

WELCOME

Sand & Gravel General Permit –
Modification
Workshop & Hearing

Chanele Holbrook
Hearings Officer



Agenda



Introductions

Workshop Presentation

Questions

Break!

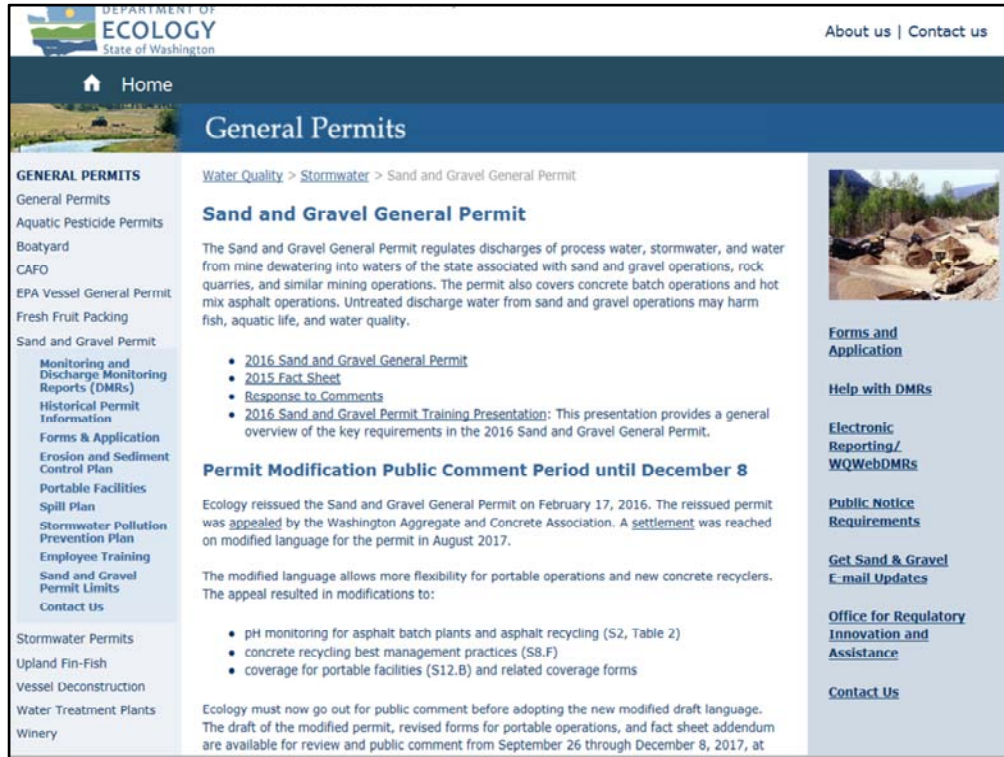
Public Hearing

Workshop Presentation

Sand & Gravel General Permit
Modification

Carrie Graul
Sand & Gravel General Permit Writer
Water Quality Program





Before we get started discussing the modification. I want to let you know about our webpages which will be changing. This is our current webpage you can find all of the Sand and Gravel Permit documents and information about the modification here.

Our current website will change December 11th.

Both the old and new website will be live Dec. 4-10 to let people check out the new site.

