list did not identify any additional businesses that may be subject to the industrial stormwater NPDES permit.

FACILITY INSPECTIONS

The City's Stormwater Management Plan (2012) requires annual inspections of industrial/ commercial facilities that are identified as a priority facility warranting inspection. The goal of the facility inspections is to identify water quality impairments and work with facility owners and operators to remove the discharge.

Facility Inspection Prioritization

The City's list of high potential pollutant generating facilities includes a wide range of operations and types of facilities. Some businesses may operate entirely indoors and are not likely to have a significant impact on stormwater quality. Other businesses may be of more concern due to the type of manufacturing processes, the physical structure of the facility, or the proximity of the facility to surface water.

Table 2 includes a prioritization category, designating as to whether each business is perceived to have a low, moderate, or high potential of contributing pollutant loads to the MS4.

Annually, the City's Stormwater Management Coordinator will conduct a windshield survey of each facility listed on the high potential pollutant generating facility list and prioritize facilities for a formal site inspection. The prioritization is based on professional judgment and the understanding of City staff of the current activities and facilities at each site. The prioritization will consider whether facilities have ongoing inspections as part of other regulatory programs (e.g., has a current 1200-Z permit) and whether additional information regarding the facility is needed to confirm whether the facility may be subject to a 1200-Z permit.

Formal business site inspections will be conducted on up to five high priority businesses annually.

Legal Authority

The City's authority to inspect businesses premises is outlined in the City of Wilsonville Code (WC) 8.214. The City's authority to prohibit pollutant discharges to the MS4 is covered in WC 8.202 under public sewer use.

Procedures

Formal business inspections will be conducted by the Stormwater Management Coordinator. When practicable, the City will provide advance notice to the business operator in the form of a phone call to schedule an appropriate time to conduct the inspection. Records of phone calls and communication with business owners/operators will be retained in the water quality program files.

The City will assemble the following materials for use during the inspection:

- Industrial/Commercial Inspection Program, Facility Inspection Form (see Attached).
- Aerial map of the facility
- Camera
- A copy of the guidebook, Industrial Stormwater Best Management Practices Manual (DEQ, February 2013)

During the site visit, the Stormwater Management Coordinator will physically walk the site, both indoors and outdoors to evaluate whether the facility has the potential to contribute significant pollutant loads to the MS4. The Stormwater Management Coordinator will complete the Facility Inspection Form, noting any findings of concern and indicating the appropriate follow-up action(s) and will take pictures of activities or site conditions that look to be problematic.

At the conclusion of the site inspection, the Stormwater Management Coordinator will verbally discuss any findings of concern with the business owner/operator and provide the owner/operator with a copy of the guidebook, Industrial Stormwater Best Management Practices Manual (DEQ, February 2013).

Follow-up Actions

Any observed illicit discharges will be recorded by the City for inclusion and reporting in their NPDES MS4 annual report and appropriate follow-up procedures will be initiated.

For businesses that do not contribute significant pollutant loads to the MS4, the Stormwater Management Coordinator will prepare a follow-up letter, thanking the business for participating in the city's Industrial/Commercial Facility Inspection Program. The Facility Inspection Form will be filed and the inspection date noted. No additional follow-up actions are required.

For businesses that have the potential to contribute significant pollutant loads to the MS4 and/ or appear to require coverage under a general industrial stormwater permit (1200-Z permit), City staff will prepare a notification letter. If the business may be subject to a 1200-Z permit, the notification letter will be sent to both the business license applicant and DEQ's NW Region Office within 30 days. If the business is potentially contributing pollutants to the MS4 (but does not appear subject to a 1200-Z permit), the notification letter will outline observed concerns and refer to DEQ's Industrial Stormwater Best Management Practices Manual (DEQ, February 2013). The letter will indicate a potential violation of WC 8.202 and indicate that a follow-up inspection will be conducted to determine whether the pollutant discharge is an ongoing problem. Copies of all letters are retained in the City's water quality program files.

The Stormwater Management Coordinator will conduct a follow-up inspection, utilizing the same Facility Inspection Form that was completed for the initial formal business inspection. Observations and findings will be recorded and a follow-up action will be identified. Ongoing pollutant source problems will be referred to the City's illicit discharge program for follow-up and enforcement.

