

Solid Waste, Rodent, and Zoonotic Disease Program

CHK-PH-1100

401 5th Ave, Suite 1100

Seattle, WA 98104

Email: jjessen@kingcounty.gov

P: 206-263-0856

Jessen, Jennifer

From: Jessen, Jennifer
Sent: Thursday, May 30, 2019 9:55 AM
To: David Morris
Cc: Barto, Joe; Pon, Yolanda
Subject: Green Section 30 Inert Waste Landfill Application Public Health

Dear David Morris,

Thank you for your submittal of an application for a solid waste inert waste landfill permit on May 17, 2019. As with all permit applications, a fee for application review is required for us to begin review of the application. Public Health Seattle King County (PHSKC) fee for a solid waste application is \$739.20 for the first 4 hours of review. After the 4 hours, a fee of \$184.80 per hour is applied. Once payment is received and processed, the review of your application will begin.

A list of PHSKC service fees can be found online at : <https://www.kingcounty.gov/depts/health/environmental-health/fees.aspx>

Please make the *check payable to*: Seattle King County Department of Public Health (SKCDPH).

Please *mail payment to*:

Jennifer Jessen, RS
Environmental Services Division
Solid Waste, Rodent and Zoonotic Program
CHK-PH-1000
401 5th Ave, Suite 100
Seattle, WA 98104

Please note that SKCDPH does not accept payment over the phone.

Additionally, section 173-350-410 Washington Administrative Code (WAC) Inert Waste Landfills and section 173-350-040 WAC Performance Standards require that performance standards be met as a condition of permitting. It has come to our attention that there may be some compliance issues with your fill and grade/mining permit GRDE15-0070. To ensure your facility and land use are properly zoned, and permit requirements are in compliance please reach out to:

Joseph Barto, *Engineer*
King County Department of Local Services, Permitting Division
35030 SE Douglas Street, Suite 210
Snoqualmie, WA 98065-9266
206-477-0374

Thank you for your time. If you have any questions, please feel free to contact me. Again, thank you for your permit submission. I look forward to assisting you through the permitting process.

Sincerely,

Jennifer Jessen, RS
Health and Environmental Investigator III
Environmental Health Services Division

21A.24.314 Critical aquifer recharge areas — King County Code provisions adopted — Washington state underground tank provisions implemented.

21A.24.313 Critical aquifer recharge areas — categories. Critical aquifer recharge areas are categorized as follows:

A. Category I critical aquifer recharge areas include those mapped areas that King County has determined are:

1. Highly susceptible to groundwater contamination and that are located within a sole source aquifer or a wellhead protection area; or
2. In an area where hydrogeologic mapping or a numerical flow transport model in a Washington department of health approved wellhead protection plan demonstrate that the area is within the one year time of travel to a wellhead for a Group A water system;

B. Category II critical aquifer recharge areas include those mapped areas that King County has determined:

1. Have a medium susceptibility to ground water contamination and are located in a sole source aquifer or a wellhead protection area; or
2. Are highly susceptible to groundwater contamination and are not located in a sole source aquifer or wellhead protection area; and

C. Category III critical aquifer recharge areas include those mapped areas that King County has determined have low susceptibility to groundwater contamination and are located over an aquifer underlying an island that is surrounded by saltwater. (Ord. 16267 § 50, 2008; Ord. 15051 § 174, 2004).

Joe

Jessen, Jennifer

From: Jessen, Jennifer
Sent: Tuesday, May 21, 2019 8:53 AM
To: Barto, Joe
Cc: Pon, Yolanda
Subject: RE: KC Code 21A.24.311-314 Critical Aquifer Recharge Areas

Hi Joe,
Thank you for this. Your time yesterday was very much appreciated.
What do the CARA land use and zoning rules state?
Where might I find this information in the KC code, or state code?

Also, I am not able to process the application for Franklin Ridge's request for inert waste landfill until Franklin Ridge has a letter from you stating the zoning and land use (and now CARA) for their sites (a combination of all parcel numbers under their fill and grade) is approved for an inert waste landfill. It may be that landfills themselves are not allowed, but if approved through DEPER, PH can move forward.