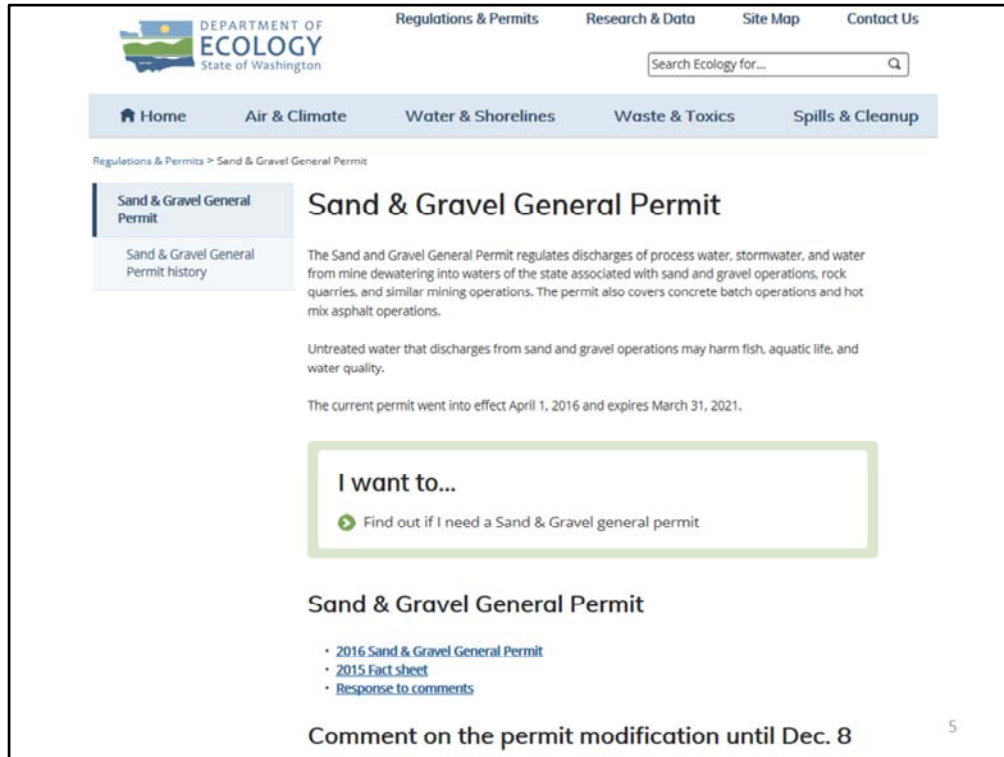
It is now mobile friendly, you can use our website from your phone or tablet.

All links to the old site will be broken including within publications and bookmarks

Our primary web address is changing to www.ecology.wa.gov. (Formerly ecy.wa.gov)

We understand this will disrupt a lot of people and we apologize for that. However, it is unavoidable with a complete web redesign.

If people click an outdated link they will be sent to an error page that will explain our new website is the cause of the broken links.



Here is a preview of our new website. It will still contain the permit documents and information about the permit modification.

We have rewritten, redesigned, and rebuilt our website

The new website is now organized by topic and is based on user testing and data

Our old website had an <30% success rate in customers finding what they were looking for, our new site now has a 70% success rate.

New Website Addresses

- Main Sand and Gravel Page:
<http://www.ecology.wa.gov/Regulations-Permits/Permits-certifications/Sand-Gravel-General-Permit>
- Sand and Gravel DMR guidance:
<http://www.ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Stormwater-permittee-guidance-resources/Sand-and-Gravel-Permit-guidance>

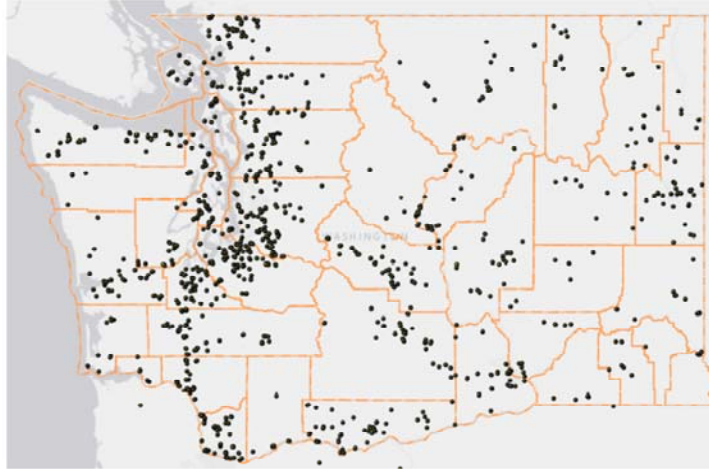


Questions





891 Sand and Gravel Facilities Across the State



The Sand and Gravel General Permit regulates discharges of process water, stormwater, and water from mine dewatering into waters of the state associated with sand and gravel operations, rock quarries, and similar mining operations. The permit also covers concrete batch operations and hot mix asphalt operations. Untreated discharge water from sand and gravel operations may harm fish, aquatic life, and water quality.

