MILES
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CONCRETE · GRAVEL · CRUSHED ROCK · SAND

August 10, 2015

Amy Moon
Washington State Department of Ecology
Water Quality Program
PO Box 47696
Olympia WA 98504-7696

RE: Miles Sand & Gravel Company
Comments on the Draft Construction Stormwater General Permit

Ms. Moon,
Miles Resources has several comments on the Draft Construction Stormwater General Permit released by the Washington State Department of Ecology (WADOE). In general WADOE has made changes that have put undue burden on permit holders for water quality and have taken action to include solid waste requirements in the draft permit. The following are comments addressing the issues we see with the draft construction stormwater general permit.

- S2.A.1.f
  - This section was added to require the reporting of all contaminated soils and groundwater. The permit is exclusively a permit on stormwater, not a solid waste permit. It is unacceptable to incorporate solid waste standards in a general stormwater permit. In addition the language used is vague and does not define clear limits to contaminated soils and no protocol for determining if there is contaminated soils/groundwater on site. This section should be removed.

- S4.D.2
  - This section, relating to recycled concrete, has several issues for monitoring. The first is the use of "fully stabilized" which has no defined end. The second is adding monitoring when "recycled concrete is first exposed to concrete". This is another term that is very broad. Does exposed mean monitoring as soon as the material is placed? Or does it mean when the recycled concrete has had precipitation fall on it? OR does it mean when there is measurable runoff from the material? This section needs to be rewritten to be much more specific and detailed in order for users of the permit to properly address

potential for pH pollution. Also a standard similar to significant concrete work should be implemented before testing is required.

- S9.D.9.h
  - Concrete washout on the jobsite needs to be managed appropriately, but a few exceptions need to be made. One of these exceptions should allow for concrete mixers to wash their hopper area and chutes in form areas that will not allow the concrete wash water to run outside of the form and will be filled shortly with concrete. The amount of water used to wash the mixer hopper and chutes are minimal and the area that has been washed into will soon be covered up by impervious material (with the exception of pervious concrete). This would not contribute in any significant way to pollution and would allow for better site management and more efficient use of time and materials.

Thank you for the considerations of these comments and I look forward to see WADOE's response to our concerns.

Sincerely,

Ryan Ransavage
Miles Sand & Gravel Company