STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300
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October 20, 2021

Ryan Ransavage
Miles Resources LLC
400 Valley Avenue NE
Puyallup, WA 98372-2516

Re: Miles Resources, LLC - Lakeview Plant – Sand & Gravel General Permit No. – WAG501290 Compliance Inspection

Dear Ryan Ransavage:

The Department of Ecology (Ecology) conducted a compliance inspection of Miles Resources, LLC - Lakeview (Facility) on October 7, 2021. Enclosed is a copy of the Inspection Report for your records. The following is provided to assist the facility in maintaining compliance under the Sand and Gravel General Permit.

Findings:

The maintenance shop has secondary containment and conveyance to an oil/water separator. Weekly oil/water separator inspections are being recorded. The accumulated oil must be removed when it reaches a thickness of one inch. The bottom sludge must be removed when it reaches a thickness of six inches. Oil absorbent pads must be replaced as necessary to maintain effectiveness. Please send written documentation of oil/water separator servicing and compliant conditions.

The concrete and asphalt recycling operation is conducted on bare ground without source control Best Management Practices (BMPs). There are multiple groundwater discharge points where concrete recycling runoff from imported concrete piles and crusher by-product is ponding within earthen basins or depressions or bare ground without lining or treatment (photos 1-4). A pH between 10.06 and 12.30 was measured in ponding water discharging to groundwater within the concrete storage, transfer, and processing area; **this is a permit violation**.

A third monitoring point (G003) has been added to the permit coverage for the concrete storage, transfer and processing area to provide representative sampling. Samples collected at G002 are required at the first infiltration pond where the discharge pipe is located.

Compliance Actions Required:

- **Immediately:** Submit weekly pH sample reports for the recycling operation discharges to groundwater (G003).
- **Within 30 days:** Implement source control BMPs and treatment BMPs for concrete recycling areas (storage or transfer of solid raw materials, by-products, or finished products) OR remove all source materials from the site to comply with pH effluent limits.

Within 30 days of receiving this report, please verify in writing that you have corrected the violations listed. It is your responsibility to provide documentation that the required improvements have been completed at your facility.

Please review this permit information for compliance guidance:

Discharges to Groundwater (Special Condition S.3.H on page 16):

The permittee is authorized to discharge process water, mine dewatering water, and stormwater to groundwater at the permitted location subject to the numeric effluent limitations in S2 (pH 6.5-8.5) limit. If the Permittee combines discharges from two or more industrial activities, the most stringent effluent limit for each parameter applies.

1. There must be no visible oil sheen at any points of discharge to groundwater.
2. Any discharge to a pond, lagoon, or other type of impoundment or storage facility that is unlined is considered a discharge to groundwater and is subject to the groundwater quality standards (Chapter 173-200 WAC). **Water ponding at a facility can be considered a discharge to groundwater.**

Discharges to Groundwater (Special Condition S.4.B on page 17):

1. The Permittee must monitor all discharges of process water, mine dewatering water, Type 2 stormwater, and Type 3 stormwater to groundwater per S2.
2. The Permittee is required to representatively sample discharges to ground.

Runoff Conveyance and Treatment BMPs (Special Condition S.8.B on page 26):

The Stormwater Pollution Prevention Plan (SWPPP) must include runoff conveyance and treatment BMPs as necessary to control pollutants and comply with the stormwater

discharge limits in S2 and S3. (Refer to the Stormwater Management Manuals for additional information.)

Runoff conveyance BMPs include, but are not limited to:

1. Interceptor dikes
2. Swales
3. **Channel lining**
4. Pipe slope drains

Source Control BMPs (Special Condition S.8.E.13 on page 29):

The Permittee must use **source control BMPs** in the following areas and during the following activities as necessary to control pollutants:

a. Fueling at Dedicated Stations

b. Mobile Fueling

c. Loading and Unloading Areas

d. Storage of Liquid in Permanent Above-ground Tanks

e. Dust Control

f. High Use Parking Areas

g. Storage or Transfer of Solid Raw Materials, By-Products or Finished Products

The Sand and Gravel Permit details a lined (impervious) surface as:

- Synthetic or flexible membrane material, not less than 30 mils thick (40 mils for new installations after the effective date of this permit), that must not react with the discharge.
- Concrete with a minimum thickness of six inches.
- Asphalt with a minimum thickness of six inches.
- Steel-walled containment tank.
- Any other functionally equivalent impoundment, structure, or technique that is based on standard engineering practices, and approved by Ecology to meet the intent of this section.

