STORMWATER POLLUTION CONTROL PLAN

Former Automatic Vending Co./Walter E. Nelson Co.
5001 North Lagoon Avenue
Portland, Oregon
DEQ ECSI No. 1430

For
Oregon Department of Environmental Quality
August 12, 2024

Project: BCSAmerica-1-02

NV5

August 12, 2024

Oregon Department of Environmental Quality
Northwest Region
700 NE Multnomah Street, Suite 600
Portland, OR 97232

Attention: Rob Hood

Stormwater Pollution Control Plan
Former Automatic Vending Company
5001 North Lagoon Avenue
Portland, Oregon
DEQ ECSI No. 1430
Project: BCSAmerica-1-02

NV5 is pleased to submit this Stormwater Pollution Control Plan for the former Automatic Vending Company site located at 5001 North Lagoon Avenue in Portland, Oregon (subject property). This report is being submitted to satisfy DEQ's recommendation of a stormwater pollution control plan to ensure on-site stormwater system upgrades function properly and best management practices are followed. In our opinion, this stormwater pollution control plan combined with the results of the final stormwater sampling event, will allow DEQ to issue a stormwater SCD and NFA determination for the subject property.

Please call if you have questions concerning this submittal.

Sincerely,

NV5

Kyle R. Sattler, L.G. (Washington)
Principal Geologist

cc: John Jansen, BCS America LLC
cc: Asher Nelson, Walter E. Nelson Co.

JJR:KRS:ew
Attachments
One copy not submitted
Document ID: BCSAmerica-1-02-081224-envr-SWPCP.docx

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ACRONYMS AND ABBREVIATIONS

BMP	best management practices
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
DEQ	Oregon Department of Environmental Quality
ECSI	Environmental Cleanup Site Information
ESA	Environmental Site Assessment
NFA	No Further Action
NPDES	National Pollutant Discharge Elimination System
SARA	Superfund Amendments and Reauthorization Act
SCD	Source Control Decision
SCE	Source Control Evaluation
SIC	Standard Industrial Classification
SWPCP	Stormwater Pollution Control Plan
TSS	total suspended solids

1.0 INTRODUCTION

NV5 has developed this SWPCP for the former Automatic Vending Company [currently the Walter E. Nelson Company (WENCO)] site located at 5001 North Lagoon Avenue in Portland, Oregon (subject property). This SWPCP includes information regarding the WENCO facility at the subject property, potential pollutant sources, and BMPs that will be implemented at the WENCO facility to minimize pollutants ultimately discharging from the subject property into the Swan Island Lagoon located on the east side of the Willamette River via Outfall Basin S-2. DEQ has noted that implementation of SCMs at upland sites, together with the existing programmatic SCMs in the basin, are expected to provide necessary source control for Outfall Basin S-2 discharges.

2.0 PURPOSE AND OBJECTIVES

We understand that the subject property is not required to obtain coverage under the NPDES 1200-Z Industrial Stormwater Permit and therefore is not required to develop and maintain an SWPCP as a permit condition. However, DEQ recommended the development of this SWPCP for the subject property as an instrument of regulatory closure to demonstrate that the subject property will employ appropriate measures following issuance of the SCD and NFA determination (discussed above) to meet the objective of implementing long-term BMPs at the subject property following closure.

Therefore, the purpose of this SWPCP is to provide detailed information regarding the WENCO facility at the subject property potential pollutant sources and BMPs to be implemented at the subject property to minimize delivery of potential contaminants to the public stormwater system and associated receiving waters.

3.0 FACILITY DESCRIPTION

3.1 FACILITY LOCATION AND DESCRIPTION

The subject property is located on Tax Lot 700 within Swan Island in the Willamette River, at 5001 North Lagoon Avenue in Portland, Oregon and is situated in Section 20, Township 1 North, Range 1 East of the Willamette Meridian in Multnomah County. The vicinity map is included as Figure 1.

The subject property is located at an elevation of approximately 38 feet above sea level, and the topography of the site is generally flat.

Properties adjoining the subject property include Temp Control Mechanical to the west; Stagecraft Industries to the northwest; North Lagoon Avenue to the north, across which is a trucking storage area; North Ballast Street to the east, across which is Olsa Resources; TCM Corporation to the southeast; and vacant commercial/industrial space to the south. The subject property layout and adjacent properties are shown on Figure 2.

3.2 DEVELOPMENT AND INDUSTRIAL ACTIVITY DESCRIPTION

Swan Island was connected to the mainland sometime between 1927 and 1940 using dredge material reportedly originating from the Willamette River. The Portland Airport reportedly occupied

Swan Island from 1927 through 1940, and it appeared that a runway may have historically occupied a portion of the subject property. In 1944, the subject property consisted of a parking lot with a building near the western side of the subject property.

The current warehouse building was constructed on the subject property in 1963, with additions constructed in 1969 and 1978. The warehouse building consists of an approximately 51,100-square-foot metal-framed structure with a slab-on-grade foundation that is occupied by warehouse and office space.

The shop building located on the southwestern portion of the subject property was constructed in 1973/74 and consists of an approximately 1,200-square-foot metal structure with a slab-on-grade foundation.

