

SEPA¹ Environmental Checklist

Purpose of checklist

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization, or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. **You may use “not applicable” or “does not apply” only when you can explain why it does not apply and not when the answer is unknown.** You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to **all parts of your proposal**, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for lead agencies

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B, plus the Supplemental Sheet for Nonproject Actions (Part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in “Part B: Environmental Elements” that do not contribute meaningfully to the analysis of the proposal.

¹ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/Checklist-guidance>

A. Background

[Find help answering background questions²](https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-A-Background)

1. Name of proposed project, if applicable:

Ecology names this nonproject proposal (proposal) as a revision to the existing Department of Ecology Air Quality Program's General Order of Approval No. 10AQ-GO-01 Amendment 1 Portable and Stationary Asphalt Plants regulated by Chapter 70A.15 RCW Washington Clean Air Act.

2. Name of applicant:

Washington State Department of Ecology

3. Address and phone number of applicant and contact person:

300 Desmond Dr SE, Lacey, WA 98503

4. Date checklist prepared:

April 9, 2026

5. Agency requesting checklist:

Washington State Department of Ecology

6. Proposed timing of schedule (including phasing, if applicable):

The revised general order should be available for use before the end of 2026.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

No specific future plans at this time, except that General Orders may need to be revised periodically for various reasons such as but not limited to: keeping up with relevant toxic air pollutant (TAP) rule changes, keeping up air pollution control technology advances, etc. .

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

The proposed revisions to this General Order are documented in the technical support document (TSD) prepared for this General Order, and the General Order itself. The TSD is included as part of public comment period documents and includes detailed environmental information that has been prepared directly related to this proposal. When an applicant applies to use this general order, additional environmental information will be obtained through the General Order application.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

No.

² <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-A-Background>

10. List any government approvals or permits that will be needed for your proposal, if known.

Other than the Department of Ecology Air Quality Program both proposing and approving this proposal, there are no other known government approvals or permits needed for this proposal. This General Order stands alone for air emissions and does not need any other approvals or permits. It is acknowledged that other permits or requirements might be needed (e.g., water, zoning, dangerous waste, etc.) for the facility, but they are not part of this General Order and would need to be considered separately and distinctly.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

Ecology's Air Quality Program requires air permits for certain facilities that cause air emissions over specific thresholds as listed in WAC 173-400-110 New source review (NSR) for sources and portable sources.

Per WAC 173-400-110(2) a Notice of Construction (NOC) air permit application and an order of approval must be issued by the permitting authority prior to the establishment of a new source or modification.

However, WAC 173-400-560 (General Order of approval) allows that "In lieu of filing a notice of construction [NOC] application under WAC 173-400-110, the owner or operator may apply for coverage under a general order of approval issued under this section. Coverage under a general order of approval satisfies the requirement for new source review under RCW 70.94.152" (RCW 70.A15.2210 Notice may be required of construction of proposed new contaminant source—Submission of plans—Approval, disapproval—Emission control—"De minimis new sources" defined)."

The intent of General Orders is to provide a streamlined permitting process for applicants who qualify and can satisfy the limits within the General Order.

Ecology has had a hot mix asphalt General Order since January 25, 2011, and has revised it only one time (April 18, 2011). Ecology is proposing to revise the existing hot mix asphalt General Order again as allowed in WAC 173-400-560 (General Order of approval).

The hot mix asphalt process is described in EPA document [EPA AP-42](#) 11.1 for "Hot Mix Asphalt Plants" as follows: "hot mix asphalt (HMA) paving materials are a mixture of size-graded, high quality aggregate (which can include reclaimed asphalt pavement [RAP]), and liquid asphalt cement, which is heated and mixed in measured quantities to produce HMA."

The revisions proposed for the General Order include:

- Limits on annual and daily production of air pollution producing materials
- Requirements to limit air pollution.
- Requirements to keep air pollution equipment at certain distances from the property boundary and from any residence, occupied commercial building, school, hospital, nursing home or other sensitive receptor.

The full revised General Order and technical support document contain a complete description of the proposal, see attached (or links).

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The proposal is limited to an Ecology action of making the revised General Order available as an option. But it is not known when or if a facility will apply to use the revised General Order. Therefore there is no specific property or site to evaluate at this time. However, Ecology evaluated conditions at multiple types of pits from flat to mountainous slopes.

