



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300
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April 5, 2022

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 the Miles Resources, LLC – Lakeview Plant (Facility) on March 3, 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

Drainage channels and areas below the crushing operation have been paved with asphalt. Unhardened concrete, concrete sludge and leachate striped for the asphalt improvements, is stored on top of the concrete stockpile. The area in front of the concrete stockpile has been paved with asphalt to convey runoff to the catch basins. Runoff piped from the asphalt containment to the infiltration basin at monitoring point G002 was measured during the inspection was within the effluent limits.

As bare ground is exposed under the concrete pile during future recycling, the asphalt pavement can be extended to prevent future discharge violations and contain all unhardened concrete, leachate other concrete solids within the lined system.

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.

Ryan Ransavage

April 5, 2022

Page 4

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, flowing style.

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

Enclosures: Water Quality Inspection Report, WAG501290; 2022-03-03
Photograph Log



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	2022 03 03	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	8:30 a.m.	04/01/2021
2800 104th Street Court South	Exit Time/Date	Permit Expiration Date
Tacoma, WA 98499	9:30 a.m.	03/31/2026
03/03/2022		
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 and Greg Fishel	212321	
Name, Address of Responsible Official/Title/Phone and Fax Number	324121	
Ryan Ransavage	327999	
Miles Resources LLC	327390	
400 Valley Avenue NE	ECY001, ECY002	
Puyallup, WA 98372-2516	Active Operation Status	
Contacted		
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

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

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Compliance Schedules	<input checked="" type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Stormwater	
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> 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 conducted an inspection of Miles Resources, LLC - Lakeview Plant (Facility) on March 3, 2022. The inspection was conducted with Ryan Ransavage 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 cloudy with wet ground, and roughly 41 degrees Fahrenheit.
- Runoff previously ponding within the concrete crushing area and in front of concrete stockpile has been addressed by paving the areas for compliance with Administrative Order 20863.
- Asphalt pavement now covers the area in front of the concrete stockpile and areas around the crushing equipment.
- Asphalt is used convey concrete related runoff to catch basins. The catch basins collect and pipe runoff to an infiltration basin at the pipe outlet with monitoring point G002. The pH at G002 was measured and found to be compliant during the inspection.
- As the concrete pile footprint decreases from recycling in the future, the asphalt pavement can be extended to eliminate any discharge violations occurring under the concrete pile.

Verify Latitude and Longitude	<input checked="" type="checkbox"/> Announced	
47.1635208129883 -122.475440979004	<input type="checkbox"/> Unannounced	
Name(s) and Signature(s) of Inspector(s):	Agency/Office/Phone and Fax Numbers	Date
Eli Newby	Ecology/SWRO (360) 407-6292	3/8/2022
Signature of Management QA Reviewer	Agency/Office/Phone and Fax numbers	Date
Steven G. Eberl, P.E.	Steven G. Eberl, Ecology (360) 407-6293	4/5/2022

Photograph Log



Photograph 1: Asphalt paving conveys concrete pile runoff to the catch basin.



Photogrpah 2: Unpaved areas that do not currently contain ponding water. As the concrete pile is recycled, asphalt should extend under the pile to convey all runoff to the lined system and prevent future discharge violations.



Photograph 3: Near the boundary of paved and unpaved areas where concrete pile runoff is draining towards the pavement.