According to a Phase I ESA (K&S Environmental, 2018), the subject property was occupied by a distribution warehouse for candy and vending machine businesses (1963 through 2013), catering and equipment occupants and BCS America (2013 through 2019), Total Handling Solutions (2015 through 2019), Temp Control Mechanical (2016 through 2019), and Green State of Mind (2016 through 2019). The subject property was vacant between 2019 and 2022 while undergoing renovations for the current occupant (WENCO) following the sale of the property.

The current occupant (WENCO) is a janitorial, chemical, and paper distributor serving the Pacific Northwest. Operational activities at the subject property relate to storage and distribution of these products. Specific on-site activities include the following:

- Receiving finished goods and packaging materials by common carrier and private trucks
- Packaging of finished products into containers of various sizes
- Shipping finished products via common carrier trucks
- Staging of materials for on-site processing and shipping
- Administration/offices
- Miscellaneous equipment storage

The Primary SIC Code for the facility is 2841 – Soap and Other Detergents, Except Specialty Cleaners. The secondary SIC Code for the facility is 2842 – Specialty Cleaning, Polishing, and Sanitation Preparations.

3.3 SUBJECT PROPERTY DRAINAGE

The subject property stormwater conveyance system layout is shown on Figure 2. The stormwater system infrastructure was constructed during site development in 1963; subsequent building additions between 1969 and 1978; and more recent renovations between 2019 and 2022. Our knowledge of the stormwater system layout is based on the following:

- As-built drawings and permits
- City of Portland (online) records
- Camera surveys of the stormwater and wastewater discharge lines performed by the City of Portland in 1984 and 2000

- Camera survey inspections and dye testing of the stormwater system conducted by NV5 in 2021
- Recent modifications and upgrades to the stormwater collection and conveyance system completed in conjunction with site improvements completed between October 2021 and June 2022 for new tenancy

3.3.1 Historical Drainage Layout

Stormwater collection and conveyance at the subject property has historically been accomplished via seven on-site catch basins (CB1 through CB7) and building roof drains. During site improvements in 2021 - 2022, catch basin CB3 was removed and new stormwater infrastructure was constructed near the loading dock area in the western portion of the subject property. The 2021 - 2022 stormwater system improvements were largely separate (i.e., new additions) from the original array of catch basins, as detailed in the sections below.

3.3.2 Stormwater System improvements

In conjunction with site improvements associated with planned new tenancy of the subject property, upgrades to the stormwater and sanitary collection and conveyance systems were completed between October 2021 and June 2022. These improvements included the following elements:

- One new catch basin (CB8) and conveyance line (and new cleanout) connected to the sanitary system was constructed at the loading dock area.
- One additional catch basin (CB9) and conveyance line (and new cleanout SW-3) for the stormwater system was constructed at the loading dock area.
- One new catch basin (CB11) was installed immediately northwest of the vegetated swale. As part of this improvement, former catch basin CB3 was removed; however, the conveyance line that CB3 was connected to remains connected to catch basin CB5.
- A new, lined vegetated swale (intended to store and treat stormwater) and associated catch basin/swale overflow (CB12) was constructed immediately northeast of the loading dock area. These new catch basins and vegetated swale replaced former catch basin CB3.

These new features collect and convey stormwater to the public system using a new and separate lateral to the mainline in Lagoon Avenue, as shown on Figure 2. The new infrastructure was constructed in accordance with the City of Portland Stormwater Manual.

3.3.4 Catch Basin Replacements

NV5's field observations recorded during the SCE work suggested that the condition of the originally installed catch basins could contribute to elevated concentration of contaminants in catch basin sediment and stormwater samples. Specifically, the older catch basins were not amenable to the use of modern replaceable filter inserts and exhibited significant corrosion that could facilitate the intrusion of subgrade material (e.g., site fill particulates and subgrade water temporarily in contact with site fill following rain events).

Based on these observations, NV5 coordinated the replacement of catch basins CB1, CB2, CB5, and CB7 in late April and early May 2022.[1] The replacement work included complete removal of the former structures and replacement with new catch basin structures with replaceable filter inserts, which were not previously in working order.

4.0 SIGNIFICANT MATERIALS AND POLLUTANTS

4.1 SIGNIFICANT MATERIALS ON SITE

Each facility must inventory the types of materials that are handled, stored, or processed on site. "Significant materials" include, but are not limited to, the following:

Raw recycling materials; fuels; waste oils; antifreeze; detergents; plastic; finished metallic products; hazardous substances designated under section 101 (14) of CERCLA; any chemical the facility is required to report pursuant to section 313 of title III of SARA; fertilizers; pesticides; and waste products such as ashes, slag, and sludge that have the potential to be released with storm water discharges [40 CFR 122.26(b)(12)].