The revised General Order for hot mix asphalt plants will be available for use by applicants in the following counties regulated by Ecology's Air Quality Program (Adams, Asotin, Chelan, Columbia, Douglas, Ferry, Franklin, Garfield, Grant, Kittitas, Klickitat, Lincoln, Okanogan, Pend Oreille, Stevens, Walla Walla, and Whitman) or any other source regulated by Ecology.

Other areas in the state are regulated by regional clean air agencies, with some exceptions. An example of a source regulated by Ecology outside of these counties would be a source at the Hanford site regulated by Ecology's Richland Field Office, even though Hanford is located within Benton County which is regulated by the Benton Clean Air Agency (BCAA).

One change from the previous Ecology hot mix asphalt General Order is that it will no longer be available in San Juan County. As of July 1, 2025, San Juan County is now within the jurisdiction of the Northwest Clean Air Agency (NWCAA).

Hot mix asphalt plants generally operate within a gravel pit where gravel or rock is readily accessible. The gravel pit is considered an industrial site sometimes shared by other industries such as rock crushers and concrete batch plants. Ecology also has separate General Orders for rock crushers and concrete batch plants which are addressed in their own individual SEPA documents.

B.Environmental Elements

1. Earth

[Find help answering earth questions](https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-earth)³

a. General description of the site:

This General Order will be available to use at all types of sites in the counties listed in the location information of part A-12 above.

Circle or highlight one: Flat, rolling, hilly, steep slopes, mountainous, other:

³ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-earth>

b. What is the steepest slope on the site (approximate percent slope)?

Not applicable.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them, and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

Unknown. Site description will vary by location of proposed facility.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

It is not known when or if a facility will apply to use the revised General Order. Therefore there is no known property or site to evaluate at this time. However, hot mix asphalt plants are generally located in areas with gravel.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

The revision of this General Order is limited to an Ecology action of making the General Order available as an option. But it is not known when or if a facility will apply to use the revised General Order. Therefore there is no known property or site to evaluate at this time.

However, when or if this General Order revision is used, it has limits on annual and daily production of asphalt.

If a facility cannot meet the new limits, they cannot apply for the General Order. If a facility has a General Order and is not meeting these limits, Ecology inspectors address the situation through enforcement or the applicant would need to apply for an individual permit that allows Ecology to place more site specific restrictions and allowances and mitigation measures (if needed) on the applicant to ensure compliance with the CAA. Alternatively, an individual permit also allows an applicant to demonstrate via site specific modeling, why potentially less restrictive limits may be appropriate than what are in the General Order.

In order to keep this answer brief, the full revised General Order and technical support document are not repeated here, but they contain more details of the proposal.

f. Could erosion occur because of clearing, construction, or use? If so, generally describe.

Unknown. Site description will vary by location of proposed facility.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

Most pits where asphalt operations occur, continue to be pits for future use and do not obtain impervious surfaces other than entry roads in some instances.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any.

This General Order does not require mitigation for erosion since it is regulated by other federal and state laws. Regulatory requirements for erosion control for gravel pits may include various National Pollution Discharge Elimination System (NPDES) permits such as sand and gravel, boatyard, or industrial stormwater general permits that includes measures to stabilize slopes and reduce impacts to earth.

2. Air

[Find help answering air questions](#)⁴

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

Air emissions that may result from hot mix asphalt operations are primarily particulate matter, NO_x, SO₂, VOC, and toxic air pollutants. Emissions quantities are described in detail in Tables 1-9 of the technical support document for this General Order.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

Unknown. Offsite source descriptions will vary depending on where facilities apply to use this general order.

However, Ecology considered both proposed emissions as well as background sources of emissions when performing air modeling on various types of pits expected to be representative of the types of pits where this general order may be used.

Therefore, there are likely no known offsite sources of emissions that may affect the proposal as permitted in the General Order that were not already accounted for as part of the air modeling for this proposal. See Appendix D of the technical support document for more specific details.

Offsite sources of odor are not considered an issue that would affect this proposal for hot mix asphalt activities.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

Because this proposal includes more restrictions per pit location than the existing general permit, Ecology expects less air emissions per pit as a result of this General Order revision.

Section 2 of the general order includes the following limits to reduce or control emissions to air.

⁴ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-Air>

- Production limits per pit location: 160,000 tons per year in any consecutive rolling 12-month period and 2,800 tons per any calendar day;
- Boundary offsets: If the hot mix asphalt plant cannot meet a 150 feet boundary distance buffer and a residential 325 feet distance buffer, it cannot use this General Order and must apply for a full Notice of Construction (NOC) minor NSR permit.
- Visual opacity limits of 10% opacity from any hot mix asphalt plant operations as well as general condition 7.k that no visible emissions from the source are allowed beyond the property.

