



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

April 3, 2008

CERTIFIED MAIL
7006 3450 0001 6754 0871

Mr. Victor Bonagofski
1303 W. Reynolds Ave
Centralia, WA 98531

Re: Action Required at 1303 W. Reynolds Ave, Centralia WA 98531 and
4020 Harrison Ave, Centralia WA 98531

Dear Mr. Bonagofski:

The Department of Ecology (Ecology) inspected both the Reynolds Avenue and 4020 Harrison Avenue properties on January 24, 2008. At that time, Ecology observed the following materials left out in the weather causing actual or potential environmental harm:

- Wet-cell automotive batteries
- Automotive transmissions, engine blocks and fuel tanks
- Unmarked 55-gallon drums, 1- and 5-gallon buckets, and aerosol cans (contents unknown)
- Pressurized cylinders (contents unknown)
- Potentially hazardous debris (what appeared to be decomposed fireworks)
- Computer components ("e-waste")

Ecology inspectors also observed oily stains on the ground under/around automobiles, and observed fireworks (or similar) stacked and spilled on the ground. Oil from engine blocks or transmissions may contain halogenated hydrocarbons, metals or other contaminants. Fireworks may contain sulfur, salt peter (potassium nitrate), and charcoal. Each tube may have 1 to 3 grams of this material, depending on the manufacture. The composition for the flaming ball it launches into the air will usually be made of a combination of potassium perchlorate, sulfur, aluminum, copper oxide, barium sulfate or carbonate, strontium, iron oxide, and titanium.

These conditions are a violation of RCW 90.48.080 and WAC 173-303-145 (Spills and Releases), and the following actions must be taken to address risks:

1. **WAC 173-303-145 and RCW 90.48.080: Cease releases and discharges, and mitigate risks to human health and the environment.**
Immediately upon receipt of this letter, cease any discharge of industrial waste to trenches, sumps, in-ground vaults or dry-wells. Cease any discharge of gray water to illegal



septic or sewer lines. Within 30 days of receipt of this letter, cleanup hazardous debris (fireworks) off soil and place it into containers that can be closed, labeled and managed to prevent releases. Move all lead-acid batteries, air cylinders, aerosol cans, buckets, jugs and other containers holding material to an area that is protected from the weather. These materials must be inventoried and stored, labeled and managed to prevent releases.

Within 30 days of receipt of this letter, cleanup any soil contaminated with oil, lead acid, fireworks residue, or other hazardous material. Soil must be placed into containers that can be closed, labeled and managed to prevent additional releases.

Soil and groundwater analysis may be required if you determine that hazardous constituents were released to the environment through a trench, sump, in-ground vault or drywell. This analysis will be coordinated through Ecology's Toxics Clean-up Program, and may be completed while addressing other areas of the site.

2. WAC 173-303-070(8): Designate waste.

Within 45 calendar days of receipt of this letter, designate the following wastes as required in WAC 173-303-070:

- Waste accumulated in containers on both properties
- Waste accumulated on the ground, believed to be fireworks
- Contaminated soil cleaned up on either property

If waste streams are multi-phase (for example, sludge layer, oil layer, water layer, etcetera), then each phase must be discretely addressed. At a minimum, wastes must be analyzed to define waste characteristics as defined in WAC 173-303-090 and -100. The waste must also be analyzed to define the concentration of total petroleum hydrocarbons, polychlorinated biphenyls, polyaromatic hydrocarbons, and total metals (arsenic, barium, cadmium, chromium, copper, lead, mercury, nickel, selenium, silver, thallium and zinc).

3. RCW 90.48.010: Apply the use of all known, available and reasonable methods to prevent and control the pollution of waters of the state.

All tanks, drums or other containers used to accumulate waste must be in good condition and compatible with the waste. They must be kept closed except to add or remove waste, and must be stored in a manner that minimizes impacts to the environment. Tanks and containers should be placarded as "waste pending designation" or with their known content. They also must be marked with the date that waste was placed into the container. If you determine that the waste is dangerous, then accumulation tanks and containers must be managed to meet the WAC 173-303-640 (tank) and -630 (drum) requirements.

