

Industrial and Commercial Facilities Stormwater Program

Program Outline

1. Purpose: To reduce and control the discharge of pollutants from industrial and commercial facilities to the municipal separate storm sewer system. To fulfill NPDES MS4 Permit requirements of Section A.3.g.
2. Legal Authority: Environmental Services has historically requested stormwater source controls at facilities where stormwater pollutants are a concern. The City of Salem has adopted a new Stormwater Ordinance (SRC 71), Design Standards (administrative-rule-109-001_109-007-public-works-design-standards), and Stormwater Management Manual (administrative-rule-109-012-stormwater-source-controls) which require source control for known or potential sources of pollution and for certain activities.
3. New Facilities (A.3.g.i): Plans review/comment process—Environmental Services Staff will review new industrial and commercial development building permit applications submitted to the City to determine if any new facilities could be subject to an industrial stormwater NPDES (1200-Z) permit.
4. Existing Facilities (A.3.g.i): Environmental Services Staff will review data sources to determine if any existing facilities within the City could be subject to an industrial stormwater 1200-Z permit. The review will consist of the following steps:
 - Compare the SIC list provided in the 1200-Z permit to a list of industrial pretreatment-permitted businesses within the City;
 - Use existing data sources and staff knowledge of the community to identify businesses that appear to conduct operations covered by the SIC list, but may not currently have a 1200-Z permit; and
 - Perform site visits to identify sites potentially requiring a 1200-Z permit and/or having a discharge of concern.
5. Notification (A.3.g.i): If a new or existing facility is identified that is potentially subject to an industrial stormwater 1200-Z permit, Environmental Services Staff will notify the facility owner/operator and DEQ within 30 days. Environmental Services Staff will notify the facility owner or contact person by letter (see Attachment 1). Regional staff for the DEQ Western Region will be contacted by email and copied on the letter sent to the facility owner.

6. Significant Pollutant Sources (A.3.g.ii): The strategy to reduce significant pollutant sources in stormwater discharges from industrial and commercial facilities involves multiple City workgroups, with activities identified as follows:
- Stormwater Services Section: Implement annual dry weather outfall inspections to detect and eliminate illicit discharges, provide annual stream cleaning activities, and conduct water quality monitoring (in-stream and MS4).
 - Environmental Services Section: Respond to citizen complaints, provide 24/7 spill response, perform general business inspections and plans review (including: grease trap requirements/inspections, trash area management plans, residential grease management plans, waste management plans, spill response plans and stormwater design standards), require reports from industries permitted through the Industrial Pretreatment Program, perform industrial pretreatment inspections, receive information from City crews during routine maintenance work (including: TV inspection crews, sewer cleaning crews, and stormwater maintenance crews), provide monthly stream monitoring, and maintain existing Environmental Services database (see Attachment 2).
 - Wastewater Pretreatment Section: Permitted Industrial users under the pretreatment program (40CFR403) are subject to annual or biannual inspections, depending upon permit type, which include a review of site activities, potential pollution sources, existing source controls, and stormwater facilities (see Attachment 3). Examples of stormwater inspections include viewing outside storage areas, looking for evidence of staining or discoloring from past spills, and checking existing source controls and storm to sanitary diversion systems.
 - Commercial Development Review: The plans review process will help screen new significant pollution sources by requiring pollution prevention plans be submitted. Plans may include information on grease trap requirements/inspections, trash area management, waste management, spill response, residential/apartment complex grease management and stormwater design standards.
 - Inspection and Enforcement: Facilities can also be inspected on a complaint derived basis. All facilities that are the subject of a complaint will be inspected in a timely manner. Inspections may be conducted during source tracking activities if storm event monitoring work or routine monitoring work shows excessive levels of one or more pollutants. The implementation of control measures for stormwater discharges from these facilities will be deemed necessary if the

presence of excess levels of pollution in stormwater has been confirmed. Should the discharger's initial attempts to improve stormwater quality not produce the required improvement, City personnel will continue to provide guidance and technical assistance until the facility's stormwater quality improves. Enforcement actions are guided by Salem Revised Code (SRC) Chapter 71 – Stormwater.

