



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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June 11, 2013

Bill Monson
Monson Bulk Crush
63615 East Jacobs Rd. NE
Benton City, WA 99320

RE: Review of Application for a State Waste Discharge Permit for Monson Bulk Crush

Dear Mr. Monson:

The Department of Ecology (Ecology) reviewed the application, received May 2, 2013, for a wastewater discharge permit in accordance with RCW 90.48.110 Chapter 173-240 WAC.

The application's purpose is to provide Ecology with information on pollutants in the wastestream, flow characteristics of the discharge, and the site characteristics at the points of discharge.

Ecology staff has the following comments in regard to the Monson Bulk Crush application.

The application is missing or lacking important details. The following information is needed for an acceptable application:

- Section C #3 information lacking and/or incorrect. What is the highest average monthly discharge to the roads for dust abatement (sprayfield)? State in inches per acre per month or gallons per acre per day.
- Section F. No ground water information.
- Section G. Site Assessment – no information about where land application is proposed. How many acres are proposed for the land application? Please define down to quarter-section scale, where planned application is to take place. What are the hydro-geological characteristics in the proposed land application areas?
- Section G #2 mentions SEPA review. Ecology suggests that an inquiry be made to Benton County to ask if it requires a SEPA review.
- Section I Other Information – Summary of Attachments: box C2 is checked – production schematic flow diagram and water balance; this attachment is not found in the application.
- The attached soil survey is interesting history (year 1919), but newer, site specific information exists from this USDA NRCS website:
<http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>.
- Attachment G3 presents a topo map, soil type overlay, and agricultural lease information. This is useful information, but a map presenting the actual roads proposed to use wastewater for dust abatement is necessary. How many total acres do these roads have?



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Ecology acknowledges that application's Section E.4 asks for a misleading response when it states "Provide measurements or range of measurements for treated wastewater prior to discharge to the POTW . . .". It should state: "Provide measurements for treated wastewater prior to land application for the parameters with an "X" in the left column."

The single reported wastewater value of ~2200 mg/L, Total Dissolved Solids does pose a risk for groundwater contamination. The State's groundwater criteria for TDS is 500 mg/L.

Section C – Plant Operational Characteristics #7 – lists 41,000 gallons per acre per day to be infiltrated for dust abatement on a year around basis. This equates to 1.51 inches per day/ 365 days per year. The proposed rate is too high. For example, the State's Fresh Fruit Packer General permit limits dust abatement rates, using noncontact cooling water, to a maximum of 6,000 gallons/acre/day (0.22 inches/acre/day) for dust abatement land application.

Given the above information, Ecology rejects the application as presented on May 2, 2013. Should you have any questions or need any additional information, please contact Jim Leier, permit manager at (509) 457-7124.

Sincerely,



Cindy Huwe
Permit Coordinator
Water Quality Program

cc: Glen Ward, Monson Bulk Crush