Closure Report for Certain Discrete Units

J.H. Baxter & Co. Arlington, Washington Facility



Prepared for:

United States Environmental Protection Agency Region 10 1200 Sixth Avenue Seattle, WA 98101 And Washington Department of Ecology

Prepared by:

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Acronyms and Abbreviations

AOC	Administrative Order on Consent, EPA Region 10 Docket No.					
	RCRA -10-2001-0086					
Baxter	J. H. Baxter & Company					
CAS	Columbia Analytical Services, Inc.					
DRO	diesel-range hydrocarbons					
Ecology	Washington Department of Ecology					
EPA	United States Environmental Protection Agency					
ERI	Environmental Resolutions, Inc.					
HDPE	high density polyethylene					
LDR	Land Disposal Restrictions					
MRL	method reporting limit					
OSHA	Occupational Safety and Health Administration					
PCP	pentachlorophenol					
Premier	Premier Environmental Services, Inc.					
PRG	EPA Region IX's Preliminary Remediation Goal					
PVC	polyvinyl chloride					
RCRA	Resource Conservation and Recovery Act					
SI	Site Investigation					
SPLP	Synthetic Leaching Precipitation Procedure					
WAC	Washington Administrative Code					

1 Introduction

This report describes the closure of two discrete areas at the wood treating plant owned and operated by J.H. Baxter & Company ("Baxter") in Arlington, Washington (Figure 1-1). These areas are: the former catch basins 13 and 14 and Ditch 2. These two areas were identified by the U.S. Environmental Protection Agency (USEPA) in a Notice of Violation (NOV) issued April 25, 2000. The NOV alleges that each of these areas managed hazardous waste. While Baxter does not agree with the characterization of these areas as hazardous waste units, Baxter has completed decontamination and removal of alleged hazardous waste at these two discrete areas as part of environmental improvements at the facility.

The goal in closing these units was to achieve clean closure of each discrete area. This closure report describes the activities conducted for decontamination and removal of the alleged hazardous waste at the two specific areas.

In addition, Baxter has conducted work at two other areas at the facility: the center strip between the drip pads and the aprons adjacent to the drip pads. Due to the proximity of the centerstrip and the aprons to the drip pads, closure of these areas will be conducted when the drip pads are closed in accordance with USEPA's regulations 40 C.F.R. §264.575 and Ecology counter-part regulations WAC 173-303-675(6). All four areas are identified in Figure 1-2.

2 Closure Performance Standards

Pursuant to the Washington Administrative Code (W.A.C.) Section 173-303-610(2), catch basins 13 and 14 and Ditch 2 have been closed in a manner that protects human health and the environment by minimizing or eliminating after-closure escape of dangerous waste, dangerous constituents leachate, contaminated run-off or decomposition products to the ground, surface water, groundwater and atmosphere. The closure minimizes the need for further maintenance of the areas closed. The post-closure appearance of the land is consistent with the surrounding wood treating facility, which is an active operating facility. It is important to note that each of these areas is located in the operations area of an active treating facility and, thus, a return to a natural setting is not relevant. The closure has included the removal and disposal of any dangerous waste present at the discrete areas and decontamination of the structural components. All rinseate from the closure process was included with the process water at the plant and properly treated. Excavated soils were sampled and disposed of in accordance with State of Washington and Federal requirements based on the sampling results.

For purposes of closure, each of the two areas was addressed as a discrete unit and they are described as such in this report. These areas are shown on Figure 1-2. This closure is a partial closure under the Washington Department of Ecology (Ecology) Guidance on Closure. The facility is and will remain an active wood treating facility for the foreseeable future. As such, final closure of the center strip between the two drip pads and the aprons adjacent to the drip pads will occur when the facility closes the drip pads the closure will be subject to the Resource Conversation and Recovery Act (RCRA) requirements for wood preserving facilities. See 40 C.F.R. § 264.575 and WAC 173-303-675(6).

The portion of the Baxter facility where the units are located has been a wood treating facility since the 1960s. As a result of the long operational history at the facility, there is

pre-existing contamination resulting from activities that occurred prior to the passage of the Federal Resource Conservation and Recovery Act in 1980 and the promulgation in the early 1990s of the subsequent regulations that apply to wood-treating operations. This closure report addresses the removal of all the dangerous waste, constituents, and residues from the two discrete units identified and any contamination that originated from the activities associated with these discrete units as described in the NOV. To the extent that contamination from historical operations pre-dating the RCRA regulations may remain on the facility, this contamination will be addressed in accordance with the ongoing site remediation, which is being conducted under the direction of USEPA in connection with a USEPA Administrative Order on Consent USEPA Docket No. RCRA-10-2001-0086 (AOC).

Baxter will implement institutional controls for the parcel of land that contains these two areas as appropriate to site conditions and in accordance with the selection of remedies under the AOC.

3 Closure Activities

3.1 Removal of Catch Basins 13 & 14

On May 10, 2000, Catch Basins 13 and 14 were removed and closed in accordance with Ecology Administrative Order No. DECOWQNR-850. The locations of these two catch basins are shown in Figure 1-2. The initial closure of the catch basins included removal of the concrete vaults, disconnecting and capping the ends of the perforated drain pipe that connected to the vaults with high density polyethylene (HDPE) end caps, and filling the excavation with clean gravel to the surface. Following removal, the concrete vaults were placed on the drip pad and washed with water using a pressure washer until all visible soil was removed. The rinseate was collected on the drip pads and treated with the facility's process water. The cleaned vaults are stored on-site. Documentation of these activities is provided in an affidavit from Robert Crane, the former assistant plant manager. As assistant plant manager, Mr. Crane supervised these activities. (Attachment 1)

3.1.1 Supplemental Closure Activities

On July 11, 2001, Baxter conducted supplemental closure activities at the locations of Catch Basins 13 & 14 at the request of Ecology. These supplemental closure activities included excavating the area where the catch basins were formerly located down to the level of the capped drain pipes. A layer of low-permeability bentonite clay was placed between and around the capped drain pipes and within the footprint of the former concrete vault. The bentonite was then hydrated to create a minimum 4-inch sealing layer. The soil stockpiled from the excavation was placed on top of the bentonite to provide a working surface. The supplemental closure activities are described in an August 29, 2001, letter to Kirk Cook of Ecology from Hart Crowser (Hart Crowser 2001) (Attachment 2).

In order to further isolate Catch Basins 13 and 14, Baxter installed a 60-mil HDPE liner over the former basins in November 2002. The liner was covered with clean fill. These activities were described in the November 15, 2002, Progress Report submitted to EPA (Baxter 2003) (Attachment 3). In addition, the area was graded so that water would not collect over the site of the former catch basins.

3.2 Ditch Improvements

Between September 30 and October 6, 2004, Baxter performed improvement measures in Ditch 2, which at one time was connected to Catch Basins 13 and 14 (Figure 1-2). The purpose of the improvement measures was to remove material with low levels of site-related chemicals from the ditches. These improvement measures were conducted under the provisions of Paragraph 63 of the AOC regarding other work at the facility. The proposed scope of work for the improvement measures was outlined in a letter to EPA dated August 10, 2004 (Baxter 2004). EPA approved of these improvement measures in a letter dated August 17, 2004 (EPA 2004).¹

¹ The Scope of Work approved by EPA also included improvements to Ditch 1 (See Figure 1-2). However, Ditch 1 was never connected to Catch Basins 13 and 14 and is not part of the Closure Report. Information on the Ditch 1 improvements is provided here for clarity since the work was performed under the same scope of work.

Material from Ditch 1 was excavated in a single phase and placed directly into a dump truck and transferred to an on-site soil pile. Material from Ditch 1 was removed using a track-mounted excavator, and placed directly into a 10-yard dump truck. Approximately 6-inches of material was removed from the entire length of the ditch (approximately 350 linear feet), including the sides and base of the ditch. Two discrete samples (D1-1 and D1-3) were collected from the base of the excavation at the locations shown in Figure 3-1. In addition, one sample (D1-2) was collected from a depth of approximately 12-inches

3.2.1 Ditch Material Characteristics

Material within Ditch 2 included eroded soil and rock ditch base material and is collectively identified as ditch material. Prior to the improvements, Baxter had sampled the material in the ditches as part of the Site Investigation (SI). Sampling results indicated that pentachlorophenol (PCP) concentrations ranged from 1.9 mg/kg to 11 mg/kg. The concentrations are below Ecology's Model Toxics Control Act (MTCA) Method C criteria for direct contact ingestion and dermal using default assumptions. The highest concentrations are just slightly above the EPA Region IX's Preliminary Remediation Goal (PRG) for direct contact with soil.

Synthetic Leaching Precipitation Procedure (SPLP) testing was conducted during the SI on a sample of the ditch material to evaluate the potential of PCP leaching. The results of the SPLP testing ranged from 0.820 μ g/L to 4.0 μ g/L, indicating the low potential for

below the location of D1-1 (Figure 3-1). Each sample was collected in a laboratoryprovided container, placed in a cooler with ice, and transferred under chain-of-custody to CCI Laboratories in Everett, Washington for 24-hour rush analysis of PCP by EPA Method 8270.

Following completion of excavation activities, all soil from Ditch 1 was transferred to a bermed and plastic lined soil pile located on-site. The top of the soil pile was covered with plastic and secured. Approximately 100 cubic yards of material was removed from Ditch 1.

Three samples were collected and analyzed for PCP from Ditch 1. PCP results ranged from 2.3 mg/kg to 3.8 mg/kg, which are below the EPA Region IX PRG and the MTCA Method C criteria. The sample with the lowest concentration of PCP (D1-2) was collected approximately 12-inches below the sample with the highest concentration of PCP (D1-1), indicating a decreasing trend with depth. Sample results are summarized on Table 3-1 and shown on Figure 3-1.

PCP to leach from the ditch material. In addition, concentrations of diesel-range organics (DRO) were detected in the soils. These concentrations ranged from 140 mg/kg to 2,100 mg/kg.

3.2.2 Ditch Material Excavation and Sampling

Ditch improvement measures were conducted by Jerry's Bulldozing of Arlington, Washington, under the supervision of Premier Environmental Services, Inc. (Premier) of Portland, Oregon. Waste Management Inc. (WMI) provided fourteen, 20-cubic yard roll-off bins for containerizing soil that contained hazardous waste from Ditch 2. Prior to initiating field activities, a safety meeting was held to familiarize the field crew with the proper health and safety protocols for the planned activities, in accordance with Occupational Safety and Health Administration (OSHA) requirements.

Material from Ditch 2 was excavated in two separate phases. This work was conducted under the provisions of the AOC. As directed by EPA, Ditch 2 material was placed directly into steel roll-off bins designed for temporary storage of hazardous waste. Additional details of the improvement measures for each ditch are provided below. Photographs of the improvement measures are provided in Attachment 4.

Material from Ditch 2 was removed using the track-mounted excavator, and placed directly into the steel roll-off bins as directed by EPA. Plastic sheeting was placed between the working area of the ditch and roll-off bins, to contain any debris falling off the excavator bucket onto the ground. During the initial phase of the excavation (Phase 1), approximately 6-inches of material was removed from the entire length of the ditch (approximately 450 linear feet), including the sides and base of the ditch. Where a geotextile fabric was present in the ditch (i.e., the southern half of Ditch 2), the excavation extended an additional 6-inches below the fabric.

Five discrete samples (D2-1, D2-2, D2-4, D2-6, D2-8) were collected from the base of the excavation at the locations shown in Figure 3-1 during Phase 1. At the direction of EPA, sample D2-6 was collected from the location where the highest concentration of

PCP was detected during the SI. In addition to the samples collected from the base of the Phase 1 excavation, three discrete samples (D2-3, D2-5, D2-7) were collected from depths approximately 12-inches below the primary sample (Figure 3-1). One duplicate sample was also collected (D2-9). Each sample was collected in a laboratory-provided container, placed in a cooler with ice, and transferred under chain-of-custody to CCI Laboratories in Everett, Washington for 24-hour rush analysis of PCP by EPA Method 8270. A composite of the five samples collected from the base of the excavation was also analyzed for DRO by NWTPH-Dx methods.

Following receipt of preliminary results from the Phase 1 excavation in Ditch 2, which indicated concentrations slightly above the MTCA Method C criteria and the PRGs, additional material was excavated from the southern half of the ditch (Phase 2). An additional 1 to 2.5 feet of gravely material with few fines was removed from the southern half of Ditch 2. The gravelly material was non-native, and represented material placed into the ditch during initial construction. All of the gravelly material was removed down to native soils during the Phase 2 excavation.

Following completion of the Phase 2 excavation, four discrete samples (D2-10, D2-12, D2-14, D2-16) were collected from the base of the ditch at the locations shown in Figure 3-1. In addition, three discrete samples (D2-11, D2-13, D2-15) were collected from depths approximately 12-inches below the primary sample (Figure 3-1). Each sample was collected in a laboratory-provided container, placed in a cooler with ice, and transferred under chain-of-custody to CCI Laboratories in Everett, Washington for 24-hour rush analysis of PCP by EPA Method 8270.

A total of approximately 250 tons of material was removed from Ditch 2. All of the material from Ditch 2, including the geotextile fabric, was placed in 14 steel roll-off bins. Each roll-off bin was secured, covered, and properly labeled pending profiling and off-site disposal.

3.2.3 Sampling Results

A total of 15 samples were collected from Ditch 2, along with one duplicate sample. PCP results for all of the confirmation samples collected ranged from not-detected at or above the method reporting limit (MRL) of 0.5 mg/kg, to 12 mg/kg. Following the Phase 2 excavation, in which the depth of the excavation was increased by 1 to 2.5 feet to reach native soils, PCP concentrations were considerably lower. Following the completion of all excavation activities, PCP concentrations of material remaining in place at the base of the excavation ranged from not-detected to 7 mg/kg, which is below both the PRG and MTCA Method C criteria. Analysis of samples collected from depths approximately 12-inches below the base of the excavation resulted in PCP concentrations ranging from not-detected to 2.3 mg/kg, again indicating a decreasing trend with depth. A composite sample from the base of the Phase 1 excavation indicated a DRO concentration of 110 mg/kg. Laboratory reports are provided in Attachment 5. The laboratory's QA/QC results are included in Attachment 6.

