



September 12, 2014
G-Logics File Number 01-0109-F

Mr. Dale Myers
Washington Department of Ecology, Northwest Regional Office
3190 160th Avenue SE
Bellevue, WA 98008-5452

Subject: Planned Explorations and Remedial Actions
Binford Metals Property
78th Avenue South and South 262nd Street
Kent, WA 98032
Facility/Site No.: 1172217
Cleanup Site No: 1375
VCP Project No.: NW1863

Dear Mr. Myers:

The following document presents a brief outline of exploration and remedial actions that currently are anticipated to be conducted on the subject property. This property also is known to Ecology as the Japanese Auto Wrecking Site (former BB5 and BB7 Partnership Properties). The property location is shown on the attached Figure 1 and a recent aerial photograph is presented as Figure 2. The location of the nearby Green River also can be seen on these figures.

This document is in response to bullet item 3 in your letter dated July 21, 2014 (and our subsequent telephone conversations). Numerous reports documenting the status of the cleanup work were provided to Ecology on August 18, 2014. These documents were provided in response to bullet items 1 and 2 in your letter.

Introduction

A former property occupant (Japanese Auto Wrecking) caused soil and groundwater contamination at the property (gasoline-related contaminants). This occupant also abandoned a significant number of automobile and truck tires. Significant remedial investigations and cleanup work were conducted at the property (Administrative Order on Consent, Docket No. CWA-10-2004-0039). The soil and groundwater contamination was addressed to the satisfaction of the Environmental Protection Agency, with documentation received in 2012.

During this period and approximately 10 years ago (2005), the BB5 and BB7 parcels were sold to Binford Metals, LLC (Binford), which now operates a large metal-recycling business on the combined property. In anticipation of Ecology-required cleanup and documentation work, a Cleanup Action Plan (CAP) was prepared (November 21, 2007) and submitted to Ecology. This CAP was submitted with Binford's entry into Ecology's Voluntary Cleanup Program (VCP). This CAP described the continued treatment for remaining groundwater contamination, specifically the gasoline contaminants that remained in the area of monitoring well GL MW-08. Accordingly, Binford continued to operate the groundwater-treatment system for the residual gasoline-related contaminants.

The documents provided to Ecology (August 18, 2014) demonstrate that the cleanup work has been conducted and was highly successful. Specifically, quarterly groundwater sampling (completed in 2012) documents that gasoline-related contaminants no longer remain in the groundwater in this area or in any other groundwater-monitored areas of the property. With the successful results, operation of the treatment system was discontinued in 2012. The monitoring wells currently remain at the property.

With the recent submittal of site-cleanup documentation, we understand that Ecology remains concerned regarding other possible site contaminants, specifically oil-range hydrocarbons and metals in the near-surface soils and shallow groundwater. Accordingly, this document presents a brief outline of exploration, and if necessary, remedial actions that can be conducted to address these additional concerns. The goal of this work will be to provide Ecology with sufficient information that an NFA Determination can be granted (for both BB5 and BB7 parcels).

Current Property Operations

Binford Metals currently accepts and recycles large volumes of metals including aluminum, stainless steel, iron, brass, copper, and bronze. The facility does not accept or process hazardous materials such as florescent-light fixtures, computer electronics, appliances containing refrigerants, or undrained engines/transmissions. In addition to the conducted site cleanup work over the past several years, significant improvements have been made by Binford to reduce the potential for soil, groundwater, and surfacewater contamination. These include covered operation and storage areas, secondary-containment systems for hazardous liquids (e.g., used oils), additional protections during possible flooding events, and the use/maintenance of sophisticated plate-coalescing oil/water separators (located in the stormwater-collection areas).

Currently, Binford is working with a design team, consisting of surveyors, engineers, and Aspect Consulting (Aspect), to further improve their facility and operations. These planned improvements currently include additional covered buildings, concrete pavement for yard areas, and systems designed to treat the collected stormwater prior to on-site infiltration. These improvements also will additionally reduce the potential for petroleum and metal contaminants to reach the environment. A copy of the current draft plan (prepared by Aspect) is attached.