PROGRAM TRACKING AND RECORDKEEPING

The City will maintain records of Industrial/Commercial Inspection activities and follow-up actions to meet annual reporting requirements of the MS4 Permit.

ATTACHMENTS

The following documents are included with this SOP:

- Table 1. DEQ General Industrial Stormwater Permit Applications in Wilsonville
 - Table 2. Wilsonville's High Potential Pollutant Generating Facility List (dated 2013)
 - Business Inspection Stormwater Checklist
 - DEQ Guidance Document "*Screening Industrial Facilities to Assess Potential for Industrial Stormwater NPDES Permit Applicability*" (dated June 2013).
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TABLE 1: 1200-Z Permittees in Wilsonville

Facility_ID	SIC_Code	Legal_Name	Common_Name	Facility Descripton	Address	City	County	Permit Type	Initial Permit Issuance Date	Permit Renewal/ Permit Action Date	Expiration
111308	2086	BCI COCA-COLA BOTTLING COMPANY OF LOS ANGELES	COCA-COLA BOTTLING CO OF OREGON	Bottled and Canned Soft Drinks	9750 SW Barber St	WILSONVILLE	CLACKAMAS	GEN12Z	4/13/2001	7/10/2012	6/30/2017
107178	3291	FUJIMI CORPORATION	FUJIMI CORPORATION - SW COMMERCE CIRCLE	Abrasive Products	9949 Commerce Circle	WILSONVILLE	WASHINGTON	GEN12Z	1/8/1998	8/29/2012	6/30/2017
102861	4212	INTERSTATE DISTRIBUTOR CO.	INTERSTATE DISTRIBUTOR CO	Local Trucking without	10110 SW Ridder Rd	WILSONVILLE	CLACKAMAS	GEN12Z	10/23/1997	7/10/2012	6/30/2017
114869	3499	KINETICS CLIMAX INC.	KINETICS CEM	Fabricated Metal Products	10085 SW Commerce Circle	WILSONVILLE	WASHINGTON	GEN12Z	11/18/2005	8/14/2012	6/30/2017
108104	4213	MARTEN TRANSPORT, LTD.	MARTEN TRANSPORT, LTD.	Trucking, Except Local	29605 SW Kingsman Rd	WILSONVILLE	CLACKAMAS	GEN12Z	3/9/1998	9/25/2012	6/30/2017
106495	3272	OLDCASTLE PRECAST, INC.	OLDCASTLE PRECAST UTILITY VAULT	Other Concrete Products	28499 SW Boberg Rd	WILSONVILLE	CLACKAMAS	GEN12Z	12/21/2001	10/2/2012	6/30/2017
122499	4214	PACIFIC FOODS OF OREGON, INC.	PACIFIC FOODS - WILSONVILLE DISTRIBUTION FACILITY	Local Trucking with Storage	27255 SW 95th Ave	WILSONVILLE	CLACKAMAS	GEN12Z	9/5/2012	9/5/2012	6/30/2017
107737	4225	THRIFTY PAYLESS, INC	RITE AID DISTRIBUTION CENTER # 0080	General Warehousing and Storage; NPDES Washwater	29555 SW Boones Ferry Rd	WILSONVILLE	CLACKAMAS	GEN12Z	9/29/2011	7/16/2012	6/30/2017
118412	4111	TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON	TriMet WES COMMUTER RAIL MAINTENANCE FACILITY	Local and Suburban Transit	9499 SW Barber	WILSONVILLE	CLACKAMAS	GEN12Z	10/7/2008	9/25/2012	6/30/2017
108580	4212	WILLAMETTE RESOURCES, INC.	WRI MATERIAL RECOVERY FACILITY	Local Trucking without Storage	10295 SW Ridder Rd	WILSONVILLE	WASHINGTON	GEN12Z	12/30/1997	9/19/2012	6/30/2017
87640	2893	XEROX CORPORATION	XEROX	Printing Ink	26600 SW Parkway Ave	WILSONVILLE	CLACKAMAS	GEN12Z	12/1/2008	9/18/2012	6/30/2017

TABLE 2: High Potential Pollutant Generating Facility List (2013)