For a full list of permit limits, and additional details, see both the General Order and the technical support document.

3. Water

[Find help answering water questions](#)⁵

a. Surface:

[Find help answering surface water questions](#)⁶

1. **Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.**

N/A: site specific location information is unknown.

2. **Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.**

N/A: Site specific location information is unknown.

3. **Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.**

N/A Site specific location information is unknown.

4. **Will the proposal require surface water withdrawals or diversions? Give a general description, purpose, and approximate quantities if known.**

N/A Site specific location information is unknown. However, operations that will utilize this General Order usually do not require withdrawals or diversions

5. **Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.**

⁵ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water>

⁶ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Surface-water>

N/A: Site specific location information is not available.

- 6. Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.**

N/A: Site specific location information is not available.

b. Ground:

[Find help answering ground water questions](#)⁷

- 1. Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give a general description, purpose, and approximate quantities if known.**

Operations that will utilize this General Order usually do not withdraw well water..

- 2. Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.**

The proposal is not expected to involve discharge of waste material to groundwater.

c. Water Runoff (including stormwater):

- 1. Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.**

Runoff is regulated by other federal and state laws. Regulatory requirements for stormwater runoff for gravel pits may include various National Pollution Discharge Elimination System (NPDES) permits that include measures to address impacts to adjacent waterbodies for turbidity, metals, and oil/grease runoff, etc.

- 2. Could waste materials enter ground or surface waters? If so, generally describe.**

Waste material from the proposal could effect ground or surface waters (turbidity, metals, and oil/grease runoff, etc).

- 3. Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.**

The proposed revision to our existing General Order is not expected to cause drainage pattern alterations as it is mostly isolated within a pit.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

⁷ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Groundwater>

These impacts do not require further mitigation because they are regulated and mitigated by the federal clean water act and state water pollution control act and are addressed by other program permits such the Ecology Water Quality Program and NPDES permits that include measures to address impacts to adjacent waterbodies for turbidity, metals, and oil/grease runoff, etc.

4. Plants

[Find help answering plants questions](#)

a. Check the types of vegetation found on the site:

- deciduous tree: alder, maple, aspen, other**
- evergreen tree: fir, cedar, pine, other**
- shrubs**
- grass**
- pasture**
- crop or grain**
- orchards, vineyards, or other permanent crops.**
- wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other**
- water plants: water lily, eelgrass, milfoil, other**
- other types of vegetation**

b. What kind and amount of vegetation will be removed or altered?

N/A: Site specific location information is not available.

c. List threatened and endangered species known to be on or near the site.

N/A: Site specific location information is not available.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any.

N/A: Site specific location information is not available..

e. List all noxious weeds and invasive species known to be on or near the site.

N/A: Site specific location information is not available..

5. Animals

[Find help answering animal questions](#)⁸

a. List any birds and other animals that have been observed on or near the site or are known to be on or near the site.

Examples include:

⁸ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-5-Animals>

- **Birds: hawk, heron, eagle, songbirds, other:**
- **Mammals: deer, bear, elk, beaver, other:**
- **Fish: bass, salmon, trout, herring, shellfish, other:**

N/A: Site specific location information is not available..

b. List any threatened and endangered species known to be on or near the site.

N/A: Site specific location information is not available..

c. Is the site part of a migration route? If so, explain.

N/A: Site specific location information is not available.

d. Proposed measures to preserve or enhance wildlife, if any.

N/A: Site specific location information is not available..

e. List any invasive animal species known to be on or near the site.

N/A: Site specific location information is not available..

6. Energy and natural resources

[Find help answering energy and natural resource questions⁹](#)

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Portable facilities will use diesel or gasoline engines to support hot mix asphalt machinery. Stationary facilities are required to have line power.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

The proposed revision to our existing General Order is not expected to affect solar energy by adjacent properties. The facility permit contains visual opacity limits both from hot mix asphalt units as well as visual opacity limits at the property boundary. For specific measures and additional details, see both the General Order and the technical support document.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.

No energy conservation features or measures are planned because hot mix asphalt facilities are not considered high energy use facilities.

⁹ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-6-Energy-natural-resou>

7. Environmental health

[Health Find help with answering environmental health questions](#)¹⁰

- a. **Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur because of this proposal? If so, describe.**

The proposal is not expected to have environmental health hazards such as risk of fire and explosion, spills, or hazardous waste. Toxic air pollutants identified as potentially present as part of hot mix asphalt activities are addressed in Section 5 and Appendix D of the technical support document.

