



**STATE OF WASHINGTON**  
**DEPARTMENT OF ECOLOGY**

PO Box 47600, Olympia, WA 98504-7600 • 360-407-6000

October 2, 2024

Permit Number: WAG501203

Ryan Ransavage

[Ryan.Ransavage@miles.rocks](mailto:Ryan.Ransavage@miles.rocks)

Miles Sand & Gravel Shelton Pit

3100 West Franklin Street

Shelton, WA 98584-0995

Re: Notification of Laboratory Results and Submittal of Best Management Practices (BMP)  
Implementation Plans- Miles Sand & Gravel Shelton Pit- (Permit WAG501203)

Dear Ryan Ransavage:

This letter is to notify Miles Sand & Gravel of the Department of Ecology's (Ecology) laboratory results from the Miles Sand & Gravel Shelton Pit WAG501203 (Miles Shelton facility) and to address compliance with the Sand & Gravel General Permit. Additionally, we request the submission of a written implementation plan outlining how the facility intends to comply with Groundwater Quality Standards (Chapter 173-200 WAC).

Ecology visited the Miles Shelton facility in March/April of 2024 for a sampling event as part of a larger concrete effluent characterization study<sup>1</sup>. The Miles Shelton facility was one of the 51 facilities sampled by Ecology. The Miles Shelton facility is permitted to discharge process water to groundwater subject to Groundwater Quality Standards.

The laboratory results from the Miles Shelton facility indicated the presence of chromium, barium, manganese, and lead in the total metal fraction as well as total dissolved solids above the groundwater quality criteria (WAC 173-200-040) at 47.212220, -123.13577 and were abnormal when compared to the larger study's statistics.

Following the characterization study sampling event, Ecology staff Eric Daiber (Sand & Gravel Permit Writer), Eli Newby (Sand & Gravel Permit Manager), and Sean McGuire (Compliance Enforcement Specialist) conducted a compliance conference on May 30, 2024. Ecology conducted compliance sampling on June 11, 2024. Ecology compliance sampling confirmed non-compliance with Groundwater Quality Standards within the main infiltration pond (Sample #: 2406047-07, Sample ID: WAG501203-6).

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<sup>1</sup>See <https://apps.ecology.wa.gov/publications/documents/2410001.pdf> for details on the larger concrete effluent characterization study.

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The compliance sampling of the Miles Shelton facility on June 11 yielded similar results to the March 8, 2024 characterization study results, indicating the presence of chromium, barium, manganese, and lead, in addition to copper in the total metal fraction above the groundwater quality criteria (WAC 173-200-040).

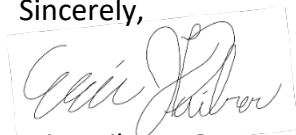
The Sand & Gravel General Permit Special Condition S3.B states the permittee's "discharges must not cause or contribute to a violation of: Groundwater Quality Standards (Chapter 173-200 WAC), Surface Water Quality Standards (Chapter 173-201A WAC), or Sediment Management Standards (Chapter 173-204 WAC) of the State of Washington; and 40 CFR 131." The chromium, barium, manganese, lead, and copper metal criteria in WAC 173-200-040 are measured using the total metal fraction. The total metal concentrations being discharged at the Miles Shelton facility appear to be causing or contributing to a violation of groundwater quality standards.

Miles Sand & Gravel must address the total metal concentrations being discharged to ground. This may be accomplished through a reduction in the suspended sediments/solids at the Miles Shelton facility: Potentially useful BMPs include lined settling pond containment and mechanical, chemical, or passive removal of sediments. In accordance with the Sand & Gravel General Permit: Miles Sand & Gravel must update the Miles Shelton facility's Site Management Plan as required.

Please submit within 60 days of receiving this letter a written best management practices (BMPs) implementation plan to ensure compliance with state water quality standards at the Miles Shelton facility.

If there are any questions concerning this decision, you may contact Eli Newby at [eli.newby@ecy.wa.gov](mailto:eli.newby@ecy.wa.gov) or me at [Eric.Daiber@ecy.wa.gov](mailto:Eric.Daiber@ecy.wa.gov).

Sincerely,



Eric Daiber, LG

Sand & Gravel General Permit Writer

Water Quality Program

Enclosure: June 11, 2024 Sample Results – Manchester Environmental Laboratory Case Narrative – Metals, July 16, 2024.

cc: Eli Newby  
Sheila Spaulding  
Sean McGuire