4. WAC 173-303-220(3): Additional Records.

Within sixty (60) days of receipt of this letter, provide Ecology with the following:

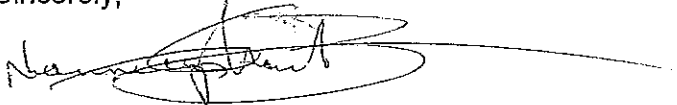
- Copies of manifests, bills of lading, or other documentation for waste managed off-site during 2008.
- A written inventory of all chemicals and/or wastes that remain on the site; their volume, and proposed disposal or use.

Mr. Victor Bonagofski
April 3, 2008
Page 3 of 3

You are required to take action as defined in this letter. Failure to take action could result in formal enforcement, including a penalty issued under the Hazardous Waste Management Act (RCW 70.105.080 and .095) of up to \$10,000 per day per violation.

I am available to meet with you and/or your contractor to discuss required actions. Please contact me at 360-407-6242 or at nbro461@ecy.wa.gov to schedule a time to meet, or to discuss this letter, Ecology's concerns, or required actions.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Nannette Brooks', with a long horizontal line extending to the right.

Nannette Brooks, Inspector
Hazardous Waste and Toxics Reduction Program
Southwest Regional Office

cc: Doug Ruth, Lewis County Deputy Prosecuting Attorney
Trooper Orr, Washington State Patrol
Steve Garrett, Lewis County Health Department

Washington State Department of Ecology
Hazardous Waste & Toxics Reduction Program
Compliance Inspection Report

SITE & INSPECTOR INFORMATION

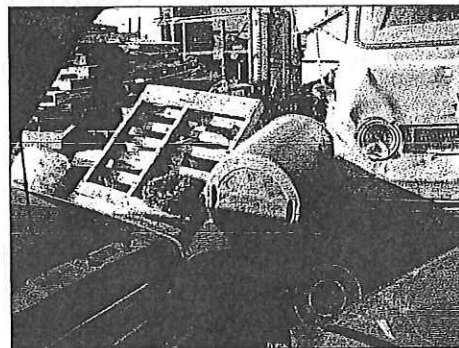
EPA RCRA #:	Facility Site ID#:	Inspection Date: 01/24/08	Address: Bonagofski-Reynolds Road Property 1303 W. Reynolds Road Centralia WA 98531
Dangerous Waste  Compliance	Inspectors: Nannette Brooks, Inspector 360-407-6242 Nbro461@ecy.wa.gov Dee Williams, Inspector (360) 407-6348 Sharon Huff, Project Manager (360) 407-6300		Contact: Victor Bonagofski (address above) Property Owner: Picese Trust (Bonagofski, co-trustee)
	Business Overview, Generator Status: Alleged illegal wrecking. See ERTS # 603470		

SUMMARY

This was an unannounced compliance inspection, initiated by the Washington State Patrol to conduct a warrant search of the property.

We arrived on-site at approximately 10:00, after the site was secured by Washington State Patrol. We began our walk-through the facility where we observed the wastes listed in Table A, and the following:

- There were several junk cars and other vehicles scattered throughout the property. Some cars had blackberry bushes growing through the doors, and others had materials stacked and leaning on-top.
- There were several containers on-site, including blue plastic 55-gallon drums, rusted metal drums, several 1- and 5-gallon buckets, and various sized compressed air cylinders. Containers were not adequately labeled, and contents were unknown.
- There were several tire piles, engines and transmissions scattered throughout the site.
- There were several lead-acid batteries sitting outside, exposed to the weather.
- There were several stacks of pallets, scrap metal (including appliances), and black plastic bags full of glass bottles, aluminum cans, and plastic bottles scattered through out the property.
- There were at least two vehicles leaking oil or transmission fluid to the ground.
- There were several buildings on the property. We did not enter any building due to safety restrictions, but were able to view the interior. We observed containers, scrap metal, black bags with glass bottles and aluminum.