Why do I need a Permit?

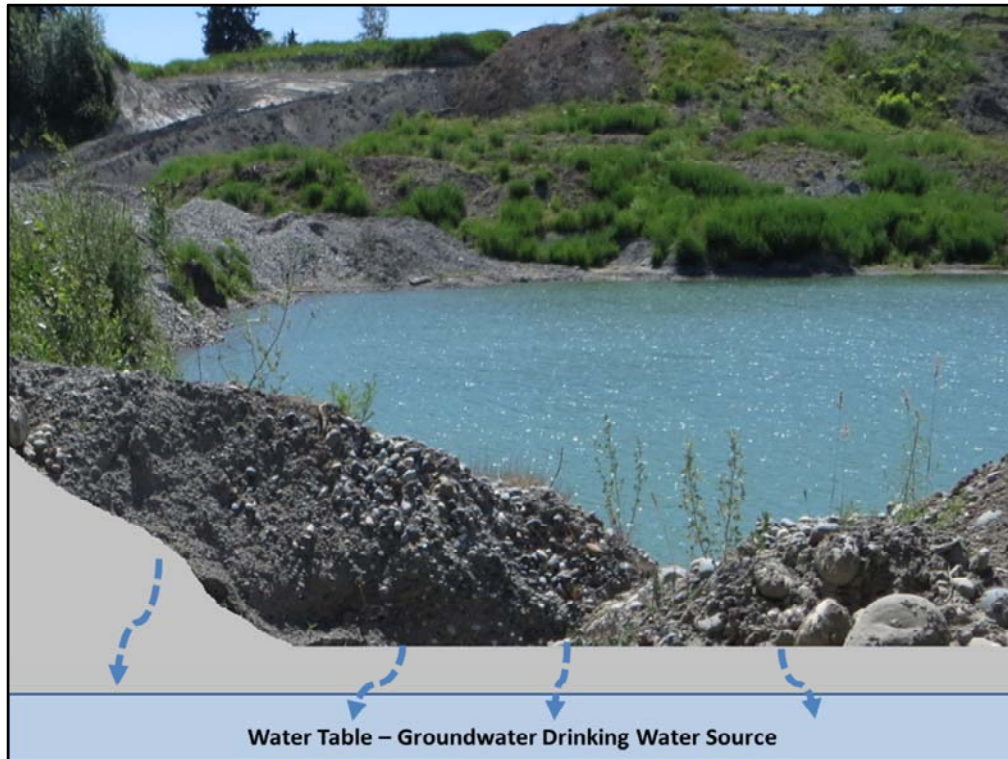
- Chapter 90.48 RCW requires a permit to regulate discharges of pollutants or waste materials to waters of the state
- Goals: waters that are drinkable, fishable, and swimmable
- Discharge of pollutants to navigable waters is not a right
- A permit is required to use public resources for wastewater disposal



Permittees are required to get a permit per Federal and State laws.



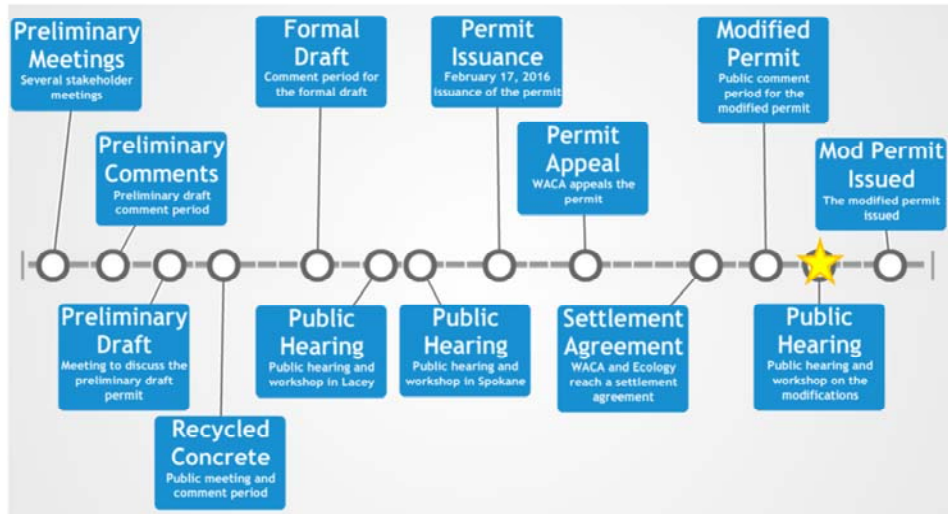
For example, here you see some turbid water discharging from a Sand & Gravel facility into a river.



