



T E C H N I C A L M E M O R A N D U M

TO: Washington State Department of Ecology

cc: Tom Sroufe – Snoqualmie Mill Ventures LLC
Malcolm McInnis – Snoqualmie Mill Ventures LLC

FROM: Molly Alar, Associate Compliance Specialist

DATE: May 10, 2023

RE: **MODIFICATION OF PERMIT COVERAGE, LEVEL 3 WAIVER
SNOQUALMIE MILL INDUSTRIAL AREAS
SNOQUALMIE, WASHINGTON
FARALLON PN: 1744-005**

Farallon Consulting, L.L.C. (Farallon) has prepared this Technical Memorandum on behalf of Snoqualmie Mill Ventures LLC (SMV) to request a Modification of Permit Coverage, Level 3 Waiver for Industrial Stormwater General Permit (ISGP) number WAR310172 (Permit) for a portion of the property owned by SMV located at Southeast Stearns Road and Southeast Haul Road in Snoqualmie, Washington (Property). Approximately 21 acres of the northwest portion of the Property are occupied and used by licensees for industrial activities. The approximately 21-acre portion of the Property covered under the Permit is referred to as the “Industrial Area.”

In accordance with the ISGP S8.D, exceedance of a benchmark for any three quarters in a calendar year requires a Level 3 corrective action to be implemented by no later than September 30 of the following year, unless the Washington State Department of Ecology (Ecology) grants a waiver. A Level 3 corrective action requires the implementation of a treatment best management practice (BMP). SMV is requesting that Ecology grant a waiver from implementing a Level 3 corrective action and allow SMV to implement a Level 2 corrective action that includes additional structural BMPs to address benchmark exceedances prior to implementing treatment BMPs as explained in this Technical Memorandum. This Technical Memorandum has been prepared to satisfy the requirements



presented in ISGP S8.D.5.c by providing a detailed explanation of the request (technical basis for the waiver request) and the Modification of Permit Coverage, Level 3 Waiver form. The Modification of Permit Coverage, Level 3 Waiver form is provided in this Technical Memorandum in Attachment A.

BENCHMARK EXCEEDANCE SUMMARY

Turbidity, copper, and total suspended solids (TSS) concentrations at the monitoring point for the Industrial Area identified as “SP2” exceeded ISGP benchmarks in the first, second, and fourth quarters of 2022. The SP2 monitoring point is at the downstream end of a ditch that runs west to east in the central portion of the area operated by Hos Bros Construction Inc. (Hos Bros). Hos Bros is a licensee of SMV that occupies the northern portion of the Industrial Area. Industrial activities in the Hos Bros operational area include storing construction vehicles and equipment on a gravel lot and vehicle maintenance in an enclosed and covered building. Stormwater that accumulates on the Hos Bros operational area either infiltrates into the gravel surface or sheet flows to the ditch. Some stormwater that infiltrates into the gravel surface near the ditch also percolates into the ditch. From the ditch, stormwater discharges through the SP2 monitoring point. From the SP2 monitoring point, stormwater is conveyed southwest through an underground pipe. The underground pipe drains into a ditch that flows southwest to a second underground pipe. The second underground pipe conveys stormwater northwest into another ditch that conveys stormwater to the northwest off the Industrial Area and the Property.

Solids and sediment from the Hos Bros gravel lot and tire wear particles from vehicles and equipment in the Hos Bros operational area were identified as significant pollutant sources that may have contributed to the turbidity, copper, and TSS concentrations observed in stormwater discharging through SP2. SMV has implemented structural BMPs to reduce the concentrations of those significant pollutants. A summary of structural BMPs implemented is discussed in the following section.

BEST MANAGEMENT PRACTICES IMPLEMENTED

In August 2022, SMV installed BMPs in the ditch in response to the benchmark exceedances in the first and second quarters of 2022. BMPs included installation of coconut matting inside and around the outside edges of the ditch, lining compost socks along the bottom of the ditch, and planting grass on the inside and around the outside edges of the ditch. Sediment fence was also installed 3 feet below ground surface on the north side of and parallel to the ditch to minimize turbidity by reducing turbid stormwater



that infiltrates into the ground surface and flows into the ditch. These BMPs were intended to minimize turbidity, copper, and TSS concentrations in stormwater; however, based on the analytical results of the fourth quarter SP2 monitoring point samples, the BMPs were not sufficient to reduce pollutant concentrations below ISGP benchmark values.

