

# **Appendix F**

## **UIC Compliance Determination Procedure**

### **Evaluation and Response Program Element**

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*Bureau of Environmental Services*

**UIC Compliance Determination Procedure**

**PURPOSE**

This City of Portland Bureau of Environmental Services (BES) Compliance Determination procedure is a tool for determining if an individual City-owned Underground Injection Control (UIC) system (*i.e.*, sump, injection point; injection well) is constructed and operated in compliance<sup>1</sup> with the conditions in the DEQ issued Water Pollution Control Facility (WPCF) permit (No. 102830) and applicable<sup>2</sup> rules and regulations. The intent of the procedure is to define the criteria and types and quality of data (*i.e.*, weight-of-evidence) needed to determine UIC permit compliance. Non-compliant conditions will be defined based on known and verifiable information that is determined to have a high or medium confidence level, as described below.

The quality and verifiable nature of the data used to determine compliance status can be generally described by three data categories, based on the level of confidence that can be placed on the information:

Level of Confidence	Description
High	Data and information that is based on the following: field verification of the characteristic(s) being evaluated; direct observations; written professional reports; or contained in files, field notes, etc., prepared by an appropriate professional.
Medium	Data and information obtained from a reliable professional that is based on the following: limited field verification; casual observations or indications; anecdotal information passed by word-of-mouth but not documented in written professional reports; files, field notes, etc. prepared by an unknown author with known original study objectives (limited data quality); or data interpreted or extrapolated, based on best professional judgment, from nearby sites or information.
Low	Data and information is based on the following: no field verification; no direct observations; third party anecdotal information; limited or no written documentation; files, field notes, etc. prepared by an unknown author with unknown original study objectives (unknown data quality); or other data or information that cannot be directly verified or confirmed.

Completion of the Compliance Determination worksheets will separate UICs into three categories:

1. **Compliant:** UICs are compliant with WPCF permit conditions and will continue be managed (*i.e.*, operated and maintained) in accordance with the *System Management* (UIC Management Plan (UICMP) Section 3) and *System Monitoring* (UICMP Section 4) program elements.
2. **Non-Compliant:** UICs determined to be non-compliant will be referred to the Corrective Action program element, described in Section 6 of the UICMP for selection and implementation of an appropriate corrective action(s).
3. **No Determination:** No conclusive determination can be made. Additional data, of known and verifiable quality and of high or medium confidence is needed, or further evaluation is needed to make a UIC compliance determination. In this case, the UIC will be evaluated using the *UIC Evaluation and Response* (UICER) guidelines, described in Section 5 of the UICMP, as necessary and appropriate.

<sup>1</sup> Defined in Schedule F, Section 5(gg), of DEQ Water Pollution Control Facilities (WPCF) permit No. 102830.

<sup>2</sup> The permit requires compliance (Schedule F Section 1(f)) with State statutory laws and administrative rules applicable to the UIC program.

## **APPLYING THE COMPLIANCE DETERMINATION PROCEDURE**

The Compliance Determination procedure consists of five (5) following worksheets and a final compliance determination form provided at the end of the procedure. The worksheets include:

- 1) Adequate Separation Distance;
- 2) Annual Mean MADL Exceedance;
- 3) Proximity to Drinking Water Wells;
- 4) Direct Discharge of Prohibited Fluids; and
- 5) Motor Vehicle Drains.

Worksheets 1 through 5 should be completed, as needed, for each UIC or group of UICs identified as potentially non-compliant. The worksheets should be completed using the best available information (see following section).

Worksheets 1 through 3 should be completed using data collected in accordance with the following UICER guidelines. Specific guidelines that should be considered include:

- Separation Distance (UICER Guideline No. 1);
- MADL Exceedances (UICER Guideline No. 2); and
- UIC Proximity to Drinking Water Wells (UICER Guideline No. 3).

Information used for compliance determinations should be referenced and copies of data should be attached to the individual worksheets, as appropriate. The purpose of these worksheets is to identify non-compliant UICs that meet a known and verified standard. If verifiable data are not available to confirm a non-compliant condition, the UIC will be referred for further evaluation, described in Section 5 of the UICMP, to address identified data gaps or to collect confirming information in accordance with the UICER guidelines.

The Compliance Determination Procedure is anticipated to be an iterative process. In order to achieve a high or medium level of confidence that a UIC does not meet permit conditions, data gaps need to be addressed and further investigation or evaluation performed. It is the City's goal to limit the number of iterations of the Compliance Determination Procedure to less than three, including the initial identification of the UIC through the UICMP *System Management* or the *System Monitoring* program elements.