Number	Facility Name	Facility Address	SIC Code	Priority Ranking	Notes
1	AB MAURI FOOD INC.	26994 SW 95TH AVE	2090		
2	ALDIS MANUFACTURING LTD	26099 SW 95TH AVE Unit 601	2870		
3	Chemstation of Oregon	26100 SW 95TH AVE Unit 202	2840		
4	Coca Cola Bottling Company	9750 S.W. Barber St	2056	Low	Existing 1200-Z permit holder
5	Entertainment Publications Inc.	25999 SW Canyon Creek #H	2741		
6	Flir Systems Inc.	27700 A SW Parkway Ave.	3990		
7	Fujimi America	9949 SW Commerce Circle	3291	Low	Existing 1200-Z permit holder
8	Hartung Glass Industries	10450 SW Ridder Rd	3990		
9	Interstate Distributor	10110 SW Ridder Road	4230	Low	Existing 1200-Z permit holder
10	Kinetics	10085 SW Commerce Circle	4212	Low	Existing 1200-Z permit holder
11	Lazerquick	29900 SW Kinsman Rd	2752		
12	Leader Technologies / Leadtek	27555 S. W. Boones Ferry Road	3400		
13	Marten Transport	29605 SW Kinsman Road	4213	Low	Existing 1200-Z permit holder
14	Mentor Graphic Corporation, Inc.	8005 SW Boeckman Rd	3577		
15	Oldcastle Precast	28425 SW Barbur St	3272	Low	Existing 1200-Z permit holder
16	Pacific Foods of Oregon	27255 SW 95th Ave	4214	Low	Existing 1200-Z permit holder
17	Process Tube Systems, Inc.	9025 SW Hillman Ct Ste 3132	3499		
18	Prographics Services, Inc.	26200 SW 95TH AVE STE 300	2752		
19	Rite Aid	29555 S.W. Boones Ferry Road	4225	Low	Existing 1200-Z permit holder
20	Rockmore International, Inc.	10065 SW Commerce Circle	3990		
21	SSI Shredding System, Inc.	9760 SW Freeman Drive	3990		
22	Sysco Foods	26250 SW Parkway Center Dr	1541		
23	Tri-Met WES Rail	9499 S.W. Barbur Blvd	4111	Low	Existing 1200-Z permit holder
24	White GMC Tec Equip. Inc.	7950 SW Burns Way	7530		
25	Willamette Resources, Inc.	3100 SW Industrial Way	4212	Low	Existing 1200-Z permit holder
26	Wilsonville Concrete Products	3100 SW Industrial Way	3200		
27	Xerox	26600 S.W. Parkway Ave	2893	Low	Existing 1200-Z permit holder

**Wilsonville
INDUSTRIAL/COMMERCIAL INSPECTION PROGRAM
FACILITY INSPECTION FORM**

Inspections must be conducted by a person with the knowledge and skills to assess conditions and activities that could impact stormwater quality and evaluate the effectiveness of best management practices. Retain a copy of the completed form.

I. INSPECTION SUMMARY		
FACILITY NAME:	INSPECTION DATE:	TIME:
FACILITY ADDRESS:	INSPECTOR(S) NAME:	
BUSINESS TYPE:	WEATHER INFORMATION:	
CONTACT INFORMATION:	PERSONS PRESENT DURING INSPECTION:	
II. FACILITY OVERVIEW		
DESCRIBE SITE ACTIVITIES:		
ONSITE STORMWATER SYSTEM: (catch basins, trench drains, floor drains, roof drains, ditches, drywells, treatment facilities, etc.)		
DISCHARGE TO:		
III. POTENTIAL POLLUTANT SOURCE AREA INSPECTION AND BMP EVALUATION		
Good Housekeeping BMPs:	Y N N/A	Findings and Follow Up Actions:
<ul style="list-style-type: none"> • Are paved surfaces free of accumulated sediment and debris? • Waste receptacles located outdoors covered and in good condition? • External surfaces and areas free of excessive contaminant buildup? • Methods in place to prevent erosion and sediment discharge to storm drains? 		
Spill Response and Equipment:	Y N N/A	Findings and Follow Up Actions:
<ul style="list-style-type: none"> • Spill kits available and properly stocked? • Any evidence of leaks or spills? • Any vehicles and/or equipment leaking fluids? 		