Low levels of PCP, below potentially applicable EPA and Ecology criteria for direct contact, remain beneath the level of excavation in Ditch 2. Since Ditch 2 was excavated to a total depth between 1.5 to 3.0 feet, it is likely that the PCP remaining in place (below the level of excavation) is the result of historical practices over the long period of the facility's history, rather than recent releases that would be present at shallower depths and significantly higher concentrations. This area of the facility has been used for wood treating activities since the 1960s. Furthermore, any contamination from historical practices will be addressed by the RCRA Section 7003 Order.

3.2.4 Waste Profiling and Disposal

A representative sample was collected from each of the 14 roll-off bins filled with material from Ditch 2. The samples were collected in a laboratory-provided container, placed in a cooler with ice, and transported under chain-of-custody to CCI Laboratories, Inc. At the laboratory, the 14 individual samples (HWP-1 through HWP-14) were composited into a single sample for analysis of semivolatile organic compounds by EPA

Method 8270, as well as total arsenic and copper by EPA Method 6010. A portion of the sample was shipped under chain-of-custody to Columbia Analytical Services in Houston, Texas, for analyses of dioxins and furans by EPA Method 8290. Laboratory reports for the waste profile samples are provided in Attachment 7.

Following receipt of the laboratory data, the results were forwarded to WMI for final profiling. The material from Ditch 2 was accepted at WMI's Subtitle C disposal facility in Arlington, Oregon (Profile CS 7807). Laboratory results indicated that the concentrations of contaminants in material removed from Ditch 2 were below Land Disposal Restrictions (LDR) applicable to FO32 material. Between November 19 and December 17, 2004, WMI transported a total of 15 roll-off bins containing 256.43 tons of material to its facility for disposal. One additional roll-off bin was delivered to Baxter's Arlington facility by WMI to contain excess material from previously loaded roll-off bins that were slightly overweight. This material also was sent to WMI's disposal facility. Shipping Manifests and Certificates of Disposal are included in Attachment 8.

4 Improvements

Baxter has also conducted certain improvements at the site, which are briefly described below to provide additional information regarding site conditions.

4.1 Center Strip Cleaning and Sealing

The center strip between the drip pads was cleaned and sealed on October 4, 2003 and July 19, 2004. The work was performed by Baxter's employees under the supervision of Robert Crane. The cleaning and sealing process included the use of a pressure washer to clean the center strip. The pressure washing resulted in no visible contamination on the center strip. The rinseate from the pressure washing was collected on the drip pads and treated with the facility's process water. Following the pressure washing a cold asphalt sealant was applied and allowed to air dry (See Affidavit of Robert Crane Attachment 1).

In addition, in August 2002 procedures were put in place to further minimize the tracking of material from the drip pad to the center strip. For example, training was modified to reemphasize that only authorized personnel are allowed in the drip pad area including the center strip. In addition, signs were installed along the drip pad and at each end of the roof over the center strip to remind workers of the limited access. Moreover, when moving from the drip pad to the center strip authorized personnel are required to wipe their feet on absorbent pads (See Affidavit of Mary Larson, Environmental & Safety Specialist, Attachment 9).

Due to the physical proximity of the center strip to the drip pads, final closure of the center strip will be addressed when the drip pads are closed in accordance with RCRA closure requirements for wood preserving facilities. See 40 C.F.R. § 264.575 and WAC 173-303-675(6).

4.2 Apron Modifications

In November 2002, Baxter completed modifications to the aprons. The modifications included re-grading the aprons and placement of a new asphalt surface, as well as other tank, piping, and transfer pump changes to facilitate capture and treatment of stormwater collected from the aprons. The Notes and Requirements for the apron modifications are provided in a technical document (ERI 2002) from Environmental Resolutions, Inc. (ERI), which was the engineering firm under subcontract to Premier. The ERI technical document is included as Attachment 10. The actual apron installation included modifications that are explained in the ERI report.

Apron and tank/plumbing modifications were completed by Jerry's Bulldozing of Arlington, Washington during late October and early November 2002. ERI provided engineering and surveying support during the modifications. Mr. Tarmo Pajutee of URS Corporation, also under subcontract to Premier, provided oversight during placement of the new aprons.

4.2.1 Cleaning of Aprons

Prior to the modification the existing aprons were cleaned by rinsing with a pressure washer. Following the pressure washing there was no visible contamination on the aprons, with the exception of minimum staining. The water from the pressure washing was sprayed upward towards the drip pads and was collected on the drip pads. The rinseate from the apron cleaning was treated with the facility's process water (Affidavit of Robert Crane Attachment 1).

4.2.2 Re-grading of Aprons

Prior to apron modifications, the aprons sloped gently away from the drip pads. The new aprons were designed to contain all stormwater and allow collected water to flow to a central collection sump in the treatment building. The modifications included placement, grading, and compaction of a crushed aggregate base material over the existing apron and

footprint of the new apron. Asphalt was then placed and compacted over the crushed aggregate to form a final wearing surface. A berm was installed along the outer edges of the new aprons to prevent stormwater from flowing off the aprons, and directing water flow to the collection sump. Elevations of the final asphalt surface were carefully surveyed to ensure that stormwater would flow to the collection sump at the southern end of the apron. Two deviations from the original Notes and Requirements (ERI 2002) are summarized as follows:

- Crushed aggregate was placed and compacted in conjunction with asphalt to raise the elevation of the outer edges of the apron by approximately 2.7 feet, rather than only asphalt. This modification was implemented to reduce materials cost and provided a more stable surface.
- 2) The original Notes and Requirements specified that the existing apron be scarfed and tack-coated prior to placement of new asphalt. Based on consultation with asphalt suppliers, it was determined that the asphalt could be placed directly on the apron without scarfing or tack-coating. To ensure a clean surface for placement of new asphalt, the existing asphalt apron was pressure-washed prior to placement of the base material and asphalt, as described above.

Completion of the apron modifications was reported in the November 15, 2002, Progress Report (Baxter 2002). An "As-Built" drawing of the final loading area apron grading (ERI 2003) is provided in Attachment 11.

Any contamination below the aprons is likely to be from historical activities, as this has been an area of active wood treatment plant since the 1960s. Moreover, due to the physical proximity of the aprons to the drip pads, the aprons will be closed when the drip pads are closed pursuant to the RCRA closure requirements. See 40 C.F.R. § 264.575 and WAC 173-303-675(6).

5 Certifications

I certify under penalty of the law that this document and attachments 3 through 11 were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel gather and evaluate the information submitted. Attachments 1 and 2 describe activities undertaken prior to my employment at J.H. Baxter & Company, and, therefore, were not performed under my direction or supervision, but I have interviewed the responsible parties and reviewed available information to ascertain the accuracy of the documents. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing of violations.

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RueAnn Thomas Environmental Programs Director J.H. Baxter & Company, Facility Owner

4-30-07

The undersigned Washington State-registered Professional Engineer and Licensed Hydrogeologist are familiar with J.H. Baxter & Company's closure activities as described herein for the removal of materials in Ditch 2 and installation of the liner over Former Catch Basins 13 and 14. All work related to these activities was performed by, or under our supervision, and we certify the activities were performed as described in the Closure Plan submitted to USEPA and Ecology in accordance with good engineering practices.

Although we did not supervise the catch basin removal, we have reviewed the affidavit of Robert Crane (Attachment 1) and the letter from Hart Crowser Engineering (Attachment

2) regarding these activities, and the Closure Report reflects the activities as described in these documents. Based on the available documentation and interviews with the people responsible for completing catch basin removal activities, all work appears to have been performed in a manner consistent with good engineering practices.



Joe A. Ricker

Independent Qualified Registered Professional Engineer

Washington State PE No. 40182 April 30, 2007



J. Stephen Barnett Independent Qualified Licensed Hydrogeologist

Washington State LHG No. 1051 April 30, 2007 The following documents demonstrate the closure of these units pursuant to directions from both Ecology and USEPA, and as described herein.

Catch Basin Removal

Affidavit of Robert Crane

Attachment 1

Letter from Hart Crowser Engineer

Attachment 2

Ditch 2

5

Ditch Material Sampling

Attachment 5

Certificates of Disposal from WMI

Attachment 8

6 References

Baxter 2002. November 15, 2002, Progress Report. Prepared for Ms. Christy Brown of EPA, Region 10 by J.H. Baxter & Co. November 14.

Baxter 2004. Letter to Ms. Jan Palumbo of EPA Region 10 from RueAnn Thomas of J.H. Baxter & Co. regarding ditch excavation activities. August 10.

EPA 2004. Letter to RueAnn Thomas of J.H. Baxter & Co. from Jan Palumbo of EPA Region 10 regarding Interim Measure approval. August 17.

ERI 2002. Loading Area Apron Modifications & Storm Water Control System Notes and Requirements. Prepared by Environmental Resolutions, Inc. of Lake Forest, CA. October 8.

ERI 2003. Loading Area Apron Grading. "As-Built" Drawing G2. Prepared by Environmental Resolutions, Inc. of Lake Forest, CA. February 18.

Hart Crowser 2001. Letter to Kirk Cook of Washington Department of Ecology from T. Carlson and L. Herman of Hart Crowser regarding Treated Pole Yard Catch Basin Closure. August 29.

FIGURES





n 1994. Marka 2000 Marka 1997. Alba 1000 Marka 2000 Marka 2000 Marka 1997. Marka 1997. Marka 2007. Marka 1997. ------

CLOSED WOODWASTE LANDFILL Location of Site Investigation Station ID "D5" (PCP concentration of 11 mg/kg) Phase ID PCP Phase ID Depth PCP Depth D2-8 1 D2-4 Base 12 9.2 1 Base 1 D2-5 12' below 12 1 D2-9 Dup (D2-8) 10 Phase ID Depth PCP 2 D2-10 Base 2 D2-14 Base 1.5 1.6 D1-1 3.8 2 1 Base 2 D2-15 12' below D2-11 12' below 1.5 2.0 1 2.3 D1-2 12' below Phase ID Depth PCP D2-1 Base 2.5 1 Berm **CB-23** m 朝内 洞靴 \odot CB-24 Phase ID Manhole Depth PCP Phase ID Depth PCP D2-2 1 Base 2.5 Phase ID Depth PCP 2 D2-16 Base 7.0 1 D2-3 12' below 0.5 U D1-3 Base 3.3 🛛 CB-13 Phase ID Depth PCP APRON 1 D2-6 Base 4.1 CANOPY 1 D2-7 12' below 11 2 黀 D2-12 Base 3.0 APRON CB-14 DITCH 2-2 DITCH 1-D2-13 12' below 2.3 CB-15 📓 TREATED POLE STORAGE LEGEND D1-1 Ditch Sample Location & ID Note: -All results in mg/kg U - not detected at or above detection limit shown PCP - Pentachlorophenol Phase 1 excavation - 6 inch minimum, or approximately 6 inches below fabric, where present Phase 2 excavation - Excavated 1-2.5 feet below Phase 1 excavation. Approximately 2-4 inches below gravel fill 100 200 Feet

Figure 3-1. Ditch 1 & 2 Confirmation Sampling Results - J.H. Baxter & Co. - Arlington, WA



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Table 3-1. Summary of Ditch Soil Confirmation Results

			Distance from						
Sample ID	Date	Ditch	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	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

All laboratory analyses completed by CCI Laboratories of Everett, Washington.

ATTACHMENTS

UNITED STATES

ENVIRONMENTAL PROTECTION AGENCY

REGION 10

SEATTLE, WASHINGTON

AFFIDAVIT OF ROBERT CRANE

STATE OF WASHINGTON:

SS:

COUNTY OF SNOHOMISH:

Robert Crane, being duly sworn, deposes and hereby says:

My name is Robert Crane. I am currently the plant manager for the J.H. Baxter
Wood Treating Facility located at 6520 188th Street, N.W. Arlington, Snohomish County,
Washington.

2. I have been the plant manager since May, 2002. Previously, I was the assistant plant manager from December, 1994 until May, 2002.

3. In my role as assistant plant manager I was responsible for and personally supervised the cleaning and sealing of the center strip between the drip pads. This work was performed by Baxter's employees under my direct supervision. City water was applied to the strip under pressure using a pressure washer. As a result of cleaning with the pressure washer the strip was free of all visible contamination. The water from the pressure washer was collected on the drip pad and treated with the facility's process water. After the pressure washing, the center strip was sealed with an asphalt sealant, which was allowed to air dry. This work was conducted in September 1999 and was repeated in October 2003 and July 2004.

4. I also personally supervised the cleaning of the concrete vaults removed from Catch Basins 13 and 14, in 2002. The vaults were placed on the drip pads and washed with a pressure washer until all visible signs of soil or residue were removed.

5. As plant manager, I also personally supervised the cleaning of the aprons in October/November 2002 in connection with the modifications to the aprons. As part of this process Baxter employees used a pressure washer to clean the surface of the existing aprons prior to the modification. The pressure washing resulted in no visible contaminated material on the apron with the exception of minimal residual staining. The water from the pressure washer was directed onto the drip pads for collection and treatment.



ne Robert Crane

Sworn to me this $\partial \mathcal{E}^{\bullet}$ day of February, 2005.



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HARTCROWSER Delivering smarter solutions

August 29, 2001

Kirk Cook Washington State Department of Ecology, NWRO 3190 160th Avenue SE Bellevue, WA 98008

Re: Treated Pole Yard Catch Basin Closure J.H. Baxter Arlington Facility 7026-03

Dear Mr. Cook:

This letter summarizes field activities conducted to further ensure closure of the french drains located in the Main Treatment Area and Treated Pole Storage Yard at the J. H. Baxter facility in Arlington, Washington. Additional closure activities were conducted to address Ecology's concerns that the previous closure may have left a preferential pathway for infiltrating stormwater to access the subsurface. This letter describes the closure method used to provide a low permeability seal in the area where the drains previously occurred, and documents the closure action.