ATTACHMENT 1

Industrial and Commercial Stormwater Permit Notification Letter

April 8, 2026

[Contact Name]
[Business Name]
[Business Address]
[City State Zip]

SUBJECT: Industrial and Commercial Stormwater Permit Program Requirement Notification

Dear [Contact Name]:

The City of Salem operates a Municipal Separate Storm Sewer System (MS4) under authority of a National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit issued by the Oregon Department of Environmental Quality (DEQ). The permit requires the City to maintain a program to monitor and control pollutant discharges to the local storm drain system from industrial and commercial facilities located within Salem. To meet this requirement, the City has developed an Industrial and Commercial Stormwater Program to notify potentially affected Salem-area businesses that they may be subject to an industrial stormwater NPDES permit.

Your facility has been identified as a business potentially subject to DEQ's industrial stormwater NPDES permit requirements. Please contact Mark Riedel-Bash, DEQ Western Region, at 503-686-7551 or riedel.mark@deq.state.or.us, for a permit application. Mark Riedel-Bash works in the Eugene DEQ office at 165 East 7th Avenue, Suite 100, Eugene, Oregon 97401.

If a permit is required for a facility site located within Salem, the facility must submit an industrial stormwater NPDES permit application to DEQ and obtain a permit. However, if no industrial activity occurs at the site that could be impacted by rainfall (i.e., outdoor production, materials storage, fleet activities, or other outdoor activities) and/or contribute pollutants to stormwater runoff, the facility may request an exemption from obtaining a permit by filing a No Exposure Certification with DEQ.

If you have questions regarding this letter, please contact City of Salem Environmental Services at 503-588-6063.

Sincerely,

[Author's Name Placeholder]
[Author's Title Placeholder]

[typist/proofreader initials]:\\allcity\Common\Template\PublicWorks\vAll\correspondence\letter_industrial commercial stormwater permit program notification.dotx
cc: Western Region Office, Oregon Department of Environmental Quality
Jim VanHouten, Environmental Services Supervisor
File: Chrono
File: Regulatory

ATTACHMENT 2

Excerpts from Environmental Services Database

Database Homepage

Environmental Services | Welcome CITYOFSALEM\shall!

Business | Contact | Incident | Inspection | Required Action | Violation | Reports | Schedules

SSO Event Summary

Active SSO Events: [1](#)
Unresolved SSO Events: [2](#)

Incident Summary

Total Unresolved Incidents: [1](#)
Unresolved Incidents Assigned to You: [0](#)

Inspections Summary

Total Incomplete Inspections: [59](#)
Incomplete Inspections Assigned to You: [7](#)

Required Actions Summary

Total Incomplete Required Actions: [1436](#)
Incomplete Required Actions Assigned to You: [8](#)

HANSEN SERVICE REQUESTS

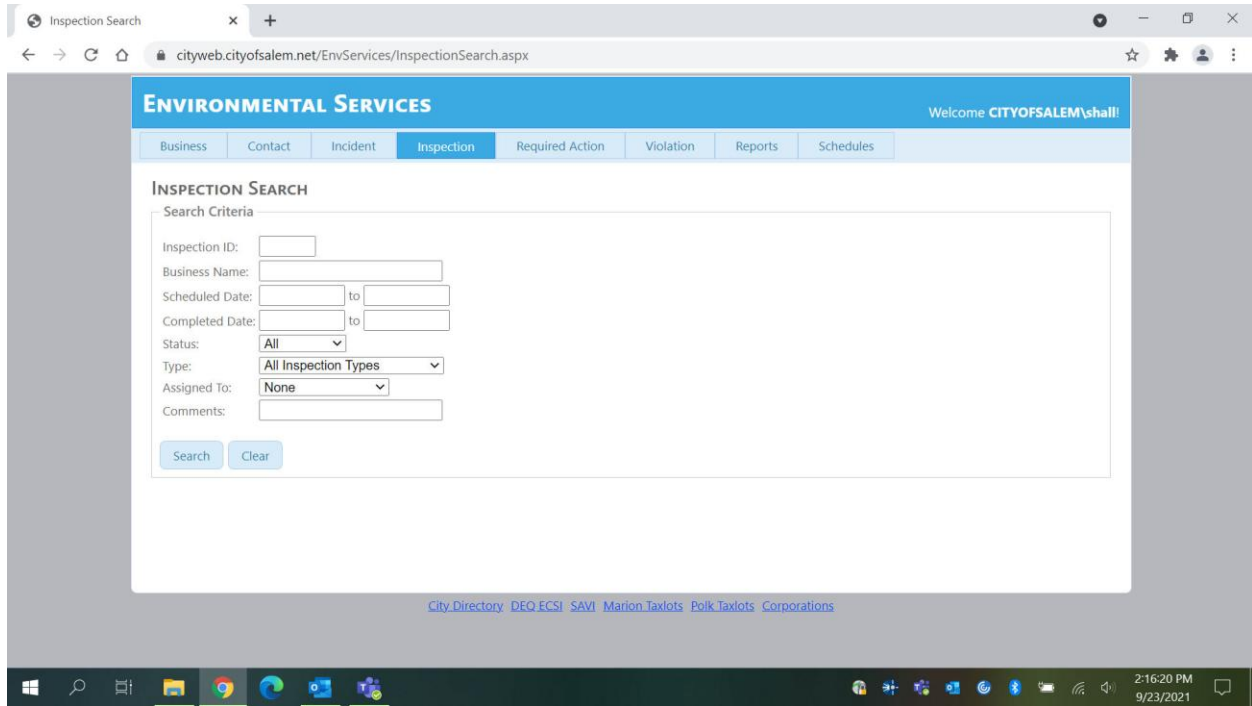
Last Imported: 09/23/2021 13:30:05
[Update Service Requests](#)