Permit Appendix-B Definitions

Representative Sampling means collecting an array of samples to accurately represent the nature of the discharge for parameters of concern. Many factors contribute to variability of pollutants in a discharge including quantity of water, time and date of sampling, and physical events and location of discharge.

Discharge Point means the location where a discharge leaves the Permittee's facility. **Discharge point also includes the location where a discharge enters the ground on-site.**

Groundwater Discharges – If water puddles/collects and discharges to ground at multiple locations on site, it is unlikely that all locations must be sampled. Consider the source of the water. If all the water is coming from a gravel stockpile area it is likely that just one sampling point is required. However, if some discharge points receive runoff from a gravel stockpile area and others receiving water from a concrete batch area, two sample points are probably necessary.

Violations of the Permit are subject to formal enforcement, which may include monetary penalties. If you have any questions or comments regarding this report or compliance with the permit, please contact me at eli.newby@ecy.wa.gov or at (360) 407-6292.

Sincerely,

Eli Newby
Sand and Gravel General Permit Manager
Southwest Regional Office
Water Quality Program

Enclosures: Water Quality Inspection Report, WAG501290
2021-10-07 Photograph Log

cc: Eric Kittilsby, Miles Resources LLC

CERTIFIED MAIL: 9489 0090 0027 6072 1569 31

United States Environmental Protection Agency
Washington D.C. 20460

EPA

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/dy	Inspection Type	Inspector	Facility Type
1 |N| |5|	|W|A|G|50|1290|	|2021|10|7|	|C|	|S|	|2|

Remarks

21 | | 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	B1	QA	Reserved
67 | |1| | 69	70 |1|	71 |N|	72 |N|	73 | | | 74 75 | | 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
Miles Resources, LLC - Lakeview Plant 2800 104th Street Court South Tacoma, WA 98499	9:20 a.m. 10/7/2021	04/01/2021
	Exit Time/Date 11:15 a.m. 10/7/2021	Permit Expiration Date 03/31/2026

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number	Other Facility Data *(e.g., SIC NAICS, and other description information)*
Ryan Ransavage, Eric Kittilsby, and Greg Fishel	212321 324121 327999 327390 ECY001, ECY002 Active Operation Status
Name, Address of Responsible Official/Title/Phone and Fax Number Ryan Ransavage Miles Resources LLC 400 Valley Avenue NE Puyallup, WA 98372-2516 Contacted ☒ Yes ☐ No	

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

☒ Permit	☒ Self-Monitoring Program	☐ Pretreatment	☐ MS4
☒ **Records/Reports**	☒ Compliance Schedules	☒ Pollution Prevention	
☒ Facility Site Review	☐ Laboratory	☒ Stormwater	
☒ Effluent/Receiving Waters	☒ Operations & Maintenance	☐ Combined Sewer Overflow	
☐ Flow Measurement	☒ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

Eli Newby and Jay Fennell conducted an inspection of Miles Resources, LLC - Lakeview Plant (Facility) on October 7, 2021. The inspection was conducted with Ryan Ransavage, Eric Kittilsby, and Greg Fishel present. Please read the accompanying cover letter for additional information. During this inspection the following areas and conditions were observed:

