June 27, 2003
Ms. Christy Brown, RCRA Project Manager
United States EPA, Region 10
Mail Stop WCM-126
1200 Sixth Avenue
Seattle, WA 98101

Re: Excavation of Ditch Material
J.H. Baxter & Co. Arlington, Washington facility
AOC Docket No. RCRA-10-2001-0086
EPA ID #: WAD 05382 3019

Dear Ms. Brown:

As we have previously discussed, J.H. Baxter & Co. (Baxter) plans to excavate material from two ditches at the Arlington Wood Treating Facility as part of the planned Stormwater Improvement Measures. The purpose of the ditch excavation is to remove material with low levels of site-related chemicals from areas with direct contact with surface water. The activities associated with the ditch excavation will be conducted under the provisions of Paragraph 63 of the Administrative Order on Consent (AOC) regarding other work at the facility.

Material within Ditches 1 & 2 includes eroded soil and rock ditch base material and is collectively identified as ditch material. Current plans call for excavation of ditch material from Ditch 1 and Ditch 2 as shown on the attached Figure 1. Baxter has sampled the material in these ditches as part of the Site Investigation and the results are summarized on Figure 1. Sampling results indicate that pentachlorophenol (PCP) concentrations range from 1.9 mg/kg to 11 mg/kg, with the highest concentrations just slightly above the United States Environmental Protection Agency's (EPA) Region IX's Preliminary Remediation Goal (PRG) of 9 mg/kg for direct contact with soil.

A Synthetic Leaching Precipitation Procedure (SPLP) was also implemented to evaluate the potential of PCP leaching from the ditch material. The results of the SPLP ranged from 0.820 µg/L to 4.0 µg/L, indicating the low potential for PCP to leach from the ditch material.

In addition, concentrations of diesel-range organics were also detected in the soils. The concentrations ranged varied from 140 mg/kg to 2,100 mg/kg.

The ditch material will be excavated from the entire lengths of Ditches 1 & 2. The material will be excavated using a backhoe or similar excavation equipment to approximately six inches below the geotextile base fabric that is present in the ditches. The backhoe will place the excavated material directly into a dump truck and it will be transported to a bermed area for material management purposes (Figure 1). Excavated ditch material will be temporarily

stockpiled onsite in the bermed area and then used as engineered fill during implementation of the stormwater improvement measures.

It is anticipated that the geotextile fabric will be torn into pieces by the backhoe during excavation. Larger pieces of fabric will be removed by hand, cleaned of loose debris and washed (if necessary), and placed in a dumpster for disposal as solid waste. Small pieces of fabric will remain mixed in with the material that will be used as fill.

The stockpiled ditch material will be used as engineered fill during construction of the stormwater collection sumps and associated piping. The design of the stormwater improvement measures is not 100 percent complete, but preliminary design indicates that there will be at least two sumps and associated piping immediately south and southwest of the Main Treatment Area, in addition to stormwater collection and conveyance sumps/ditches in the Treated Pole Storage area. The depth to groundwater in this area is approximately 20 to 30 feet below the ground surface (BGS). The sumps are estimated to extend to approximately 8 to 10 feet BGS, and associated piping will be placed at approximately this same depth interval. The ditch material will be used as engineered bedding material and fill around the sumps and piping during construction. The ditch material will be placed above the groundwater table and will not affect groundwater.

If you have any questions, please call me at (541) 689-3801.

Sincerely,

RueAnn Thomas
Environmental Programs Director

cc: Jeanne Tran, Department of Ecology
Georgia Baxter, J.H. Baxter & Co.
Mary Larson, J.H. Baxter & Co.
Norm Kennel, Premier Environmental Services, Inc.

enclosure

JH Baxter
Arlington
WAD 053823019
Hzw 5.4

CherylB Williams
09/27/2004 03:24 PM

To: dmis461@ecy.wa.gov
cc: macdonald.jennifer@epa.gov, Jan Palumbo/R10/USEPA/US@EPA
Subject: J.H. Baxter

Dave,

In August I left you a voice mail to let you know that we were entering into a tolling agreement with Baxter that would allow us until Nov. 15, 2004 to reach settlement on the violations found during the Aug. 1999 inspection.

Last week we participated in a conference call with Baxter that served as a preliminary discussion for a settlement meeting that is scheduled for next week. As part of that discussion EPA delineated 4 areas that we believe disposal has occurred (nonhistorical, post Subpart W) and Baxter will be required to close.

The areas that we delineated are:
1. The asphalt between the two drip pads;
2. The aprons on the outside of each drip pad;
3. The catch basins numbered 13 and 14 that received storm water contaminated with waste preservative that flowed off the aprons, and;
4. The ditch (that contains CB 23) that received contaminated storm water from CBs 13 and 14 (CB 13 and 14 were connected to the ditch via underground hard piping).

I have not yet had an opportunity to do an in depth review of the information that I have but my preliminary findings are as follows:

1. CBs 13 & 14 have already been closed pursuant to UIC (in fact UIC made Baxter go back and do additional work) - probably will not have to require additional work.