Finished products are received and stored at the facility. Relevant materials that are handled and stored at the facility include, but are not limited to, the following:

- Paper products, including cardboard
- Packaging materials (films, tape, wraps, void fill, etc.)
- Nonionic detergents (laundry detergents, hard surface cleaners)
- Anionic detergents (shampoos, dish liquids)
- Sodium sulfate (laundry products)
- Sodium hydroxide granules and solution (laundry and dish machine products)
- Sodium carbonate granules (laundry and dish machine products)
- Sodium metasilicate granules (laundry and dish machine products)
- Sodium tripolyphosphate (laundry and dish machine products)
- Isopropyl alcohol (cleaners and disinfectants)
- Hydrochloric acid (cleaners and descaling products)
- Phosphoric acid (cleaners)
- Granulated soap (laundry products)
- Glycol ethers (water-based surface cleaners)
- Orange oil and d-Limonene (biodegradable degreasers)

4.2 DESCRIPTION OF POTENTIAL POLLUTANT SOURCES

Onsite storage of the materials listed in the above section represent potential pollutant sources including the following:

- Releases of raw materials from their respective containers and operation of shipping/delivery trucks and equipment
- Releases of debris and sediment from material storage areas and equipment operations

[1] Replacement of catch basin CB3 was not necessary because this catch basin was removed and replaced with new catch basin CB11 during site improvements. Although catch basin CB7 services the sanitary system, it was also replaced due to its particularly deteriorated condition.

- Trucks, forklifts, and other equipment working at the facility that have the potential to generate dust or particulates comprising potential pollutant sources
- Shallow fill soils underlying the subject property that are potentially impacted with contaminants that, if exposed and mobilized, could represent a potential stormwater pollutant source

5.0 IMPERVIOUS AREA

As illustrated on Figure 2, the subject property encompasses approximately 2.67 acres (116,305 square feet). Of this total area, approximately 107,875 square feet is covered by impervious hardscape material including paving, concrete, and roof surfaces. The overall percentage of impervious area at the subject property is 92.8 percent.

Pervious areas include perimeter landscaping and the vegetated stormwater swale constructed during tenant improvements in 2019-2023.

6.0 RECEIVING WATER

Stormwater runoff from the subject property is discharged via three laterals (see Figure 2) to the City of Portland stormwater mainline located along North Lagoon Avenue, located immediately north of the subject property.

The City of Portland stormwater conveyance system discharges to the Swan Island Basin via Outfall S-2, located approximately 350 feet northwest of the subject property.

7.0 SITE CONTROLS

Project site controls or BMPs are often used to reduce the contribution of pollutants from a facility to surface waters. Project site controls can include operational, structural, or treatment measures. Source control measures are used to prevent the potential for industrial pollutants coming in contact with stormwater that discharges to receiving waters and are operational and/or structural in nature.

7.1 SUBJECT PROPERTY BMPs

This section describes the following BMPs implemented at the subject property:

- Minimize exposure
- Oil and grease
- Waste chemicals and material disposal
- Erosion and sediment control
- Debris control
- Dust generation and vehicle tracking of industrial materials
- Housekeeping
- Spill prevention and response
- Preventative maintenance

- Employee education
- Non-stormwater discharges

The following sections include BMPs implemented at the subject property to reduce pollutants in stormwater. BMPs presented in this section have been derived from the NPDES 1200-Z permit, which is administered by DEQ for those industrial facilities requiring coverage under this permit. The subject property does not currently have or require coverage under this permit; however, it provides a good resource to identify applicable BMPs with the goal of minimizing potential contaminant delivery to the public stormwater system and associated receiving waters.

7.1.1 Minimize Exposure

Isolating or containing potential pollution sources from contact with stormwater may be classified as both a source control and a structural control. Containment measures are considered to be the preferred mechanism for reducing or eliminating adversely impacted stormwater discharges. Containment measures employed at the project site are summarized below.

To the greatest extent possible, drums and containers of cleaning products are kept inside the warehouse building. There are no drains inside the building that connect to the stormwater collection and conveyance system. Major vehicle and equipment maintenance activities are conducted offsite if needed. Occasionally, limited vehicle maintenance may be performed outdoors, such as during the failure of hydraulic systems, and is limited to activities necessary to ensure capture and containment of fluids and other significant materials. Equipment and materials stored outside in the yard area are limited to equipment that does not fit inside the building and materials that are likely not liquids. These areas are checked on a regular basis for any noticeable changes.

Indoor storage and operations areas are inspected monthly to ensure that any significant materials stored or used within these areas are being properly contained and managed. In addition, personnel performing routine operational activities will observe conditions between monthly inspections.

7.1.2 Oil and Grease

WENCO employs the following measures to minimize stormwater impacts from fuels, oils, and grease:

- Selected catch basins incorporate filtration media to address potential petroleum products and metals.
- Small spills or releases of oil or other petroleum products are cleaned up using dry absorbents that are swept or shoveled up and properly disposed upon completion of clean up. No detergents, solvents, or other liquids are used.
- There are no large storage tanks with petroleum products onsite. Petroleum products would only be coming from leaking vehicles or equipment.

If visual monitoring results indicate that fuel spills or leaks may be impacting stormwater quality, project site control improvements may be required. Improvements may include additional drainage control and/or drip containment for primary project site equipment. The Stormwater Visual Monitoring Form is included in Appendix A.

