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December 6, 2024

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Department of Ecology

**Subject: BMP Implementation Plan for Permit WAG501203**

Eric,

Thank you for your letter dated October 2, 2024, regarding laboratory results and compliance measures for the Miles Shelton facility under Permit WAG501203. We appreciate the opportunity to address the elevated concentrations noted and propose actionable steps toward compliance.

We engaged Associated Earth Sciences, Inc. (AESI) to review the laboratory data and provide technical recommendations. AESI has conducted a detailed review of our site and operations, and the information from Ecology provided to Miles Sand & Gravel including your letter dated October 2, 2024 and the laboratory results from Ecology's sampling at the Shelton Facility on July 16, 2024. AESI has advised on the following mitigation measures to address the concerns identified by Ecology:

## PROPOSED BEST MANAGEMENT PRACTICES (BMPS)

### Settling Pond Modifications:

Based on AESI's review, the elevated levels of total metals in the samples are primarily attributable to suspended sediments in the pond discharge water. AESI recommends constructing berms within the existing SE Pond to create multiple cells to settle out the suspended sediments in an initial cell, reducing turbidity in the water that infiltrates, and improving compliance with groundwater quality standards.

**First Cell:** This cell will function as a primary settling basin to capture and settle out suspended sediments. It will be lined with compacted on-site fines to minimize infiltration in this first cell, and eliminate the need for a synthetic liner. A synthetic liner would make periodic maintenance of this first settling cell to remove accumulated fines very difficult without damaging the liner.

**Second/Third Cells:** These cells will serve as the primary areas to infiltrate relatively low turbidity water.

### Source Monitoring:

Based on AESI's review, the elevated concentrations of total and dissolved manganese levels are likely attributable to naturally occurring dissolved manganese concentrations in the facility's wash water supply well. To confirm this, AESI recommends installing a monitoring well upgradient of the SE Pond. This monitoring will differentiate between potential pond discharge impacts and naturally occurring