2. Baxter is currently addressing the ditch under the 7003 order and will be working with Jan (and me) to ensure that whatever work is performed by Baxter will also satisfy closure performance standards. I don't envision that there will be any additional issues to resolve with regard to the ditch.

3. With regard to the asphalt between the drip pads and the aprons. Baxter told us that annually they seal the center asphalt, but no work with regard to closure has been done and no changes have been made to this area since the 1999 inspections.

4. The aprons have been totally redesigned so that any storm water on the aprons flows back toward the retorts, goes into the retort sump and is processed through the system oil water separators etc. Here's a quote from the apron redesign plan:

"The current apron slopes northward away from the treatment building. It is proposed to scarf and tack-coat the existing surface, and add sufficient new asphalt to slope the apron southward towards the treatment building. Any asphaltic material scarfed from the existing apron would be reused in the asphalt and added to the apron. The thickness of asphalt needed will vary from virtually none at the south end of the existing apron to 2.7 feet to be added at the north end. The new asphalt required will be about 200 cubic yards for each side for a total of 400 yards. Curbing will be added to prevent storm water form entering the apron from adjacent areas.

My initial concerns with regard to the aprons:
a. Adding the scarfed material from the original aprons to the "new" aprons.... seems to me that this would be the most contaminated part of the aprons and scrapping it up and adding it to surface of the redesigned aprons doesn't really address closure.

b. 2.7 feet at the north end....this sound great...but this is the area that had the least amount of contamination, it is the south end, nearest the retorts where I believe the majority of the contamination on the apron was located and continues to be the area of the aprons most like to be contaminated and according to the plan the asphalt here will be minimal.

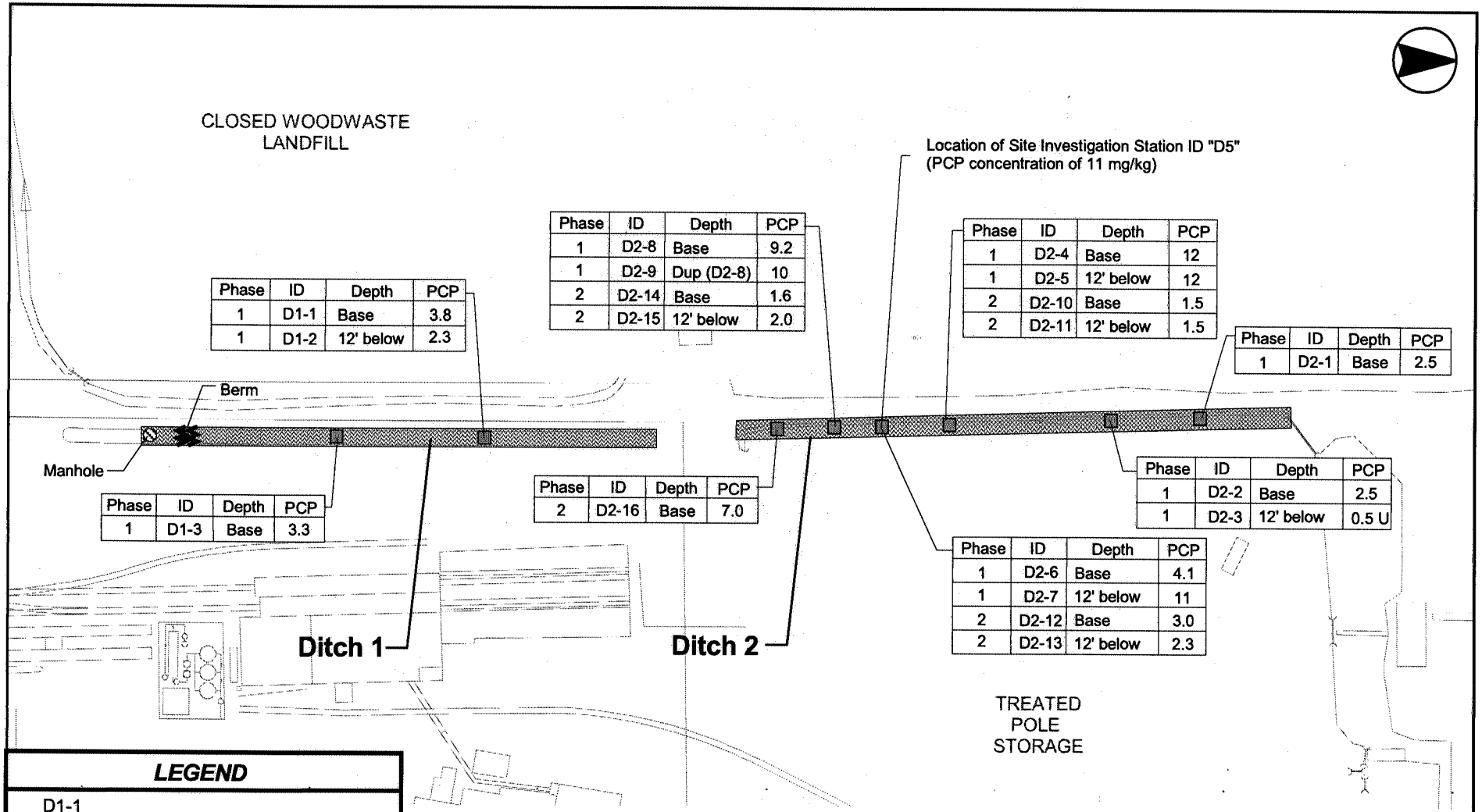
c. we have no samples for the soil under the aprons or under the center asphalt, so I don't know whether or not the contamination on the aprons and the center asphalt that we saw, and verified through with samples, actually moved through that center asphalt or the aprons or if the contamination was confined to the "surface" of these areas. How we (I) coordinate closure of center asphalt and the aprons with Jan's 7003 order will need to be decided because I don't believe that contamination specifically from these areas is being address under the 7003 order (generically of course it is) and how much we will be requiring them to do to address the surface contamination in these areas I am not yet certain.