7.1.3 Waste Chemicals and Material Disposal

Management controls related to waste chemicals and material disposal include both source control and structural control options. The following management practices related to waste chemical and material disposal have been implemented at the project site:

- Containers of waste fluids are properly labeled, are kept closed, and are maintained in appropriate storage areas. The contents of any containers damaged in shipment or storage are transferred to a sound container.

7.1.4 Erosion and Sediment Control

The facility is approximately 92 percent paved or covered, and unpaved areas coincide with planters and a stormwater swale. As such, erosion is expected to be minimal throughout most of the facility. Non-paved areas are visually inspected for signs of excessive erosion during the routine inspections implemented as a part of this SWPCP. If significant erosion is observed, the point of erosion will be evaluated in order to determine the most effective method for minimizing further erosion. Applicable BMPs to minimize erosion may include area re-vegetation, installation of coir mats, installation of straw wattles, or others.

7.1.5 Debris Control

Considering the nature of facility operations, debris buildup is a possible concern. Although most of the materials coming onsite are in drums or boxes there is the possibility of stockpiles of boxes, plastic wrapping, and pallets accumulating. WENCO personnel strive to ensure that only designated areas are used for these stockpiles and that high-traffic areas, parking areas, work areas, and buildings remain free of accumulated debris. The following measures have been implemented at the facility to control debris:

- A dry dust pavement sweeper unit is used approximately once or twice per week to collect solids.
- Trash dumpsters with lids are placed strategically around the project site to promote proper disposal of paper, wood, and other items that may be discarded during truck loading and offloading.
- Facility-wide inspections are conducted at least once per month to identify areas of debris buildup that needs cleanup.

Solid refuse is collected by an outside waste disposal company on a regular basis. The areas where the refuse is stored will be kept clean and lids will be used to keep refuse inside the containers and prevent stormwater contact.

7.1.6 Dust Generation and Vehicle Tracking

Sediment and dust generated at the project site is likely due to truck and equipment operation and loading and unloading at the loading dock. Methods described in Sections 7.1.5 and 7.1.7 will help prevent dust generation and vehicle tracking.

If the discharge benchmark for TSS cannot be met, more aggressive sweeping of paved areas and use of additional catch basin filters may be required. Monthly visual inspections should include a determination as to whether or not there are isolated sediment sources that may be controlled through additional BMPs.

7.1.7 Housekeeping

Good housekeeping practices will be used at the facility to reduce potential pollutant loading to stormwater. These practices include the following:

- Trash dumpsters are placed strategically around the project site to promote proper disposal of items that may be discarded during truck loading and offloading.
- Containers are properly labeled, are kept closed, and are maintained in appropriate storage areas. Any containers damaged in shipment or storage are promptly over-packed or the contents are transferred to a sound container.
- Facility-wide inspections are conducted at least once per month to identify areas needing cleanup and general policing.
- Keeping the facility neat and orderly.
- Improving operation and maintenance of industrial machinery and processes.
- Implementing careful material storage practices.
- Maintaining up-to-date material inventory.
- Regular cleaning and maintenance of the stormwater system.
- Collecting and recycling used materials.
- Training employees in basic cleanup procedures and good housekeeping practices.

The equipment used for sorting, processing, and loading and unloading will be inspected and maintained according to the facility's routine schedules. Other equipment used at the facility will be inspected and maintained in the same manner. Additional preventative maintenance practices include the following:

- Replace hydraulic oils in an impervious contained area
- Avoid using polyalkylene glycol-based or high zinc-based hydraulic oils in project site equipment

7.1.8 Spill Prevention and Response

Spill prevention consists of implementing safe operating procedures to reduce the likelihood of a spill while handling, storing, or using significant materials.

Table 1. Reportable Quantities

Material	Container	Specific Gravity	Reportable Quantity
Petroleum, Oils, Fuel	Vehicle Fuel Tanks	<1	42 gallons to land
			A visible sheen on the water surface

7.1.9 Preventative Maintenance

The preventative maintenance program will include inspections and maintenance of stormwater management devices, inspections of equipment, and maintenance of such equipment. Monthly preventative maintenance inspections will be made of the general drainage basin features and operations, catch basins, debris screens, and swale. Items that appear in unsatisfactory condition are noted on the inspection form and are repaired or replaced. The Preventative Maintenance Site

Inspection Checklist documented on the form included in Appendix B; completed forms should be retained on file for DEQ if requested.

Management of the stormwater system includes the items listed below:

- Catch basins, stormwater detention and treatment systems, and areas where potential spills or leaks could occur will be inspected during monthly visual inspections. Observations will be recorded on monthly inspection forms.
- Deterioration threatening the structural integrity of the facilities will be repaired or replaced. These include such items as replacement of cleanout grates and catch basin lids.

7.1.10 Employee Education

One of the most important aspects of an effective SWPCP is an employee education program. Employees are trained in pollution prevention activities described in this SWPCP. This training includes good housekeeping practices, preventative maintenance, spill prevention and response procedures, and project site-specific BMPs. This will be an annual review of this document.

Annual SWPCP review from each employee will be documented on an employee acknowledgment form. An example Record of Employee Acknowledgment Log is included in Appendix C.