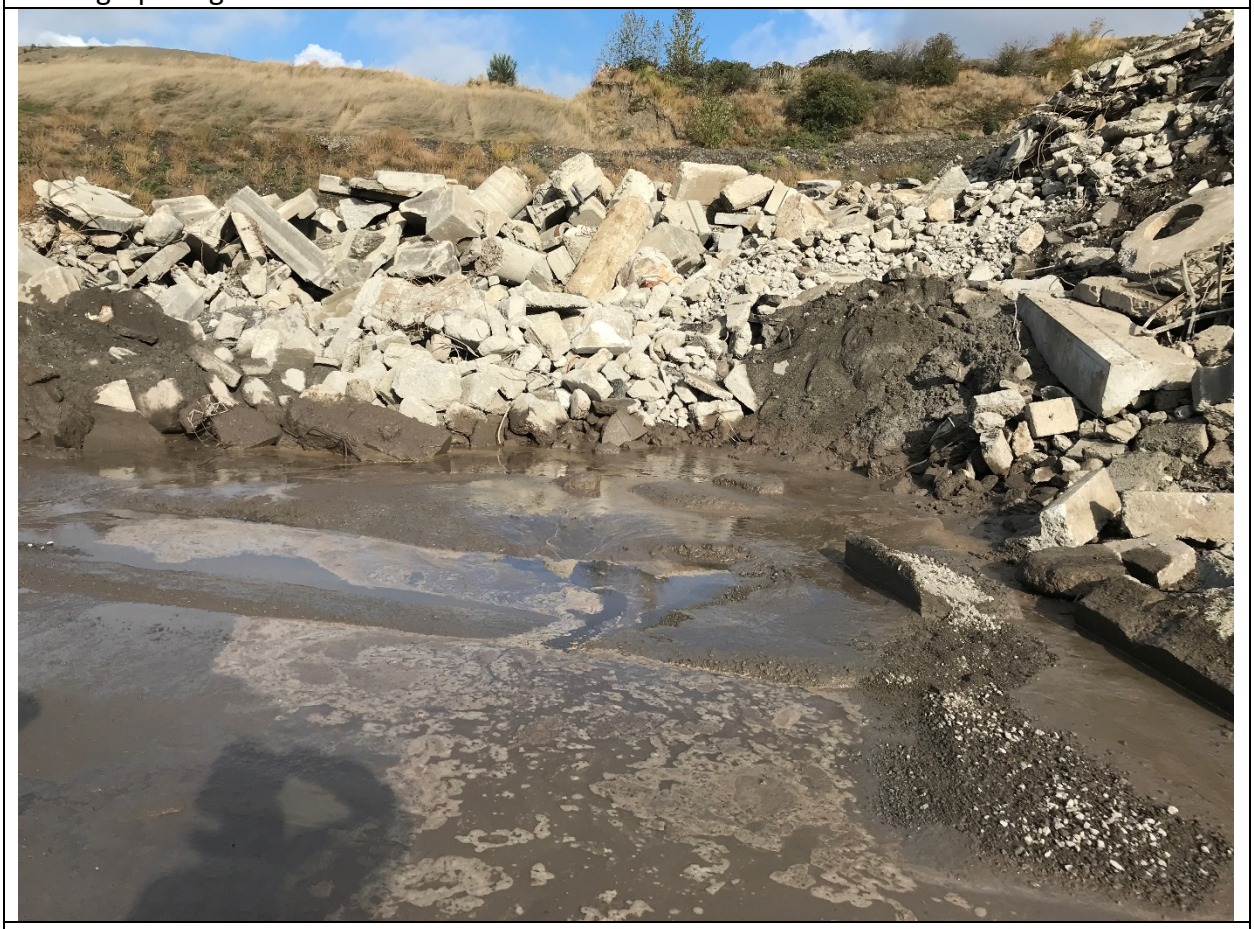
- The weather condition during the inspection was sunny with ponding water, and roughly 51 degrees Fahrenheit.
- pH effluent violations were measured in stormwater discharging to groundwater in multiple locations near the concrete recycling equipment and concrete stockpiles (pH 10.06 to 12.30 measured with a digital meter calibrated on 10/7/21).
- A representative monitoring point (G003) is being added to the permit coverage for the concrete operation area discharge to groundwater.
- Concrete crushing by-product has accumulated on the ground and equipment throughout the recycling area.
- Disposal of concrete recycling by-product and solid waste material must comply with all solid waste regulations.
- The asphalt plant is contained on an impervious cement slab with process water piped to an infiltration pond (G001); Oil sheen or pH exceedance was not found at monitoring point G001.
- The Site Management Plan requires revisions to address pH discharge violations and monitoring.