While surface waters are easy to see and the idea of going swimming and boating is easy to grasp. Protecting our groundwater can sometimes be a bigger challenge. The majority of Sand & Gravel permittees discharge to ground. This discharge infiltrates and can affect the groundwater.



Reissuance Process



Timeline graphic courtesy of: http://www.readwritethink.org/files/resources/interactives/timeline_2/

We are located at the star.

Modification

- Ecology and the Washington Aggregate & Concrete Association settled on changes to three sections
- The permit has been modified for these agreed upon changes
- Ecology must go out for public comment before adopting the modified language
- Ecology will only respond to comments on the modified requirements



Agreement

Comments

Provide comments by 11:59 p.m., December 8, 2017.

Written comments

Oral comments

Preferred method –
via e-mail to
carrie.graul@ecy.wa.gov

By mail to:
Carrie Gaul
Washington State
Department of Ecology
PO Box 47696
Olympia, WA 98504

By testifying at the
public hearing following
this presentation





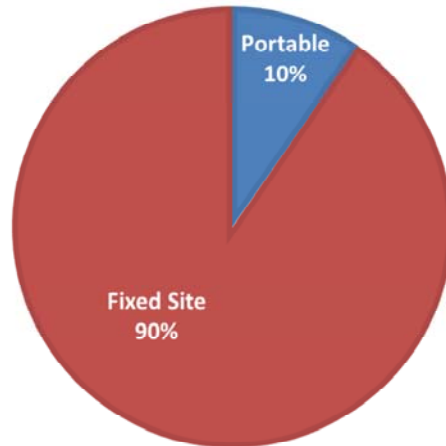
Who is affected by the
permit modification?

Changes Affect

- Asphalt Batch Plants and Asphalt Recycling operations with process water discharges
- New facilities receiving coverage for the first time that will have concrete recycling operations
- Portable operations