7.1.11 Non-Stormwater Discharges

Non-stormwater discharges may be significant pollutant sources. In addition, most non-stormwater discharges require NPDES permits. Therefore, the facility will be monitored regularly for sources of non-stormwater discharges as part of the implementation of this SWPCP. Authorized non-stormwater discharges at the facility include the following:

- Minor landscape irrigation within landscape and stormwater swale area. All runoff from irrigation activities is routed through stormwater swale or catch basins with filters prior to discharge.

8.0 PROCEDURES AND SCHEDULES

8.1 SPILL PREVENTION AND RESPONSE PROCEDURES

Response procedures include actions necessary to contain and cleanup a spill of significant material once a spill has occurred. Procedures for preventing spills and for providing prompt response to control spills are included as part of the SWPCP and employee training programs. The Spill Report Form is included in Appendix D. The following general spill prevention and response procedures will be used:

- Operations personnel are equipped with two-way radios and/or cellular phones to provide immediate communication in the event of an accidental release.
- Spill kits containing absorbent pads and booms and other cleanup and safety supplies are placed in strategic locations throughout the project site.
- An adequate supply of absorbent and containment booms and similar items are available to contain and clean up any spilled materials. Spilled materials are cleaned up using dry methods only, whenever possible.

- Prompt relocation of vehicles and equipment that exhibit evidence of potential oil or fluid leakage and appropriate spill response.
- Containers are periodically inspected to ensure that they are closed, properly labeled, and in good condition.
- Protecting vehicle unloading areas from rain and stormwater run-on.
- Spills are immediately contained by using sorbent material such as sawdust, granular sorbent, or sorbent booms.
- Spills are not washed into stormwater drainages.
- Chemicals and small-quantity petroleum products are stored under cover (as permitted by Uniform Fire Code).

Initial Spill Response

In the event of a spill, the initial response efforts, listed below, should be followed:

1. React in a manner consistent with approved health and safety plans to promote personal safety and safety of others.
2. Attempt to keep the spill from reaching any body of water or catch basin.
3. Attempt to actively contain the spill within the area in which it occurred, including the following measures:
   - Block drainage systems from which spill can escape,
   - Build dams around the spill, and/or
   - Direct spilled material to low spots for containment.
4. Notify applicable contacts of the spill. Table 2 provide a list of individuals and agencies to notify in case a spill occurs, as appropriate. The facility main contact (Asher Nelson) is the primary representative responsible for any agency notification and contact.
5. Determine if a Reportable Quantity release has occurred. See Table 1 for a list of Reportable Quantity thresholds. (Note: These substances may be contained in products that do not go by the specific chemical name. Check the material safety data sheet for the material that was released to determine if it contains a Reportable Quantity substance.)
6. If a Reportable Quantity release has occurred, notification of the following agencies is MANDATORY (if in doubt, report):
   - National Response Center – as soon as possible, but within 15 MINUTES of confirmation of the release
   - Oregon Emergency Response System – as soon as possible, but within 1 HOUR of confirmation of the release
   - City of Portland Environment Services – as soon as possible and practicable after notification of above agencies
7. Document the incident on a Spill Containment Emergency Situation Report form. The forms are stored on the WENCO computer network, which is accessible to all employees.
8. Submit the completed form to the facility main contact (Asher Nelson).

Table 2. Emergency Spill Incident Contacts

Contact	Phone Number	Title
Walter E. Nelson Co.		
Asher Nelson (Main Contact)	503.285.3037	Vice President
State/Federal/Local Government Agencies		
DEQ (Cleanup and Tanks) Rob Hood	(503) 860-9661	Call the WENCO contact FIRST; they will help you determine the appropriate notification steps. The **Main Contact (Asher Nelson),** or designee, is the primary representative responsible for any agency notification and contact.
National Response Center (oil and Reportable Quantity spills only)	(800) 424-8802	
Oregon Emergency Response System (oil and Reportable Quantity spill reporting)	(800) 452-0311	
Emergency Response Contractors		
River City Environmental	(503) 546-5549 office	On call responder

8.2 PREVENTATIVE MAINTENANCE PROCEDURES

Preventative maintenance involves the regular inspection, cleaning, and mechanical maintenance of vehicles, equipment, and stormwater management structures, as well as other activities designed to reduce the likelihood of spills and leaks. The following preventative maintenance provisions have been implemented at the WENCO facility:

- A vehicle and equipment inspection and maintenance program has been developed that includes the following:
  - Regularly scheduled vehicle and equipment inspections
  - Service and inspection checklists specific to each type of vehicle and major item of equipment
  - Maintenance logs detailing services performed on each vehicle and major item of equipment
  - Training requirements for personnel involved in vehicle and equipment operations, inspection, and maintenance
- Major items of equipment that are stored or used outdoors are cleaned on a regular basis to remove accumulated oil and grease from exterior surfaces (except as necessary for proper operation).
- Vehicle and equipment maintenance is conducted within the enclosed maintenance building, to the extent possible.