[Open map in new window](#)

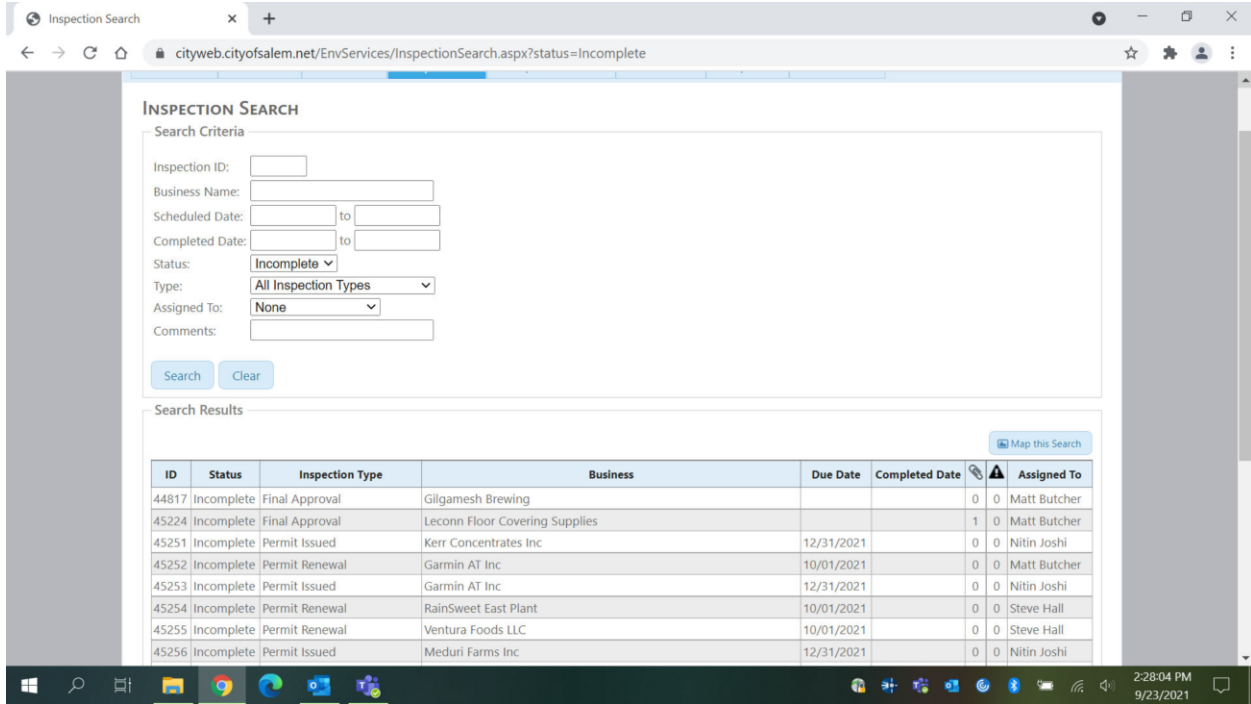
City Directory | DEQ | ECSI | SAVI | Marion Taxlots | Polk Taxlots | Corporations

1:52:53 PM
9/23/2021

Inspection – Search



Inspection – Search – Example



ATTACHMENT 3

Excerpts from Environmental Services Pretreatment Manual

Implementation Manual TAB A

VIII. Inspection of Industrial Users [Manual, pg 21-29]

In accordance with SRC 74.480, the City inspects the facilities of all permitted industrial users to determine compliance with this chapter.