Verify Latitude and Longitude
47.1635208129883 -122.475440979004

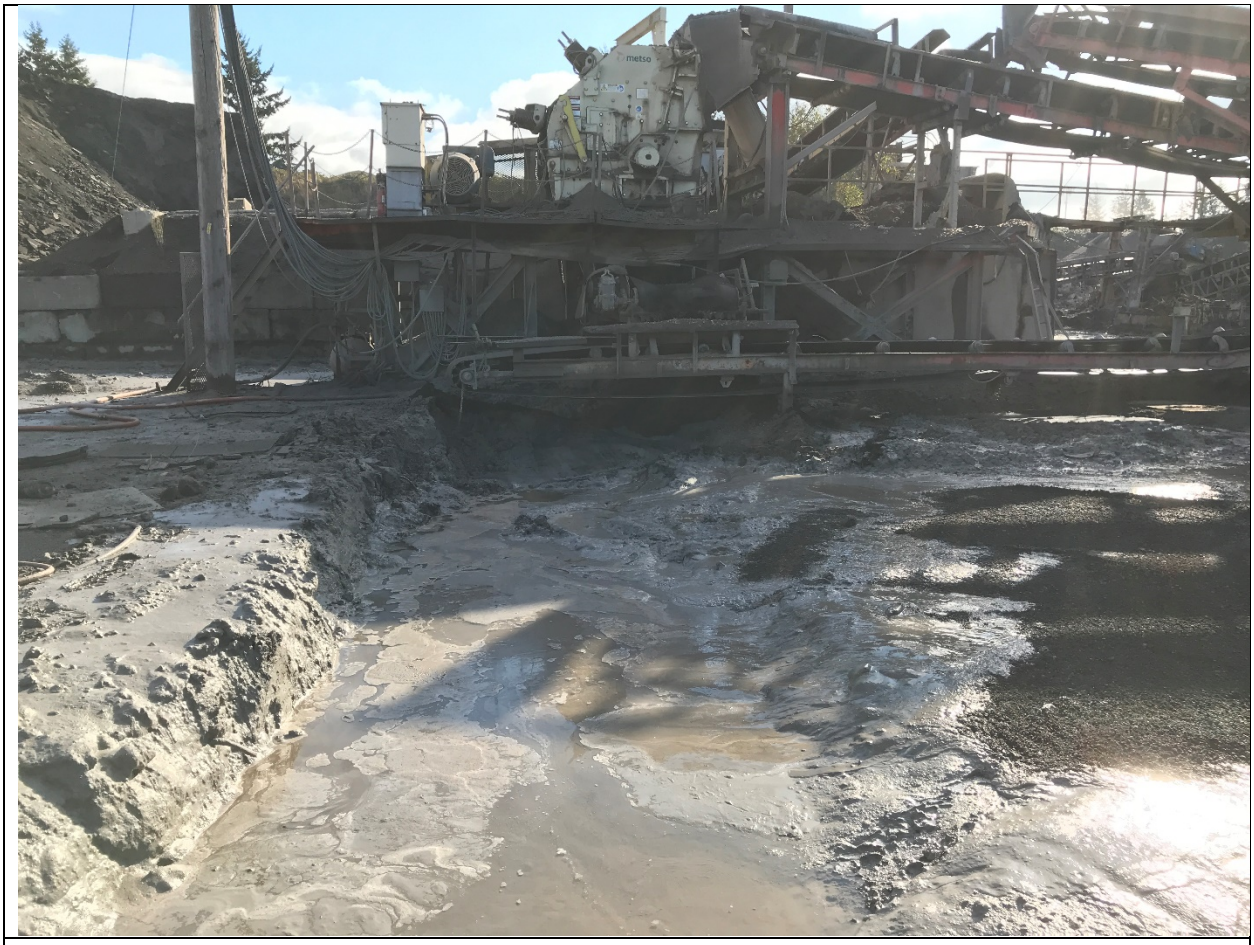
☒ Announced
☐ Unannounced

Name(s) and Signature(s) of Inspector(s): Jonathan Fennell Eli Newby	Agency/Office/Phone and Fax Numbers Ecology/SWRO (360) 407-6292	Date 10/8/2021
Signature of Management QA Reviewer **Steven G. Eberl, P.E.**	Agency/Office/Phone and Fax numbers Ecology/SWRO (360) 407-6293	Date 10/20/2021