Vehicle/Equipment Areas: <ul style="list-style-type: none"> • Is equipment washed and/or cleaned in ways that are protective of stormwater? • Fueling areas free of contaminant buildup and evidence of chronic leaks/spills? • Tools, equipment and materials stored in designated areas? • Drums and containers of fluids stored with proper cover and containment? 	Y N N/A	Findings and Follow Up Actions:
Material Storage Areas: <ul style="list-style-type: none"> • Potential pollutants stored inside a building or another type of storm resistance shelter? • Material piles secured to protect storm drainage system? • Are outdoor containers covered? • Are empty containers cleaned and stored properly? 	Y N N/A	Findings and Follow Up Actions:
Stormwater BMPs and Treatment Structures: <i>Visually inspect all stormwater infrastructure and treatment BMPs. Complete private facility inspection forms where applicable.</i>	Y N N/A	Findings and Follow Up Actions:
Observation of Non-Stormwater Discharges: <i>Visually inspect the site for illicit discharges and/or evidence of dumping or washing into the storm drainage system.</i>	Y N N/A	Findings and Follow Up Actions:
Additional Findings: <i>Describe additional inspection findings and follow-up actions, if needed.</i>		
IV. FOLLOW-UP ACTION (check all that apply):		
<input type="checkbox"/> Daily operations of the site are not a concern for significant pollutant discharge to the MS4; Close File <input type="checkbox"/> Site activities/conditions are a concern for pollutant discharge to the MS4; Prepare letter and schedule follow-up inspection <input type="checkbox"/> Observed illicit discharge; Refer for enforcement <input type="checkbox"/> Other: _____		

FOLLOW-UP INSPECTION (IF NEEDED)		
INSPECTION DATE:	TIME:	INSPECTOR(S) NAME:
WEATHER INFORMATION:		PERSONS PRESENT DURING INSPECTION:
OBSERVATIONS/FINDINGS:		FOLLOW-UP ACTION: <ul style="list-style-type: none"> <input type="checkbox"/> Problem Resolved; Close File <input type="checkbox"/> Problem Persists; Refer for Enforcement <input type="checkbox"/> Other: _____

Municipal Stormwater Program Guidance

Screening Industrial Facilities to Assess Potential for Industrial Stormwater NPDES Permit Applicability

Background and Purpose

To achieve goals and requirements outlined in the federal Clean Water Act, DEQ issues permits to municipal stormwater dischargers that are designed to prohibit illicit discharges and reduce pollutant discharges. Similarly, DEQ issues permits to industrial stormwater dischargers that require best management practices to reduce stormwater pollutants and meet benchmarks that measure the success of these practices. In an effort to better align these permits, to further engage local communities in evaluating potential stormwater pollutant sources, and to utilize local storm sewer system knowledge, DEQ has incorporated new requirements into recent Municipal Separate Storm Sewer System (MS4) Phase I permits.

This document clarifies the screening requirement, particularly as it relates to an industrial facility potentially being subject to an industrial stormwater National Pollutant Discharge Elimination System permit. This document can be used as a practical guide by permittees, associated representatives and others to ensure that provisions of the MS4 permit are adequately addressed and useful information is collected, documented, and disseminated. This guidance document does not substitute for the permit conditions, nor is it a regulation itself.

Permit Conditions

The following permit conditions do not replace DEQ's ultimate responsibility to determine industrial stormwater (1200Z, 1200COLS) permit applicability or the industrial facility's responsibility to be aware of applicable regulatory requirements. Instead, the MS4 permittee's efforts to address the following two permit conditions should complement and inform DEQ's industrial stormwater program and local businesses, and increase the effectiveness of the local stormwater program. Please note there are additional opportunities that exist, such as a municipality serving as a DEQ stormwater agent, to allow for local stormwater programs and DEQ's industrial stormwater program to further align.

Schedule A.4.b.i - Screen existing and new industrial facilities to assess whether they have the potential to be subject to an industrial stormwater NPDES permit or have the potential to contribute a significant pollutant load to the MS4.

Schedule A.4.b.ii - Within 30 days after the facility is identified, notify the industrial facility and the Department that an industrial facility is potentially subject to an industrial stormwater NPDES permit.

Recommended Facility Screening Procedure

Use the following list of actions to conduct an industrial facility screening. It's not necessary to conduct these actions in chronological order, but following them in a step-by-step fashion may be useful. DEQ acknowledges completing the screening elements described below is just one approach to conducting an industrial facility screening, and other effective strategies or approaches for screening industrial facilities may exist. DEQ encourages permittees to share other experiences with DEQ to help the state improve its permitting process.