Closure Activities

On July 11, 2001, Baxter retained the services of Jerry's Bulldozing and Hart Crowser to address additional closure in the area of the former french drains catch basins CB 13, CB 14, CB 23, CB 24, CB 25, and CB 26 (Figure 1). Jerry Hagenson with Jerry's Bulldozing operated the backhoe and was the same operator used to do the initial closure. Tyson Carlson with Hart Crowser and Mary Larson with J.H. Baxter observed and directed the activities. Photographs 1 through 3 on Figure 2 provide a pictorial summary of the process.

The backhoe was used to excavate to the capped drainpipes in the location of the former catch basin vaults. A layer of bentonite was then placed between and around the end caps within the footprint of the former vault. The integrity of the caps placed on the pipes during initial closure was verified before placing the bentonite. The bentonite was then hydrated so that a minimum 4-inch sealing layer was installed. The soil stockpiled from the excavation was placed back on top of the bentonite to provide a working surface. Photo 1

1910 Fairview Avenue East Seattle, Washington 98102-3699 Fax 206.328.5581 Tel 206.324.9530 Denver

Fairbanks

Jersey City

Juneau

Long Beach

Portland

Seattle

Department of Ecology August 29, 2001 7026-03 Page 2

shows the excavation to the top of the drainpipes, Photo 2 illustrates the layer of bentonite placed in the bottom of the excavation, and Photo 3 shows the final grade after drain closure.

We trust these activities are sufficient to complete the closure of the french drains in the main treatment area and treated pole storage yard, and ensure that a preferential pathway to the groundwater system does not exist at the former french drain catch basins CB 13, CB 14, CB 23, CB 24, CB 25, and CB 26.

Sincerely,

HART CROWSER, INC.

el elas for

Tyson D. CARLSON Sr. Staff Hydrogeologist

LORI J. HERMAN Principal Hydrogeologist

Attachments:

Figure 1 Catch Basin Location Map Figure 2 Photographs 1, 2, and 3

C:\Docs\Jobs\702603\DrainClosureLetter.doc

French Drain and Monitoring Location Map





Photograph 1 - Open Excavation.



Photograph 2 - Bentonite placed at bottom of excavation.

HARTCR	OWSER
7026-03	08/01
Figure 2	1/2



Photograph 3 - Final grade after closure.

SZS 08/03/01 Dratting/Dwg/Jobs/7026/702603/Fig2 photos.cdr

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J.H. BAXTER & CO., a California Limited Partnership



November 14, 2002

Ms. Kim Ogle, RCRA Project Manager United States EPA, Region 10 1200 Sixth Avenue Seattle, WA 98101

Subject: November 15, 2002 Progress Report J. H. BAXTER ARLINGTON FACILITY Docket No. RCRA-10-2001-0086

Dear Ms. Ogle:

This letter provides the November 15, 2002 progress report for work completed under the Administrative Order on Consent (AOC) for the J. H. Baxter (Baxter) facility during the period October 15 to November 15, 2002.

Significant Developments This Period

This section discusses significant developments for the referenced reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- Baxter completed additional Site Investigation (SI) field activities during the week of October 14, 2002, including the installation of two temporary wells and one permanent well north of the Closed Wood Waste Landfill.
- During the week of October 21, 2002, Baxter completed groundwater monitoring activities for the South Closed Wood Waste Landfill wells and onsite wells. These activities were performed to meet the objectives of the SI Work Plan as well as satisfy the State Waste Discharge Permit (SWDP) requirements.
- On October 18, 2002, Baxter received a letter from the United States Environmental Protection Agency (EPA) disapproving the September 23, 2002, Site Investigation Addendum, which was specific to the air portion of the SI. The disapproval letter requested that Baxter submit a revised addendum within 14 days.

85 N. Baxter Road P.O. Box 10797 Eugene, OR 97440-2797 Phone 541 689 3801 Fax 541 689 8303



November 15, 2002 Progress Report Page 2

- On October 25, 2002, Baxter submitted a letter to EPA requesting a 30-day extension for submitting the revised Site Investigation Addendum. The extension was requested in order to comply with EPA's October 18, 2002, request for model parameters and emission rates, which were not included with the original addendum and had not yet been calculated.
- On October 29, 2002, a letter was submitted to notify EPA of Baxter's intent to proceed with the phased approach for stormwater management, in accordance with Section 63 of the AOC. The phased approach for stormwater management was authorized in the October 22, 2002 letter from the Washington Department of Ecology (Ecology) (see *Other Information*).
- On October 30, 2002, EPA granted the requested extension for the Site Investigation Addendum concerning the air portion of the SI. The revised Site Investigation Addendum will be submitted to EPA on or before December 2, 2002.

Anticipated Developments Next Period

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to implement the SI Work Plan activities, including data validation, database compilation, and data evaluation during the next reporting period. Offsite soil samples to support the air investigation will be collected upon EPA approval of the revised SI Addendum, and sediment samples in the Burlington Northern Santa Fe Railway (BNSF) ditch adjacent to the Arlington facility will be collected upon BNSF approval of access to the ditch.
- Baxter will initiate the phased approach for stormwater management during the next reporting period, including construction of an additional portable stormwater treatment system and design of the constructed wetlands in the Untreated Pole Storage Area.
- Baxter will continue with development of the Plans and Specifications for the Stormwater Improvement Measures. The Plans and Specifications are to be submitted within 30 days of receipt of Ecology's review comments on the Engineering Design Report (submitted September 9, 2002) and subsequent Amendment (submitted October 4, 2002).
- Baxter will continue working on the City of Arlington Land Use Permit Application package.

November 15, 2002 Progress Report Page 3

• Baxter will revise the Site Investigation Addendum and submit the document to EPA by December 2, 2002.

Anticipated Problems and Problem Resolution

This section discusses anticipated problems, and planned resolution of past or anticipated problems.

No new problems or issues have been identified at the facility, other than those mentioned in previous progress reports. On November 6, 2002, Baxter installed a 60 mil high density polyethylene (HDPE) liner (covered will clean fill) over the area of former drains 13 and 14 near the aprons. The liner was installed to isolate those areas from precipitation runoff and minimize the potential for infiltration. Baxter completed the modifications to the aprons adjacent to the drip pads to isolate precipitation runoff from those areas on November 12, 2002.

Baxter has not yet received a response to its October 1, 2002, letter to EPA requesting that it be allowed to submit validated sample results from the SI to EPA as attachment to the monthly progress report.

Other Information

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Baxter completed drain closure activities on October 17, 2002 in accordance with the Work Plan – Closure of Untreated Pole Storage Area Catch Basins (as revised by letter to Ecology and EPA dated October 4, 2002). Solid wastes generated during catch basin closure activities were containerized in a roll-off bin pending laboratory analysis to determine proper disposal methods.
- On October 22, 2002, Baxter received authorization from Ecology to proceed with the phased approach for stormwater management at the facility. Ecology authorized Baxter to collect excess stormwater from the facility, and treat it through trailer-mounted treatment systems prior to discharge to constructed wetlands in the southwestern portion of the Untreated Pole Storage Area.
- The Hydrologic Assessment of the Downstream Drainage Course was submitted to Ecology on October 31, 2002. The report provided an assessment of the stormwater conveyance system that extends from the proposed Baxter stormwater treatment facility outlet into an adjacent stormwater conveyance ditch, and was prepared in response to a

July 18, 2002 letter from Washington State Department of Ecology. EPA was provided a copy of this report.

- On November 4, 2002, Baxter received comments on *Hydrologic Assessment of the Downstream Drainage Course* from the State of Washington Department of Fish and Wildlife (WDFW). EPA and Ecology were provided a copy of the WDEW letter.
- Groundwater monitoring activities for the North Closed Wood Waste Landfill were completed on November 5, 2002.
- In accordance with the SWDP, Baxter performed quarterly sampling of groundwater monitoring wells BXS-1, MW-2, HCMW-5, HCMW-6, and HCMW-7 in July 2002. Baxter also sampled the carbon units and all of the landfill monitoring wells in July 2002. The Quality Assurance Review (memorandum from Kathy Gunderson to Stephen Barnett) and laboratory reports for these data are included as Attachment 1.
- Baxter has completed validation activities for the initial surface soil samples collected as part of the SI. A Quality Assurance Review (memorandum from Kathy Gunderson to Les Brewer) and laboratory reports for these initial samples are included as Attachment 2.
- Logs for the new monitoring wells installed as part of the SI (MW-10 through MW-15) are included as Attachment 3.

November 15, 2002 Progress Report Page 5

Certification

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Rugh thomas

Signature:

Name:	RueAnn Thomas
Title:	Environmental Programs Director
Date:	November 14, 2002

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (541) 689-3801.

Sincerely,

cc:

Rue An thomas

RueAnn Thomas Environmental Programs Director

> Jeanne Tran, Ecology Georgia Baxter, J. H. Baxter & Co. Mary Larson, J. H. Baxter & Co. J. Stephen Barnett, Premier Environmental Services, Inc.





<u>Photo 1:</u>

View of phase 1 excavation in Ditch 2. Looking south.

Photo 2:

View of southern end of Ditch 2, following phase 1 excavation. Looking south.

Photo 3:

View of Ditch 2 following phase 1 excavation. Looking north.



SITE PHOTOGRAPHS J.H. BAXTER FACILITY 6520 - 188th NE ARLINGTON, WASHINGTON

DATE Jan. 17, 2005

PROJECT NO. 205003

Att. B-1



Photo 4:

Northeasterly view of Ditch 2 during phase 2 excavation.

Photo 5:

View of filled, covered, and labled rolloff bins.

Photo 6:

View of lined and covered Ditch 1 nonhazardous soil pile.

SITE PHOTOGRAPHS

J.H. BAXTER FACILITY 6520 - 188th NE ARLINGTON, WASHINGTON

DATE Jan. 17, 2005

PROJECT NO. 205003

Att. B-1



Attachment 5 Ditch Material Sampling -Laboratory Report



CERTIFICATE OF A		

CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/1/04	
	333 SW FIFTH AVE #625	CCIL JOB #:	409152	
	PORTLAND, OR 97204	CCIL SAMPLE #:	1	
		DATE RECEIVED:	9/30/04	
		WDOE ACCREDITATION #:	C142	

CLIENT PROJECT ID:	J.H. BAXTER ARLINGTON
CLIENT SAMPLE ID:	D2-1 9/30/04 1545

DATA RESULTS

				ANALYSIS	ANALYSIS
ANALYTE	METHOD	RESULTS*	UNITS**	DATE	BY
PENTACHLOROPHENOL	EPA-8270	2500	UG/KG	9/30/04	CCN

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

APPROVED BY:

CRA



CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/1/04
	333 SW FIFTH AVE #625	CCIL JOB #:	409152
	PORTLAND, OR 97204	CCIL SAMPLE #:	2
		DATE RECEIVED:	9/30/04
		WDOE ACCREDITATION #:	C142

CLIENT CONTACT: STEVE BARNETT

CLIENT PROJECT ID: CLIENT SAMPLE ID: J.H. BAXTER ARLINGTON D2-2 9/30/04 1540

	DATARESUL	TS			
				ANALYSIS	ANALYSIS
ANALYTE	METHOD	RESULTS	UNITS**	DATE	BA
PENTACHLOROPHENOL	EPA-8270	2500	UG/KG	10/1/04	CCN

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

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	CERTIFICATE OF ANA	

CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/4/04
	333 SW FIFTH AVE #625	CCIL JOB #:	410006
	PORTLAND, OR 97204	CCIL SAMPLE #:	1
		DATE RECEIVED:	10/1/04
		WDOE ACCREDITATION #:	C142

CLIENT PROJECT ID:	JHB ARLINGTON
CLIENT SAMPLE ID:	D2-4 10/1/04 1600

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS BY
PENTACHLOROPHENOL	EPA-8270	12000	UG/KG	10/4/04	CCN

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

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CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/4/04
	333 SW FIFTH AVE #625	CCIL JOB #:	410006
	PORTLAND, OR 97204	CCIL SAMPLE #:	2
		DATE RECEIVED:	10/1/04
		WDOE ACCREDITATION #:	C142

CLIENT CONTACT: STEVE BARNETT

CLIENT PROJECT ID:	JHB ARLINGTON
CLIENT SAMPLE ID:	D2-5 10/1/04 1605

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS BY
PENTACHLOROPHENOL	EPA-8270	12000	UG/KG	10/4/04	CCN

• "ND" INDICATES ANALYTE ANALYTED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT, REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

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CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/4/04
	333 SW FIFTH AVE #625	CCIL JOB #:	410006
	PORTLAND, OR 97204	CCIL SAMPLE #:	3
		DATE RECEIVED:	10/1/04
		WDOE ACCREDITATION #:	C142

CLIENT PROJECT ID: JHB ARLINGTON CLIENT SAMPLE ID: D2-6 10/1/04 1610

DATA RESULTS

ANALYTE	METHOD	RESULTS	UNITS"	ANALYSIS DATE	ANALYSIS BY
PENTACHLOROPHENOL	EPA-8270	4100	UG/KG	10/3/04	CCN

* "NO" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

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CERTIFICATE OF ANALYSIS

CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/4/04
	333 SW FIFTH AVE #625	CCIL JOB #:	410006
	PORTLAND, OR 97204	CCIL SAMPLE #:	4
		DATE RECEIVED:	10/1/04
		WDOE ACCREDITATION #:	C142

CLIENT CONTACT: STEVE BARNETT

CLIENT PROJECT ID:	JHB ARLINGTON
CLIENT SAMPLE ID:	D2-7 10/1/04 1615

DATA RESULTS

				ANALYSIS	ANALYSIS
ANALYTE	METHOD	RESULTS	UNITS"	DATE	BY
PENTACHLOROPHENOL	EPA-8270	11000	UG/KG	10/4/04	CCN

• "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

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	CERTIFICATE OF ANALYSIS			
CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/4/04	