## **DATA SOURCES USED IN COMPLIANCE DETERMINATION**

The UIC Compliance Determination worksheets use a wide variety of information or data collected with varying levels of associated confidence in data quality, depending on the purpose of collecting the information. In general, data and information for completing the *Compliance Determination Procedure* worksheets comes from one of three sources, which are described in more detail in the following subsections:

- 1) Data or information collected while implementing comprehensive *System Inventory and Assessment* or other activities performed under the UICMP *System Management* program element (UICMP Section 3);
- 2) Information collected as part of the UICMP *System Monitoring* program element (UICMP Section 4); and
- 3) Subsequent assessments or investigations (*i.e.*, UICER guideline implementation) to evaluate and document UIC compliance status.

The activities listed above will be performed throughout the duration of the WPCF permit (June 1, 2005 through June 1, 2015). Data collected during the UICMP *System Management* and the *System Monitoring* program elements are described below. Data and information that may be collected through UICER guideline implementation are included in the individual UICER guidelines.

1) System Management. In accordance with the WPCF permit, the City conducted a comprehensive system inventory and assessment, which evaluated the spatial and physical characteristics of City-owned UICs relative to WPCF permit requirements, and assessed the drainage to each UIC. This systemwide assessment was required as part of the WPCF permit as a mechanism to identify UICs that may present a risk of adverse impacts to groundwater. Results were presented in an initial comprehensive *Systemwide Assessment* report (City of Portland 2006) and included lists of UICs with the following characteristics:

- 1) Receive drainage from motor vehicle maintenance floor drains, indoor parking facilities, and fire station bay drains.
- 2) Receive drainage from SARA Title III facilities.
- 3) Receive drainage from commercial/industrial properties that have site activities that could result in a violation of MADLs in stormwater entering City-owned UICs.
- 4) Are in areas of high (*i.e.*, shallow) groundwater and potentially have inadequate separation distance between the bottom of the UIC and groundwater.
- 5) Are within 500 feet of a drinking water or irrigation well or within the 2-year time of travel.

A work plan for the further evaluation of these UICs was submitted to DEQ on December 1, 2006. The work plan builds on several of the UICER guidelines described in Section 5 of the UICMP.

*System Inventory and Assessment* will occur over the lifetime of the WPCF permit through on-going application of the best management practices (BMPs) that constitute the UICMP *System Management* program element (UICMP Section 3). These BMPs will serve as a continual means to identify, investigate, evaluate, and characterize the physical and spatial characteristics of City-owned UICs.

The types of information and data that will be drawn from the *Systemwide Assessment* for use in the Compliance Determination Procedure include information on physical and spatial parameters that could present an adverse impact to groundwater.

2) System Monitoring. The *Stormwater Discharge Monitoring Plan* (City of Portland 2006), described in Section 4 of the UICMP, provides the procedures for monitoring the quality of stormwater discharged to UICs and analyzing the results. Stormwater monitoring results will be submitted to DEQ each July in annual Stormwater Discharge Monitoring reports and summarized in the annual UICMP reports submitted each December. These reports will identify UICs that exceed a MADL concentration either for an individual storm event concentration or for the annual mean concentration.

A list of UICs (Year 1) with annual mean stormwater discharge concentrations that exceeded the MADLs specified in the WPCF permit was presented in the *Annual Stormwater Discharge Monitoring Report* (City of Portland 2006) submitted to DEQ in July 2006. A list of UICs that exceed MADLs in permit years 2 through 10 will be included in the annual UIC reports submitted to DEQ in July and December of each permit year.

Monitoring information and data (*e.g.*, detected concentrations of pollutants as compared to their respective MADLs) will be drawn from the annual Stormwater Discharge Monitoring reports for use in the Compliance Determination Procedure.

## NON-COMPLIANT CONDITIONS DEFINED BY THE WPCF PERMIT

This section summarizes key portions of the WPCL defining non-compliant UIC conditions:

### Schedule C, Section 12a, Corrective Actions.

- a. A corrective action must be implemented under the following conditions:
  - i. For public any (*sic*) UIC that is non-compliant as defined in Schedule F(5)(gg),
  - ii. For public UICs that fail to meet permit conditions; or
  - iii. For public UICs within domestic, irrigation or public water well setbacks as defined in Schedule F(5)(gg), the Permittee must demonstrate through monitoring data that the quality of stormwater discharged into the public UIC meets the annual mean MADLs specified in Table 1.