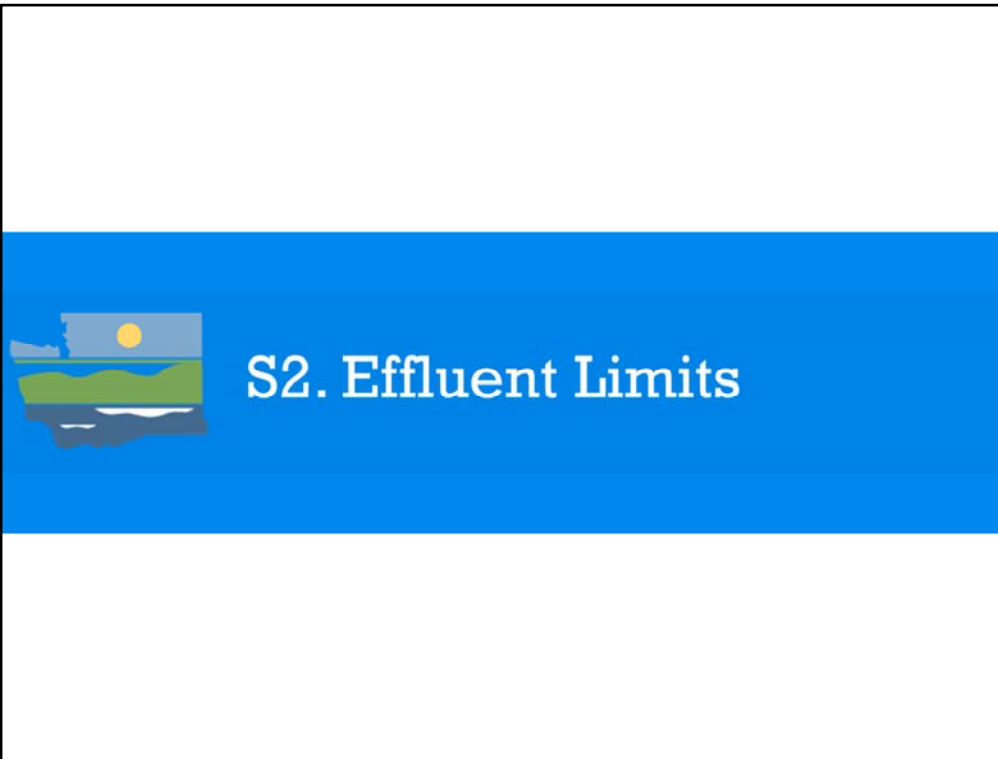
Majority of Permittees Not Affected



Most permittees will not see a change to the permit from the permit modification.

Questions





Monitoring Frequency

- We revised the monitoring frequency for process water discharges from:
 - 324121, Asphalt paving mixture and block manufacturing
 - ECY001, Asphalt recycling
- Frequency reduced from monthly to quarterly
 - Aligns with the effort set by the 2005 permit
 - Corrects this change which Ecology intended to make in the 2016 permit



Table 2: Effluent Limits and Monitoring Requirements for Process Water and Mine Dewatering Water

Type	NAICS Code (see Appendix A)	Discharge to:	pH		Turbidity (NTU)		Total Suspended Solids (TSS)	Oil Sheen ³	Total Dissolved Solids (TDS)
			Min	Max	Average Monthly	Maximum Daily	Average Quarterly		
Process Water, Mine Dewatering Water	113110, 113310, 212312, 212313, 212319 ⁴ , 212399	Surface	Quarterly ¹		Two/Month ²		Quarterly ¹	Daily when runoff occurs	----
			6.5	8.5	50	50	40 mg/l	No Discharge	----
		Ground	Quarterly ¹		----		----	Daily when runoff occurs	----
			6.5	8.5	----	----	----	Visible Sheen	----
	212321	Surface	----		Two/Month ²		Quarterly ¹	Daily when runoff occurs	----
			----	----	50	50	25 mg/l	No Discharge	----
		Ground	----		----		----	Daily when runoff occurs	----
			----	----	----	----	----	No Discharge	----
	212311, 212324, 212325	Surface	---Surface Water Discharge Not Permitted---						
		Ground	Quarterly ¹		----		----	Daily when runoff occurs	----
			6.5	8.5	----	----	----	No Discharge	----
			----	----	----	----	----	No Discharge	----
	212322	Surface	----		Two/Month ²		Quarterly ¹	Daily when runoff occurs	----
			----	----	50	50	25 mg/l	No Discharge	----
		Ground	----		----		----	Daily when runoff occurs	----
			----	----	----	----	----	No Discharge	----
	327320, 327331, 327332, 327390, 327999, EGY002	Surface	One/Month		Two/Month ²		Quarterly ¹	Daily when runoff occurs	----
			6.5	8.5	50	50	40 mg/l	Visible Sheen	----
		Ground	One/Month		----		----	Daily when runoff occurs	Monthly
			6.5	8.5	----	----	----	Visible Sheen	500 mg/l
	324121 ⁵ , EGY001	Surface	---Surface Water Discharge Not Permitted---						
		Ground	One/Month		----		----	Daily when runoff occurs	----
			6.5	8.5	----	----	----	Visible Sheen	----