On or around February 17, 2023, SMV implemented additional structural BMPs to address the turbidity, copper, and TSS benchmark exceedances that occurred in 2022. Two check dams constructed of sandbags were installed in the western quarter of the ditch upstream of the SP2 monitoring point and the ditch discharge pipe. A pump was installed between the two check dams that pumps stormwater captured between the check dams into a settling tank. The settling tank contains three weirs that retard the flow of stormwater, allowing solids in the stormwater to settle out prior to discharge. Stormwater in the settling tank gravity drains and discharges through a sediment filter bag and flows through quarry spall rock back into the ditch directly upstream of the SP2 monitoring point. A sketch of the structural BMPs is included in Attachment B. Hos Bros is responsible for operation and maintenance of the check dams, stormwater pump equipment, and settling tank. The BMPs are inspected on a routine basis by Encore Environmental, LLC, an environmental consultant contracted by SMV.

Since implementation of the structural BMPs, two sample events were conducted at the SP2 monitoring point on March 13, 2023 and April 25, 2023. Analytical results from the March and April sampling events for turbidity, copper, and TSS are as follows:

March 13, 2023:

- Turbidity: 139 Nephelometric Turbidity Units (NTU);
- Copper: 18 micrograms per liter; and
- TSS: 20 milligrams per liter.

April 25, 2023:

- Turbidity: 16 Nephelometric Turbidity Units;
- Copper: 6.6 micrograms per liter; and
- TSS: 8 milligrams per liter.

The concentration of TSS in the March 13, 2023 sample was below the benchmark value; however, turbidity and copper concentrations were above benchmark values.



Shortly after the March sampling event, it was discovered that the pump was installed incorrectly and was pumping sediment from the bottom of the ditch into the settling tank. Therefore, the March sampling event may not be representative of the effectiveness of the structural BMPs. In early April 2023, the pump was reinstalled, and the sediment tank was cleaned to remove the excess sediment.

The concentrations of turbidity, copper, and TSS in the April 25, 2023 sample were below benchmark values.

TECHNICAL BASIS FOR BMP SELECTION

The implementation of additional settling and filtration is an appropriate BMP for addressing TSS and turbidity in stormwater. Additionally, metals are historically associated with solids found in stormwater. Therefore, removal of TSS is anticipated to reduce copper concentrations. This technical basis for BMP selection is consistent with Volumes III and V of the Stormwater Management Manual for Western Washington revised January 25, 2022, dated July 2019.

WAIVER REQUEST

SMV requests approval to continue to implement the structural BMPs described above to prevent stormwater benchmark exceedances before proceeding directly to installation of a treatment BMP. SMV proposes to evaluate sampling data collected during the 2023 monitoring year to determine whether the structural BMPs are effective in reducing concentrations of turbidity, copper, and TSS below benchmark values. SMV proposes that if data collected during the 2023 monitoring year shows that the structural BMPs are effective in preventing stormwater benchmark exceedances, this Modification of Coverage Request, Level 3 waiver be considered approved, and a treatment BMP will not be required.

Attachments: Attachment A, Modification of Permit Coverage, Level 3 Waiver Form
Attachment B, BMPs Engineering Sketch

cc: Howard Jensen, Veris Law Group PLLC
Hannah Solomon, Veris Law Group PLLC

MA/CP:cm

ATTACHMENT A

MODIFICATION OF PERMIT COVERAGE, LEVEL 3 WAIVER FORM

Snoqualmie Mill Industrial Areas
Southeast Stearns Road and Southeast Haul Road
Snoqualmie, Washington

Farallon PN: 1744-005



Modification of Permit Coverage Form for Industrial Stormwater General Permit

Permit No. WAR310172

I. Operator/Permittee for the Facility (All permit and billing correspondence will be mailed here)

Operator/Permittee's Name Tom Sroufe		Phone No. (425) 200-8566	Email Address tom@bwanw.com
Company Name Snoqualmie Mill Ventures LLC			
Street Address or P.O. Box 13471 456 th Place Southeast			
City North Bend	State WA	Zip + 4 98045	

II. Modified Permit Information CHECK ALL THAT APPLY

☐ New Industrial Process (requires public notice), please list the associated SIC codes:

1						2						3						4						5					
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Type or Nature of New Industrial Activities: N/A

Are there new monitoring points associated with the new industrial process? ☐ No ☐ Yes

If no, please list the previously established monitoring points associated with the new process (i.e. CB1, DP4):

N/A

If yes, please identify new monitoring points: N/A

Discharge identifier. These cannot be symbols. (maximum of three characters ex. 01A)	Latitude degrees, minutes, seconds	Longitude degrees, minutes, seconds	Location description (i.e. Catch Basin 1)
	° ' N	° ' W	
	° ' N	° ' W	
	° ' N	° ' W	

If Applicable, New Receiving Water

Receiving Water Body	Latitude degrees, minutes, seconds	Longitude degrees, minutes, seconds
	° ' N	° ' W
	° ' N	° ' W

What type of modification are you requesting?

☐ Level 2 / Level 3 Deadline Extension, please list the new deadline requested (MM/DD/YYYY): _____

- Attach detailed technical basis for extension. Include proposed timeline for completion and describe issues that affect completion date; for example, state/local permits, study, design, financing, professional services and contracting, etc.