Anyway,
I will be mailing you a package of pertinent documents that you may decide (or not) to have someone from your staff take a look at. Otherwise, I am assuming that we will be working under the same sort of arrangement as you drafted for closure work at Oeser.

Let me know if you have any thoughts. I would love to hear anything that you have offer!

Thanks for all your support!

Cheryl Williams
US Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
Air and RCRA Compliance Unit
e-mail: williams.cherylb@epa.gov
phone: 206/553-2137
fax: 206/553-8509



Ditch 1 & 2 Confirmation Sampling Results - J.H. Baxter & Co. - Arlington, WA

Table 1. Summary of Ditch Soil Confirmation Results

Sample ID	Date	Ditch	Distance from North End of Ditch[1]	Phase[2]	Depth	Method	PCP (mg/kg)	DRO (mg/kg)	RRO (mg/kg)
D1-1	10/4/2004	Ditch 1	150 feet	1	Base of phase 1 excavation	EPA 8270	3.8	--	--
D1-2	10/4/2004	Ditch 1	150 feet	1	Base of phase 1 excavation	EPA 8270	2.3	--	--
D1-3	10/4/2004	Ditch 1	280 feet	1	12 inches below base of phase 1 excavation	EPA 8270	3.3	--	--
D2-1	9/30/2004	Ditch 2	80 feet	1	Base of phase 1 excavation	EPA 8270	2.5	--	--
D2-2	9/30/2004	Ditch 2	160 feet	1	Base of phase 1 excavation	EPA 8270	2.5	--	--
D2-3	9/30/2004	Ditch 2	160 feet	1	12 inches below base of phase 1 excavation	EPA 8270	0.5 U	--	--
D2-4	10/1/2004	Ditch 2	300 feet	1	Base of phase 1 excavation	EPA 8270	12	--	--
D2-5	10/1/2004	Ditch 2	300 feet	1	12 inches below base of phase 1 excavation	EPA 8270	12	--	--
D2-6	10/1/2004	Ditch 2	360 feet	1	Base of phase 1 excavation	EPA 8270	4.1	--	--
D2-7	10/1/2004	Ditch 2	360 feet	1	12 inches below base of phase 1 excavation	EPA 8270	11	--	--
D2-8	10/1/2004	Ditch 2	400 feet	1	Base of phase 1 excavation	EPA 8270	9.2	--	--
D2-9 (Duplicate)	10/1/2004	Ditch 2	400 feet	1	12 inches below base of phase 1 excavation	EPA 8270	10	--	--
D2-10	10/4/2004	Ditch 2	300 feet	2	Base of phase 2 excavation	EPA 8270	1.5	--	--
D2-11	10/4/2004	Ditch 2	300 feet	2	12 inches below base of phase 2 excavation	EPA 8270	1.5	--	--
D2-12	10/4/2004	Ditch 2	360 feet	2	Base of phase 2 excavation	EPA 8270	3	--	--
D2-13	10/4/2004	Ditch 2	360 feet	2	12 inches below base of phase 2 excavation	EPA 8270	2.3	--	--
D2-14	10/4/2004	Ditch 2	400 feet	2	Base of phase 2 excavation	EPA 8270	1.6	--	--
D2-15	10/4/2004	Ditch 2	400 feet	2	12 inches below base of phase 2 excavation	EPA 8270	2	--	--
D2-16	10/4/2004	Ditch 2	450 feet	2	Base of phase 2 excavation	EPA 8270	7	--	--
COMP D2-1, 2, 4, 6, 8	9/30/2004	Ditch 2	Composite	1	Composite sample from base of initial excavation	NWTPH-dx	--	110	330

Notes:

[1] - distance from north end of either Ditch 1 (west of Main Treating Area) or Ditch 2 (west of Treated Pole Storage Area), as appropriate