333 SW FIFTH AVE #625
PORTLAND, OR 97204

DATE:	10/4/04
CCIL JOB #:	410006
CCIL SAMPLE #:	5
DATE RECEIVED:	10/1/04
WDOE ACCREDITATION #:	C142

CRA

CLIENT CONTACT: STEVE BARNETT

CLIENT PROJECT ID:	JHB ARLINGTON
CLIENT SAMPLE ID:	D2-8 10/1/04 1615

DATA RESULTS

ANALYTE	METHOD	RESULTS"	UNITS**	ANALYSIS DATE	ANALYSIS BY
PENTACHLOROPHENOL	EPA-8270	9200	UG/KG	10/4/04	CCN

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

APPROVED BY:

Page 5



CERTIFICATE OF ANALYSIS	

CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/4/04
	333 SW FIFTH AVE #625	CCIL JOB #:	410006
	PORTLAND, OR 97204	CCIL SAMPLE #:	6
		DATE RECEIVED:	10/1/04
		WDOE ACCREDITATION #:	C142

CLIENT PROJECT ID:	JHB ARLINGTON
CLIENT SAMPLE ID:	D2-9 10/1/04 1620

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS BY
PENTACHLOROPHENOL	EPA-8270	10000	UG/KG	10/4/04	CCN

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

APPROVED BY:

CRA



CERTIFICATE OF ANALYSIS	

CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/4/04	
	333 SW FIFTH AVE #625	CCIL JOB #:	410006	
	PORTLAND, OR 97204	CCIL SAMPLE #:	7	
		DATE RECEIVED:	10/1/04	
		WDOE ACCREDITATION #:	C142	

CLIENT PROJECT ID:JHB ARLINGTONCLIENT SAMPLE ID:COMPOSITE D2-1, D2-2, D2-4, D2-6, AND D2-8

DATA RESULTS

				ANALYSIS	ANALYSIS
ANALYTE	METHOD	RESULTS"	UNITS**	DATE	BY
TPH-DIESEL RANGE TPH-LUBE OIL RANGE	NWTPH-DX NWTPH-DX	110 340	MG/KG MG/KG	10/4/04 10/4/04	DLC DLC

NOTE:

CHROMATOGRAM INDICATES SAMPLE CONTAINS LATE DIESEL RANGE PRODUCT AND LUBE OIL

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES OR AS FOLLOWS: DIESEL RANGE REPORTING LIMIT IS 25 MG/KG LUBE OIL RANGE REPORTING LIMIT IS 50 MG/KG

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

APPROVED BY:

CRA



CERTIFICATE OF ANALYSIS

CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/1/04	
	333 SW FIFTH AVE #625	CCIL JOB #:	409152	
	PORTLAND, OR 97204	CCIL SAMPLE #:	3	
		DATE RECEIVED:	9/30/04	
		WDOE ACCREDITATION #:	C142	
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CLIENT PROJECT ID:	J.H. BAXTER ARLINGTON
CLIENT SAMPLE ID:	D2-3 9/30/04 1555

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS BY
PENTACHLOROPHENOL	EPA-8270	ND(<500)	UG/KG	10/1/04	CCN

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING UMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

APPROVED BY: C R



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CERTIFICATE OF ANALYSIS

CLIENT: PREMIER ENVIRONMENTAL 333 SW FIFTH AVE #625 PORTLAND, OR 97204

DATE:	10/4/04
CCIL JOB #:	410006
CCIL SAMPLE #:	1
DATE RECEIVED:	10/1/04
WDOE ACCREDITATION #:	C142

CLIENT CONTACT: STEVE BARNETT

CLIENT PROJECT ID:	JHB ARLINGTON
CLIENT SAMPLE ID:	D2-4 10/1/04 1600

DATARESULTS

ANALYTE	METHOD	RESULTS*	UNITS	ANALYSIS DATE	ANALYSIS BY
PENTACHLOROPHENOL	EPA-8270	12000	UG/KG	10/4/04	CCN

**ND" INDICATES ANALYZE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

APPROVED BY:

CRA



CERTIFICATE OF ANALYSIS	

CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/4/04
	333 SW FIFTH AVE #625	CCIL JOB #:	410006
	PORTLAND, OR 97204	CCIL SAMPLE #:	2
		DATE RECEIVED:	10/1/04
		WDOE ACCREDITATION #:	C142

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CLIENT PROJECT ID:	JHB ARLINGTON			
CLIENT SAMPLE ID:	D2-5 10/1/04 1605			

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS BY
PENTACHLOROPHENOL	EPA-8270	12000	UG/KG	10/4/04	CCN

* "ND" INDICATES ANALYTE ANALYTE FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING UMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

APPROVED BY:

CRA

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PREMIER ENVIRONMENTAL	DATE:	10/4/04
333 SW FIFTH AVE #625	CCIL JOB #:	410006
PORTLAND, OR 97204	CCIL SAMPLE #:	3
	DATE RECEIVED:	10/1/04
	WDOE ACCREDITATION #:	C142

CLIENT CONTACT: STEVE BARNETT

CLIENT PROJECT ID: JHB ARLINGT	
CLIENT SAMPLE ID:	D2-6 10/1/04 1610

DATA RESULTS

			ANALYSIS	ANALYSIS
ANALYTE	METHOD RESULTS	UNITS**	DATE	BY
PENTACHLOROPHENOL	EPA-8270 4100	UG/KG	10/3/04	CCN

• "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT, REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

APPROVED BY:

CRA



	CERTIFICATE OF			NOCESSIE
CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/4/04	
	333 SW FIFTH AVE #625	CCIL JOB #:	410006	
	PORTLAND, OR 97204	CCIL SAMPLE #:	4	
		DATE RECEIVED:	10/1/04	
		WDOE ACCREDITATION #:	C142	
CLIENT C	ONTACT: STEVE BARNETT			

CLIENT PROJECT ID:	JHB ARLINGTON			
CLIENT SAMPLE ID:	D2-7 10/1/04 1615			

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS BY
PENTACHLOROPHENOL	EPA-8270	11000	UG/KG	10/4/04	CCN

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

APPROVED BY:

CRA



LIENT: PREMIER ENVIRONME	NTAL DATE:	10/4/04
333 SW FIFTH AVE #62		410006
PORTLAND, OR 97204		5
	DATE RECEIVED:	10/1/04
	WDOE ACCREDITATION #	C142

CLIENT CONTACT: STEVE BARNETT

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CLIENT PROJECT ID:	JHB ARLINGTON
CLIENT SAMPLE ID:	D2-8 10/1/04 1615

DATA RESULTS

ANALYTE	METHOD	RESULTS	UNITS**	ANALYSIS AN DATE	ALYSIS BY
PENTACHLOROPHENOL	EPA-8270	9200	UG/KG	10/4/04	CN

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

APPROVED BY:

CRA



CERTIFICATE OF ANALYSIS

CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/4/04
	333 SW FIFTH AVE #625	CCIL JOB #:	410006
	PORTLAND, OR 97204	CCIL SAMPLE #:	6
		DATE RECEIVED:	10/1/04
		WDOE ACCREDITATION #:	C142

CLIENT PROJECT ID:	JHB ARLINGTON			
CLIENT SAMPLE ID:	D2-9 10/1/04 1620			

DATA RESULTS

ANALYTE	METHOD	RESULTS *	UNITS**	•	ANALYSIS DATE	ANALYSIS BY
PENTACHLOROPHENOL	EPA-8270	10000	UG/KG		10/4/04	CCN

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES.

" UNITS FOR ALL NON UQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

APPROVED BY:

CRA



	CERTIECATE	OF ANALYSIS	
CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/4/04
	333 SW FIFTH AVE #625	CCIL JOB #:	410006
	PORTLAND, OR 97204	CCIL SAMPLE #:	7
		DATE RECEIVED:	10/1/04
		WDOE ACCREDITATION #:	C142
CLIENT C	ONTACT: STEVE BARNETT		

CONTACT: STEVE BARNET

CLIENT PROJECT ID: JHB ARLINGTON CLIENT SAMPLE ID: COMPOSITE D2-1, D2-2, D2-4, D2-6, AND D2-8

DATA RESULTS

				ANALYSIS	ANALYSIS
ANALYTE	METHOD	RESULTS"	UNITS**	DATE	BY
TPH-DIESEL RANGE TPH-LUBE OIL RANGE	NWTPH-DX NWTPH-DX	110 340	MG/KG MG/KG	10/4/04 10/4/04	DLC DLC

NOTE:

CHROMATOGRAM INDICATES SAMPLE CONTAINS LATE DIESEL RANGE PRODUCT AND LUBE OIL

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING UMIT IS GIVEN IN PARENTHESES OR AS FOLLOWS: DIESEL RANGE REPORTING LIMIT IS 25 MG/KG LUBE OIL RANGE REPORTING LIMIT IS 50 MG/KG

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

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CLIENT: PREMIER ENVIRONMENTAL	DATE:	10/5/04
333 SW FIFTH AVE #625	CCIL JOB #:	410014
PORTLAND, OR 97204	CCIL SAMPLE #:	. 1
	DATE RECEIVED:	10/4/04
	WDOE ACCREDITATION #:	C142

CLIENT PROJECT ID:	JH BAXTER ARLINGTON			
CLIENT SAMPLE ID:	D2-10 10/4/04 1330			

DATA RESULTS

ANALYTE	METHOD	RESULTS *	UNITS"	ANALYSIS DATE	ANALYSIS BY
PENTACHLOROPHENOL	EPA-8270	1500	UG/KG	10/4/04	CCN

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT, REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

APPROVED BY:

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CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/5/04	
	333 SW FIFTH AVE #625	CCIL JOB #:	410014	
	PORTLAND, OR 97204	CCIL SAMPLE #:	2	
		DATE RECEIVED:	10/4/04	
		WDOE ACCREDITATION #:	C142	

CLIENT CONTACT: STEVE BARNETT

CLIENT PROJECT ID:	JH BAXTER ARLINGTON			
CLIENT SAMPLE ID:	D2-11 10/4/04 1335			

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS ANALYSIS DATE BY	•
PENTACHLOROPHENOL	EPA-8270	1500	UG/KG	10/5/04 CCN	

* ND* INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING UMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

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CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/5/04	
	333 SW FIFTH AVE #625	CCIL JOB #:	410014	
	PORTLAND, OR 97204	CCIL SAMPLE #:	3	
		DATE RECEIVED:	10/4/04	
		WDOE ACCREDITATION #:	C142	

CLIENT CONTACT: STEVE BARNETT

CLIENT PROJECT ID:JH BAXTER ARLINGTONCLIENT SAMPLE ID:D2-12 10/4/04 1345

DATA RESULTS

ANALYTE	METHOD	RESULTS'	UNITS**	ANALYSIS DATE	ANALYSIS BY
PENTACHLOROPHENOL	EPA-8270	3000	UG/KG	10/5/04	CCN

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

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CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/5/04	
	333 SW FIFTH AVE #625	CCIL JOB #:	410014	
	PORTLAND, OR 97204	CCIL SAMPLE #:	4	
		DATE RECEIVED:	10/4/04	
		WDOE ACCREDITATION #:	C142	

CLIENT CONTACT: STEVE BARNETT

CLIENT PROJECT ID:JH BAXTER ARLINGTONCLIENT SAMPLE ID:D2-13 10/4/04 1350

DATA RESULTS

ANALYTE	METHOD	RESULTS'	UNITS"	ANALYSIS DATE	ANALYSIS BY
PENTACHLOROPHENOL	EPA-8270	2300	UG/KG	10/5/04	CCN

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

APPROVED BY:

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CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/5/04
	333 SW FIFTH AVE #625	CCIL JOB #:	410014
	PORTLAND, OR 97204	CCIL SAMPLE #:	5
		DATE RECEIVED:	10/4/04
		WDOE ACCREDITATION #:	C142

CLIENT CONTACT: STEVE BARNETT

CLIENT PROJECT ID:	JH BAXTER ARLINGTON			
CLIENT SAMPLE ID:	D2-14 10/4/04 1400			

DATA RESULTS

				ANALYSIS	ANALYSIS
ANALYTE	METHOD	RESULTS*	UNITS**	DATE	BY
PENTACHLOROPHENOL	EPA-8270	1600	UG/KG	10/5/04	CCN

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT, REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

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CERTIFICATE OF ANALYSIS

CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/5/04
	333 SW FIFTH AVE #625	CCIL JOB #:	410014
	PORTLAND, OR 97204	CCIL SAMPLE #:	6
		DATE RECEIVED:	10/4/04
		WDOE ACCREDITATION #:	C142

CLIENT PROJECT ID:JH BAXTER ARLINGTONCLIENT SAMPLE ID:D2-15 10/4/04 1405

DATA RESULTS						
				ANALYSIS	ANALYSIS	
ANALYTE	METHOD	RESULTS	UNITS"	DATE	BY	
PENTACHLOROPHENOL	EPA-8270	2000	UG/KG	10/5/04	CCN	

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

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CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/5/04
	333 SW FIFTH AVE #625	CCIL JOB #:	410014
	PORTLAND, OR 97204	CCIL SAMPLE #:	7
		DATE RECEIVED:	10/4/04
		WDOE ACCREDITATION #:	C142
CLIENT C	CONTACT: STEVE BARNETT		

CLIENT PROJECT ID:JH BAXTER ARLINGTONCLIENT SAMPLE ID:D2-16 10/4/04 1415

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS"		ALYSIS By
PENTACHLOROPHENOL	EPA-8270	7000	UG/KG	10/5/04 C	CN

* "NO" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

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CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/5/04
	333 SW FIFTH AVE #625	CCIL JOB #:	410014
	PORTLAND, OR 97204	CCIL SAMPLE #:	8
		DATE RECEIVED:	10/4/04
		WDOE ACCREDITATION #:	C142

CLIENT CONTACT: STEVE BARNETT

.