Salem Revised Code Chapter 74, as well as Departmental policy WW-4-3, provides guidelines for performing inspections. The inspections are to be conducted in a concise, professional manner by ECS employing the following general procedures:

A. Type of Inspections

ECS perform more than one type of inspection, inspections include:

- Survey**

A survey is conducted as an initial screening generally done when canvassing an area. Basic information gathered includes the business name, address, date, type of business, SIC number, if chemicals are used or are present, and if a permit is required. This information is recorded in the field. Upon return to the office, the ECS enters the information into the computer database. If chemicals are used or are disposed of, if a permit or pretreatment is needed, or if the business is a categorical user, the ECS arranges for a more complete inspection visit.

2. **Complaints**

When receiving a nonemergency complaint, the ECS first needs to determine if a problem exists. Information similar to that gathered during a survey is covered, but with the main focus being on the specific complaint. Documentation is collected as needed. If a problem is found, the ECS will require that corrective action be taken by the responsible party. If the problem is found at a permitted user's facility and relates to pretreatment equipment and requirements, a Field Notice of Violation is issued and the date of required correction is set. If an accidental release to the sanitary sewer or environment has occurred, the ECS will also require the spiller to report the incident and actions taken in written form within five days. If the inspector is dispatched to respond to a spill a job order form will be completed to record the event and document costs incurred by the City, if appropriate. In the case of a spill or release, the spiller or the spiller's business is designated the responsible party and is responsible for all cleanup and related costs and corrective action to prevent recurrence (SRC 74.060).

3. **Full Facility Inspection**

A full facility inspection is an in-depth tour of an existing permitted facility, the initial inspection of a new facility, or the initial inspection of an unpermitted user who the ECS feels may need to be permitted.

Preparation for this type of inspection is covered later in this section and includes steps to be taken prior to, during, and after the inspection. The full facility inspection can be either an announced or unannounced inspection, refer to the following table for required frequency.

Announced Inspection

Contact the designated business representative to schedule an appointment for the inspection. Usually the business is informed during a scheduled inspection that an unannounced inspection will occur in the future. The procedures followed are the same for each type of inspection, with the exception of prescheduling a date and time.

Review past records and be familiar with any problems that have occurred, or changes that were anticipated, since last inspection.

Be familiar with any changes in local, State, or Federal regulations that may have an effect on the business's wastewater discharge.

Have new inspection forms ready.

If samples are to be taken, have sampling containers ready. Notify testing laboratory so they will be expecting samples and can process them in a timely manner. Use chain-of-custody forms.

Ensure any field test equipment is calibrated and working properly (such as pH meters). If pictures are taken, make sure camera is ready.

Have employee identification and business cards available so they may be used when introducing yourself to the business. This is especially important if past contact has not already been established.

Plan schedule so you can arrive for meeting at proper time.

Unannounced Inspection

Same process as announced inspections; however no prior appointment is made. There are permitted industries in Salem that require advance notice of an inspection because of security measures required at correctional facilities.

B. Inspection Frequency

Minimum inspections and sampling schedule:

Classification	Minimum Sampling	Announced Inspection	Unannounced Inspection
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Significant Industrial Users	twice/year	once/year	once/year
Other Industrial Users	as needed	every 5 years	

C. Procedures Prior to the Inspection

1. Become familiar with facility.

- a. Review facility plans if available.
- b. Review permit, if a permitted industry.
- c. Review file for previous contacts/problems/information.
- d. Is facility a categorical, significant, or other type of business?
- e. Given the type of business, what might be discharged (grease, oil, other chemicals, grit, vegetable matter, etc.)?
- f. Is any form of pretreatment/equipment in place (screens, pH neutralization/monitoring, settling, heavy metals precipitation, etc.)?
- g. Who is the business contact person?

2. Inspection/Sampling Equipment.

- a. Calibrate pH meter.
- b. Clean sampling equipment.
- c. Check that you have enough sample containers of the proper type for the samples to be taken.
- d. Ensure sample containers contain necessary preservative if required.
- e. Check for chain-of-custody forms.
- f. Is ice chest needed for transporting sample?