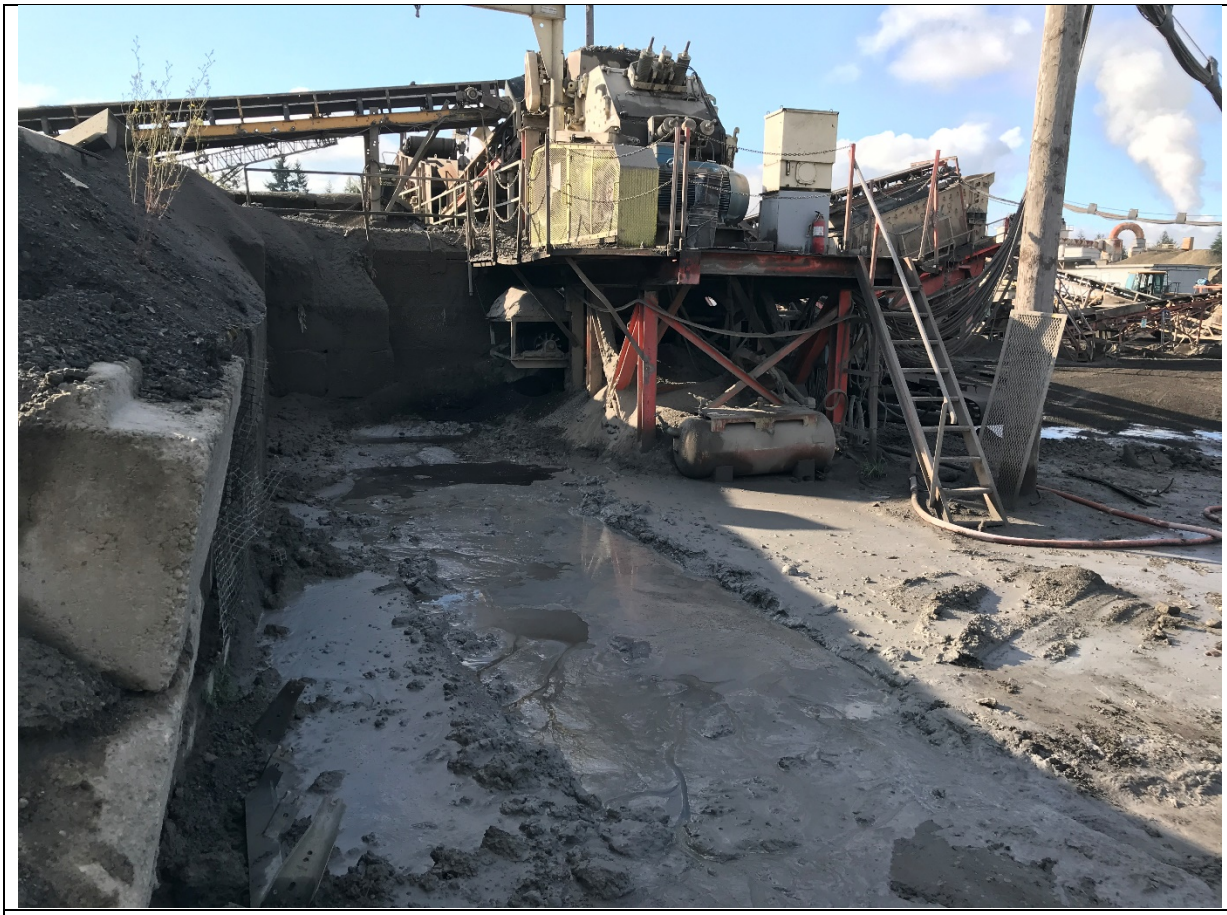
Photograph Log



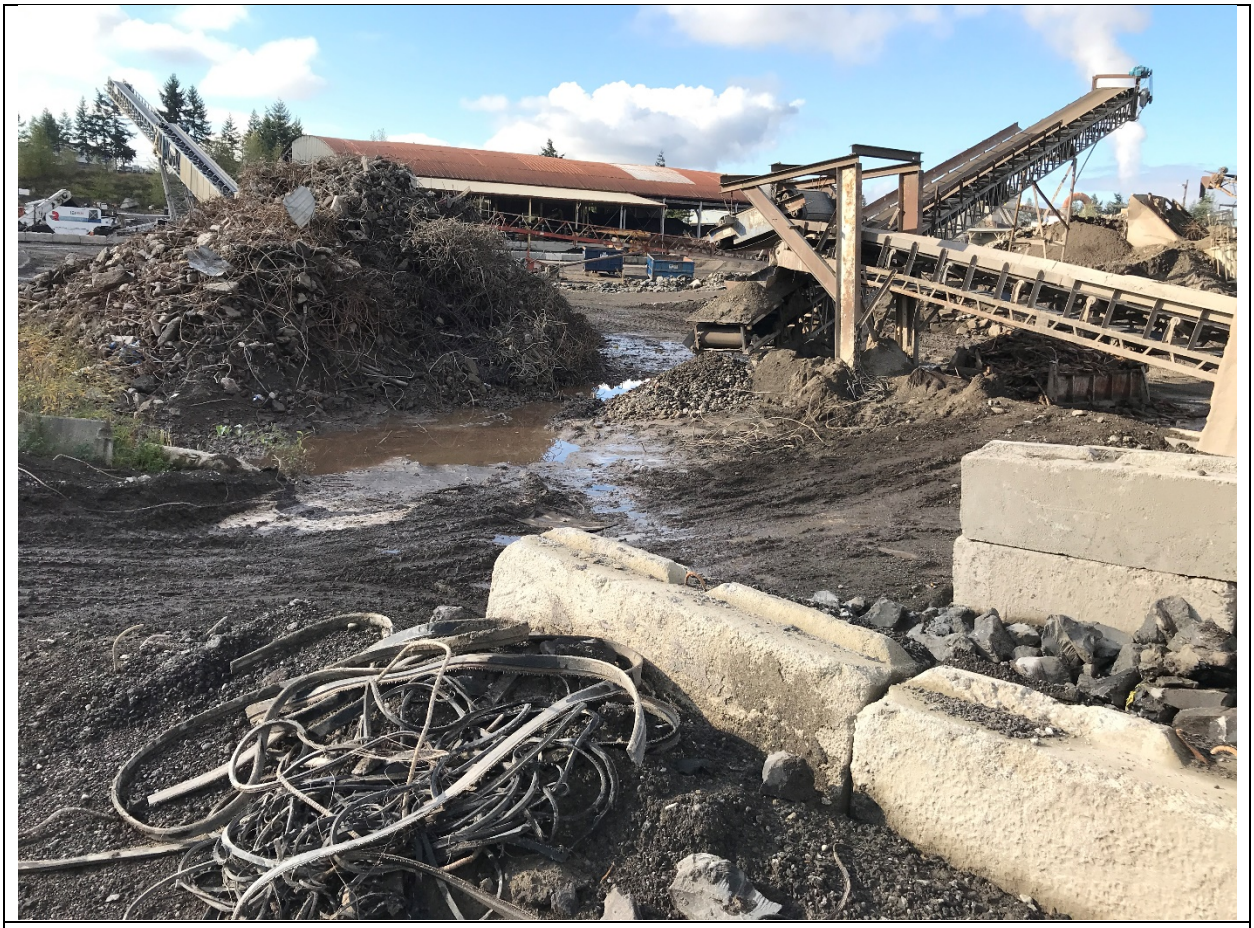
Photograph 1: Concrete stockpile pond discharge to groundwater with pH 12.30 (location 47.16558, -122.47318).