☒ Level 2 / Level 3 Waiver. Attach technical basis for request.

- If request is based on claim that it is "not feasible" to perform corrective actions, provide detailed information to support request (e.g., lease, contract, affidavit, maps, photos, and/or other documentation).
- If request is based on claim that corrective action is "not necessary" to prevent violations of water quality standards, Ecology recommends including an engineering report and sampling information to support claim.

☒ Other (please explain): To update contact information for permittee, Tom Sroufe. Updated contact information is as follows:

Phone: 425-200-8566
Email: tom@bwanw.com
Mailing Address: 13471 456th Place Southeast, North Bend, WA 98045

To update contact information for site contact, Mac McInnis. Updated contact information is as follows:

Phone: 425-442-6002
Email: mac@bwanw.com
Mailing Address: 13471 456th Place Southeast, North Bend, WA 98045

III. Public Notice

Facilities modifying existing coverage must publish a public notice at least once a week for **two** consecutive weeks with **seven** days in between publications, in a **single** newspaper of general circulation in the county in which the facility is located. Ecology cannot grant permit coverage sooner than the end of the 30-day public comment period, which begins on the date of the second public notice.
Submit (or fax: 360-407-6426) the application to Ecology on or **before** the date of the first public notice. If you fax the application to Ecology, you must follow up with hard copy by mail.

Date of the first public notice: 05 / 19 / 2023

Date of second public notice: 05 / 26 / 2023 (Begins 30-day public comment period)

Example: Date of the first public notice: 01 / 01 / 2010

Date of second public notice: 01 / 08 / 2010

Name of the newspaper that will publish the public notices: Snoqualmie Valley Record.

Complete this template using site-specific information. The **bold** language is required by WAC 173-226-130 and must be included in its entirety. (Either use the fill-in template below or attach on a separate sheet of paper, if necessary.)

Snoqualmie Mill Ventures is seeking modification of coverage under the Washington Department of Ecology's NPDES General Permit for Stormwater Discharges Associated with Industrial Activities at the industrial site, known as Snoqualmie Mill Industrial Areas located at SE Stearns Road and SE Haul Road in Snoqualmie.

Activities requiring permit modification include a request to waive the Level 3 Corrective Action of a treatment best management practice (BMP) and instead implement a Level 2 corrective action.

Any person desiring to present their views to the Department of Ecology concerning this application may notify Ecology in writing within 30 days from the last date of publication of this notice. Comments may be submitted to:

**Washington Dept of Ecology
Water Quality Program – Industrial Stormwater
PO Box 47696
Olympia, WA 98504-7696**

IV. Certification of Permittee

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Mac McInnis

Snoqualmie Mill Ventures LLC

Printed Name

Company

Date

MALCOLM MCINNIS

6.20.23

Signature

Date

6.20.23

***Federal regulations require this application is signed by one of the following:**

- A. In the case of corporations, by a principal executive officer of at least the level of vice president.
- B. In the case of a partnership, by a general partner of a partnership.
- C. In the case of sole proprietorship, by the proprietor.
- D. In the case of a municipality, state, federal, or other public facility: by either a principal executive officer or ranking elected official.

Return this signed original document to the address below. Make sure you retain a copy for your records.

Washington Department of Ecology
Water Quality Program – Industrial Stormwater
PO Box 47696
Olympia, WA 98504-7696

If you have any questions, please call:

- **Shawn Hopkins** 360-407-6442 or shop461@ecy.wa.gov for Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Skagit, Snohomish, Spokane, Stevens, Walla Walla, Whatcom, and Whitman counties.
- **Clay Keown** 360-407-6048 or ckeo461@ecy.wa.gov for Island, King (except Seattle), and San Juan counties.
- **Josh Klimek** 360-407-7451 or jokl461@ecy.wa.gov for city of Seattle and Kitsap, Pierce, and Thurston counties
- **Joyce Smith** 360-407-6858 or josm461@ecy.wa.gov for Benton, Chelan, Clallam, Clark, Cowlitz, Douglas, Grays Harbor, Jefferson, Kittitas, Klickitat, Lewis, Mason Okanogan, Pacific, Skamania, Wahkiakum, and Yakima counties.

To ask about the availability of this document in a version for the visually impaired call the Water Quality Program at 360-407-6600. Persons with hearing loss, call 711 for Washington Relay Service. Persons with a speech disability, call 877-833-6341.

ATTACHMENT B

BMPS ENGINEERING SKETCH

SNOQUALMIE MILL INDUSTRIAL AREAS

Snoqualmie Mill Industrial Areas
Southeast Stearns Road and Southeast Haul Road
Snoqualmie, Washington

Farallon PN: 1744-005

HOS BROS DITCH, PROFILE VIEW OF TANK SETUP