Planned Property Improvements

Using the attached plan from Aspect, Binford currently is working to apply for and receive King-County permits for significant structural improvements to the property. Again, these improvements are specifically intended to reduce the potential for site contamination while allowing for increased capacity for their recycling operations.

Schedule for Planned Improvements

From a recent telephone conversation with representatives from Aspect, we understand the following activities (with tentative schedules) are included to support the planned work.

- Slug testing to assess infiltration characteristics, November of 2014
- Pre-application documents to King County, Spring-early Summer of 2015
- Initial construction, August/September of 2015

Suggested Site-Exploration Sampling

It currently is anticipated that prior to placing structural concrete, surface soils will be removed and structural materials will be placed to allow for grading and concrete-forming work. To provide additional soil-contamination information to Ecology, samples can be collected from these removed soils to allow for their proper characterization and/or disposal. Samples also can be collected from the remaining soils in order to document that contaminants are not present and will not be covered with planned structures (building or concrete slabs).

As part of this site characterization work, groundwater samples also can be collected for metals contaminants (groundwater has been shown to be free of petroleum contaminants). This work can be conducted in advance of the planned construction work, in order to provide quarterly analytical data to Ecology.

Documentation Needs

From our recent conversations, we understand that Ecology believes a Remedial Investigation and Feasibility Study (RI/FS) is required, along with the preparation of a Cleanup Action Plan (CAP), before Ecology could consider an NFA Determination. Given the information summarized in this letter, as well as the more-detailed information provided in previously-submitted documents, G-Logics does not believe that significant site exploration or cleanup work remains at this property. However, in order to satisfy Ecology's documentation requirements, information collected at this property can be compiled into a RI-report format, with any data gaps identified and discussed. Subsequently, remaining areas of contamination (if present) can be addressed in a corresponding FS report. It is also anticipated that any residual-contamination areas can be easily described and addressed in a simple CAP document, with any remedial efforts conducted as part of the planned improvement work.

Next Steps

If our understanding of existing conditions and the suggested approach to moving forward is acceptable to Ecology, G-Logics can provide a schedule and begin the preparation of the RI report for this Site. We also suggest that a meeting should occur, with representatives from G-Logics, Binford, and Ecology, to discuss and further refine this approach.

Closing

Please feel free to contact us if you have questions regarding the completed work, the presented information, or the understood site-closure approach. Please also let us know when it may be convenient to meet to discuss conducted and planned site-cleanup work. Thank you in advance for your assistance.

Sincerely,
G-Logics, Inc.