**Schedule D, Section 11, Non-compliant Public UICs.** A public UIC is non-compliant if it fails to meet the conditions of this permit or meets the definition in Schedule F(5)(gg).

### Schedule D, Section 13 (e).

The Permittee may exclude any public UIC authorized by this permit from the non-compliant conditions for domestic well or public water system well setbacks, if the Permittee demonstrate any of the following conditions are met, and the Department concurs in writing with the exclusion. The Permittee must demonstrate:

- i. The stormwater is pre-treated prior to discharge to the public UIC to meet limits established in Table 1; and/or
- ii. Irrigation wells cannot be used as a drinking water supply source through enforceable ordinance, plumbing code or other legal process.

### Schedule F, Section 1 (f).

This permit is issued pursuant to OAR Chapter 340, Division 44 (revised and adopted by the Environmental Quality Commission in September 2001), OAR Chapter 340, Division 40 and OAR Chapter 340, Division 45. In implementing the State UIC Program, the Department requires compliance with applicable State statutory laws and administrative rules applicable to the UIC program and Department issued WPCF permits.

### Schedule F, Section 5 (gg).

- i) UIC is within 500 feet of a domestic or irrigation well and does not meet the water quality limits established in the permit (Schedule F, Section 5(gg)(i)).
- ii) UIC is within 500 feet of a public water well serving a public water system and does not have a Department of Human Services groundwater time-of-travel (TOT) delineation and the water quality of the discharge does not meet the water quality limits established in the permit (Schedule F, Section 5(gg)(ii)).
- iii) It is within the 2-year TOT delineated by the Department of Human Services (DHS) for a public water well or wells serving a public water system and the water quality of the discharge does not meet the water quality limits established in the permit; (Schedule F, Section 5(gg)(iii)).
- iv) Any public UIC that does not meet the water quality discharge limits established in the permit at the end-of-pipe discharge point into the public UIC (Schedule F, Section 5(gg)(iv)).
- v) Any public UIC that has insufficient separation distance, as determined by the DEQ, between the bottom of the injection well and groundwater to protect the natural water quality (Schedule F, Section 5(gg)(v)).
- vi) Any public UIC that is constructed into groundwater, causes direct discharge of fluids into groundwater, or causes a violation of OAR 340-040-0014(1) (Schedule F, Section 5(gg)(vi)).

## COMPLIANCE DETERMINATION WORKSHEET NO. 1

### ADEQUATE SEPARATION DISTANCE

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#### GENERAL UIC INFORMATION

**BES UIC Sump Hansen Node Number(s):**

**UIC Address(es):**

**DEQ UIC Number(s):**

**Site Evaluator's Name:**

**Date:**

**Applicable UICER:** *Guideline No.1 – Separation Distance*

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#### CIRCLE APPROPRIATE DETERMINATION

- NA = Not Applicable (i.e., not an identified issue for subject UIC(s))
- NC = Non-compliant
- ND = No Determination – Further Evaluation Needed
- C = Compliant

#### **UIC Separation Distance:** (*Schedule F, Section 5(gg)(v)*)

A) Based on the *Systemwide Assessment Report*<sup>3</sup>, UICMP *System Management* program element, or the results of UICER Guideline No. 1, is the distance between the seasonal high groundwater level and the bottom perforation of the UIC less than:

- 1) 10 feet for UICs greater than 5 feet in total depth? Yes / No
- 2) 5 feet for UICs less than 5 feet in total depth? Yes / No

If either A(1) or A(2) are Yes, the UIC is potentially non-compliant; go to Step B.

If No, UIC is compliant.

B) Is the separation distance, calculated using field-verified UIC construction information (*e.g.*, location, measure total depth), less than 10 feet for UICs greater than 5 feet in total depth or less than 5 feet for UICs less than 5 feet in total depth? Yes / No

If Yes, UIC is potentially non-compliant. Proceed to Step C if groundwater is anticipated to occur within the perforated section of the UIC or proceed to Step D if the groundwater is anticipated within 10 feet of the bottom of the UIC. Consult *UICER Guideline No. 1 – Separation Distance* for additional considerations.

If No, UIC is compliant.

C) Has groundwater been observed<sup>4</sup> within the UIC system under seasonal high water conditions? Yes / No

If Yes, UIC is non-compliant.

If No, proceed to Step D if the groundwater is anticipated within 10 feet of the bottom of the UIC. Consult *UICER Guideline No. 1 – Separation Distance* for additional considerations.