[2] - ditch remediation conducted in 2 phases: phase 1 (initial excavation to 6 inches below fabric), and phase 2 (an additional 1 foot to 2.5 feet below phase 1 excavation)

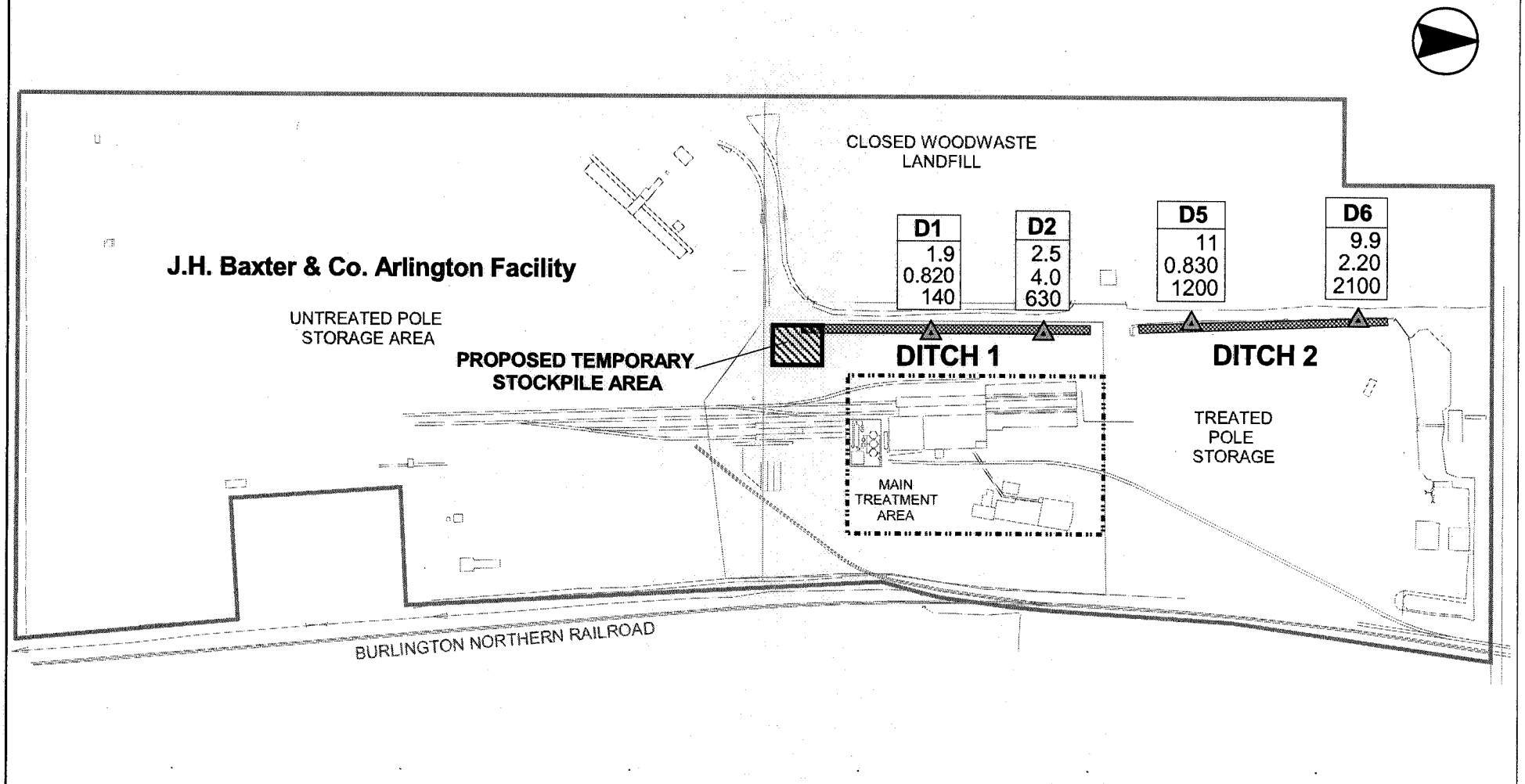
-- not analyzed

U - undetected at or above method reporting limit shown

PCP - pentachlorophenol

DRO - diesel range hydrocarbons

RRO - residual range hydrocarbons



LEGEND

Sample location

D1	Station ID
1.9	Pentachlorophenol (PCP) (mg/kg)
0.820	SPLP Analysis PCP (ug/L)
140	Diesel Range Organics (mg/kg)