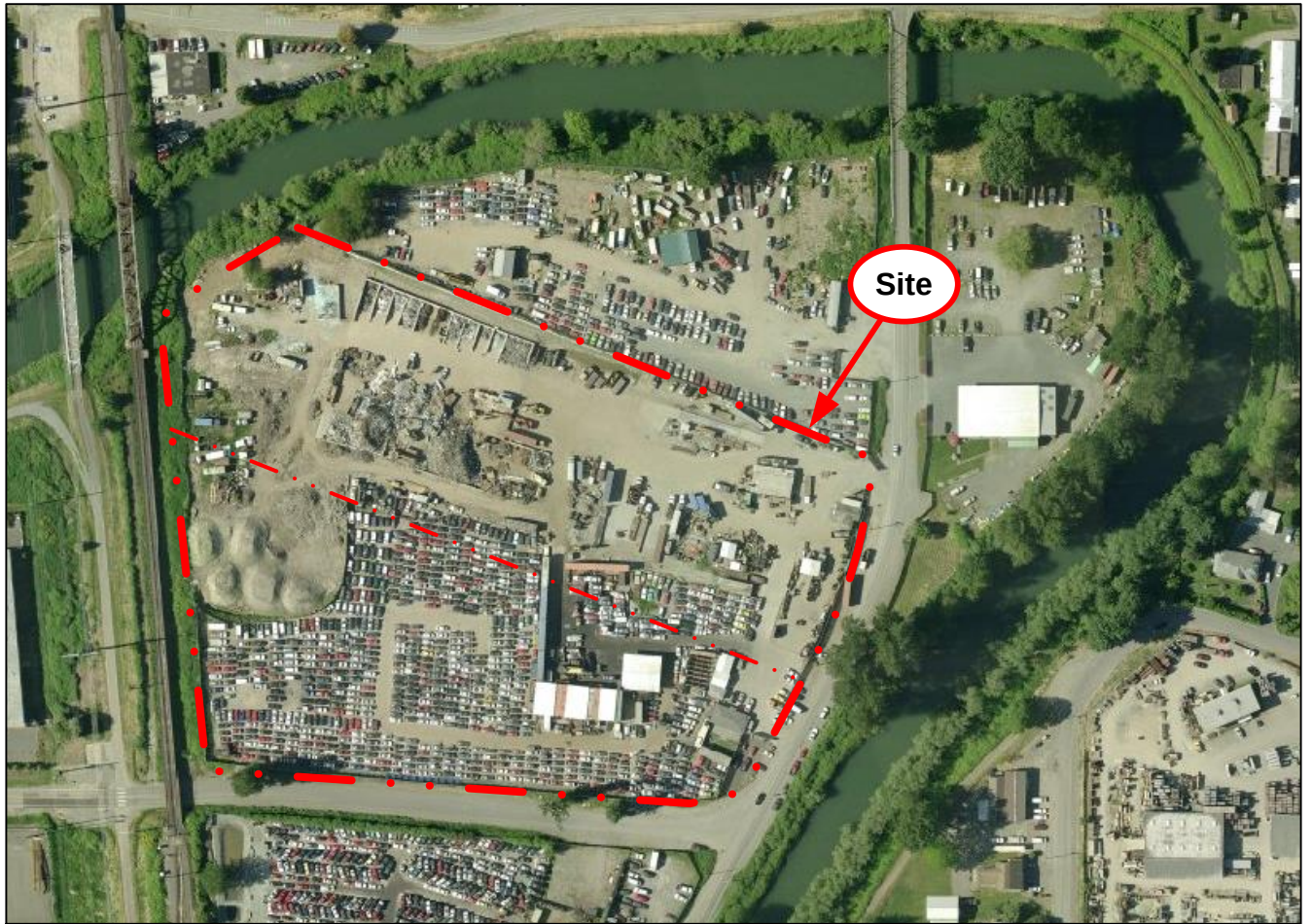
Rory L. Galloway, LG, LHG
Principal

Attachments:

Figure 1, Site Location Maps
Figure 2, Site Diagram, Aerial Photograph from 2009
Conceptual Site Plan, Preliminary, Aspect Consulting

CC David Binford

ATTACHMENTS



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Site Location Maps
Binford Metals Property
78th Ave South and South 262nd Street
Kent, Washington