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<sup>3</sup> The initial *Systemwide Assessment* report was submitted to DEQ in July 2005 and based on information contained in the City's Hansen database and U.S. Geological Survey depth to groundwater map.

<sup>4</sup> Based on available UIC construction data, groundwater is present within UIC perforation (i.e., >2 feet of water measured in UIC sump during period of seasonal high water).

D) Does the weight-of-evidence developed in accordance with *UICER Guideline No. 1 – Separation Distance* indicate that separation distance meets permit requirements? Yes / No

If Yes, UIC is compliant.

If No, UIC is non-compliant.

**SEPARATION DISTANCE NOTES:**

## COMPLIANCE DETERMINATION WORKSHEET NO. 2

### ANNUAL MEAN MADL EXCEEDANCE

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#### GENERAL UIC INFORMATION

**BES UIC Sump Hansen Node Number(s):**

**UIC Address(es):**

**DEQ UIC Number(s):**

**Site Evaluator's Name:**

**Date:**

**Applicable UICER:** *Guideline No. 2 - MADL Exceedances*

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#### CIRCLE APPROPRIATE DETERMINATION

- NA = Not Applicable (i.e., not an identified issue for subject UIC(s))
- NC = Non-compliant
- ND = No Determination – Further Evaluation Needed
- C = Compliant

#### **Annual Mean MADL Exceedance** (*Schedule F, Section 5(gg)(iv)*)

A). Mean Annual<sup>5</sup> Stormwater Concentrations (1<sup>st</sup> wet season MADL<sup>6</sup> Exceedance):

Permit Year	Compound	MADL	Concentration <sup>7</sup>	Reference <sup>8</sup>
_____	_____	_____	_____	_____

B) Mean Annual Stormwater Concentrations (2<sup>nd</sup> wet season following exceedance):

Permit Year	Compound	MADL	Concentration	Reference
_____	_____	_____	_____	_____

C) Was the annual mean MADL(s) exceeded in the second<sup>9</sup> consecutive year of sampling? Yes/No

If Yes, UIC is non-compliant.

If No, continue monitoring and/or address remaining data gaps and re-evaluate in accordance with *UICER Guideline No. 3 – MADL Exceedances*.

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<sup>5</sup> Annual concentration based on geometric mean of five individual sampling events (see QAPP; BES, 2006).

<sup>6</sup> MADL = Maximum Allowable Discharge Limit (MADL) defined in Table 1 of the permit.

<sup>7</sup> If the mean annual concentration does not exceed its respective MADL the UIC would be considered compliant under this criterion.

<sup>8</sup> Provide reference to where applicable information is documented (attach copies of information if appropriate).

<sup>9</sup> Annual mean concentration must be exceeded for two consecutive wet seasons before UIC is determined to be non-compliant and corrective action is required (Schedule C, Section 10(b)).

**MADL EXCEEDANCE NOTES:**

## COMPLIANCE DETERMINATION WORKSHEET NO. 3

### PROXIMITY TO DRINKING WATER WELLS

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#### GENERAL UIC INFORMATION

**BES UIC Sump Hansen Node Number(s):**

**UIC Address(es):**

**DEQ UIC Number(s):**

**Site Evaluator's Name:**

**Date:**

**Applicable UICER:** *Guideline No. 3 Proximity to Drinking Water Wells*

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#### CIRCLE APPROPRIATE DETERMINATION

- NA = Not Applicable (i.e., not an identified issue for subject UIC(s))
- NC = Non-compliant
- ND = No Determination – Further Evaluation Needed
- C = Compliant

Note: Step 2 of this guideline requires the results from Work Sheet No. 2 – Annual Mean MADL Exceedances for in order to determine the compliance status.

#### **Step 1) UIC Proximity to Drinking Water Well** (*Schedule F, Section 5(gg)(i thru iii)*)

- A. Is the estimated distance to the nearest domestic, irrigation well, or public<sup>10</sup> well, based on *Systemwide Assessment*<sup>11</sup> or UICMP *System Management* program element less than 500 feet? Yes/No  
If Yes, UIC is potentially non-compliant; go to Step 1B.  
If No, UIC is compliant.
- B. Is the field-verified distance between the UIC and nearest domestic, irrigation, or public well less than 500 feet? Yes/No  
If Yes, UIC is potentially non-compliant; go to Step 2.  
If No, UIC is compliant.
- C. Is the UIC located within a Oregon Department of Health Services (DHS) 2-year groundwater time-of-travel (TOT), based on *Systemwide Assessment* or UICMP *System Management* program element? Yes/No  
If Yes, UIC is potentially non-compliant; go to Step 1D.  
If No, UIC is compliant.
- D. Is field-verified location of UIC within the verified (see UICER Guideline No. 2) 2-year TOT of a public well? Yes/No  
If Yes, UIC is potentially non-compliant; go to Step 2.  
If No, UIC is compliant.