Industrial Stormwater Facility Screening Tips

For purposes of the MS4 permit requirement, for there to be a 'potential' for a facility to be 'subject' to the NPDES industrial stormwater requirements, a facility must be categorized under an applicable primary Standard Industrial Code or industrial activity **AND** have stormwater runoff that discharges to surface waters from an associated industrial area, as highlighted in the



State of Oregon
Department of
Environmental
Quality

Water Division
Surface Water Quality
Section
Stormwater Program
811 SW 6th Avenue
Portland, OR 97204
Phone: (503) 229-5185
(800) 452-4011
Fax: (503) 229-6037
Contact: MS4 Program
Coordinator
www.oregon.gov/DEQ

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restoring, maintaining and
enhancing the quality of
Oregon's air, land and
water.*

four screening elements below. DEQ describes suggested screening actions for each element and includes supporting narrative for clarity.

Elements of an Industrial Stormwater Facility Screening

1. SIC Code or Industrial Activity
2. Stormwater Runoff and Discharge to Surface Water
3. Industrial Activity Areas
4. Existing permit coverage

1. SIC Codes or Industrial Activity

- **Become familiar with the SIC codes and activities associated with the NPDES industrial stormwater program requirements.** A list of applicable primary SIC codes and activities is in Table 1 on page 3 of the 1200-Z Industrial Stormwater General Permit or in Table 2 on page 4 of the 1200-COLS permit (<http://www.deq.state.or.us/wq/stormwater/industrial.htm>). The general industrial categories and activities include: landfills; hazardous waste treatment, storage or disposal facilities (TSDs); steam electric power generating facilities; and a variety of mining, manufacturing, transportation and recycling facilities. Some permit exceptions apply to certain SIC codes, but becoming familiar with these exceptions is not necessary for purposes of the MS4 permit.
- **Identify the SIC code assigned to local facilities.** The most common information sources to obtain local facility SIC codes are in local business license applications or sanitary sewer surveys. However, these sources often rely on the applicant to supply the proper SIC code, with a varying degree of accuracy.

You can access SIC codes and narrative descriptors for each SIC code category on the U.S. Department of Labor Occupational Safety and Health Administration website (http://www.osha.gov/pls/imis/sic_manual.html). Comparing the code descriptions for the applicable NPDES industrial stormwater SIC codes with information provided by a local facility can be effective in confirming a facility SIC code has been accurately supplied.

You can also use general search databases to get information about businesses. Use these databases to verify SIC codes provided on applications or surveys or to conduct a general search. For example, the Oregon State Library maintains an account with ReferenceUSA, which can be used to search for business with a specific SIC code (e.g., SIC code 20 - Manufacturing or Processing Foods and Beverages for Human Consumption) in a specified city (e.g., City of Wilsonville). Other business search services include, but are not limited to: Hoovers, Manta, MelissaData, SICCode.com and ThomasNet.

SIC or NAICS Code – What’s the difference?

Historically, the U.S. Census Bureau assigned SIC codes to businesses based on a company’s primary activity (generally the activity generating the most revenue for the company). This SIC code was often derived from information that a business provided on surveys, forms or administrative records. The SIC codes were last updated in 1987. In 1997, the North American Industry Classification System (NAICS) replaced the SIC code system. It may be necessary to convert a facilities NAICS code to the SIC code. Detailed conversion tables, or concordances (e.g., *2002 NAICS to 1987 SIC conversion table*), can be used to do this. (<http://www.census.gov/eos/www/naics/concordances/concordances.html>)

2. Stormwater Runoff and Discharge to Surface Waters

- **Understand and document site and MS4 drainage characteristics.** In order for the industrial stormwater requirements to be applicable, a facility must have a runoff discharge from a conveyance used for collecting and transporting



stormwater, such as curb/gutter, pipe, catch basin or ditch. The runoff discharge must come from areas directly related to the industrial activity. For example, if runoff is generated only from an industrial facility's office building and employee parking, and it is not mixed with runoff from industrial activity areas, the runoff from the office building and parking lot would not be considered an industrial stormwater discharge. As a result, it's important to be familiar with site drainage characteristics and the MS4 system.