- g. If the sampler is battery powered, are batteries charged and do the batteries have sufficient power to operate for the length of time you wish to sample?
- h. Do you need any special adaptor wires to connect batteries to sampler?
- i. Do you need an extension cord for sampler?
- j. Is an on-site power supply available?
- k. Will the sampler be secure in the area you wish to leave it?

D. Denial of Entry

If entry is denied, the ECS must ensure they are speaking to the appropriate contact person or ask to have that person notified and inform them entry has been denied. The ECS must properly identify themselves as a City representative, showing their City identification card as well as business card, and making sure the reason for the visit is clearly stated. When contact with the appropriate person is made, the ECS can remind the person that allowing facility access is required under SRC 74.480 and if access is denied the user could be subject to enforcement actions as outlined in SRC Chapter 74 and 40 CFR 403.

At no time should the inspector threaten the individuals involved or engage in any verbal or physical assault. The inspector should withdraw from the facility and notify their supervisor of the situation. A police officer and/or supervisor may be dispatched to accompany the inspector to gain facility access. Every reasonable attempt to allow cooperation by the facility representative should be afforded.

Enforcement actions, as outlined in the Enforcement Response Guide of this manual, will be initiated if needed.

E. Procedures During the Inspection

- 1. Some facilities require all visitors to sign a visitor's log book stating the date, time, organizational affiliation, and whom you wish to contact. The ECS should comply with the business's wishes in use of a visitor's log;

however, the ECS should not sign any other waiver or hold harmless type of liability form.

2. Make contact with the business representative you are to deal with during the inspection. If the primary contact person is unavailable, ask for the alternate person, business owner, manager, or other individual having authority in the operation. Inform the contact person you have arrived to perform a facility inspection.
3. Discuss any previous concerns or changes noted in file or observed during previous inspections.
4. Determine if any new operations, procedures, products, or chemicals have been employed since the last inspection (get overview of process/chemical use if inspecting a previously uninspected business).
5. Determine if any new disposal methods have been implemented since the last inspection (such as recycling rather than disposing of solvents).
6. Determine if any physical changes have been made to the facility since the last inspection (such as building expansions, changes in process areas, and changes in plumbing).
7. Determine if any changes are anticipated in the near future.
8. Tour the facility, noting whether the location of such items as operations and drains are the same as indicated in the business file.
9. Inspect any pretreatment processes, noting whether they are functioning properly.
10. Take a grab sample if needed to confirm compliance with discharge limits.
11. Inform the business representative of any potential changes in discharge regulations which could require action by the company.
12. Review the inspection with the representative, answering questions and clarifying information. Discuss any problem areas and

establish date for compliance if required.

13. Encourage the representative to contact you any time changes are made or problems are experienced that will affect their effluent.

Checklist Questions

a. What is the type of business?

- Is it regulated under Federal categorical standards?
- Is it a City-permitted business?
- Is it a significant industrial user based on the volume or possible content of the wastewater?

b. What type of process wastes are generated?

- Does the process waste discharge to the sanitary sewer?
- If there is no discharge to the sanitary sewer, is there any discharge to storm drains?
- Is there on-site solids or sludge removal?
- If wastes are removed from the process, who removes the wastes, how much is removed, how often is it removed, and is the removal contractor licensed?

c. Is This a New or Existing Operation?

- If this is an existing business, have there been previous inspections and sampling performed?
- If previously inspected or sampled, were there any violations or problems found?
- Does the business have a current discharge permit?

- Does a permit need to be issued, renewed or revised?

d. Where do Process Wastes Originate?

- How do the wastes pass through the business?
- Are the process wastes separate from the domestic wastes?
- Is pretreatment of process wastes required?
- Is the required pretreatment accomplished?
- Have sampling results indicated any violations of pretreatment standards?
- Does the pretreatment equipment operate properly?
- Are personnel trained and equipped to maintain pretreatment equipment?
- Do employees understand how equipment is to work and what standards need to be kept (i.e., pH range)?
- Is maintenance done and are records kept?
- Is equipment calibration done as required?
- Are records kept and available for review?
- Are other unregulated waste streams being discharged?
- Is there dilution of the process waste stream by side streams?
- Are production-based standards applicable?
- Is the production level within reported range?

e. What Chemicals or Waste Products May be Contained in

the Discharge Stream?