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<sup>10</sup> A public water means a water supply well serving a public water system that provides piped water for human consumption (See Permit Schedule F, Section 5 (qq) and (rr)).

<sup>11</sup> The initial *Systemwide Assessment* report was submitted to DEQ in July 2005.

**Step 2) Annual Mean MADL Exceedance** (*Schedule F, Section 5(gg)(iv)*)

A. Complete Compliance Determination Worksheet No. 2 “Annual Mean MADL Exceedance”.

- 1) If the annual mean MADL is not exceeded, the UIC is compliant.
- 2) If the annual mean MADL is exceeded for two consecutive wet seasons, the UIC is non-compliant and the appropriate relationship to domestic, irrigation, or public well or a 2-year TOT should be identified from one of the following using the results of Worksheet No. 3 “UIC Proximity to Drinking Water Wells” regarding the following statements:
  - a) If the answer to Step 1B is Yes and UIC located within 500 feet of a domestic or irrigation well, the UIC is non-compliant (Schedule F, Section 5(gg)(i)).
  - b) If the answer to Step 1B is Yes and UIC located within 500 feet of a public well, the UIC is non-compliant (Schedule F, Section 5(gg)(ii)).
  - c) If the answer to Step 1D is Yes and UIC located within 2-year TOT, the UIC is non-compliant (Schedule F, Section 5(gg)(iii)).

**PROXIMITY TO DRINKING WATER WELL NOTES:**

## COMPLIANCE DETERMINATION WORKSHEET NO. 4

### DIRECT DISCHARGE OF PROHIBITED FLUIDS

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#### GENERAL UIC INFORMATION

**BES UIC Sump Hansen Node Number(s):**

**UIC Address(es):**

**DEQ UIC Number(s):**

**Site Evaluator's Name:**

**Date:**

**Applicable UICERs:**     *Guideline No. 4 –Source Identification*  
                                  *Guideline No. 5 –Source Specific Investigation Monitoring*

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#### CIRCLE APPROPRIATE DETERMINATION

- NA = Not Applicable (i.e., not an identified issue for subject UIC)
- NC = Non-compliant
- ND = No Determination – Further Evaluation Needed
- C = Compliant

**Direct discharge of prohibited fluids** into groundwater or causes a violation of OAR 340-040-0014(1) (Schedule F, Section (5)(gg)(vi)).

- A) Have any of the following permit prohibited discharges, identified in Schedule A, Section 3(e) of the permit, been documented, to a City-owned UIC :
- 1) Any fluid from industrial or commercial facilities where hazardous substances or toxic materials including petroleum products are stored, handled or used, except as allowed under OAR 340-044-0018(3)(d) of the WPCL permit? Yes / No
  - 2) Non-incidental fluids, or stormwater mixed with non-incidental fluids not covered under the WPCL permit, including but not limited to, runoff from:
    - (a) Uncovered public trash compactor and associated storage area?; Yes / No
    - (b) Uncovered public garbage or trash dumpster and associated storage areas?; and Yes / No
    - (c) Public facility loading docks that discharge to a public UIC?; Yes / No
  - 3) Fluids from motor vehicle drains (MVDs) including MVDs in public repair or maintenance facilities, fire station bays or in-door parking areas?; Yes / No
  - 4) Municipal wastewater for the purpose of effluent disposal, unless such disposal is allowed under a separate Department-issued permit?; and Yes / No
  - 5) Fluids that fail to meet the conditions and requirements of the WPCL permit; except as listed in Schedule A(3)(h)? Yes / No
- B) If A1 through A5 are all No, the UIC is compliant.

- C) If any of the responses to A1 through A5 are Yes and the discharge(s) is expected to be ongoing and potentially result in an exceedance of a MADL (or adversely impact groundwater quality) and the finding is based on either unverifiable information or data with unknown or unacceptable quality; then the UIC is potentially non-compliant and will be further evaluated in accordance with the UICER Guidelines or equivalent, presented in the UIC Management Plan (submitted December 2006).

