



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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December 14, 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 December 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:

Housekeeping has occurred within portions of the concrete recycling area. Portions of the recycling operation sit on a concrete slab that was buried below the by-product and sediment build up. Miles has plans to implement additional impervious surfaces near the catch basins and in conveyance channels (Photo 1).

Concrete by-product and sludge stripped from the recycling area have been moved to the concrete stockpile located on bare ground. The depression at the base of the concrete pile is filled with leachate and concrete sludge, and has been partial covered by recycled asphalt product (RAP). A pH measurement of 11.83 S.U. was sampled from water at the base of the concrete stockpile where discharge to groundwater is occurring; **this is a violation of Water Quality Standards and Permit Special Condition S.3.**

Additional implementation of source control Best Management Practices (BMPs) is needed to comply with **Administrative Order 20863 (due December 31, 2021)**. Sludge waste disposal and storage of unhardened concrete must not cause violations of water quality standards. Please continue to monitor the concrete stockpile area discharge to groundwater (monitoring point G003) as agreed.

Please review this permit information for compliance guidance:

Solid Waste Disposal (Special Condition S.11 on page 34):

A. Solid Waste Handling

The Permittee must handle and dispose of all solid waste material, including material from cleaning catch basins and any sludge generated by impounding process water or stormwater, in such a manner as to prevent its entry into waters of the State. Disposal must comply with all applicable local, state, and federal regulations.

B. Leachate

The Permittee must not allow *leachate* from solid waste material to enter waters of the State without providing All Known, Available, and Reasonable methods of prevention, control, and Treatment (AKART), nor allow such leachate to cause or contribute to violations of the [State Surface Water Quality Standards, Chapter 173-201A WAC](#), or the [State Groundwater Quality Standards, Chapter 173-200 WAC](#). The Permittee must apply for an individual permit or permit modification as may be required for such discharges to waters of the State.

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

The 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

Store unhardened concrete, any type of concrete solids (does not include fully cured or recycled concrete), returned asphalt, and cold mix asphalt on a bermed impervious surface. This includes comeback concrete, ecology blocks, septic tanks, jersey barriers, and other cast concrete products. Treat all stormwater that contacts these materials in a lined impoundment. Discharge of this water is subject to the effluent limitations in [S2](#) and must not cause a violation of water quality standards.

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.

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.**

Discharge to Groundwater means the discharge of water into an unlined impoundment or onto the surface of the ground that allows the discharged water to percolate, or potentially percolate, to groundwater. Discharge to groundwater, discharge to land, and discharge to ground all have the same meaning.

Ryan Ransavage
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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,

A handwritten signature in black ink that reads "Eli Newby". The signature is written in a cursive style with a long, sweeping underline.

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

Enclosures: Water Quality Inspection Report, WAG501290
2021-12-07 Photograph Log

Photograph Log



Photograph 1: Miles plans to pave additional areas for conveyance improvements.



Photograph 2: The catch basin previously buried by concrete recycling by-product and sludge has been uncovered. Additional impervious surface and lined channel conveyance needed.



Photograph 3: Concrete recycling by-product sludge near a catch basin.



Photograph 4: The cement slab below the sludge has been exposed after by-product/sludge removal. Runoff from the remaining sludge is measured at a pH of 10.80 S.U. on the lined conveyance.



Photograph 5: The base of the concrete stockpile has been partially covered with recycled asphalt product (RAP). Concrete sludge and unhardened concrete are observed on the bare ground. The discharge to groundwater is measured at pH 11.83 S.U for monitoring point G003.



Photograph 6: RAP covering concrete sludge and discharge to groundwater.



Photograph 7: Concrete sludge and unhardened concrete on bare ground.



Photograph 8: Runoff from the concrete stockpile depression area is not contained by an impervious surface or lined channel conveyance to the catch basin.