1. **Describe any known or possible contamination at the site from present or past uses.**

N/A: Site specific location information is not available.

2. **Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.**

N/A: Site specific location information is not available.

3. **Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.**

N/A: Site specific location information is not available. Toxic air pollutants are addressed in the technical support document

4. **Describe special emergency services that might be required.**

Emergency services associated with typical industrial operations could potentially be required.

5. **Proposed measures to reduce or control environmental health hazards, if any.**

Criteria air pollutants and toxic air pollutants produced by the proposal are described in the technical support document. And the permitted limits to reduce or control them are described in the revised General Order and summarized in Part 2-c above.

b. Noise

1. **What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?**

N/A: Site specific location information is not available.

¹⁰ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-7-Environmental-health>

- 2. What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site)?**

There may be noise from bucket loaders used to transport feeder materials to the hot mix asphalt equipment, as well as from the hot mix asphalt mixing process and truck traffic to haul asphalt product away from the site.

Typical hours for hot mix asphalt operations are daylight hours which vary between seasons.

- 3. Proposed measures to reduce or control noise impacts, if any:**

Hot mix asphalt operations typically operate during daylight hours.

8. Land and shoreline use

[Find help answering land and shoreline use questions](#)¹¹

- a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.**

When site specific location information is not available, most hot mix asphalt plants that use this General Order locate at existing gravel pit sites.

- b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses because of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?**

N/A: Site specific location information is not available.

- 1. Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how?**

N/A: Site specific location information is not available.

- c. Describe any structures on the site.**

N/A: Site specific location information is not available.

- d. Will any structures be demolished? If so, what?**

N/A: Site specific location information is not available.

- e. What is the current zoning classification of the site?**

N/A: Site specific location information is not available.

- f. What is the current comprehensive plan designation of the site?**

N/A: Site specific location information is not available.

¹¹ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-8-Land-shoreline-use>

g. If applicable, what is the current shoreline master program designation of the site?

N/A: Site specific location information is not available.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

N/A: Site specific location information is not available.

i. Approximately how many people would reside or work in the completed project?

While the exact number is not known and would vary, hot mix asphalt plants are limited in staff to less than one dozen workers.

No one will reside in the completed proposal.

j. Approximately how many people would the completed project displace?

N/A: Site specific location information is not available. However, hot mix asphalt plant operations in gravel pits are not expected to displace people.

k. Proposed measures to avoid or reduce displacement impacts, if any.

None because the proposal is not expected to displace people.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.

N/A: Site specific location information is not available.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:

N/A: Site specific location information is not available.

However, asphalt that is produced at the site may be beneficial to forest land road maintenance.

9. Housing

[Find help answering housing questions](#)¹²

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

None.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

None.

c. Proposed measures to reduce or control housing impacts, if any:

None.

¹² <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-9-Housing>

10. Aesthetics

[Find help answering aesthetics questions](#)¹³

- a. **What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?**

Because hot mix asphalt plants operate in a pit, heights may vary up to around 5 meters (16 feet). But it is not uncommon to have no structures above ground level outside the pit.

- b. **What views in the immediate vicinity would be altered or obstructed?**

N/A: Site specific location information is not available.

- c. **Proposed measures to reduce or control aesthetic impacts, if any:**

N/A: Site specific location information is not available.

11. Light and glare

[Find help answering light and glare questions](#)¹⁴

- a. **What type of light or glare will the proposal produce? What time of day would it mainly occur?**

The proposal is not expected to be a source of light or glare. Typical hours for hot mix asphalt plants are daylight hours which vary between seasons.

- b. **Could light or glare from the finished project be a safety hazard or interfere with views?**

The proposal is not expected to be a source of light or glare.

- c. **What existing off-site sources of light or glare may affect your proposal?**

N/A: Site specific location information is not available.

- d. **Proposed measures to reduce or control light and glare impacts, if any:**

The proposal is not expected to be a source of light or glare that would require control measures.

12. Recreation

[Find help answering recreation questions](#)

- a. **What designated and informal recreational opportunities are in the immediate vicinity?**

N/A: Site specific location information is not available.

- b. **Would the proposed project displace any existing recreational uses? If so, describe.**

N/A: Site specific location information is not available.

¹³ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-10-Aesthetics>

¹⁴ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-11-Light-glare>

- c. **Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:**

N/A: Site specific location information is not available.