Fluid Description: \_\_\_\_\_

Reference <sup>12</sup>: \_\_\_\_\_

- D) If any of the responses to A1 through A5 are Yes and the discharge(s) is documented to be ongoing and to result in an exceedance of a MADL (or adversely impact groundwater quality) and the finding is based on verifiable information of known and acceptable quality; then the UIC is non-compliant.

Fluid Description: \_\_\_\_\_

Reference: \_\_\_\_\_

**DIRECT DISCHARGE NOTES:**

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<sup>12</sup> Provide reference to where applicable information is documented (attach copies of information if appropriate).

## COMPLIANCE DETERMINATION WORKSHEET NO. 5

### MOTOR VEHICLE DRAINS<sup>13</sup>

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#### GENERAL UIC INFORMATION

**BES UIC Sump Hansen Node Number(s):**

**UIC Address(es):**

**DEQ UIC Number(s):**

**Site Evaluator's Name:**

**Date:**

**Applicable UICERs:**     *Guideline No. 4 – Source Identification*  
                                  *Guideline No. 5 – Source Specific Investigation Monitoring*

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#### CIRCLE APPROPRIATE DETERMINATION

- NA = Not Applicable (i.e., not an identified issue for subject UIC)
- NC = Non-compliant
- ND = No Determination – Further Evaluation Needed
- C = Compliant

“A **motor vehicle waste disposal well** is a type of **Class V** injection well. Typically they are shallow disposal systems that receive or have received fluids from vehicular repair or maintenance activities, such as an auto body repair shop, automotive repair shop, new and used car dealership, specialty repair shop (e.g., transmission and muffler repair shop), or any area where vehicular repair work is performed.”

Source: EPA UIC Program “What Should I Know About Motor Vehicle Waste Disposal Wells?”  
<http://www.epa.gov/safewater/uic/cl5oper/motorveh.html>

**Motor vehicle floor drains** - In accordance with OAR 340-044-0015(2)(e), motor vehicle floor drains that discharge to public UICs or directly to the subsurface are prohibited. (Schedule C, Section 13).

A). Does the motor vehicle floor drain discharge directly to a UIC or the subsurface?

- 1) If Yes, based on verifiable information of known or acceptable quality, the UIC is non-compliant and actions under the WPCF permit (Schedule C, Section 13) must be implemented.
- 2) If No or unknown, , then the UIC is potentially non-compliant and will be further evaluated in accordance with the UICER Guidelines, presented in the UIC Management Plan (submitted December 2006).
- 3) If Yes, based on verifiable information of known and acceptable quality; then the UIC is non-compliant.

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<sup>13</sup> Non-motor vehicle floor drains that discharge to UICs will be evaluated in Worksheet 4 – Direct Discharge of Prohibited Fluids.

**MOTOR VEHICLE DRAIN NOTES:**

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## FINAL COMPLIANCE DETERMINATION

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### GENERAL UIC INFORMATION

**BES UIC Sump Hansen Node Number(s):**

**UIC Address(es):**

**DEQ UIC Number(s):**

**Site Evaluator's Name:**

**Date:**

.....  
This Final Compliance Determination form should be completed, based on the results of Worksheets 1 – 5.

### CHECK ONE

**Compliant** – UIC is compliant, based on consideration of available data and the factors listed in Schedule F, Section 5(gg) of the WPCF permit and as identified in Worksheets 1-5. No further evaluation or action required at this time.

**Compliant – Corrective Action Recommended.** UIC is compliant, based on consideration of available data and the factors listed in Schedule F, Section 5(gg) of the WPCF permit and as identified in Worksheets 1-5. However, corrective action is recommended to address the following:

- 1)
- 2)

**Non-compliant – Corrective Action Required.** UIC is non-compliant, based on consideration of available data and the factors listed in Schedule F, Section 5(gg) of the WPCF permit and as identified in Worksheets 1-5. UIC should be referred for corrective action (See City of Portland, *Corrective Action Plan*, dated July 2006) due to the following non-compliant conditions:

- 1)
- 2)

No Determination - **Further Evaluation Needed** -- Additional data or evaluation is needed before a non-compliance determination can be made (*i.e.*, insufficient information available). Site should be referred for further evaluation in accordance with Section 5 of the *UIC Management Plan* (December 2006).

Briefly describe the scope of the further evaluation:

- 1)
- 2)
- 3)

### **EVALUATOR DISCUSSION**

Describe the overall impression of the compliance determination for the subject UIC(s). Include a brief discussion of the confidence and/or the uncertainty of the data used in this determination. Add discussions of other relevant permit conditions, factors, or considerations not addressed in these worksheets.

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