



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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February 4, 2022

Ryan Ransavage  
Miles Resources LLC  
400 Valley Avenue NE  
Issaquah, WA 98027-7016

**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 the Miles Resources, LLC – Lakeview Plant (Facility) on January 25, 2022. Enclosed is a copy of the Inspection Report and Photograph Log for your records. The following findings are provided to assist the facility in maintaining compliance with the Sand and Gravel General Permit.

**Findings**

Conveyance for concrete runoff and areas below the crushing operation have been lined with asphalt since the December 7, 2021 inspection for Best Management Practices (BMP) improvement. Unhardened concrete, concrete sludge and leachate striped for the asphalt improvements, has been moved to the top of the concrete stockpile.

Discharge Monitoring Reports (DMRs) have been submitted with “no discharge” for monitoring point G003. Water pooling on the bare ground with pH effluent exceedance continues to discharge around the concrete stockpile area (monitoring point G003). **Please implement additional source control BMPs to eliminate all pH effluent exceedance violations in discharges to groundwater and avoid the need for continued G003 monitoring.**

During the inspection we discussed removing the remaining unhardened concrete/sludge/leachate where pH effluent exceedances continue in pooling water on bare ground, and expanding the asphalt surface under the concrete stockpile to comply with the Administrative Order #20915 actions due by March 30, 2022.

**The following permit sections are provided for general 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.

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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](mailto: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, flowing style.

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

Enclosures: Water Quality Inspection Report, WAG501290; 2022-25-01  
Photograph Log



Photograph Log



Photograph 1: Asphalt lined conveyance.



Photograh 2: Asphalt paving below the concrete crusher.



Photograph 3: Discharge to groundwater with concrete leachate below the concrete stockpile (monitoring point G003). The pH measured to 10.61 S.U. with a digital meter calibrated on January 25, 2022.



Photograph 4: Unhardened concrete, leachate, and discharges to groundwater remaining near the base of the concrete stockpile (monitoring point G003).



Photograph 5: Concrete sludge and unhardened concrete moved to the top of the stockpile.