Questions



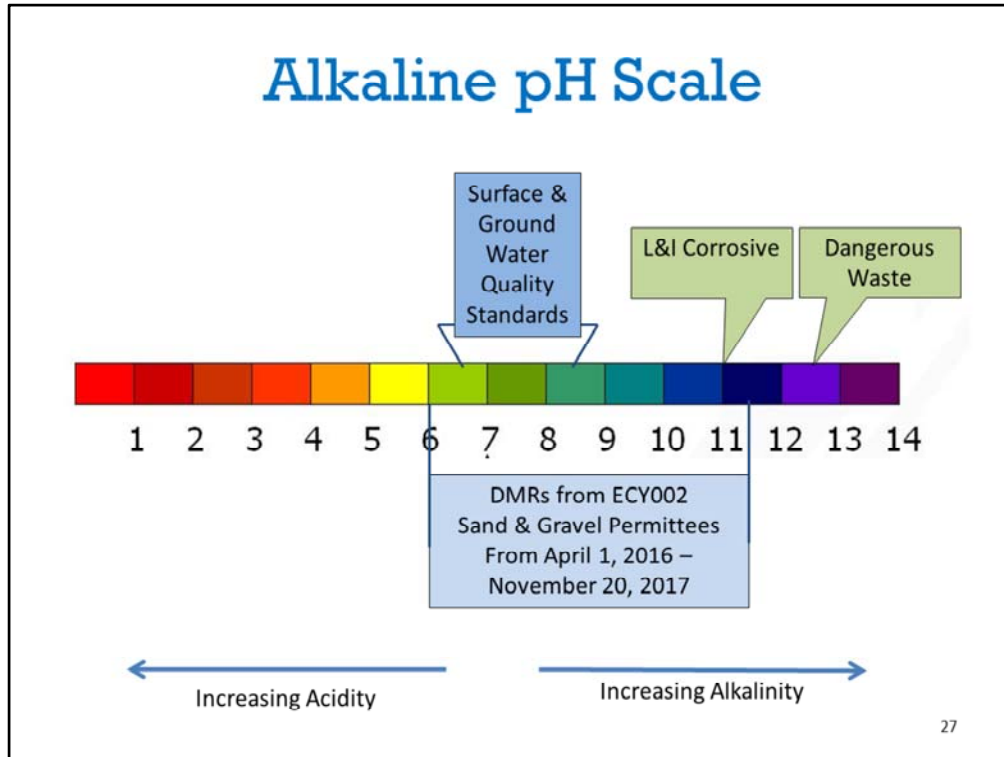


S8. F Concrete Recycling BMPs



We are concerned about the water quality from recycled concrete stockpiles

- Crushing or fracturing hardened concrete exposes unreacted quicklime or cement
- When water contacts the unreacted quicklime or cement chemical reactions occur that result in high pH
- Stormwater, erosion, and movement within the stockpile can continuously expose new potential reaction sites



Since the new permit took effect we have had permittees associated with code ECY002 report to us pH numbers between 6 to 11.45. This is above the effluent limits in the permit which are from 6.5 to 8.8. High pH can lead to higher levels of arsenic in drinking water since pH affects the solubility and availability of metals and other compounds. Having to adjust for high pH water increases the cost of drinking water treatment.

Concrete Recycling Stockpiles

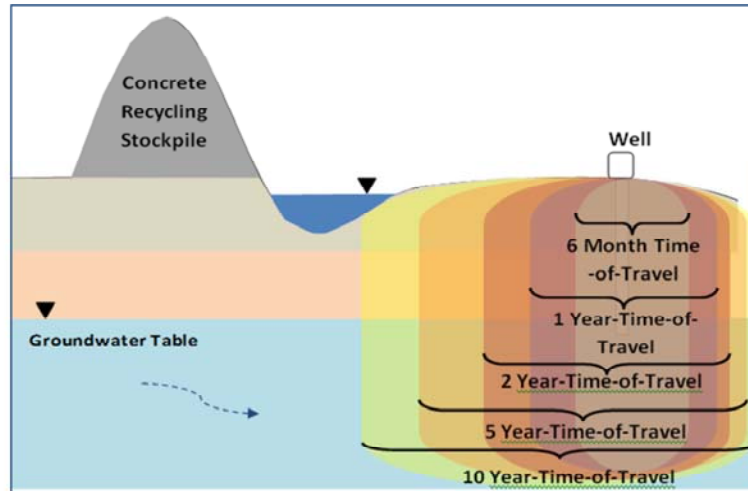
The 2016
permit put
restrictions
on the
placement of
concrete
recycling
stockpiles at
new sites