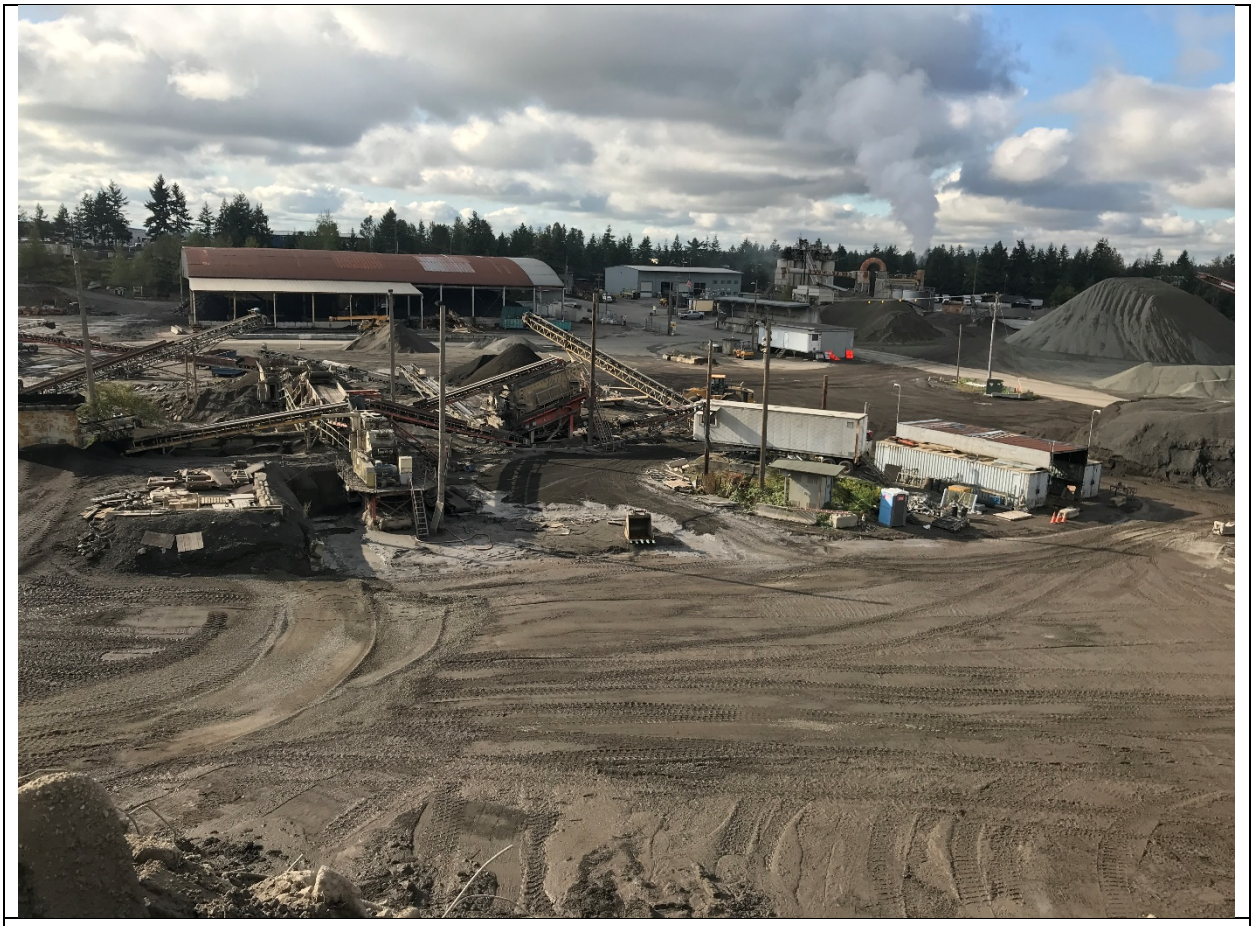
Photogrpah 2: Earthen basin next to the conrete crusher has a dicharge groundwater with pH 12.17 measured (location 47.16498, -122.47294).