CLIENT PROJECT ID:JH BAXTER ARLINGTONCLIENT SAMPLE ID:D1-1 10/4/04 1615

DATA RESULTS

				ANALYSIS	ANALYSIS
ANALYTE	METHOD	RESULTS*	UNITS"	DATE	BY
PENTACHLOROPHENOL	EPA-8270	3800	UG/KG	10/5/04	CCN

• "ND" INDICATES ANALYTE ANALYTE OF BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

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CERTIFICATE OF ANALYSIS

CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/5/04
	333 SW FIFTH AVE #625	CCIL JOB #:	410014
	PORTLAND, OR 97204	CCIL SAMPLE #:	9
		DATE RECEIVED:	10/4/04
		WDOE ACCREDITATION #:	C142

CLIENT CONTACT: STEVE BARNETT

CLIENT PROJECT ID:JH BAXTER ARLINGTONCLIENT SAMPLE ID:D1-2 10/4/04 1616

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS BY
PENTACHLOROPHENOL	EPA-8270	2300	UG/KG	10/5/04	CCN

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHÉSES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

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CERTIFICATE OF ANALYSIS

CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/5/04	
	333 SW FIFTH AVE #625	CCIL JOB #:	410014	
	PORTLAND, OR 97204	CCIL SAMPLE #:	10	
		DATE RECEIVED:	10/4/04	
		WDOE ACCREDITATION #:	C142	

CLIENT CONTACT: STEVE BARNETT

18

CLIENT PROJECT ID:	JH BAXTER ARLINGTON
CLIENT SAMPLE ID:	D1-3 10/4/04 1620

DATA RESULTS

				ANALYSIS	ANALYSIS
ANALYTE	METHOD	RESULTS*	UNITS**	DATE	BY
PENTACHLOROPHENOL	EPA-8270	3300	UG/KG	10/5/04	CCN

* "NO" INDICATES ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

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Attachment 6 Laboratory QA/QC Results



	CERTIFICA	TE OF ANALYSIS	
CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/4/04
	333 SW FIFTH AVE #625 PORTLAND, OR 97204	CCIL JOB #:	410006
		DATE RECEIVED:	10/1/04
		WDOE ACCREDITATION #:	C142
CLIENT C	CONTACT: STEVE BARNETT		

JHB ARLINGTON CLIENT PROJECT ID:

QUALITY CONTROL RESULTS

SURROGATE RECOVERY

CCIL SAMPLE ID	ANALYTE	SUR ID	% RECV
410006-01	EPA-8270	2,4,6-TRIBROMOPHENOL	115
410006-02	EPA-8270	2,4,6-TRIBROMOPHENOL	95
410006-03	EPA-8270	2,4,6-TRIBROMOPHENOL	101
410006-04	EPA-8270	2,4,6-TRIBROMOPHENOL	81
410006-05	EPA-8270	2,4,6-TRIBROMOPHENOL	73
410006-06	EPA-8270	2,4,6-TRIBROMOPHENOL	100
410006-07	NWTPH-DX	C25	96
410006-02 410006-03 410006-04 410006-05 410006-06	EPA-8270 EPA-8270 EPA-8270 EPA-8270 EPA-8270	2,4,6-TRIBROMOPHENOL 2,4,6-TRIBROMOPHENOL 2,4,6-TRIBROMOPHENOL 2,4,6-TRIBROMOPHENOL 2,4,6-TRIBROMOPHENOL	95 101 81 73 100

BLANK AND DUPLICATE RESULTS

METHOD	BLK RESULT	ASSOC SMPLS
NWTPH-DX (DSL)	ND(<25)	410006-07
NWTPH-DX (OIL)	ND(<50)	410006-07
EPA-8270(PENTACHLOROPHENOL)	ND(<500)	410006-01 TO 06

SPIKE/ SPIKE DUPLICATE RESULTS

METHOD	SPIKE ID	ASSOCIATED SAMPLES	% SPIKE RECOVERY	% SPIKE DUP RECOVERY	REL % DIFF
NWTPH-DX	DIESEL	410006-07	95	93	2
EPA-8270	PENTACHLOROPHENOL	410006-01 TO 06	78	91	15

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CLIENT: PREMIER ENV 333 SW FIFTH PORTLAND, O	AVE #625	DATE: CCIL JOB #:	10/1/04 409152
		DATE RECEIVED:	9/30/04
		WDOE ACCREDITATION #:	C142
CLIENT CONTACT: STE	VE BARNETT		
CLIENT PROJECT ID:	J.H. BAXTER ARL	INGTON	
		· · · · · · · · · · · · · · · · · · ·	
	QUALITY C	ONTROL RESULTS	
	SURROGAT	E RECOVERY	
CCIL SAMPLE ID	ANALYTE	SUR ID	% RECV
409152-01	EPA-8270	2,4,6-TRIBROMOPHENOL	106

CERTIFICATE OF ANALYSIS

		2		
40	9152-02	EPA-8270	2,4,6-TRIBROMOPHENOL	99
40	9152-03	EPA-8270	2,4,6-TRIBROMOPHENOL	101

BLANK AND DUPLICATE RESULTS

METHOD	BLK RESULT	ASSOC SMPLS
EPA-8270(PENTACHLOROPHENOL)	ND(<500)	409152-01, 02, 03

SPIKE/ SPIKE DUPLICATE RESULTS

METHOD	SPIKE ID	ASSOCIATED SAMPLES	% SPIKE RECOVERY	% SPIKE DUP RECOVERY	REL % DIFF
EPA-8270	PENTACHLOROPHENOL	409152-01, 02, 03	78	91	15

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	CERTI	FICATE OF ANALYSIS	
CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/4/04
	333 SW FIFTH AVE #625 PORTLAND, OR 97204	CCIL JOB #:	410006
		DATE RECEIVED:	10/1/04
		WDOE ACCREDITATION #:	C142
CLIENT C	ONTACT: STEVE BARNETT		

CLIENT PROJECT ID: JHB ARLINGTON

QUALITY CONTROL RESULTS

SURROGATE RECOVERY

CCIL SAMPLE ID	ANALYTE	SUR ID	% RECV
410006-01	EPA-8270	2,4,6-TRIBROMOPHENOL	115
410006+02	EPA-8270	2,4,6-TRIBROMOPHENOL	95
410006-03	EPA-8270	2,4,6-TRIBROMOPHENOL	101
410006-04	EPA-8270	2,4,6-TRIBROMOPHENOL	81
410006-05	EPA-8270	2,4,6-TRIBROMOPHENOL	73
410006-06	EPA-8270	2,4,6-TRIBROMOPHENOL	100
410006-07	NWTPH-DX	C25	96
	BLANK AND DUPLICA	TE RESULTS	
a secto da asses METHOD	BLK RESULT	ASSOC SMPLS	
NWTPH-DX (DSL) NWTPH-DX (OIL) EPA-8270(PENTACHLOROPHENOL)	ND(<25) ND(<50) ND(<500)	410006-07 410006-07 410006-01 TO 06	

SPIKE/ SPIKE DUPLICATE RESULTS

		ASSOCIATED	% SPIKE	% SPIKE DUP	
METHOD	SPIKE ID	SAMPLES	RECOVERY	RECOVERY	REL % DIFF
- 985 8235-55 NO 6	Celle Museu Haera (
NWTPH-DX	DIESEL	410006-07	95	93	2
EPA-8270	PENTACHLOROPHENOL	410006-01 TO 06	78	91	15

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CERTIFICATE OF ANALYSIS

CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/5/04
	333 SW FIFTH AVE #625	CCIL JOB #:	410014
	PORTLAND, OR 97204		
	-	DATE RECEIVED:	10/4/04
		WDOE ACCREDITATION #:	C142
CLIENT C	ONTACT: STEVE BARNETT		

CLIENT PROJECT ID: JH BAXTER ARLINGTON

QUALITY CONTROL RESULTS

SPIKE/ SPIKE DUPLICATE RESULTS

METHOD	SPIKE ID	ASSOCIATED SAMPLES	% SPIKE RECOVERY	% SPIKE DUP RECOVERY	REL % DIFF
EPA-8270	PENTACHLOROPHENOL	410014-01 TO 10	61	66	8

APPROVED BY: CR



Attachment 7 Waste Profiling Laboratory Reports

- **4**.

October 14, 2004

Mr. Steve Barnett Premier Environmental 333 SW Fifth Ave #625 Portland, OR 97204

Dear Mr. Barnett

On October 6^{th} , 16 soil samples were received by our laboratory and assigned our laboratory project number 410020. The samples were identified as your JH Baxter project. The sample identification and requested analyses are outlined on the attached chain of custody record.

It was requested that we composite your samples HWP-1 through HWP-14 and perform the requested analyses on the composite sample. This was done and the composite sample was given our sample number 17.

The attached report includes analytical results, laboratory quality control results, and the chain of custody record. Our laboratory does not perform the requested dioxin analyses and this analysis was subcontracted to Columbia Analytical. Due to the length of the dioxin report it is attached as it was received from Columbia Analytical.

No known abnormalities or nonconformances were observed during the analyses of the project samples.

Please do not hesitate to call me if you have any questions or if I can be of further assistance.

Sincerely

CCI Analytical Laboratories, Inc.

Chuck B. Rancatti Laboratory Director



CLIENT:	PREMIER ENVIRONMENTAL	DATE:	10/14/04
	333 SW FIFTH AVE #625	CCIL JOB #:	410020
	PORTLAND, OR 97204	CCIL SAMPLE #:	17
		DATE RECEIVED:	10/6/04
		WDOE ACCREDITATION #:	C142

CLIENT CONTACT: STEVE BARNETT

CLIENT PROJECT ID: JH BAXTER HWP-1 TO HWP-14 10/1/04 1500 TO 1540, 10/6/04 1200 TO 1220 CLIENT SAMPLE ID:

	DATA RESUL	TS			
				ANALYSIS	ANALYSIS
ANALYTE	METHOD	RESULTS*	UNITS**	DATE	BY
PHENOL	EPA-8270	ND(<120)	UG/KG	10/12/04	CCN
2,4-DIMETHYLPHENOL	EPA-8270	ND(<120)	UG/KG	10/12/04	CCN
NAPHTHALENE	EPA-8270	ND(<120)	UG/KG	10/12/04	CCN
2,4,6-TRICHLOROPHENOL	EPA-8270	ND(<120)	UG/KG	10/12/04	CCN
ACENAPHTHENE	EPA-8270	ND(<120)	UG/KG	10/12/04	CCN
2,3,4,6-TETRACHLOROPHENOL	EPA-8270	ND(<300)	UG/KG	10/12/04	CCN
FLUORENE	EPA-8270	ND(<120)	UG/KG	10/12/04	CCN
PENTACHLOROPHENOL	EPA-8270	6000	UG/KG	10/12/04	CCN
PHENANTHRENE	EPA-8270	ND(<120)	UG/KG	10/12/04	CCN
ANTHRACENE	EPA-8270	ND(<120)	UG/KG	10/12/04	CCN
PYRENE	EPA-8270	ND(<120)	UG/KG	10/12/04	CCN
BENZOJAJANTHRACENE	EPA-8270	ND(<120)	UG/KG	10/12/04	CCN
CHRYSENE	EPA-8270	ND(<120)	UG/KG	10/12/04	CCN
BENZOBJILUORANTHENE	EPA-8270	ND(<120)	UG/KG	10/12/04	CCN
BENZOKIFLUORANTHENE	EPA-8270	ND(<120)	UG/KG	10/12/04	CCN
BENZOJAJPYRENE	EPA-8270	ND(<120)	UG/KG	10/12/04	CCN
INDENO[1,2,3-CD]PYRENE	EPA-8270	ND(<120)	UG/KG	10/12/04	CCN
DIBENZ[A,H]ANTHRACENE	EPA-8270	ND(<120)	UG/KG	10/12/04	CCN
ARSENIC	EPA-6010	4.9	MG/KG	10/11/04	RAB
CHROMIUM	EPA-6010	12	MG/KG	10/11/04	RAB

" "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

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EPA-8270

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EPA-6010 (AS)

EPA-6010 (CR)

	CE	IRTIFICATE OI	ANALYSIS			
333	EMIER ENVIRONMENTAL SW FIFTH AVE #625 RTLAND, OR 97204	с	DATE: CIL JOB #:	10/14/04 410020		
			DATE F	RECEIVED:	10/6/04	
			WDOE ACCREDI	TATION #:	C142	
CLIENT CONT	ACT: STEVE BARNETT					
CLIENT PROJ	ECT ID: JH BAX1	FR				
OEIEINI TROOM		L , N				
	C	UALITY CONT	ROLRESULTS			
		SURROGATE REG	COVERY			
CCIL SAMPLE ID	ANALYTE		SUR ID	•		% RECV
410020-17	EPA-827	0	2-FLUOROPHE	NOL		103
410020-17	EP A-8 27	0	PHENOL-d5			97
410020-17	EPA-827	0	NITROBENZEN	E-d5		96
410020-17	EPA-827	0	2-FLUOROBIPHE	NYL		104
410020-17	EPA-827	0	2,4,6-TRIBROMOPI	IENOL		119
410020-17	EPA-827	D	TERPHENYL-d	14		104
	BLANK	AND DUPLICATE	RESULTS			
METHOD	BLK RESULT	ASSOC SMPLS				
EPA-6010 (AS)	ND(<0.84)	410020-17				
EPA-6010 (CR)	ND(<0.13)	410020-17				
EPA-8270	SEE BLANK REPORT					
	SPIKE/ S	PIKE DUPLICATE	RESULTS		\$	
		ASSOCIATED	% SPIKE	% SPIKE DUP		
METHOD	SPIKE ID	SAMPLES	RECOVERY	RECOVERY		REL % DIFF
EPA-8270	PHENOL	410020-17	96	97		1
EPA-8270	2-CHLOROPHENOL	410020-17	95	96		1
EPA-8270	1,4 DICHLOROBENZENE	410020-17	84	84		0
EPA-8270	N-NITROSO-DI-N-PROPYLAMINE	410020-17	50	50		0
EPA-8270	1,2,4-TRICHLOROBENZENE	410020-17	94	93		1
EPA-8270	4-CHLORO-3-METHYLPHENOL	410020-17	109	103		5
EPA-8270	ACENAPHTHENE	410020-17	95	95		0
EPA-8270	4-NITROPHENOL	410020-17	88	92		5
EPA-8270	2,4-DINITROTOLUENE	410020-17	82	80		3
EPA-8270	PENTACHLOROPHENOL	410020-17	61	66		8
FDA 0070		440000 47	400	400		~