- Within 100 feet or less from surface waters (lakes, rivers, wetlands, etc.)
- Within 100 feet or less from drinking water and irrigation wells
- Within a Wellhead Protection Area
- Where there is less than 10 feet of separation between the bottom of the recycled concrete stockpile and groundwater

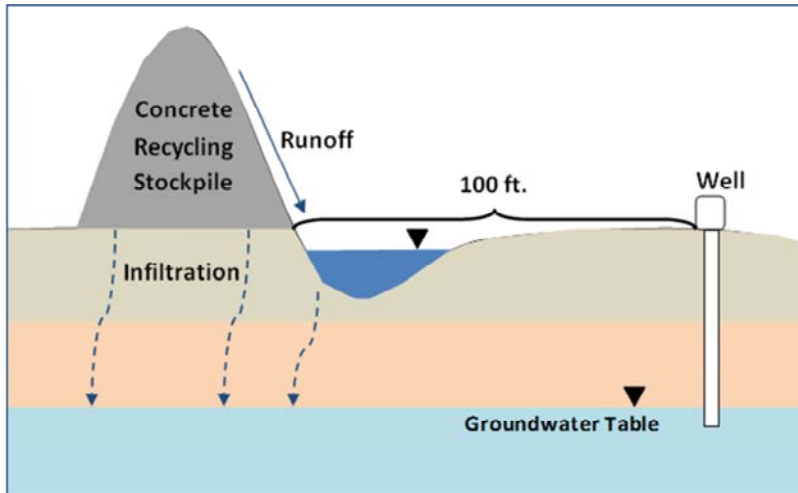
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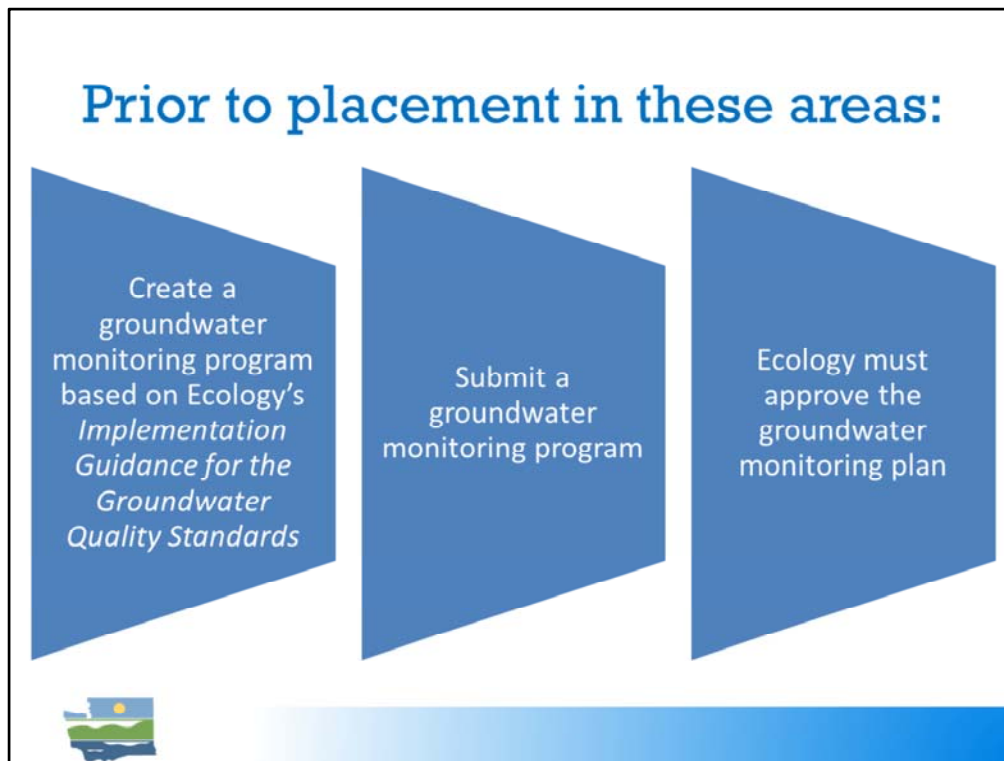
All sites with Sand and Gravel General Permit coverage on or before April 1, 2016 were grandfathered in. This only applies to brand new sites that have never before received coverage.