And, what are your next steps with Merlino site—Cedar Shores? Will you be informing them of their CARA determination? Will your department be sending a letter outlining violations with their current fill and grade permit? I am going to compare the parcel numbers listed under the fill and grade with the site activity. I will let you know if there is a discrepancy.

PH will be making another site visit to see where processing is taking place. At this time, Cedar Shores is stating that they do not have an inert waste landfill. If you have any evidence to the contrary, that over 250 cu/yds. of inert material has been landfilled, sharing this information with PH would be appreciated. Would you like to be a part of this visit?

Thanks again for your time and partnership on this. King County needs sites to bring material, yet we still need to protect the groundwater and our environment.

Sincerely,

Jennifer

From: Barto, Joe
Sent: Tuesday, May 21, 2019 8:16 AM
To: Jessen, Jennifer <JJessen@kingcounty.gov>
Subject: KC Code 21A.24.311-314 Critical Aquifer Recharge Areas

Jennifer,

Here is the KC Code where Critical Aquifer Recharge Areas are addressed and defined.

21A.24.311	Critical aquifer recharge areas — maps adopted.
21A.24.312	Critical aquifer recharge areas — reclassification or declassification.
21A.24.313	Critical aquifer recharge areas — categories.

- Procedures to prevent non-inert waste from being accepted or mixed with inert waste.
- Procedures and protocols to ensure compliance with WAC 173-350-040 (Performance Standards).
- Fugitive dust control procedures.
- Procedures and protocols for facility inspection to prevent malfunction and deterioration, prevention of operator errors and discharges that may cause to human health.).
- Procedures to maintain daily records including quantities of inert waste disposed on a daily basis.
- Develop, keep and abide by a Plan of Operations approved as part of the permitting process.
- Description and types of solid waste to be handled at the facility.
- Description how the solid waste will be handled at the facility.
- Describe how equipment, structures and other systems are to be inspected and maintained including frequency of inspections.
- Develop and submit Safety and Emergency Plan.

WAC 173-350-410(8)(c) Documentation that all owners of property located within one thousand feet of the facility property boundary have been notified that the proposed facility may impact their ability to construct water supply wells, in accordance with Chapter 173-160 WAC, Minimum standards for construction and maintenance of wells.

If you have any questions or concerns about this letter, please contact me by phone at 206-263-2992 or email at Darshan.dhillon@kingcounty.gov.

Sincerely,



Darshan (Dan) S. Dhillon, H&EI III
Public Health Seattle & King County
Solid Waste, Rodent and Zoonotic Program

CC: Yolanda Pon, Supervisor, Public Health, Solid Waste Program
Jennifer Jessen, PHSKC, Health & Environmental Investigator III,
Public Health, Solid Waste Program.
Joe Barto, Department of Local Services, Engineer
Kinley Deller, King County Solid Waste, Construction and Demolition Specialist
John Bromley, Department of Natural Resources, Deputy State Geologist

Environmental Health Services Division

401 Fifth Avenue, Suite 1100
Seattle, WA 98104

206-263-9566 Fax 206-296-0189

TTY Relay: 711

www.kingcounty.gov/health

August 17, 2019

Bill Wheeler
Green Section 30, LLC
P.O. Box 1266
Enumclaw, WA 98022

RE: Inert Solid Waste Permit Application (SR1428913)

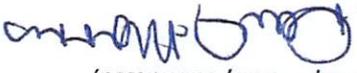
Dear David Morris and Bill Wheeler

Thank you for submitting a Solid Waste Permit Application (application) to the Public Health Seattle & King County (PHSKC) for depositing Inert Solid waste material.

As you are aware, your facility located at 3600 Enumclaw-Franklin Road, Enumclaw, WA 98022 is currently out of compliance with Washington Administrative Code 173-350 Solid Waste Handling Standards. The submission of a complete and accurate application is necessary for PHSKC to determine the application complete and to continue with review of your submission.