Site boundary

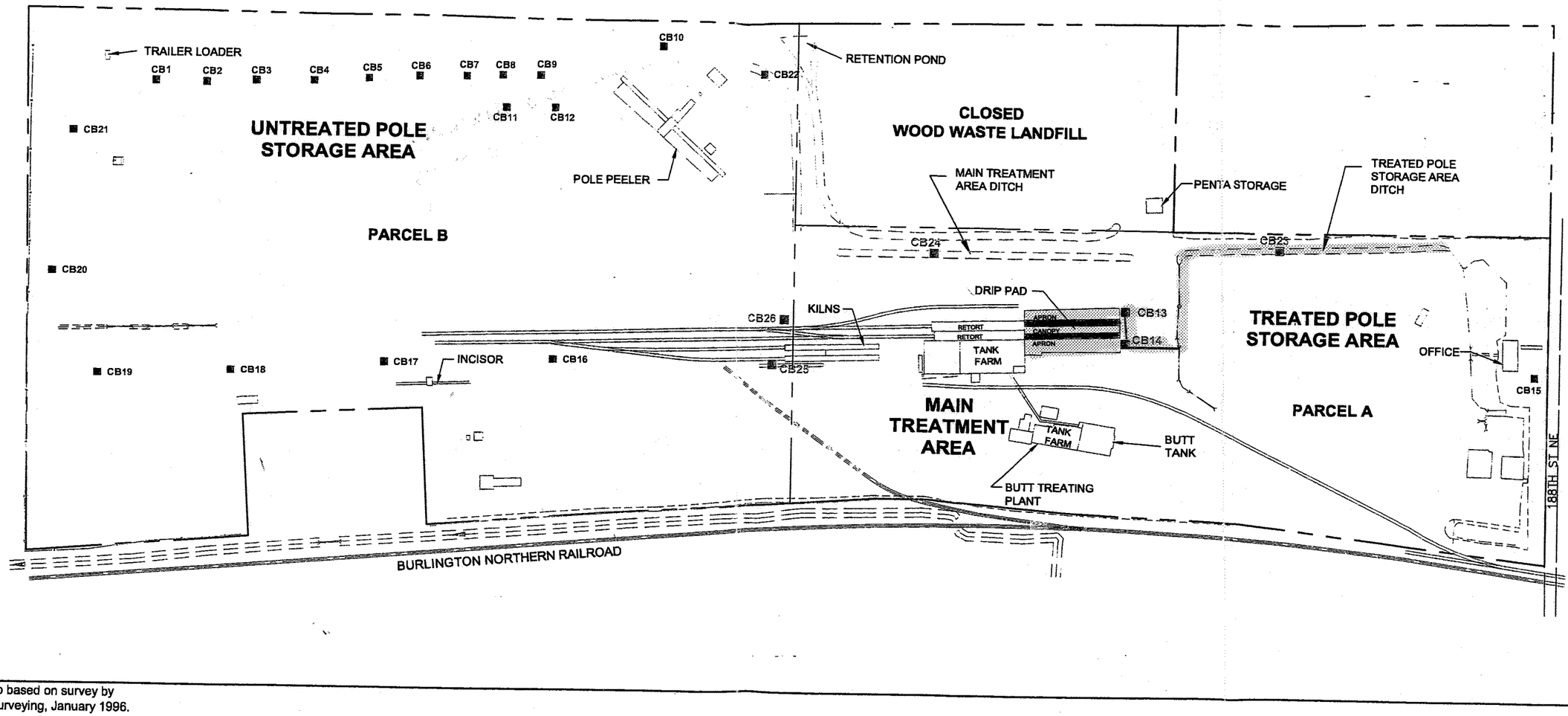
0 200 400 Feet

Figure 1. Ditch Excavation Area and Ditch Material Concentrations - Arlington, WA

French Drain and Monitoring Location Map

RCRA units subjected to closure due to disposal of HW w/o permit or I.S.

(2 aprons, asphalt under canopy. Catch basins 13+14 hard piped to ditch that contains CB 22.)



Note: Base map based on survey by Clark Leaman Surveying, January 1996.