Plastic drums and pallets.



Buckets with Unknown Content



Scrap pile.

We spoke briefly with Steve Garret of Lewis County Health Department. He noted that there was an un-permitted septic tank on-site. We observed the discharge pipe from a trailer to this system. We also spoke with Trooper Orr, and offered to forward our Field Report and Photo Log. Off-site at 10:50.

(Additional photos in Photo Log)

TABLE A – WASTE SUMMARY

Waste/Product Observed	Amount	Location	Management
Tires / Tire Piles	Estimate <500	Throughout Site	Stored along side vehicles; stacked randomly.
Wet-Cell Batteries	Estimate <10	Throughout Site	Stored outside on ground; not in vehicles. Questionable use (may be spent).
Unknown Material in Containers	Various 55-gallon drums, 1-gal and 5-gallon buckets.	Throughout Site & in Buildings	Stored outside; unknown volume & characteristics. No labels.
Engine Blocks, Transmissions, Gas Tanks	Estimate <10	Throughout Site	Stored outside.
Unknown Material in Pressurized Cylinders	Various Volume	Throughout Site	Stored outside; not secured.
Metal Scrap, including Appliances	Piles (~1200 ft ³)	Throughout Site	Stored outside.
Miscellaneous Solid Waste (cardboard, glass & plastic bottles, aluminum, plastic bags, & trash)	Undefined (one pile cardboard ~3200 ft ³)	Throughout Site & in Buildings	Stored outside in large piles; no obvious form of control.
Septic Waste	At least one Line	Connected to Trailer	According to local Health Department, un-permitted septic system.

VIOLATION SUMMARY:

1. **RCW 90.48.080, Water Pollution Control Act** -- provides that it shall be unlawful for any person to throw, drain, run, or otherwise discharge into any of the waters of this state, or to cause, permit or suffer to be thrown, run, drained, allowed to seep or otherwise discharged into such waters any organic or inorganic matter that shall cause or tend to cause pollution of such waters according to the determination of the Department of Ecology.

Observations: During the inspection of the property, Ecology inspectors observed the following materials left out in the weather causing actual or potential contamination of waters of the State of Washington:

- Wet-cell automotive batteries.
- Automotive transmissions, engine blocks and fuel tanks.
- 55-gallon drums, 1- and 5-gallon buckets, and aerosol cans (contents unknown).
- Pressurized cylinders (contents unknown).

Ecology inspectors also observed oily stains on the ground under/around automobiles & heavy equipment. Oil from engine blocks or transmissions may contain halogenated hydrocarbons, metals or other contaminants.

These conditions are a violation of RCW 90.48.080, and are also a violation of WAC 173-303-145 (Spills and Releases).

Washington State Department of Ecology
Hazardous Waste & Toxics Reduction Program
Compliance Inspection Report

SITE & INSPECTOR INFORMATION

EPA RCRA #:	Facility Site ID#:	Inspection Date: 01/24/08	Address: Bonagofski – Harrison Property 4020 Harrison Ave., Centralia WA 98531
Dangerous Waste  Compliance	Inspectors: Nannette Brooks, Inspector 360-407-63 Nbro461@ecy.wa.gov Dee Williams, Inspector 360-407-6348 Sharon Huff, Project Manager 360-407-6300		Contact: Victor Bonagofski 1303 W. Reynolds Ave. Centralia, WA 98531 Property Owner: Golden Unicorn (Bonagofski, co-trustee)
	Business Overview, Generator Status: Alleged illegal wrecking. See ERTS # 603471		

SUMMARY

This was an unannounced compliance inspection, initiated by the Washington State Patrol to conduct a warrant search of the property.