Figure
1



Legend



Property Boundary

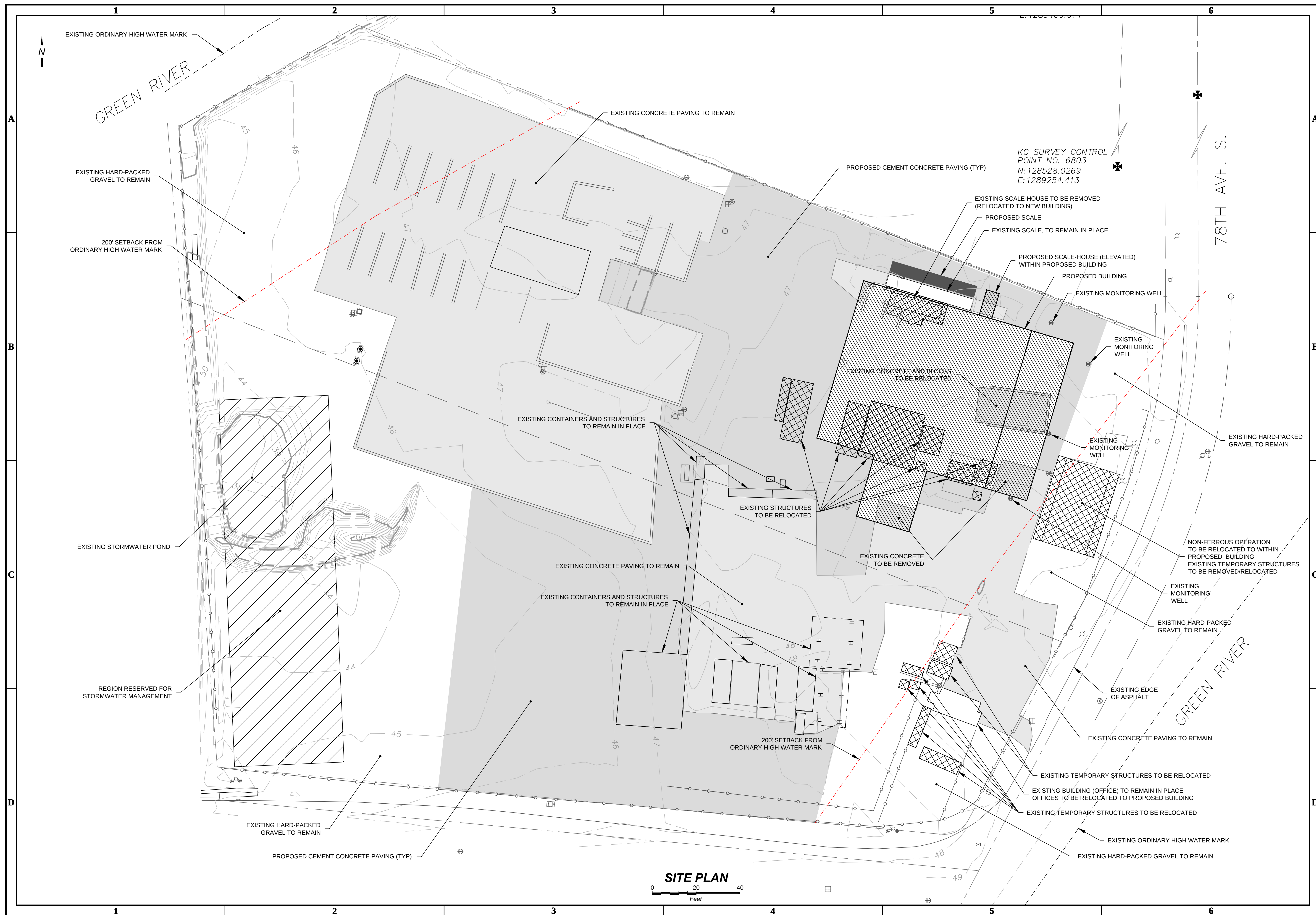
g-logics

Note: This figure contains information in color. Black & white photocopies may not be suitable for review.

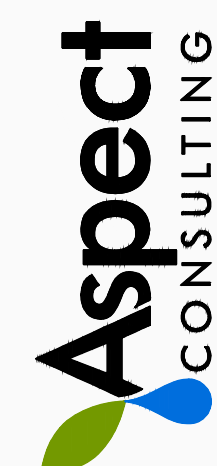
Approximate Drawing Scale: 1" = 100'
0 ft. 60 ft. 100 ft. 200 ft.

Site Diagram, Aerial Photograph from 2009
Binford Metals Property
78th Avenue South and South 262nd Street
Kent, Washington

Figure
2



PRELIMINARY



Conceptual Improvement Site Plan

Binford Metals Site Improvement
Kent, Washington

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