Drainage Ditch and Estimated Flow Direction

Culvert

Property Boundary

Approximate Parcel Boundary

Railroad

CB13 French Drain Planned for Closure

CB26 Closed French Drain

N

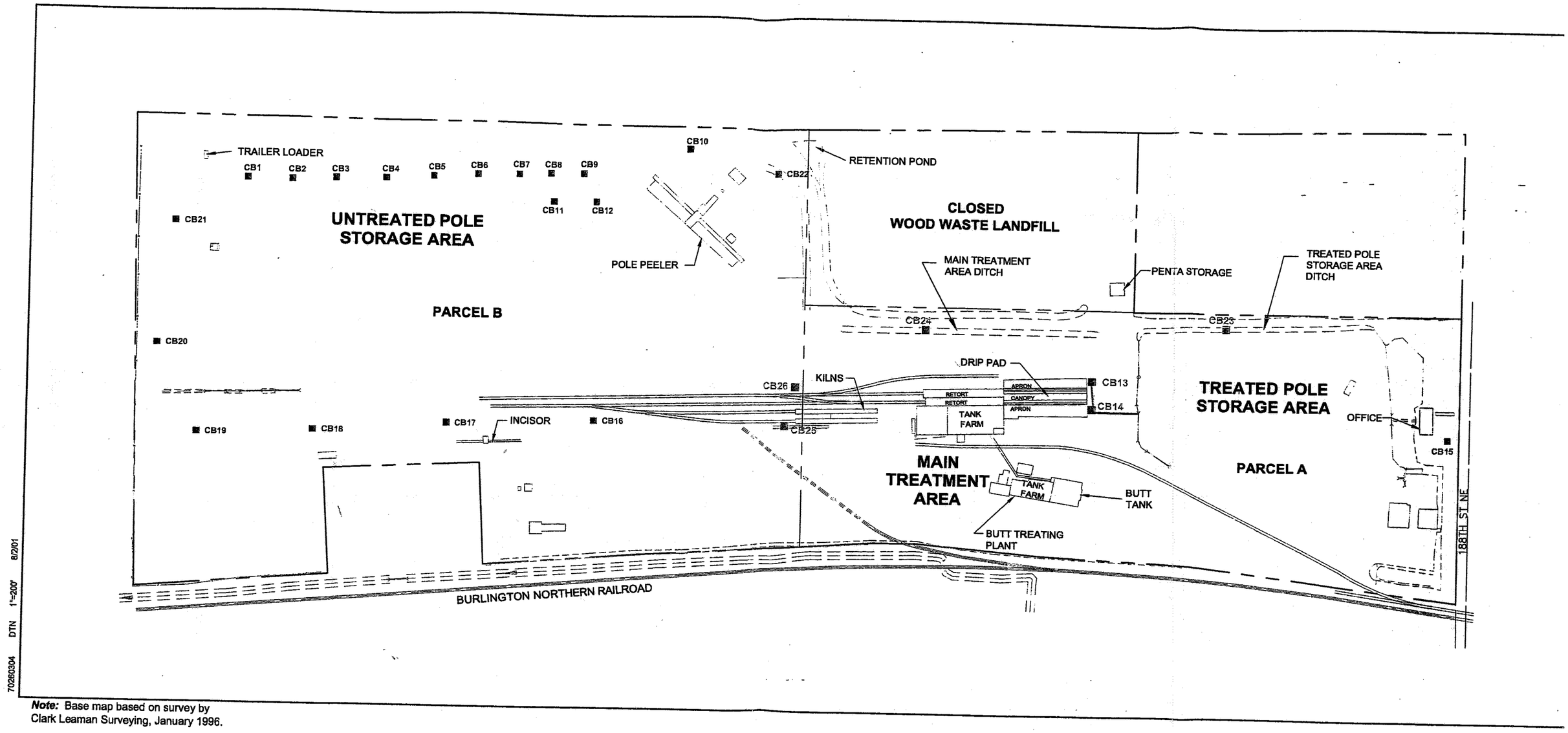
0 200 400

Scale in Feet

HARTCROWSER

7026-03 8/01

French Drain and Monitoring Location Map



Note: Base map based on survey by Clark Leaman Surveying, January 1996.