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CERTIFICATE OF ANALYSIS

CLIENT: PRE	MIER ENVIRONMENTAL	DATE:	10/14/04
333	SW FIFTH AVE #625	CCIL JOB #:	410020
POF	RTLAND, OR 97204	CCIL SAMPLE #:	BLK
		DATE RECEIVED:	10/6/04
		WDOE ACCREDITATION #:	C142
CLIENT CONT	ACT: STEVE BARNETT		

OLIENT CONTACT. OTEVE BARNETT

CLIENT PROJECT ID:JH BAXTERCLIENT SAMPLE ID:METHOD BLANK FOR EPA-8270

DATA RESULTS

				ANALYSIS	ANALYSIS
ANALYTE	METHOD	RESULTS*	UNITS**	DATE	BY
PHENOL	EPA-8270	ND(<100)	UG/KG	10/12/04	CCN
2,4-DIMETHYLPHENOL	EPA-8270	ND(<100)	UG/KG	10/12/04	CCN
NAPHTHALENE	EPA-8270	ND(<100)	UG/KG	10/12/04	CCN
2,4,6-TRICHLOROPHENOL	EPA-8270	ND(<100)	UG/KG	10/12/04	CCN
ACENAPHTHENE	EPA-8270	ND(<100)	UG/KG	10/12/04	CCN
2,3,4,6-TETRACHLOROPHENOL	EPA-8270	ND(<250)	UG/KG	10/12/04	CCN
FLUORENE	EPA-8270	ND(<100)	UG/KG	10/12/04	CCN
PENTACHLOROPHENOL	EPA-8270	ND(<500)	UG/KG	10/12/04	CCN
PHENANTHRENE	EPA-8270	ND(<100)	UG/KG	10/12/04	CCN
ANTHRACENE	EPA-8270	ND(<100)	UG/KG	10/12/04	CCN
PYRENE	EPA-8270	ND(<100)	UG/KG	10/12/04	CCN
BENZO[A]ANTHRACENE	EPA-8270	ND(<100)	UG/KG	10/12/04	CCN
CHRYSENE	EPA-8270	ND(<100)	UG/KG	10/12/04	CCN
BENZO[B]FLUORANTHENE	EPA-8270	ND(<100)	UG/KG	10/12/04	CCN
BENZO[K]FLUORANTHENE	EPA-8270	ND(<100)	UG/KG	10/12/04	CCN
BENZO[A]PYRENE	EPA-8270	ND(<100)	UG/KG	10/12/04	CCN
INDENO[1,2,3-CD]PYRENE	EPA-8270	ND(<100)	UG/KG	10/12/04	CCN
DIBENZ[A,H]ANTHRACENE	EPA-8270	ND(<100)	UG/KG	10/12/04	CCN

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES,

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

APPROVED BY:

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			Page 11 o
		orm 3	CLIENT ID.
	PCDD/PCDF TOXICITY		
	Use for Sample a	und Blank Results	(A10020-17 COMP >
Lab Name: Columbia An	alytical Services	Episode No.:	
Lab Code: CAS Met	:hod: 8290	Lab Sample ID:	E040099 7-001.01
Client Name: CCI ENVI	RONMENTAL	Sample Wt/Vol:	14.726 g or mL; g
Matrix (aqueous/solid	l/leachate): Solid	Initial Calibra	tion Date: 11/01/03
Sample Receipt Date:	10/07/04	Instrument ID:	705
Ext Date: 10/07/04		GC Column ID: D	B~5
Ext. Vol(ul):20.0	Inj. Vol(ul):1.0	Sample Data Fil	ename; B16998#12
Analysis Date: 13-OCI	-04 Time: 19:14:11	Blank Data File	name: 216998#5
Dilution Factor: 1		Cal. Ver. Data	Filename: Bl6998#2
Concentration Units (lpg/L or ng/Kg dry we	ight ing/Kg 4	Moisture: 15.90
	CONCENTRATION	TEF (1)	Tef-adjustel Concentration
2,3,7,8-TCDD	6.74	X 1.0	6.746+00
1,2,3,7,8-PeCDD	88.55	X 0.5	4,43e+01
1,2,3,4,7,8-HxCDD	250.17	X 0.1	2.508+01
1,2,3,6,7,8-ExCDD	543.05	X 0.1	5.43e+01
1,2,3,7,8,9-HxCDD	494.74	X 0.1	4.95e+01
1,2,3,4,6,7,8-HpCDD	16899.79	X 0.01	1.69e+02
OCDD	142510.71	X 0.001	1.43e+02
2,3,7,8-TCDF	5.06	X 0.1	5.06e-01
1,2,3,7,8-PeCDF	15.61	X 0.05	7.81e-01
2,3,4,7,8-PeCDF	15.62	X 0.5	7.81e+00
1,2,3,4,7,8-ExCDF	113.20	X 0.1	1.13e+01
1,2,3,6,7,8-HxCDF	79.62	X 0.1	7.96e+00
1,2,3,7.8,9-HxCDF	*	X 0.1	*
2,3,4,6,7,8-HxCDF	196.90	X 0.1	1-97e+01
1,2,3,4,6,7,8-HpCDF	3355.72	X 0.01	3.36e+01
1,2,3,4,7,8,9-HpCDF	190.61	X 0.01	1.910+00
OCDF	15446.42	X 0.001	1.54e+01

Total: 5.903e+02

 Taken from 'Interim Procudures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxin and -Dibenzofurans (CDDs and CDFs) and 1989 Udate(EPA/625/3-89/016, March 1989.)

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	Page 4 of 12
For	rm 1 CLIENT ID
PCDD/PCDF ANALY Use for Sample :	
Lab Name: Columbia Analytical Services B	Spisode No.:
Lab Code: CAS SDG No.: Meth	nod: 8290 Lab Sample ID: EB19031-MB
Client Name:	Sample Wt/Vol: 10.000 g or mL: g
Matrix (Aqueous/Solid/Ash): Solid	Initial Calibration Date: 11/01/03
Sample Receipt Date:	Instrument ID: 709
Ext. Date: 10/07/04	GC Column:DB-5
Ext. Vol(ul):20.0 Inj. Vol(ul):1.0	Sample Data Filename: B16998#5
Analysis Date: 13-OCT-04 Time: 13:18:58	Blank Data Filename: B16998#5
Dilution Factor: 1	Cal. Ver. Data Filename: B16998#2
Concentration Units (pg/L or ng/Kg dry we	sight): ng/Kg % Moisture/Lipid:
CONCENTRATION DETECTION DE	ION Quel. ION ABUND. RRT MEAN

ANALYTE	FOUND	LIMIT	(1)	RATIO	(2) (2)	RRF
2,3,7,8-TCDD	*	0-184	U	*	*	0.95
1,2,3,7,8-PeCDD	*	0.234	σ	*	+	0.97
1,2,3,4,7,8-HxCDD	-	0.256	ΰ.	*	*	0.95
1,2,3,6,7,8-HxCDD	*	0.216	ບໍ	÷	*	1.13
1,2,3,7,8,9-HxCDD	*	0.218	U	*	*	1.12
1,2,3,4,6,7,8-HpCDD	1.334	0.346	J	0.91	1.001	0.97
OCDD	27.294	0.420		0.88	1.000	1.04
2,3.7,8-TCDP	+	0.169	ប	*	*	0.91
1,2,3,7,8-PeCDF	*	0.195	ប	*	*	0.89
2,3,4,7,8-PeCDF	*	0.190	σ	*	*	0.91
1,2,3,4,7,8-HxCDF	*	0.151	U	*	*	1.23
1,2,3,6,7,8-HxCDF	•	0.149	U	*	*	1.24
1,2,3,7,8,9-HxCDF	*	0.182	U	*		1.02
2,3,4,6,7,8~HxCDF	*	0.164	U	*	*	1.13
1,2,3,4,6,7,8-HpCDF	0.293	0.185	J	0.94	1.000	1.41
1,2,3,4,7,8,9-HpCDF	*	0.251	υ	+	*	1.04
OCDF	*	0.568	σ	*	म	1.30
Total Tetra-Dioxins	*	0.184	υ			•
Total Penta-Dioxins	÷	0.234	υ			
Total Hexa-Dioxins	+	0.216	ប			
Total Hepta-Dioxins	2.451	0.346				
Total Tetra-Furans	*	0,169	σ			
Total Penna-Furans	*	0.190	U			
Total Hexa-Furans	÷	0.149	U			
Total Hepta-Furans	0.293	0.185				
(1) Qualifiers: See f	lag definici	ons.				

(2) RRTs and ion ratios are specified in Tables 11 and 8, Method 8290. 8290F1

10:32am From-CCI Analytical Laboratories, Inc

Oct-14-04

PCDD/PCDF LABELE CLEANUP STANDA Lab Name: Columbia Analytical Services E	RD RECOVERIES METHOD BLANK
Ext. Vol(ul): 20.0 Inj. Vol(ul): 1.0	Sample Data Filename: B16998#5
Analysis Date: 13-OCT-04 Time: 13:18:58	Blank Data Filename: B16998#5
Dilution Factor: 1	Cal. Ver. Data Filename: B16998#2
Concentration Units (pg/L or ng/Kg dry we	ight): ng/Kg & Moisture/Lipid:

				ION		
	SPIKE	CONCENT.	RECOV.	ABUND.	RRT	MEAN
LABELED COMPOUNDS	CONC. (pg)	FOUND (pg)	¥ Q	RATIO(2)	(2)	RRF
13C-2,3,7,8-TCDD	1000	711.34	.71.13	0.80	1.008	1.06
13C-1,2,3,7,8-PeCDD	1000	954.65	95.47	1.50	1.171	0.74
13C-1,2,3,6,7,8-HxCDD	2500	1999.28	79.97	1.22	0.991	0.96
13C-1,2,3,4,6,7,8-RpCDD	2500	1997.16	79.89	1.05	1.079	0.80
13C-OCDD	5000	2834.13	56.68	0.88	1.174	0.65
13C-2,3,7,8-TCDF	1000	. 743.44	74.34	0.78	0.980	1.45
13C-1,2,3,7,8-PeCDF	1000	768.35	76.83	1.55	1.132	1.16
13C-1,2,3,4,7,8-HxCDF	2500	1818,94	72.76	0.48	0.969	1.28
13C-1,2,3,4,6,7,8-HpCDF	2500	1904.54	76.19	0.44	1.051	0.96
CLEANUP STANDARD						
37C1-2,3,7,8-TCDD	800	701.31	87.66		1.009	

(1) Contract-required limits for percent recovery are 40%-135% (section 8.4, Method 8290).

(2) Contract-required Reference Attributions for RRTs and ion abundance ratios are specified in Tables 11 and 8, respectively, Method 8290.

NOTE: There is no ion abundance ratio for 37C14-2378-TCDD (cleanup standard).

8290F2

04 10:33az Fr	om-CCI Analyi	tical Laborat	ories, Inc	4253562626	T-648	P.010/013	F-904
			E819031	lcs_lcsd			
		3DFA					
	PCDD/PCDI	F SPIKED S	AMPLE SUMMAR	Y		CLIE	T ID
Lab Name:			T OPDUTOOC			TCS	LCSD
			L SERVICES			1/1/2/	1
Lab Code:	CAS	•	LAB. ID:	EB19031			
Matrix:	9olid	(Solid, A	queous, Ash,	Waste)			
CONCENTRATION	ONITS : (pg	/L or ng/	Kg)	ng/Kg			
				∜ .	•		
	SPIKE	LCS	LCSD	•			
	ADDED	SAMPLE	SAMPLE	LCS¥	LCSD*	RPD	
ANALYTE	(PG)	CONC.	CONC.				LIMIT
	1					r •	1 mm
2378-TCDD	200	21.200	21.220	106.00	106.10	0.09	70-13
12378-PecDD	500	46.921	46.821	93.64	93.64	0.21	70-13
123478-HxCDD	500	55.028	55.317	110.06	110.63	0.52	70-13
123678-HxCDD	500	50.607	48.910	101.21	97.82	3.41	70-13
123789-HxCDD	500	42.745	44.081	85.49	88.16	3.08	70-13
1234678-HpCDD	500	50.454	51.252	100.91	102.50	1.57	70-13
OCDD	1000	96.021	100.434	96.02	100.43	4.49	70-13
2378-TCDF	200	22.100	21.775	110.50	108.88	1.48	70-13
12378-PaCDF	500	48.337	50.827	96.67	101.65	5.02	70-13
23478-PeCDF	500	47.891	50.424	95.78	100.85	5.15	70-13
123478-HxCDF	500	44.760	44.846	89.52	89.69	0.19	70-13
123678-HxCDP	500	52.866	51.200	. 105.73	102.40	3.20	70-130
123789-HxCDF	500	41.397	41.811	82.79	83.62	1.00	70-130
234678-RxCDP	500	52.138	48.653	104.28	97.31	6.92	70-13
1234678-HpCDF	500	49.484	48.293	98,97	96.59	2.44	70-13
			43.429		86.86	1	70-13
1234789-HpCDF	500	50.307	43.425	100.61	1 00.00	14.68	110-135

If an analyte is not detected in either analysis, enter 0 (zero) as the concentration.