Allow the placement within a wellhead protection area



Allow the placement 100 feet from wells





The proposed permit modification allows for the placement of concrete stockpiles within wellhead protection areas, and within 100 feet of a drinking water or irrigation well. The proposed permit language mirrors a similar requirement in S4.B.2 of the permit regarding representative sampling from monitoring wells.

This modification allows another option, beyond BMP substitution, for permittees that wish to engage in concrete recycling activities within Wellhead Protection Areas or near drinking water or irrigation wells.

The draft modified permit requires permittees to submit and have Ecology approval of their groundwater monitoring program. This is to ensure that a proper groundwater monitoring plan is in place prior to the first discharge

Chapter 5 of the *Implementation Guidance for the Ground Water Quality Standards* is dedicated to Monitoring Plans. This chapter calls for a wide variety of information that we would expect to be in the permittees Groundwater Monitoring Plan. Information such as: the media to be sampled, constituents to be analyzed, location of monitoring wells, monitoring well construction, point of compliance, monitoring frequency, sampling and analytical protocol, well purging, sample collection, decontamination, and quality assurance / quality control. We would expect permittees to at a bare minimum monitor for the parameters at the frequencies specified in Table 2 and Table 3 of the Sand and Gravel General Permit that apply to the discharge from their recycled concrete stockpiles and any other commingled water as appropriate.

Groundwater Monitoring Program

- Includes placement of groundwater monitoring wells
- Monitoring via groundwater monitoring wells at a minimum for the parameters and frequency established in S2
- Refer to *Implementation Guidance for the Groundwater Quality Standards*



Site Management Plan (SMP)

- Documentation:
 - Copy of your groundwater monitoring plan
 - Notice of approval from Ecology
 - Monitoring data



Questions





S12.B Permit Coverage for Portable Facilities

Site Restoration

Revisions address site restoration after the completion of portable operations



3 Site Restoration Scenarios

The new language highlights three scenarios where a portable operation may not have the ability to complete site restoration:

1. At an active construction site
2. When the permittee is prohibited by law from accessing the site
3. When the permittee has no legal responsibility over site restoration



At An Active Construction Site

You do not have to provide permanent vegetative cover or permanent stabilization if all of the following conditions apply:

- You operated within a part of the site where construction activities occurred or will occur
- Restoration of the area where you operated will be completed according to construction plans for the site
- You note that you were operating at an active construction site and provide an estimated timeline for final restoration on your Portable Completion of Operation Notice form (ECY 070-308)

You do not need to submit documentation demonstrating that some one else is responsible for site restoration



We assume that the construction contractor (which could be the site owner) is responsible for site restoration at active construction sites. Ecology may use the estimated timeline to check on the site to make sure final restoration was completed and there are no lingering water quality issues arising from the site.

Prohibited by Law / No Legal Responsibility

If you are:

- Prohibited by law from accessing the site
- Or, have no legal responsibility over site restoration

Submit your Portable Completion of Operation Notice form (ECY 070-308) and supporting documentation



Supporting Documentation

Examples include:

- A copy of the contract with the site owner
- Legal notice
- Formal correspondence from the site owner



Case by cases basis

Modified Forms

- Portable Beginning of Operation Notice Form
- Portable Completion of Operations Notice Form
- Modifications to forms allow us to track these three scenarios
- Forms were update to match the electronic format through the Portal



Questions





Comment Period

- September 26 – December 8
- Submit comments before midnight on December 8
 - Email comments to carrie.graul@ecy.wa.gov
 - Or, mail in your comments
 - Or, testify at the public hearing
- Hope to have the final permit and response to comments out by January 22



Questions

E-mail comments to
carrie.graul@ecy.wa.gov
by December 8

<http://www.ecy.wa.gov/sandandgravel>



WELCOME

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Chanele Holbrook
Hearings Officer



Before beginning your testimony
remember to state:

1. Your name
2. Your address