Drainage Ditch and Estimated Flow Direction

Culvert

Property Boundary

Approximate Parcel Boundary

Railroad

CB13 French Drain Planned for Closure

CB26 Closed French Drain

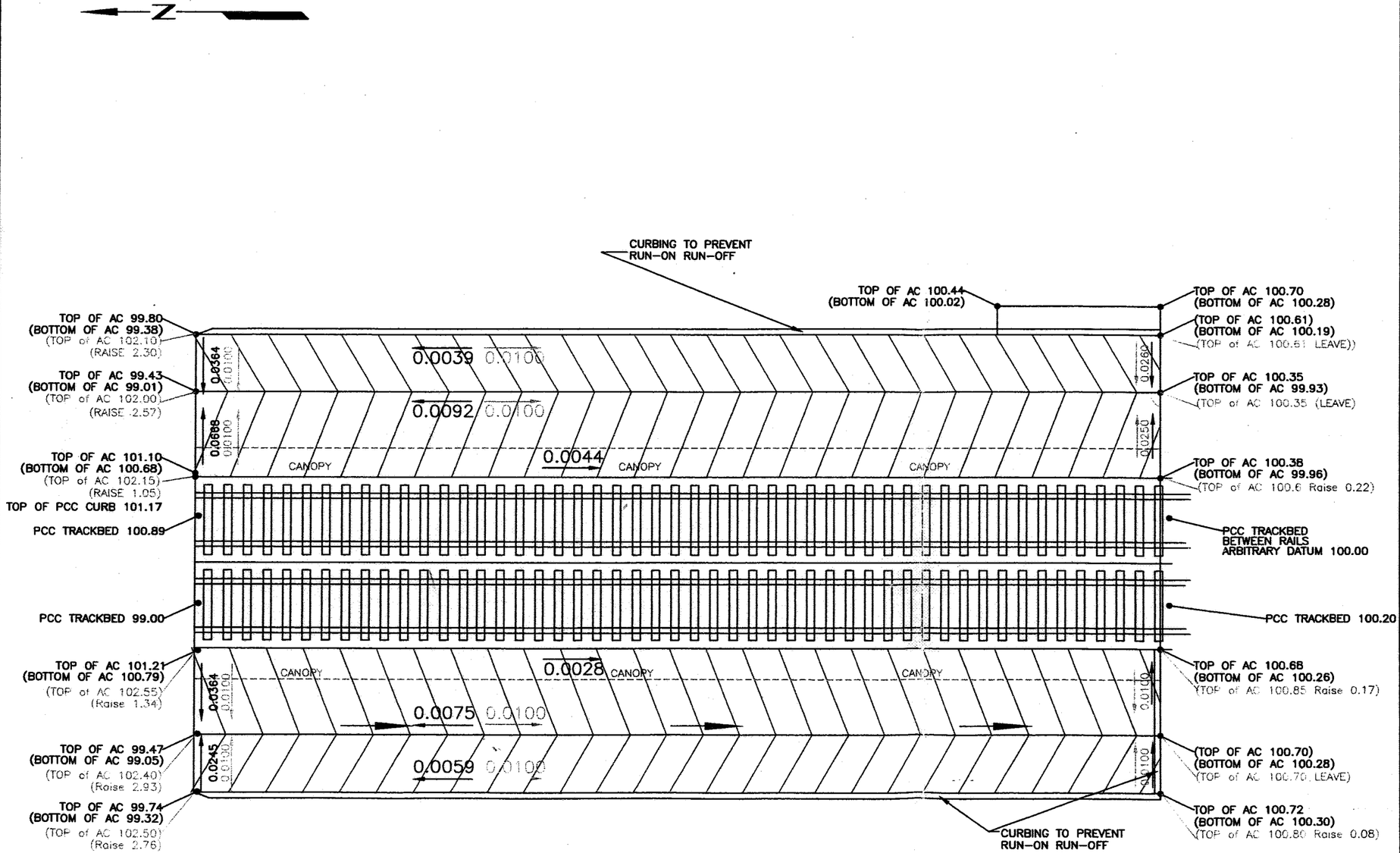
N

0 200 40

Scale in Feet

HARTCROWSER

7026-03 8/01



APPROXIMATE SCALE

0 20 40 FEET

NOTES:

BLACK NUMBERS REPRESENT EXISTING ASPHALT ELEVATIONS OF BOTH THE TOP AND BOTTOM ARE SHOWN TO ASSESS SHAVING IF REQUIRED.

CYAN NUMBERS REPRESENT THE GRADE IF ENOUGH ASPHALT IS ADDED TO REVERSE THE GRADE TO A 1% SLOPE TOWARDS THE BUILDING.

ELEVATIONS ARE LEFT NEARLY THE SAME AT THE SOUTH END OF THE PAD. THE NORTH END IS RAISED ABOUT 2.5 FEET. THE TOTAL ASPHALT REQUIRED WILL BE ABOUT 200 YARDS.

CURBING IS TO BE ADDED AS SHOWN TO PREVENT RUN-ON RUN-OFF FROM APRON

NORTH END OF NEW APRON SHOULD BE ROUNDED TO PREVENT BREAKAGE.

REV #	REVISION	BY	DATE
#2	EXTENDED CURB NORTHWARD	JOC	7/8
#1	REGRADE TOWARD BUILDING	JOC	6/30

LEGEND

SOURCE: Drawing prepared from information provided by Baxter drawings. Critical measurements are to be field verified and incorporated into the final 'as-built' drawings

