



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

15 W Yakima Ave, Ste 200 • Yakima, WA 98902-3452 • (509) 575-2490

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**Kittitas County
CDS**

June 9, 2009

Dan Valoff
Kittitas County Community Development
411 N. Ruby St., Suite 2
Ellensburg, WA 98926

Dear Mr. Valoff:

Thank you for the opportunity to comment during the optional determination of nonsignificance process for the operation of a temporary asphalt plant in the Commercial Forest zoning district, proposed by Schomac Group [CU-09-00002]. We have reviewed the documents and have the following comments.

Air Quality

Portable concrete batch plants need to obtain coverage under the Concrete Batch Plant General Order of Approval. After obtaining coverage under this General Order, the source must notify Ecology's Air Quality Program at least 10-days prior to starting concrete batching activities. If concrete batching operations are anticipated for over one year in the same location, stationary concrete batch plants also need to obtain coverage under the Concrete Batch Plant General Order of Approval.

Portable asphalt plants, which locate temporarily (for one year or less) at a particular site, will either require a Temporary Air Quality Permit or a Notice of Construction (NOC) Air Quality Permit from Ecology. If operations are anticipated for over one year in the same location, an Air Quality NOC permit will be required.

Ecology recommends that the proponent develop a site-specific Fugitive Dust Control Plan (FDCP) before starting this project, and then follow the plan for construction of the



project and duration of activity on property. The FDCP should include, but is not limited to, the following components:

- Identify all potential fugitive dust emission points.
- Assign dust control methods.
- Determine the frequency of application
- Record all dust control activities.
- Train personnel in the FDCP.
- Shut down during windy conditions.
- Follow the FDCP and monitor dust control efforts.

Washington Administrative Code (WAC) 173-400-040 requires that reasonable precautions be taken to prevent dust from leaving the site. Also, dust is prohibited from interfering unreasonably with the use and enjoyment of property, causing health impacts, or damaging property or business.

Please contact Ecology's Air Quality Program for information, Jared Mathey (509) 454-7845 or David Ogulei (509) 454-7899.

Shorelands/Environmental Assistance

Activities within shoreline jurisdiction (typically 200 feet from the Ordinary High Water Mark or the edge of the floodplain) should be consistent with requirements of the Shoreline Management Act (90.58 RCW) and the local Shoreline Master Plan.

If you have any questions concerning the Shorelands/Environmental Assistance comments, please contact Catherine Reed at (509) 575-2616.

Water Quality

Sand and Gravel Operations: All concrete products manufacturers and property owners (or operators) of sand and gravel pits, rock quarries, asphalt and concrete batch plants are required to apply for permit coverage under the Sand & Gravel General Permit. In addition, owners of *portable* crushers, operating at sites that are not permitted for crushing under the Sand & Gravel General Permit, are required to apply for coverage. You may download the application form and instructions from the internet at

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<http://www.ecy.wa.gov/programs/wq/sand/index.html> . If you do not have internet access call Cindy Huwe at (509) 457-7105 for application materials. Ecology must receive your application at least 180 days before the proposed date for starting operations. Mail your completed application to:

Cindy Huwe, Water Quality Permit Coordinator
Washington Department of Ecology
15 West Yakima Avenue #200
Yakima, WA 98902

After you complete the sand and gravel operations, you must submit an application for a wastewater discharge permit if you will use the site for industrial uses (e.g., as a stormwater retention facility). You will also need to submit an engineering report if there will be wastewater treatment components, including piping.

Project Greater-Than 1 Acre with Potential to Discharge Off-Site

An NPDES Construction Stormwater General Permit from the Washington State Department of Ecology is required if there is a potential for stormwater discharge from a construction site with more than one acre of disturbed ground. This permit requires that the SEPA checklist fully disclose anticipated activities including building, road construction and utility placements. Obtaining a permit is a minimum of a 38 day process and may take up to 60 days if the original SEPA does not disclose all proposed activities.

The permit requires that Stormwater Pollution Prevention Plan (Erosion Sediment Control Plan) is prepared and implemented for all permitted construction sites. These control measures must be able to prevent soil from being carried into surface water (this includes storm drains) by stormwater runoff. Permit coverage and erosion control measures must be in place prior to any clearing, grading or construction.

More information on the stormwater program may be found on Ecology's stormwater website at: <http://www.ecy.wa.gov/programs/wq/stormwater/construction/> . Please submit an application or contact Lynda Jamison at the Dept. of Ecology, (509) 575-2434, with questions about this permit.

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Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent soil from being carried into surface water by storm water runoff. Sand, silt, and soil will damage aquatic habitat and are considered pollutants.

Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington, and is subject to enforcement action.

Best management practices must be used to prevent any sediment, oil, gas or other pollutants from entering surface or ground water.

Water Resources

Information for the applicant:

If you plan to use water for dust suppression at your site, be sure that you have a legal right. A water right permit is required for *all* surface water diversions and for any water from a well that will exceed 5,000 gallons per day. (Chapter 90.03 RCW Surface Water Code and Chapter 90.44 RCW Regulation of Public Ground Waters) If in doubt, check with the Department of Ecology, Water Resources Program. Temporary permits may be obtainable in a short time-period. The concern of Water Resources is for existing water rights. In some instances water may need to be obtained from a different area and hauled in or from an existing water right holder.

If you have any questions concerning the Water Resources comments, please contact Breean Zimmerman at (509) 454-7647.

Solid Waste

The proponent should consider the use of recycled materials in roads for this project. Ground asphaltic roofing (from roofing projects) and crumb rubber (waste tires) have proved to be effective feed stocks in the manufacturing of roadway asphalt. Tire bales are a Washington State Department of Transportation-approved product for lightweight fill. Use of these materials would expand markets for these recycled products and reduce

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the use of natural resources needed for road construction. For further assistance contact Gary Bleeker at (509)575-2782 or gble461@ecy.wa.gov.

Sincerely,



Gwen Clear
Environmental Review Coordinator
Central Regional Office
(509) 575-2012