During monthly site inspections, the inspector (Asher Nelson or his designated representative) will determine whether potential pollution sources are being adequately controlled and whether pollution controls specified in this SWPCP have been properly and effectively implemented. Inspections will be documented using the Preventative Maintenance Site Inspection Checklist (in Appendix B), which will include the dates of inspection, items inspected, problems or concerns

encountered, and corrective measures implemented. The facility drainage basins will be included in the inspections, and the following items will be inspected, at a minimum:

- Containment structures, booms, and berms on a monthly basis to ensure that they are intact and functional.
- Discharges from the outfall on at least a monthly basis when occurring to inspect for color, foam, and sheen.
- Facility-wide inspections at least once per month to identify areas of erosion, damaged pavement, and areas requiring sweeping.
- The stormwater quality vault on a monthly basis for buildup of sediments, grease, and related materials. Vault filters will be inspected, and the vault pumped out and cleaned by a licensed private contractor, as necessary.
- Catch basins at least monthly for buildup of sediments, grease, and related materials. Catch basin filters will be inspected and basins pumped out and cleaned by a licensed private contractor, as necessary.
- Spent absorbents, filters, and booms replaced as necessary and properly disposed. It is generally recommended by the manufacturer that the stormwater filters be changed every one to three years based on condition during inspections and after three years regardless of condition to ensure filter effectiveness.

Monthly Preventative Maintenance inspections (discussed in Section 7.1.9 of this SWPCP) will be conducted regardless of stormwater runoff.

8.3 EMPLOYEE EDUCATION SCHEDULE

Employee awareness activities undertaken at the project site are presented in Table 3.

Table 3. Employee Awareness

Activity	Objective	Frequency
Review SWPCP document.	To create an awareness regarding spill response and stormwater pollution. All applicable employees will acknowledge this review.	Within 30 Days of Hire Thereafter Annually

8.4 RECORD KEEPING AND INTERNAL REPORTING PROCEDURES

WENCO is not required to but plans to demonstrate implementation of record keeping and internal reporting procedures so that facility records include relevant information pertaining to the SWPCP. Documentation and reporting that is kept at the WENCO facility should include the following:

- Employee training acknowledgment records
- Monthly visual monitoring results
- Monthly preventative maintenance inspection reports
- Any incidents of spills or leaks of significant materials with the necessary corrective actions taken
- Analytical reports

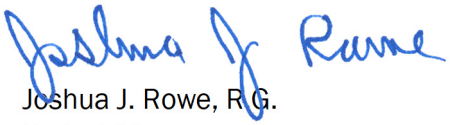
Although the above documents do not need to be submitted to DEQ, they should be maintained on site and made available for review upon request.

♦ ♦ ♦

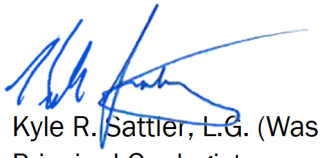
Please call if you have questions concerning the information provided.