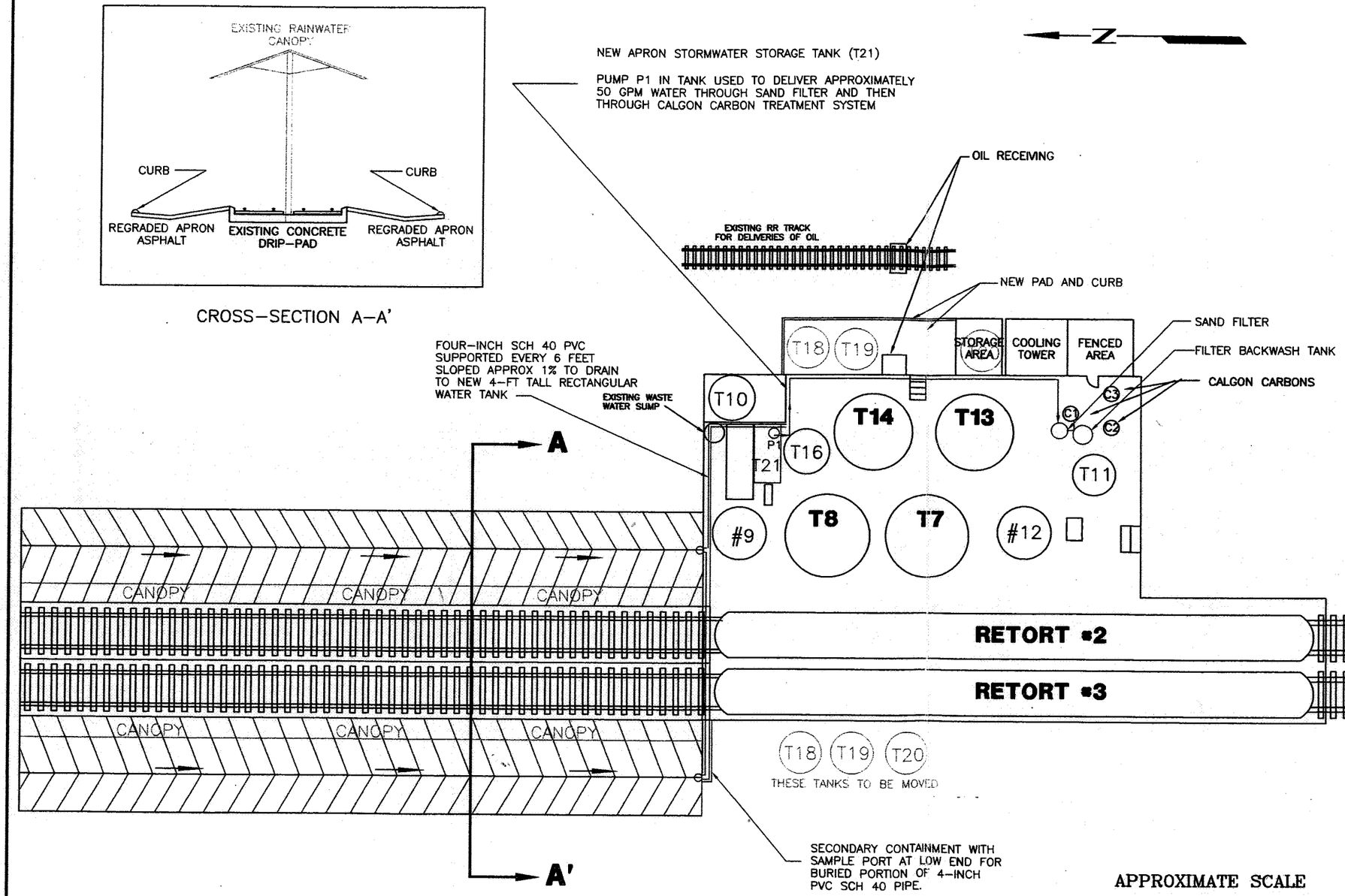
ENVIRONMENTAL RESOLUTIONS, INC.

PROJECT: 1178-Apron
FACILITY: BAXTER ARLINGTON
6520 188th ST NE
Arlington, Washington
DATE: 6/20/02 SHEET 2 of 2

TITLE:
LOADING AREA APRON GRADING

DRAWING No. G2

CROSS-SECTION A-A'



TANK DESIGNATIONS

TANK No.

(7) PRESSURE TREATING SOLUTION PCP-A
85,000 GAL 21'6" X 48' TALL

(8) PRESSURE TREATING SOLUTION PCP-A
85,000 GAL 21'6"X 48' TALL

(9) MIX TANK
9,000 GAL 14' dia. X 8' TALL

(10) DIESEL STORAGE TANK
20,000 GAL 10'6" X 32' TALL

(11) OIL WATER SEPARATOR
20,000 GAL -10' 6" X 32' TALL

(12) OIL WATER DECANTER
1,000 GAL

(13) BUTT TREATING SOLUTION PCP-A
60,000 GAL 20'3" X 30' TALL

(14) BASE OIL STORAGE P-9 OIL
60,000 GAL 20'3" X 30' TALL

(15) BOIL-OFF TANK

(16) WATER STORAGE TANK
16,000 GAL

(17) WATER IN BUTT TANK AREA
10,000 GAL

(18) TREATED WATER STORAGE
16,000 GAL

(19) TREATED WATER STORAGE
16,000 GAL

(20) TREATED WATER STORAGE
16,000 GAL

(21) APRON STORMWATER ACCUMULATION TANK
2,800 GAL - 18'7" X 6'8" X 3' WORKING HT.

REV #	REVISION	BY	DATE
#5	MOVE T21 AND SAND FILTER	SMD	10/10
#4	ADD TANK T21 AND P1	JOC	10/8
#3	NEW PAD FOR TANKS 18 & 19	JOC	7/1
#2	OIL RR TRACK & CROSS-SECTION	JOC	6/11
#1	FIELD CHECK TANK LOCATIONS	SMD	6/4

LEGEND

SOURCE: Drawing prepared from information provided by Baxter drawings. Critical measurements like (tank center points) were field verified and incorporated into the final "as-built" drawings

ENVIRONMENTAL RESOLUTIONS, INC.

PROJECT: 1178-TR2
FACILITY: BAXTER ARLINGTON
6520 118th NE
Arlington, Washington
DATE: 6/18/02 SHEET 1 of 2

TITLE:
PROPOSED APRON WATER COLLECTION

DRAWING No. G1