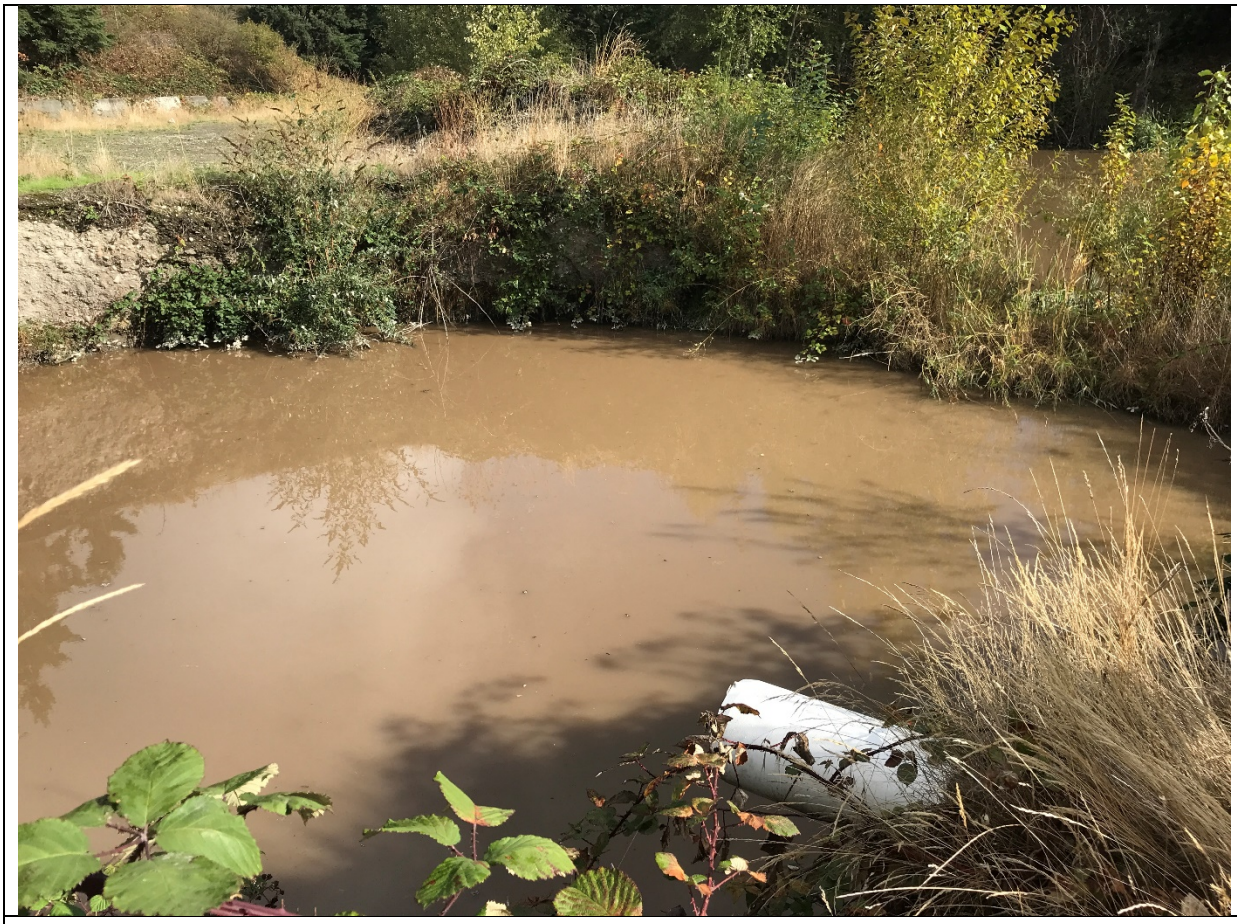
Photograph 3: Earthen basin filled concrete crushing by-product and stormwater discharge to groundwater.



Photograph 4: Stormwater collection and ponding near the concrete recycling hopper discharges to groundwater with pH 10.16 measured (location 47.16504, -122.47276).



Photograph 5: Overview of concrete crushing storage or transfer of solid raw materials, by-products or finished products as seen from the top of the concrete stockpile.



Photograph 5: Monitoring point location G002, approximately 950 feet from the concrete stockpile and crusher discharge points was not receiving piped stormwater during the inspection; pH 8.5 measured (location 47.16703, -122.47457).