Column to be used to flag values outside QC limits.

*Compound outside the QC advisory limits of 70-130

Page 1 of 1

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EB19031 lcs_csdLRLD

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Method 8290/Dioxins & Furans Method Reporting Limits

Congener	Congener	CAS RN	Water	Solid
-	Abbreviation		pg/L	ng/Kg
2,3,7,8-Tetrachlorodibenzo-p-dioxin	2378-TODD	1746-01-6	10	1.0
1,2,3,7,8-Pentachlorodihenzo-p-dioxins	12378-FeCDD	40321-76-4	25	2.5
1,2,3,6,7 8-Ficzachlorodibenzo p-dioxin	123678-HxCDD	57653-85-7	25	2.5
1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin	123478-H&CDD	39227-28-6	25	2.5
1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin	123789-HACDD	19408-74-3	25	2.5
1,2,3,4,6,7,8-Heprachlorodibenzo-p-dioxin	1234678-HpCDD	35822-39-4	25	25
1,2,3,4,6,7,8,9-Octachlorodibenzo-p-diaxin	OCDD	3268-87-9	50	5.0
2,3,7,8-Terrachlorodibenzofuran	2378-TODF	51207-31-9	10	1.0
1,2,3,7,8-Pentachlorodibenzoluran	12378-PeCDF	57117-41-6	25	2.5
2,3,4,7,8-Pentachlorodibenzofuran	23478-PeCDF	57117-31-4	25	2.5
1,7,3,5,7,8-Herschlorodibenzofuran	123678-HxCDF	57117 -44- 9	25	25
1,2,3,7,8,9-Hexachlorodibenzolurun	123789-HxCDF	72918-21-9	25	2.5
1,2,3,4,7,8-Hexachlorodibenzofuran	123478-HACDF	70648-26-9	25	25
2,3,4,6,7,8-Hexachlorodibenzofuran	234678-HixCDF	60851-34-5	25	2.5
1,2,3,4,6,7,8-Hsptachlorodibenzofuran	1234678-11pCDF	67562-39-4	25	25
1,2,3,4,7,8,9-Heptachlorodibenzofuran	1234789-HpCDF	55673-89-7	25	25
1,2,3,4,6,7,8,9-Octachlorodibenzofuran	OCDF	39001-02-0	50	5.0
Total Terra-Dioxins	- H	8	10	1.0
Total Penna-Dioxins	8	*	25	25
Total Hera-Dioxins	*	*	25	25
Total Hepta-Dioxins	*	*	25	2.5
Total Terra-Furans	4	*	10	1.0
Total Pema-Purans	4	*	25	2.5
Total Hezz-Furans	*	*	25	2.5
Total Hepta-Furans	4	4	.25	2.5

For solid samples: Soil samples are reported on a dry weight basis and tissue samples are reported on a weiweight basis.

Data Qualifier Flags

- **B** Used when the analyte is found in the associated blank, as well as in the sample
- C Indicates the value for the TCDF analyte was obtained from the DB-225 confirmation column
- E Indicates an estimated value used when the analyte concentration exceeds the upper end of the linear calibration range
- ✤ J Indicates an estimated value used when the analyte concentration is below the method reporting limit (MRL) and above the detection limit (DL)
- **K** EMPC; maximum possible concentration estimated
- **U** Indicates the compound was analyzed and not detected.
- X User defined; see case narrative for detailed explanation
- Y Indicates the recovery of the labeled standard is outside the established control limits
- * Indicates concentration is reported as 'Not Detected'

Pliane (425) 358-2600 (206) 292-9059 Santile (425) 358-2626 Fix (125) 358-2626 Fix (125) 358-2626 Fix (125) 358-2626 Fix					ANALYSIS REQUESTED						2[-	q	OTHER (Specify		1 [y]	<u> 0</u> y)					
HEPORTIU COLUBRANY: CCC MULLECT C. R ADDRESS: SUB 2 EVENCE	c Analy ancattl o Holly							WTBE by EPA-8021 [] EP4-82800[] valogomated Volatiles by EPA 5200	Abilitie Organic Compounds by EPA 8250	16 (EDC) by EPA-8260	Semivolstile Organic Compounds by EPA 8270	[] by EPA 8081/6082	Metals-MTCA-S LI RCR4-8 1 J PH Poil 17AL C	<u>}</u>	Metals (VOA; I Semi-Vol () Poet () Horbs ()			1 CK			INTAINERS
	ME				WATPH-HCID	WATPH-DX	BTEX by EPA-8021	MTBE by EPA-8021 []	atile Organic Cor	.2 Dichloroechone	nivoletile Organi 	3 LI Pesticides		Vietals Other (Specify	P-Motals UVOA	0800	\$2.40	х Í			NUMBER OF CONTAINERS
SAMPLE I.D.	I DATE	TIME	TYPE	LAB#	Ň	ě.		<u>E</u> ž	홍님	2	Sen 4	2	ž	1	ğ	MP	•		ļ		ĮĮ
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SPECIAL INSTRUCTIONS CCI Annlytical Laboraturio	ha pecente pod c	monese	hie ramuaet n	n the terros	and co	nation	18. KSI ID	rm cn 37	i leverse	5 IG8. C	V AS 80		، منتقد ال								

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Attachment 8 Ditch Soil - Shipping Manifests and Certificates of Disposal

	v		RDOUS	r. Generators i	US EPA ID No.		ifest ument No.	2	Page 1 Info	rmation	in the shaded are
		WASTE MANI		YAD0	538230	1.9.1.	2.40	<u>)</u> (12 18	Heanir	ad by Federal law
		erator's Name and M BAXTER & CO						A. 5	State Manifest	Docume	nt Number
	652	0 188TH ST N		x 305				B. 5	State Generato	r's ID	
	4. Gen	INGTON WA 982 erator's Phone (4	5 849-020	1	········						
'	D	sporter 1 Company N	lame		WAH QOO	A ID Numb	er ל		State Transpor		
7	. Tran	sporter 2 Company N	ame		8. USEP	A ID Numb			tate Transport		0-354-398
11	and the second se	ontacific			INEP OOT	792910					0-346-3488
18		gnated Facility Name			10. US EP	'A ID Numb	ər	G. 8	State Facility's	ID :	
	17	629 CEDAR SPR	INGS LANE	I, INC.				H. F	acility's Phone)	
╎┝	AR	LINGTON OR 97	812-9709	······································	L	0.8.9.		15 1	541)454-		
1	1. US	DOT Description (Incl	uding Proper Sh	ipping Name, Ha	zard Class and ID	Number)	12. Cont	1	13. Total	14. Unit	
a		NJ, HAZARDOUS	WASTE SO		Q NA2077 1		No.	Туре	Quantity	Wt/Vc	
		(PENTACHLC	ROPHENOL	F032	J, RAS077,1	,		1	0.001	0-	F032
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-	-										
C											
d		•									
J	a. C	onal Descriptions for S7807 DITCH S	POILS/ FO	Abova	R Q = 10 L BS			к D8 L1		lor Wast 750	P 17,88
	a. C 1	57807 DITCH E ろいみ # 8504	POILS/ FØ 	32 WASTE	R9 = 10 LB5				ndling Codes CO 35, H	for Wast	PT7.88
1	a. C 1 5. Spe	S7807 DITCH S	POILS/ FO	32 WASTE	RQ = 19 LBS				ndling Codes OSS	for Wast	as Listed Above
1	a. C 5. Spec a. C	S7807 DITCH E ろいし	POILS/ FO 	32 WASTE	RO = 10 LBS				ndling Codes O Y	for Wast	BE Listed Above
1	a. C 5. Spec a. C	S7807 DITCH E ろいし サ 850 cial Handling Instructi S7807 ERG # 1 Emergency Con	POILS/ FO 	32 WASTE	RG = 10 LBS	act)		D8 71	το 3ς, 4	for Wast	2 Listed Above
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23. Generator's Name JH BOALEV + CC				aniteet Occument	
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CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST, INC FEDERAL EPA ID#: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

JH BAXTER & CO WAD053823019 6520 188TH ST NE ARLINGTON WA 98223-0305

CERTIFICATE OF DISPOSAL

Chemical Waste Management of the Northwest, Inc. has received the following waste material:

· · · · · ·	
GENERATOR:	JH BAXTER & CO
MANIFEST #:	10405
CWM TRACKING ID:	375219-01
PROFILE #	CS7807
LINE ITEM:	11a
QUANTITY:	1 CM
RECEIVED DATE:	11/29/04
DISPOSAL PROCESS(ES):	LANDFILL
FINAL DISPOSAL LOCATION:	LANDFILL 14
DISPOSAL DATE:	11/29/04

I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the abovedescribed waste material was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

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CWMNW RECORDS DEPARTMENT Certificate #: 119413 Date: 12/06/04

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		Pacific RailBood		NEPOO						0-346-3498
	9. Designat	ed Facility Name and Site Addre		10. US E	PA ID Numbe	ər	G. S	tate Facility's ID		
		CAL WASTE NANAGENEN CEDAR SPRINGS LANE					H. F	acility's Phone	<u> </u>	
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ORIGINAL-RETURN TO GENERATOR AMS

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CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST, INC FEDERAL EPA ID#: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

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ALC: NOT A STOCK

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JH BAXTER & CO WAD053823019 6520 188TH ST NE **ARLINGTON WA 98223-0305**

CERTIFICATE OF DISPOSAL

Chemical Waste Management of the Northwest, Inc. has received the following waste material:

JH BAXTER & CO
10406
375200-01
CS7807
11a
1 CM
11/23/04
LANDFILL
LANDFILL 14
11/24/04

I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the abovedescribed waste material was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

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CWMNW RECORDS DEPARTMENT Certificate #: 119412 Date:

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12/06/04

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CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST, INC FEDERAL EPA ID#: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

JH BAXTER & CO WAD053823019 6520 188TH ST NE ARLINGTON WA 98223-0305

CERTIFICATE OF DISPOSAL

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Chemical Waste Management of the Northwest, Inc. has received the following waste material:

JH BAXTER & CO
10407
375199-01
CS7807
11a
1 CM
11/23/04
LANDFILL
LANDFILL 14
11/24/04

I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the abovedescribed waste material was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

BeckySumner

CWMNW RECORDS DEPARTMENTCertificate #:119368Date:12/02/04

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	UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No.	Manifest Document No.	1		in the shaded areas
3	. Generator's Name and Mailing Address JH BAXTER & CO	V.305	<u></u>		anifest Docume	ed by Federal law. nt Number
4	ARLINGTON WA 98223-0305 Generator's Phone (415 849-020) Transporter 1 Company Name			B. State G	enerator's ID	
	Transporter 2 Company Name	WAHOOC	D Number 012500 D Number	D. Transpo	ansporter's ID	2 34 378
9.	Designated Facility Name and Site Address	S 10, USEPAL	~ ~		ansporter's ID rter's Phone Co	0-34-35
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	acility Owner or Operator: Certification of re pinted/Typed Name Sue MAHren	ceipt of hazardous materials covere Signature	d by this manifest e	except as note		nth Day Year
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3.	Generator's Name and Mailing Address JH BAXTER & CO 6520 188TH ST NE PO Box ARLINGTON WA 98223-0305 Generator's Phone (415 849-020	:305	3.9.4.3.9	<u>-1: % f (</u>	-	A. 5	tate Manifest I itate Generator		nt Number.
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ORIGINAL-RETURN TO GENERATOR

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ORIGINAL-RETURN TO GENERATOR

RMS

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CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST, INC FEDERAL EPA ID#: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

JH BAXTER & CO WAD053823019 6520 188TH ST NE ARLINGTÓN WA 98223-0305

CERTIFICATE OF DISPOSAL

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Chemical Waste Management of the Northwest, Inc. has received the following waste material:

JH BAXTER & CO
10412
375430-01
CS7807
11a
1 CM
12/10/04
LANDFILL 14
12/10/04

I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the abovedescribed waste material was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

idumner

CWMNW RECORDS DEPARTMENT Certificate #: 119643 Date: 12/15/04

	HAZARDOUS MANIFEST	1. Generator's US	Doc	ument No.	1	is not		n the shad d by Feder
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JH BAXTER 4 6520 188TH	ST NE YOK	01305			B. S	tate Generator	s ID	
ARLINGTON 4. Generator's Phon	A 98223-0305							
5. Transporter 1 Co	mpany Name	6. /	USEPAID NUME	1247		tate Transporter's Pl		0458
7. Transporter 2 Co		8		190	- Internet	tate Transporte		
9. Designated Facili	ity Name and Site Addre	ss 1). US EPA ID Numb			ransporter's Ph State Facility's I	******	
CHEMICAL W	ASTE MANAGENEN AR SPRINGS LANE	T, INC.			HF	acility's Phone		
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CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST, INC FEDERAL EPA ID#: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

an organic service and the service of the

JH BAXTER & CO WAD053823019 6520 188TH ST NE ARLINGTON WA 98223-0305

CERTIFICATE OF DISPOSAL

Chemical Waste Management of the Northwest, Inc. has received the following waste material:

GENERATOR:	JH BAXTER & CO
MANIFEST #:	10413
CWM TRACKING ID:	375450-01
PROFILE #	CS7807
LINE ITEM:	11a
QUANTITY:	1 CM
RECEIVED DATE:	12/10/04
DISPOSAL PROCESS(ES):	LANDFILL
FINAL DISPOSAL LOCATION:	LANDFILL 14
DISPOSAL DATE:	12/10/04

I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the abovedescribed waste material was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