13. Historic and cultural preservation

[Find help answering historic and cultural preservation questions](#)¹⁵

- a. **Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.**

Does not apply..

- b. **Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.**

Does not apply.

- c. **Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.**

Does not apply.

- d. **Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.**

Does not apply.

14. Transportation

[Find help with answering transportation questions](#)¹⁶

- a. **Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.**

N/A: Site specific location information is not available.

- b. **Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?**

N/A: Site specific location information is not available.

¹⁵ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-13-Historic-cultural-p>

¹⁶ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-14-Transportation>

- c. **Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle, or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).**

N/A: Site specific location information is not available. However, asphalt that is produced at the site may be beneficial to area road maintenance.

- d. **Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.**

N/A: Site specific location information is not available.

- e. **How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?**

N/A: Site specific location information is not available. However, peak traffic is expected to occur during daylight hours with a majority of traffic being on-site haul vehicles.

- f. **Will the proposal interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.**

The proposal is not expected to have negative impacts on agriculture of forest products on roads.

- g. **Proposed measures to reduce or control transportation impacts, if any:**

None

15. Public services

[Find help answering public service questions¹⁷](#)

- a. **Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.**

Does not apply.

- b. **Proposed measures to reduce or control direct impacts on public services, if any.**

Does not apply.

16. Utilities

[Find help answering utilities questions¹⁸](#)

- a. **Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:**

N/A: Site specific location information is not available.

¹⁷ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-15-public-services>

¹⁸ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-16-utilities>

- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

C. Signature

[Find help about who should sign](#)¹⁹

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.



Type name of signee: Gary Huitsing

Position and agency/organization: Industrial Regulatory Policy & Permit Engineer, Air Quality Program, Washington Department of Ecology

Date submitted: May 1, 2026

D. Supplemental sheet for nonproject actions

[Find help for the nonproject actions worksheet](#)²⁰

Do not use this section for project actions.

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

- 1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?**

Ecology is proposing revisions to its existing hot mix asphalt plant General Order for portable and stationary sources. Hot mix asphalt plants cause air emissions and Ecology's Air Quality Program requires air permits for certain facilities with air emissions over specific thresholds as listed in WAC 173-400-110 (New source review (NSR) for sources and portable sources).

Per WAC 173-400-110, a Notice of Construction (NOC) air permit application and an order of approval must be issued by the permitting authority prior to the establishment of a new source or modification.

However, WAC 173-400-560 (General Order of approval) allows that "In lieu of filing a notice of construction [NOC] application under WAC 173-400-110, the owner or operator may apply for coverage under a General Order of approval issued under this section.

¹⁹ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-C-Signature>

²⁰ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-d-non-project-actions>

Coverage under a General Order of approval satisfies the requirement for new source review under RCW 70.94.152” (RCW 70.A15.2210 Notice may be required of construction of proposed new contaminant source—Submission of plans—Approval, disapproval—Emission control—"De minimis new sources" defined).”

The intent of General Orders is to provide a streamlined permitting process for applicants who qualify and can satisfy the limits within the General Order.

Ecology has had a hot mix asphalt General Order since January 25, 2011, and has revised it only one time (April 18, 2011). Ecology is proposing to revise the existing hot mix asphalt General Order again as allowed in WAC 173-400-560 (General Order of approval).

The revisions to the General Order include more restrictions for each pit it operates in compared to the existing General Order.

The full revised General Order and technical support document contain more details of the proposal, see attached (or links).

Because the proposed revisions to the existing General Order are overall more restrictive within each pit that it will operate in, the revised reissuance of the regulatory tool will not result in increased air emissions within that pit.

The revised General Order will continue to provide a streamlined permitting process for hot mix asphalt operations with updated review of Best Available Control Technology (BACT), and air quality standards.

These updates ensure consistency with the latest 40 CFR Part 50 Federal Clean Air Act (CCA) federal primary and secondary National Ambient Air Quality Standards (NAAQS), Washington Ambient Air Quality Standards (WAAQS) ([WAC 173-476-900](#)), and Washinton State toxic air pollutant (TAP) standards (Chapter 173-460 WAC).

Federal primary standards provide public health protection, including protecting the health of "sensitive" populations such as asthmatics, children, and the elderly. Federal secondary standards provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.

Washington TAP standard regulations are intended to reduce emissions to the extent reasonably possible, and maintain such levels of air quality as will protect human health and safety.