- Are any waste products listed toxic?
- Is the company required to complete a state Fire Marshal "Form R"?
- What is their hazardous waste generator status?
- Are any TTO (Total Toxic Organic) solvents used or disposed of?
- What quantity of products or chemicals are kept on site at any given time?
- Has an ASPP/SCP (Accidental Spill Prevention Plan/Slug Control Plan) been written?
- Have employees been trained what to do in case of an accidental spill? Who do they notify? Are the numbers posted?
- Is the spill plan up-to-date?
- Where are products used and stored?
- In an accident, can products run directly into the storm or sanitary sewers via floor drains or exterior lot drains?
- What actions can be taken to limit harm of an accidental discharge?

f. Identify Sampling Site to Monitor Process Waste.

- Is flow from regulated process only, not diluted with other process or sanitary waste?
- Will a grab or composite sample be needed to assure

a sample representative of the waste?

- Is site accessible to the inspector?
- Can a sampler be set up by the inspector if necessary?

g. **Does Waste Flow Match Plumbing Blueprints?**

- Have any changes or modifications been done in the facility that have altered the flow pattern?
- Have waste flows been confirmed by dye testing (especially important where new owner occupies an old, existing facility)?
- Is any discharge to the storm sewer allowed?

h. **For an Existing Business That Has Been Previously Inspected.**

- Are any new products being processed?
- Has the volume processed increased or decreased from last inspection?
- Are production increases or cutbacks expected in the future?
- Have any changes in chemicals used or processes occurred that may change the constituents of the discharge?
- Have any problems been experienced?
- Are records kept and available for review by the ECS?

F. Procedures After the Inspection

1. Make sure any samples that were collected are delivered promptly to the lab for analysis. Have the chain-of-custody form completed and ready for the lab to receive.

2. Complete the inspection report, noting any changes made or expected, or problems experienced. If a notice of violation was issued, make sure the date for re-inspection or correction of the problem was established and that re-inspection will be done.
3. If a violation was found, the business must respond, in writing, within five working days. They must explain what caused the problem, what corrective action was taken, how long the discharge occurred, and what measures are or will be taken to ensure the violation will not recur. The ECS will note when this report is due and contact the business if it is not received.
4. Upon receipt of sample analysis, review results to ensure compliance with discharge limits. Log results on the business's chronology sheet. Calculate the six-month revolving average to see if industry is in compliance. Resample within 24 hours of receipt of results indicating noncompliance.
5. Write a letter to the business, forwarding sample analysis results and discussing discharge compliance status. If results indicate noncompliance, inform business of such. A phone call may be made to the business prior to sending a letter, to inform them of the problem and initiate corrective action in a prompt manner. Follow up with a written Notice of Violation if needed.
6. Place copies of all inspection sheets, pictures, lab analysis, letters, and phone conversation sheets in appropriate business file which are kept for permanent record.
7. Follow up with any noncompliance actions initiated to ensure problems are rectified in an expedient manner. If the business was in noncompliance, they must submit a written report within five working days outlining actions taken to return to compliance. Continue inspections and sampling until they show compliance.

Significant Industrial User Inspection Forms Tab N

These forms are used for inspections at permitted industries. The full facility inspection form is used in the City's word processing application to standardize biannual compliance inspections performed at permitted industries.

CITY OF SALEM

FULL FACILITY INSPECTION

Date: [Inspection Date] **Time:** [Inspection Time]
Inspection Type: [Inspection Type] **Inspector:** <Name>
Company Name: [Company Name] **User Code:** [User Code]
Company Rep: [Company Representatives]
Address: [Address]
Mailing Address: [Mailing Address]

RECORDS

Permit:

ASPP:

Emergency Contacts: Name Day Phone Night Phone

Testing:

MSDS:

Plans:

DISPOSAL

Non-hazardous:

Hazardous:

Waste Invoices:

OTHER RECORDS

Employee Training:

OTHER PERMITS

Storm Water Permit:

Air Permit:

FACILITY INSPECTION

Processing:

Maintenance:

Storage:

Pretreatment:

CHEMICAL USE

Storage:

SPILLS/RELEASES

CHANGES

Made:

Planned:

EXTERIOR

Storm Drains:

Other:

MISCELLANEOUS