Beckysumner

CWMNW RECORDS DEPARTMENT Certificate #: 119645 Date: 12/15/04

		type. (Form designed for use on elite (IFORM HAZARDOUS	1. Generator's U	37545 SEPA ID No.	Manife	st nent No.	2. Pa	age 1	nforma	tion in	the shaded
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		erator's Name and Mailing Address		-			A. St	ate Manik	est loc	umemu	NUMDer
	6520	TNGTON WA 98223-0305	30x 305				B. St	ate Gene	rator's l	D	
4.	Gene	sporter 1 Company Name	21	6. US EP/	A ID Number		C. St	ate Trans	porter's	s ID	······································
5.	NA (Environmenta	l	LATOO.							5458-
7.	Trans	sporter 2 Company Name		8. USEP/	A ID Numbéi	r		ate Trans ansporter			18.11
	Daeid	gnated Facility Name and Sile Addr	855	10. US EP/	A ID Number	<u></u>		ate Facili			
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		LINGTON OR 97812-9709		<u>. R. D. Ø. A.</u>		.3.5.3 12. Conte		541)45 13.		14.	
	. <u>US (</u>	DOT Description (Including Proper S	hipping Name, Ha	zard Class and ID i	Number)	No.	Туре	Tota	al tity	Unit Wt/Vol	Waste
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5	Addi a. C	 tional Descriptions for Materials Lis S7807 DITCH SPOILS/	1932 WASTE	RQ = 10 LB	5		K Ha	ndling Co Yi	odes fo D ₁ 9 C	Wast O P	es Listed Ab 20.45
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	a. (t	S7807 DITCH SPOILS/ I	1032 VASTE	RC = 10 LB				ndling Cr	odes to D, 9c	rWast	es Listed Ab
	a. (t	S7807 DITCH SPOILS/ I BIN # 4005 ecial Handling Instructions and Add CS7807 2000 ERG # 1	1032 WASTE				K T	ndling Co	odes fo O, 9 C	Wasti	es Listed Ab
	a. (Energency Contect# (1)	titional Information 71	RO 10 LB 0 (WHI Cont	ract)	urately desc	ribed abc	we by		Wasti	es Listed Ab
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CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST, INC FEDERAL EPA ID#: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

JH BAXTER & CO WAD053823019 6520 188TH ST NE ARLINGTON WA 98223-0305

CERTIFICATE OF DISPOSAL

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Chemical Waste Management of the Northwest, Inc. has received the following waste material:

GENERATOR:	JH BAXTER & CO
MANIFEST #:	10414
CWM TRACKING ID:	375459-01
PROFILE #	CS7807
LINE ITEM:	11a
QUANTITY:	1 CM
RECEIVED DATE:	12/13/04
DISPOSAL PROCESS(ES):	LANDFILL
FINAL DISPOSAL LOCATION:	LANDFILL 14
DISPOSAL DATE:	12/13/04

I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the abovedescribed waste material was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

BeckySummer

Certificate #: Date:	119649 12/15/04
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CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST, INC FEDERAL EPA ID#: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

JH BAXTER & CO WAD053823019 6520 188TH ST NE ARLINGTON WA 98223-0305

CERTIFICATE OF DISPOSAL

المراجع وواوا والمصالحا المسالم الم

Chemical Waste Management of the Northwest, Inc. has received the following waste material:

GENERATOR:	JH BAXTER & CO
MANIFEST #:	10415
CWM TRACKING ID:	375511-01
PROFILE #;	CS7807
LINE ITEM:	11a
QUANTITY:	1 CM
RECEIVED DATE:	12/15/04
DISPOSAL PROCESS(ES):	LANDFILL
FINAL DISPOSAL LOCATION:	LANDFILL 14
DISPOSAL DATE:	12/15/04

I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the abovedescribed waste material was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

Nicol D. Wyscaver

CWMNW RECORDS DEPARTMENTCertificate #:119835Date:12/22/04

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3.		rator's Name and Mailing Address		JJ<u>G</u>	Gingen	A. 8	State Ma	nifest Doc	ument	Number
	632Ö		102305			B. 5	State Ge	nerator's l	D	
4,	ARLI Gener	NGTON WA 98223-0305 rators Phone (415 849-02	01					nsportere	- 10	
5.	Trans	ENVICONNER (6. USEPAID				ter's Phor		2458-32
7.	Trans	sporter 2 Company Name		8. US EPA ID	الماصية التجريبية فتتعد الكا			nsporters		
	D	nated Facility Name and Site Add	/000	10. US EPA IO	Number			ter's Phon cility's ID	18	
9.	CHE	MICAL WASTE MANAGENE	NT, INC.			1. A.				
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CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST, INC FEDERAL EPA ID#: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

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JH BAXTER & CO WAD053823019 6520 188TH ST NE ARLINGTON WA 98223-0305

CERTIFICATE OF DISPOSAL

Chemical Waste Management of the Northwest, Inc. has received the following waste material:

GENERATOR:	JH BAXTER & CO
MANIFEST #:	10416
CWM TRACKING ID:	375547-01
PROFILE #	CS7807
LINE ITEM:	11a
QUANTITY:	1 CM
RECEIVED DATE:	12/16/04
DISPOSAL PROCESS(ES):	LANDFILL
FINAL DISPOSAL LOCATION:	LANDFILL 14
DISPOSAL DATE:	12/16/04

I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the abovedescribed waste material was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

Summer

CWMNW RECORDS DEPARTMENTCertificate #:119762Date:12/20/04

Tì) •	U	NIFORM HAZARDOUS WASTE MANIFEST	1. Generator's L	5 2 8 2 2 0	Mani Docu	iment No.				n the shaded are d by Federal law
			erator's Name and Mailing Address			<u>11.34.</u>	- yein		tate Manifest D	ocumer	nt Number
		652	BAXTER & CO 0 188TH ST NE POBO	x305				B. S	tate Generator	s ID	
	4.	Gene	INGTON VA 98223-0305 erator's Phone (415 849-02	01		10.11			itate Transporte		
	^{5.}		Sporter 1 Company Name		$\begin{array}{c} 6. \\ USEPA \\ AT \\ 0. \end{array}$	D Numbe	1247		ransporter's Ph		20 48 -34
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			629 CEDAR SPRINGS LANN LINGTON OR 97812-9709	<u>.</u>	n. R. D. A. A.	9.4.5.5	2.3.53	1.1	541)454-2	643	
			DOT Description (Including Proper S	hipping Name, Ha	zard Class and ID N	lumber)	12. Cont No.	ainers Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
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CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST, INC FEDERAL EPA ID#: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

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JH BAXTER & CO WAD053823019 6520 188TH ST NE ARLINGTON WA 98223-0305

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CERTIFICATE OF DISPOSAL

Chemical Waste Management of the Northwest, inc. has received the following waste material:

GENERATOR:	JH BAXTER & CO
MANIFEST #:	10417
CWM TRACKING ID:	375587-01
PROFILE #:	CS7807
LINE ITEM:	11a
QUANTITY:	1 CM
RECEIVED DATE:	12/17/04
DISPOSAL PROCESS(ES):	LANDFILL
FINAL DISPOSAL LOCATION:	LANDFILL 14
DISPOSAL DATE:	12/17/04

I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the abovedescribed waste material was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

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CWMNW RECORDS DEPARTMENT Certificate #: 119862 Date: 12/22/04

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	3. Generator's Name and Mailing Addres				A. SI	ate Manifest Do	cumen	
	6520 188TH ST NE FO	Box 305			B. St	ate Generator's	ID	
	ARLINGTON WA 98223-0305 4. Generator's Phone (415 849-0	201						
	5. Transporter 1 Company Name		USEPAIDNui		-	ate Transporter ansporter's Pho	and the second se	A 40-7
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	9. Designated Facility Name and Site Ad		US EPA ID Number			late Facility's ID		
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	ARLINGTON OR 97812-970). Ø. A. 9.4. 5		the second s	541)454-26	543	
	11. US DOT Description (Including Prope	r Shipping Name, Hazard Clas	s and ID Number)	12. Conte		13. Total	14. Unit	Waste No.
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ORIGINAL-RETURN TO GENERAL

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CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST, INC. FEDERAL EPA ID#: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

JH BAXTER & CO WAD053823019 6520 188TH ST NE **ARLINGTON WA 98223-0305**

CERTIFICATE OF DISPOSAL

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Chemical Waste Management of the Northwest, Inc. has received the following waste material:

GENERATOR:	JH BAXTER & CO
MANIFEST #:	10418
LINE ITEM:	1 1a
PROFILE #:	CS7807
CWM TRACKING ID:	375601-01
RECEIVED DATE:	12/20/2004
DISPOSAL PROCESS(ES):	LANDFILL
DISPOSAL DATE:	12/20/2004
FINAL DISPOSAL LOCATION:	LANDFILL 14
QUANTITY:	1 CM

I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the abovedescribed waste material was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

AIPA

CWMNW RECORDS DEPARTMENT Certificate # 119879 Date 12/23/2004

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CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST, INC FEDERAL EPA ID#: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

JH BAXTER & CO WAD053823019 6520 188TH ST NE ARLINGTON WA 98223-0305

CERTIFICATE OF DISPOSAL

Chemical Waste Management of the Northwest, Inc. has received the following waste material:

GENERATOR:	JH BAXTER & CO
MANIFEST #:	10420
LINE ITEM:	11a
PROFILE #?	CS7807
CWM TRACKING ID:	375602-01
RECEIVED DATE:	12/20/2004
DISPOSAL PROCESS(ES):	LANDFILL
DISPOSAL DATE:	12/20/2004
FINAL DISPOSAL LOCATION:	LANDFILL 14
QUANTITY:	1 CM

I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the abovedescribed waste material was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

Nicole D. Wyseaver

CWMNW RECORDS DEPARTMENT Certificate # 119880 Date 12/23/2004



UNITED STATES

ENVIRONMENTAL PROTECTION AGENCY

REGION 10

SEATTLE, WASHINGTON

AFFIDAVIT OF MARY LARSON

STATE OF WASHINGTON:

SS:

COUNTY OF SNOHOMISH:

Mary Larson, being duly sworn, deposes and hereby says:

 My name is Mary Larson. I am currently the Environmental Specialist for the J.H. Baxter Wood Treating Facility located at 6520 188th Street, N.W., Arlington, Snohomish County, Washington.

2. I have been the Environmental Specialist since 2000. Previously, I was the Treated Inspector at the facility from 1987 until 2000.

3. In my role as Environmental Specialist, I assist in the training of employees regarding environmental regulations. Beginning in August 2002, Baxter initiated additional measures to minimize trackage from the drip pads to the center strip between the drip pads. These measures included the following: (a) placement of signs stating that access to the drip pads was limited to authorized personnel only along the drip pads and at each end of the roof covering of the center strip; (b) emphasizing wiping of shoes when walking from the drip pad onto the center strip and placing absorbent pads for that purpose on the center strip; (c) placing containers for the used pads on the center strip. The measures continue in place today.

ary Larson LAURA POUND NOTARY PUBLIC STATE OF WASHINGTON COMMISSION EXPIRES MARCH 19, 2007

Sworn to me this 28°

day of February 2005.

<u>Ph 949-457-8950 Fx 8956</u> Lake Forest - Novato - Seattle

LOADING AREA APRON MODIFICATIONS & STORM WATER CONTROL SYSTEM NOTES AND REQUIREMENTS J. H. BAXTER, CO. FACILITY 6520 188th NE Arlington, Washington

Revised: 10/8/02

System Summary: The proposed loading area apron modifications and stormwater control system will consist of a re-graded apron to direct rainwater, landing on the apron, southward towards the treatment building, some additional piping for storm water conveyance to the existing treatment system, an enlarged treated water storage pad and berm, and relocated water storage tanks as shown on the attached drawings. Rainwater which falls on the aprons located on either side of the drip-pad will flow by gravity to the treatment building, where it will be collected in, and drain through, newly installed, 4-inch PVC lines to a new 13'8" x 12' x 4' tall rectangular tank (T21) located in the northeast corner of the treatment building. For treatment, the water will be passed through the existing Calgon activated carbon adsorption system and accumulated in tanks T16, T18, T19 and T20 for eventual reuse or evaporation.

T21 will contain one submersible pump capable of delivering 50 gpm of water at 100 ft of head. The pump (P1) will handle all the storm water from the apron and will push the water through the sand filter, Calgon unit and into the accumulation tanks. In the event stormwater accumulation exceeds the capacity of the existing treatment plant, excess water from tank T21 will overflow onto the floor of the building where it will run into the floor sump. From there it will be pumped through the Calgon unit at a later time. The equipment layout is shown in the attached drawings: G1 – Proposed Apron Water Collection and G2 – Loading Area Apron Grading.

Re-grading: 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 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 stormwater from entering the apron from adjacent areas.

Tanks: Existing tanks T18, T19 and T20 will be used to contain treated water and excess stormwater. The tanks will be moved from the west side of the treatment building to the east side. Tank T20 will be placed on an existing pad, which drains into the treatment building. Tanks T18 and T19 will be placed on a newly constructed pad and containment berm, which will also drain into the treatment building. Tanks T 16, T18, T19, and T20 will be used to contain treated storm and process water.

1178-EQPT-APRON.doc

1178-EQPT-APRON.doc Apron Stormwater Control System Notes

Piping: New 4-inch PVC piping will be added to allow the water to gravity flow from the south end of both the east and west apron to the wastewater sump. The PVC piping will be attached to the northern wall of the treatment building, and will be supported at least every 6 feet to prevent sagging. A section of steel pipe will be used where the water flows under the hot retorts. The PVC pipe will be "double contained" inside a 6-inch pipe where it passes underground from the south end of the west apron to the treatment building. New 2-inch PVC piping will be added to allow storm water to flow from P1 to the Calgon treatment system Tank T21 will have a high level switch to activate P1, the pump delivering water to the Calgon treatment system, and a low level switch to turn P1 off. All rainwater piping and double containment piping will be hydrostatically tested to twice its operating pressure prior to use.

Timing: Construction is anticipated to take four weeks.

Pix-Apron Water Collection.doc Page 1 of 1 Pictures taken 6/26/02

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Note Hole for Electrical to Pilot Unit



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Construction and the second


Attachment 11 Apron Modifications "As Builts" (February 18, 2003)



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