Hot mix asphalt plants that cannot meet the threshold limits of this General Order, will not be able to use it. Instead, they must apply for a full NOC permit as described above. Details of the changes proposed for the revised General Order can be reviewed in the Technical support document (TSD) (see link or attachment).

Discharges to water can result from hot mix asphalt operations. Such discharges are regulated under the state water pollution control act and the federal clean water act.

While stationary hot mix asphalt plants must have line power for this equipment, storage of gasoline (or diesel) and other fuels are commonly used to run portable hot mix asphalt machinery and can be stored onsite for portable facilities that do not have line power. Best Management Practices (BMPs) for safe storage of these chemicals is required under various

National Pollution Discharge Elimination System (NPDES) permits such as sand and gravel, and industrial stormwater general permits issued under the federal clean water act and the pollution control act.

Noise from hot mix asphalt facilities can result in impacts to adjacent uses. Zoning allowances regulated by local governments, city and county daytime and nighttime noise level decibel ordinances, and also noise reducing structures are usual requirements for hot mix asphalt uses and are outside of the authority of the Air Quality Program's General Order.

- **Proposed measures to avoid or reduce such increases are:**

Section 2 of the general permit order includes the following limits to reduce or control emissions to air by including limits for annual and daily hot mix asphalt production

- Production limits: 160,000 tons of per year in any consecutive rolling 12-month period and 2,800 tons per any calendar day;
- Boundary offsets: If the hot mix asphalt plant cannot meet a 150 feet boundary distance buffer and a residential 325 feet distance buffer, it cannot use this General Order and must apply for a full Notice of Construction (NOC) minor NSR permit.
- It also contains visual opacity limits of 10% opacity from any hot mix asphalt plant as well as general condition 7.k that no visible emissions from the source are allowed beyond the property boundary.

For a full list of permit limits, specific measures and additional details, see both the General Order and the technical support document.

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

The proposal is not expected to have effects to plants, animals, fish or marine life. Hot mix asphalt plants regulated by the General Order may result in impacts depending on the presence of plant and animal species on a specific site. The limited purpose of the revisions to the hot mix asphalt plant General Order is to regulate air emissions resulting from hot mix asphalt plants.

- **Proposed measures to protect or conserve plants, animals, fish, or marine life are:**

No mitigation is proposed for the proposed permit revision.

3. How would the proposal be likely to deplete energy or natural resources?

Hot mix asphalt plants use a finite natural resource. The proposed General Order revision will have more limits on annual hot mix asphalt production within each pit, and therefore is expected to use less natural resources within each pit that it operates in compared to the existing General Order.

- **Proposed measures to protect or conserve energy and natural resources are:**

While no official mitigation is proposed for the revision, use of reclaimed asphalt pavement [RAP] in the asphalt mixing process is allowed.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection, such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

The proposal is not expected to have impacts on sensitive areas. The revisions are limited to changes in the air emission parameters.

Future hot mix asphalt operations regulated by the revised hot mix asphalt plant General Order will be subject to land use and zoning regulations that include the critical area regulations and other applicable laws that require avoidance, reduction and compensation for such impacts. Therefore there will not likely be effects on environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection, such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands from non-project effects of the proposal.

- **Proposed measures to protect such resources or to avoid or reduce impacts are:**

No mitigation in addition to the existing land use regulations is proposed at this time.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

The proposal is unlikely to affect land and shoreline use. Future hot mix asphalt plants regulated by the hot mix asphalt general order will be subject to allowances in the applicable comprehensive plan, shoreline master program and zoning code. The siting of hot mix asphalt plants are planned and regulated to ensure compatibility with adjacent uses under the Growth Management Act and the Shoreline Management Act.

- **Proposed measures to avoid or reduce shoreline and land use impacts are:**

None.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

The proposed revision to the hot mix asphalt plant General Order is not likely to increase demands for transportation or public services or utilities. Future hot mix asphalt plants may increase local truck traffic but site specific impacts are unknown at this time.

- **Proposed measures to reduce or respond to such demand(s) are:**

In order to reduce air emissions, revisions to the hot mix asphalt plant General Order include further restrictions to the allowed annual and daily hot mix asphalt production totals per pit. This will also result in limiting truck traffic per pit compared to the existing hot mix asphalt plant General Order.

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

The purpose of the revision to the hot mix asphalt plant General Order is to ensure future hot mix asphalt plants remain consistent with air emission standards referenced in the response to Question D.1 of this checklist. There are no known conflicts with other applicable laws resulting from the proposed hot mix asphalt plant General Order revisions.