Sincerely,

NV5

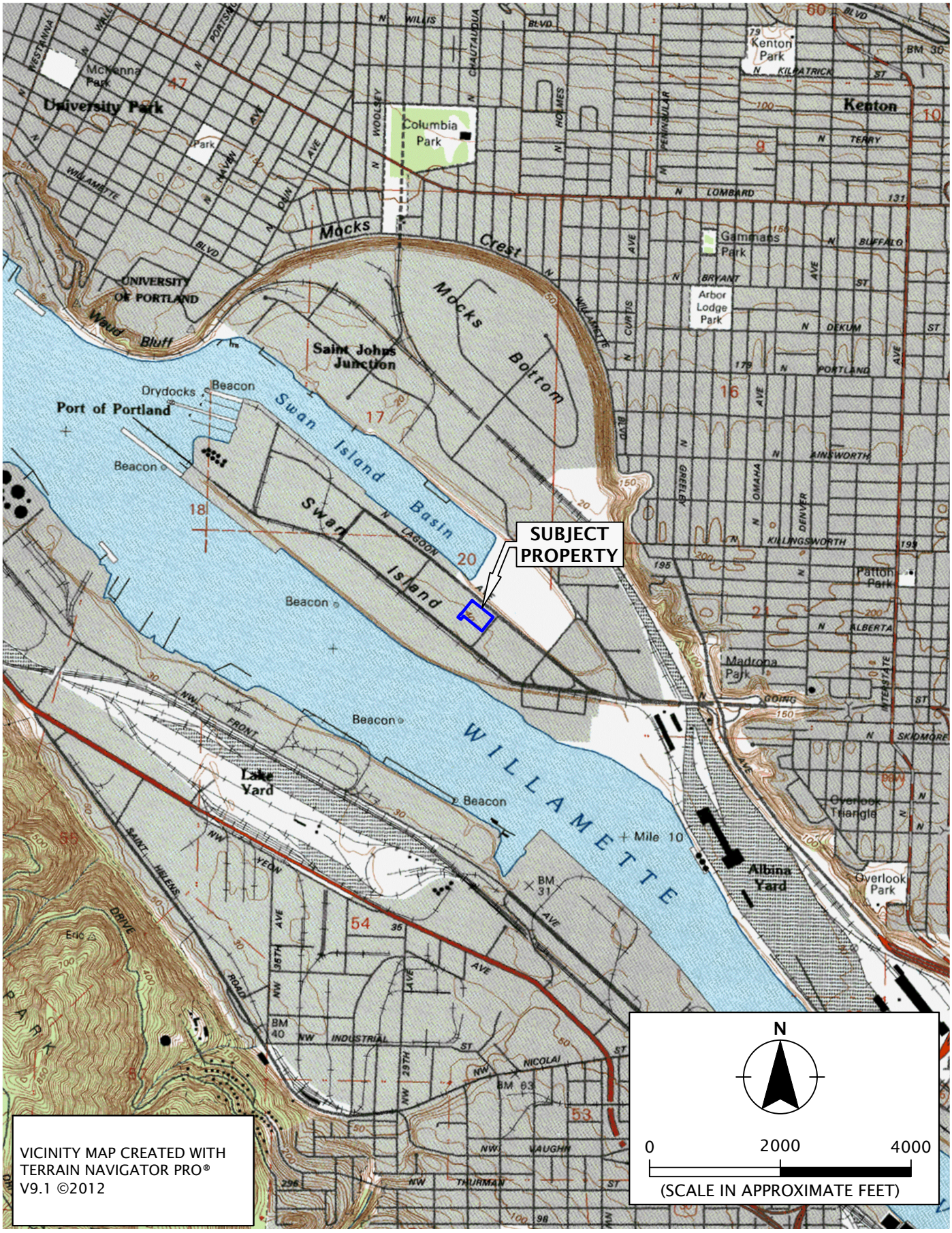


Joshua J. Rowe, R.G.
Project Manager



Kyle R. Sattler, L.G. (Washington)
Principal Geologist

FIGURES



NV5	BCSAMERICA-1-02	**VICINITY MAP**	
	AUGUST 2024	FORMER AUTOMATIC VENDING COMPANY PORTLAND, OR	**FIGURE 1**

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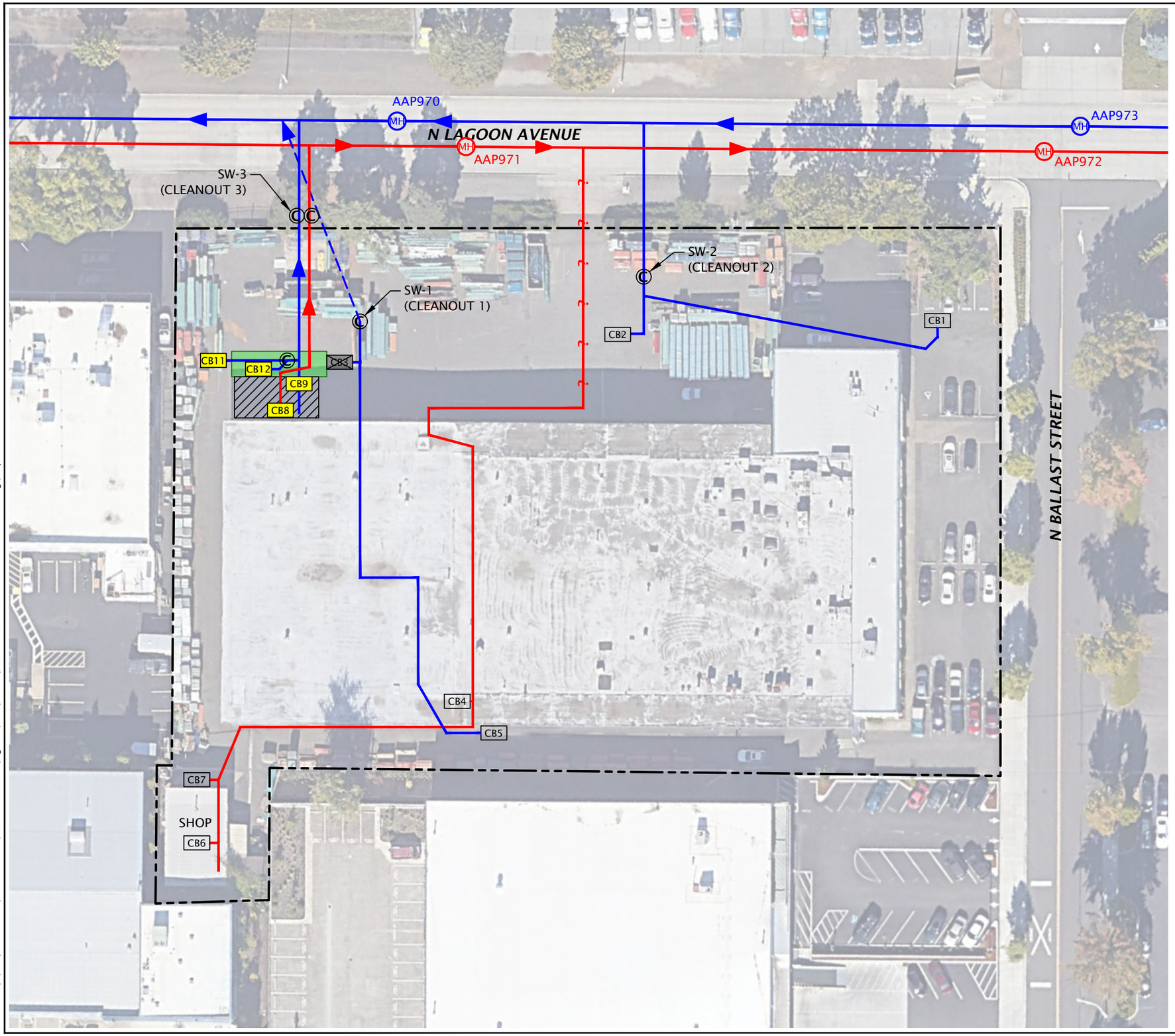
File Name: J:\A-D\BCSAmerica\BCSAmerica-1\BCSAmerica-1-02\Figures\CAD\SWPCP\BCSAmerica-1-02-VM01.dwg | Layout: FIGURE 1