We arrived on-site at approximately 11:00, after the site was secured by Washington State Patrol. We began our walk-through the facility where we observed the wastes listed in Table A, and the following:

- There were several junk cars scattered throughout the property. These cars did not look operable. Black berry bushes were growing through the windows, and many were missing tires or were resting on their sides.
- There were at least two gas tanks, an engine block and transmission removed from cars and resting on the ground.
- There at least two broken lead-acid batteries sitting on the ground, and several tires stacked near cars.
- There were several stacks of cardboard, and several black plastic bags full of glass bottles, aluminum cans, and plastic bottles scattered through out the property.
- There were at least two cars leaking oil or transmission fluid to the ground.
- There were circuit boards on the ground (possibly broken out of radios or VCR players).
- There was a wood structure collapsed, and sliding down a hill into a creek.
- There was a pile of what looked like weathered fireworks and debris, resting in/among cars. The pile was approximately three-foot tall and was spread over a 10-foot square area. There were several empty cardboard rolls (formerly containing fireworks chemical) and several rolls that still contained fireworks material.
- There were at least two empty 5-gallon plastic buckets, and aerosol cans and paint cans (contents unknown) on the site.



Cars stacked on-site.



Fireworks piled up near cars.



Fireworks package cover.

We spoke briefly with Steve Garret of Lewis County Environmental Services. He agreed to collect soil samples at the site, possibly taken from the area where fireworks were stored and under/around leaking cars.

We also spoke with Trooper Orr, and offered to forward our Field Report and Photo Log.

Off-site at 11:50.

TABLE A – WASTE SUMMARY

Waste/Product Observed	Amount	Location	Management
Tires / Tire Piles	Estimate <50	Throughout Site	Stored along side vehicles; used to hold-up vehicles; stacked randomly.
Wet-Cell Batteries	Estimate <10	Throughout Site	Stored outside on ground; not in vehicles. Questionable use (may be spent).
Unknown Material in Containers	Various 1-gal and 5-gallon buckets & aerosol cans	Throughout Site	Stored outside; unknown volume & characteristics. No labels.
Computer Parts	At least three circuit boards	East-Center portion of Site	Stored outside, broken.
Engine Blocks, Transmissions, Gas Tanks	Estimate <10	Throughout Site	Stored outside.
Weathered Fireworks	Pile (~300 ft ³)	Center of Site	Stored outside along with debris.
Miscellaneous Solid Waste (cardboard, glass & plastic bottles, aluminum, plastic bags, & trash)	Undefined (one pile cardboard ~3200 ft ³)	Throughout Site	Stored outside in large piles; no obvious form of control.

VIOLATION SUMMARY:

1. **RCW 90.48.080, Water Pollution Control Act** -- provides that it shall be unlawful for any person to throw, drain, run, or otherwise discharge into any of the waters of this state, or to cause, permit or suffer to be thrown, run, drained, allowed to seep or otherwise discharged into such waters any organic or inorganic matter that shall cause or tend to cause pollution of such waters according to the determination of the Department of Ecology.

Observations: During the inspection of the property, Ecology inspectors observed the following materials left out in the weather causing actual or potential contamination of waters of the State of Washington:

- Wet-cell automotive batteries.
- Automotive transmissions, engine blocks and fuel tanks.
- Computer components ("e-waste").
- Paint cans, 5-gallon buckets, and aerosol cans (contents unknown).

Ecology inspectors also observed oily stains on the ground under/around automobiles, and observed fireworks (or similar) stacked and spilled on the ground. Oil from engine blocks or transmissions may contain halogenated hydrocarbons, metals or other contaminants. Fireworks may contain sulfur, salt peter (potassium nitrate), and charcoal. Each tube may have 1 to 3 grams of this material, depending on the manufacture. The composition for the flaming ball it launches into the air will usually be made of a combination of potassium perchlorate, sulfur, aluminum, copper oxide, barium sulfate or carbonate, strontium, iron oxide, and titanium.

These conditions are a violation of RCW 90.48.080, and are also a violation of WAC 173-303-145 (Spills and Releases).