Information related to drainage characteristics can be found on topographic maps, drainage plans, or site construction as-built plans, but it may be necessary to conduct a site visit to gather information if it's not available. Please note that having access to this information will also support other stormwater management efforts, such as administering an illicit discharge detection and elimination program, supporting a stormwater retrofit strategy, or addressing system flow capacity issues.

- **Identify discharge location(s).** Runoff is generated when rainfall or snowmelt lands on a site's impervious surfaces and flows off the site. The industrial stormwater provisions apply to a facility if this runoff is conveyed and discharged to surface waters (e.g., lake, stream, wetland) directly or through an MS4. Conveyance systems were typically designed and constructed to move water off-site to address local drainage and flooding issues. Consequently, most industrial facilities with a conveyance will likely ultimately discharge to surface waters. However, local site conditions may not have caused drainage to leave the site, so it's important to document the discharge location (such as an outfall) to surface waters or an MS4 that drains to surface waters. This is particularly important since the industrial stormwater provisions don't apply to discharges to a combined sewer system or Underground Injection Control (UIC) system.

3. Industrial Activity Areas

- **Verify or confirm if an 'industrial activity' is being conducted at the facility.** For purposes of the NPDES industrial stormwater program, the term 'industrial activity' has a specific meaning. Overall, an 'industrial activity' is directly related to the manufacturing, processing or raw materials storage areas at an industrial facility. More specifically, industrial activity includes the following areas with a stormwater discharge:
 - Industrial plant yards
 - Immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material or by-products used or created by the facility
 - Material handling sites or sites used for the storage or maintenance of material handling equipment. These sites include areas of storage, loading and unloading, transportation or conveyance of any material, product or waste related to the manufacturing or processing.
 - Refuse sites or sites used for the application or disposal of process waste waters
 - Sites used for treatment, storage or disposal
 - Shipping and receiving areas or storage areas (including tank farms) for raw materials, and intermediate and final products
 - Locations where industrial activity has taken place and significant materials remain and are exposed to stormwater.

- **Evaluate Site for Pollutant Exposure.** When gathering information about operations or activities at an industrial facility, note if the industrial activity is exposed to stormwater runoff. The industrial stormwater permits have a no

exposure certification provision, and documenting this information will help DEQ in determining whether this no exposure provision applies or the potential or significance for a discharge of stormwater pollutants.

4. Existing Permit Coverage

- **Determine if the facility has existing permit coverage.** Before notifying the industrial facility of the potential of being subject to the industrial stormwater requirements, it's important to verify whether the facility is currently covered under the 1200-Z permit (or 1200-COLS permit if located in the Columbia Slough watershed). Permit coverage can be accessed via DEQ's water quality permit database at: <http://www.deq.state.or.us/wq/sisdata/facilitycriteria.asp>. To check the database for existing permit holders in the jurisdiction of interest, complete the following tasks in the 'Create a Report' form:
 - Click on the radio button to highlight 'stormwater' in the Facility Criteria, Water Quality Category.
 - Select the GEN12Z or GEN12COLS permit line in the Permit Criteria scroll-down bar.
 - Type the name of the City or County in the appropriate box in the Location Criteria section.
 - Click the 'Submit' button

Other Considerations and Additional Information

The MS4 permittee should consider a method to ensure new facilities are screened at an adequate frequency. The new facility screening can occur periodically or as part of a 'real-time' local approval process, such as a sewer user connection, business licensing or construction permitting. If the periodic review approach is used, screening should occur at least once every six months to a year; it can incorporate the elements used to screen existing facilities.

The MS4 permittee must notify the industrial facility and DEQ within 30 days of identifying a facility that is potentially subject to the NPDES industrial stormwater permit. Notification to DEQ should be sent to the MS4 Program Coordinator. To notify DEQ and the facility of its findings, the permittee may use a range of options, including but not limited to: email, form letter, or personalized letter. For MS4 permit compliance purposes, the permittee should at a minimum document: contact name, facility name, SIC code, date of contact and notification mechanism.

When notifying the industrial facility, the permittee may also want to highlight the Conditional No Exposure Certification Exclusion. Additional information related to the exclusion is on EPA's website (<http://cfpub.epa.gov/npdes/stormwater/exposure.cfm>), DEQ's certification form (<http://www.deq.state.or.us/wq/stormwater/docs/forms/noexposureexcl.pdf>), or the Industrial Stormwater Permit Guide (<http://www.pneac.org/stormwater/>).

For more information, please contact:

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