PHSKC's initial review of your permit application determined that your application does not comply with WAC 173-350-710 and WAC 173-350-715. Therefore, your application is incomplete. In order for PHSKC to render your application complete, following items must be completed and submitted to PHSKC:

1. Comply with all the requirements stipulated in King County Permitting Division's letter of August 8, 2019. Submit an approval of compliance signed by the King County Permitting Division, Department of Local Services confirming that all action items in the letter have been completed.
2. Submit two (2) complete permit application packages to PHSKC. Ensure that both applications are signed and dated by the owner and operator(s).
3. Submit an evidence of compliance with the State Environmental Policy Act (SEPA) along with SEPA check list.
4. Prepare and submit engineering reports, plans and specifications to address design standards which also include the following:
 - Vertical and horizontal limits of excavation and waste placement.
 - Final closure elevation and grades.
 - Design capacity, total capacity, and future use of the facility after closure.
 - Procedures and protocols to maintain site stability.
 - Management procedures and protocols for surface water including run-on prevention and runoff conveyance, storage and treatment to protect the waters of the State.
 - Operating standards.

Respectfully submitted,

David J. Morris, P.E.

- Waste roofing materials.
- Demolition debris other than items specifically listed above as accepted.



P.O. Box 1266
36000 Enumclaw Franklin Rd. SE
Enumclaw, WA 98022

February 5, 2020

Mr. Darshan Dhillon, MSc, REHS/RS
Health and Environmental Health Investigator III
Public Health Seattle & King County
Health and Environmental Services Division
Solid Waste, Rodent and Zoonotics Program
CNK-PH-1100
401 Fifth Avenue STE 1100
Seattle WA 98104

Subject: Inert Waste Landfill Application – Inert Waste Material Stipulation
Franklin Ridge Sand & Gravel Site

Dear Mr. Dhillon:

You requested that we supplement the subject application, stipulating what inert waste we plan to accept at the subject site. The following materials **will be accepted**:

- Cured concrete that has been used for structural and construction purposes, including embedded steel reinforcing and wood, that was produced from mixtures of Portland cement and sand, gravel or other similar materials.
- Asphaltic materials that have been used for structural and construction purposes (e.g., roads, dikes, paving) that were produced from mixtures of petroleum asphalt and sand, gravel or other similar materials.
- Brick and masonry that have been used for structural and construction purposes.
- Ceramic materials produced from fired clay or porcelain.
- Glass, composed primarily of sodium, calcium, silica, boric oxide, magnesium oxide, lithium oxide or aluminum oxide. Glass presumed to be inert includes, but is not limited to, window glass, glass containers, glass fiber, glasses resistant to thermal shock.

We will not accept:

- Glass containing significant concentrations of lead, mercury, or other toxic materials.
- Stainless steel or aluminum.



P.O. Box 1266
36000 Enumclaw Franklin Rd. SE
Enumclaw, WA 98022

May 17, 2019

Ms. Jennifer Jessen, RS
Public Health Seattle & King County
Health and Environmental Services Division
Solid Waste, Rodent and Zoonotics Program
CNK-PH-1100
401 Fifth Avenue STE 1100
Seattle WA 98104

Subject: Inert Waste Landfill Application
Franklin Ridge Sand & Gravel Site

Dear Ms. Jessen:

Under this cover and in accordance with your instructions in your Inspection Report of March 11, 2019 we submit this Application for an Inert Waste Landfill.

On Tuesday you asked if our zoning allows for a landfill. Our zone is "Mineral." Under KCC 21A.22.081C.3.a. all areas subject to grading or backfilling can incorporate non-noxious, nonflammable, noncombustible and non-putrescible solids in the backfill.

Our grading permit from King County specifies that the backfill material must consist of earthen material, organic material or recycled or reprocessed materials that are not categorized as dangerous waste under Title 173 WAC and that were originally from an earthen or organic material.

The Mineral zoning classification does not expressly mention landfill although one can easily consider backfilling as landfill. What we are proposing in the Application is exactly what we are doing and what has been approved by both King County and Washington Department of Natural Resources.

I'm available to answer and any questions regarding the application.

Respectfully submitted,

David J. Morris, P.E.