LEGEND:

- SUBJECT PROPERTY BOUNDARY
- STORM LINE (FLOW DIRECTION SHOWN)
- CONCRETE STORM LINE (FLOW DIRECTION SHOWN)
- SANITARY LINE (FLOW DIRECTION SHOWN)
- CB1 — CATCH BASIN
- CB8 — CATCH BASIN REMOVED IN 2022
- CLEANOUT (INSTALLED JANUARY 2021)
- AAP970 MH — MANHOLE
- CB8 — NEW CATCH BASIN
- NEW VEGETATED SWALE
- NEW LOADING DOCK

NOTE:

QUESTION MARKS DENOTE PORTIONS OF THE LINE THAT COULD NOT BE SCOPED.

N

0 50 100

(SCALE IN FEET)

SITE PLAN BASED ON AERIAL PHOTOGRAPH OBTAINED FROM GOOGLE EARTH PRO®, FEBRUARY 28, 2020

SITE PLAN - STORMWATER CONVEYANCE SYSTEM

FIGURE 2

FORMER AUTOMATIC VENDING COMPANY
PORTLAND, OR

BCSAMERICA-1-02

AUGUST 2024

NV5

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File Name: J:\A-D\BCSAmerica\BCSAmerica-1\BCSAmerica-1-02\Figures\CAD\SWPCP\BCSAmerica-1-02-STRMWTR-CONVEY-01.dwg | Layout: FIGURE 2

APPENDIX A

Monthly Stormwater Visual Monitoring Form

Walter E. Nelson Co.

5001 N Lagoon Ave, Portland, OR

Visual Inspection of stormwater monitoring point(s), MUST BE completed monthly, during a discharge event.

IF NO DISCHARGE Event occurs during the month, write "NO DISCHARGE"

Inspector _____ Date _____

Weather Conditions _____ Time _____

	Yes	No	If YES: Describe Corrective Actions Needed	Date Corrective Actions Completed
Basin 1 Monitoring Point: Vegetated Swale				
Floating solids				
Oil & grease sheen				
Was a stormwater sample collected?				

Notes:

APPENDIX B

Preventative Maintenance Site Inspection Checklist

Walter E. Nelson Co.
5001 N Lagoon Ave, Portland, OR
Inspection Must Occur Once a Month; Does NOT Need to be Completed During Storm Event

Inspector _____ Date _____

Weather Conditions _____ Time _____

	Status					
	Yes	No	Observations/Notes	If "No", Recommended Corrective Actions	Date Completed	Initials
General Operations						
Unobstructed/operative						
Dumpsters covered						
Areas clean of excess debris						
Equipment and Vehicles						
No significant spills or leakage						
Drip pans placed appropriately						
Pavement and Barriers						
Free of significant cracks and potholes						
Barriers around processing and storage areas intact						
Sorbent booms around process areas in good condition						
Spill response kits present						
Spill response kits full						
Containers and Tanks						
Kept closed						
Properly labeled						
In good condition						
Signs of leakage or spillage not present						
Catch basins						
Oil/grease sheen not present						
Sediment buildup less than outlet height						
Filters appear in good condition						
Floating solids not present						
Surface grates in good condition						
Swale						
No significant sediment buildup at effluent points						
No significant erosion						
No stressed or dead vegetation						
Stormfilter vault and filters in good condition						

APPENDIX C

Walter E. Nelson Co.
SWPCP Review
and Acknowledgement

Employee Name	**Date**	**Date**	**Date**	**Date**

APPENDIX D

SPILL REPORT FORM
Walter E. Nelson Co.
5001 N Lagoon Ave, Portland, OR

INITIAL INFORMATION		
Date:	Time Reported: ( ) AM ( ) PM	Time Occurred: ( ) AM ( ) PM
Weather Conditions:		
Individual Reporting (Your Name):		
Location of Spill:		
Description of Material Spilled:		
Estimated Amount of Material Spilled (gallons, pounds, etc.):		
Source and Cause of Spill (if known):		
Senior Management Individual Notifed:		
Reportable Quantity? NO YES (Refer to WENCO SWPCP)		

RESPONSE, CONTAINMENT AND REMEDIAL ACTIONS
Describe measures used to protect employees, contain spill, divert from stormwater system, and clean up spilled material:

NOTIFICATION		
Persons and/or Agencies Notified	**Phone Number**	**Date/Time Notified**

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