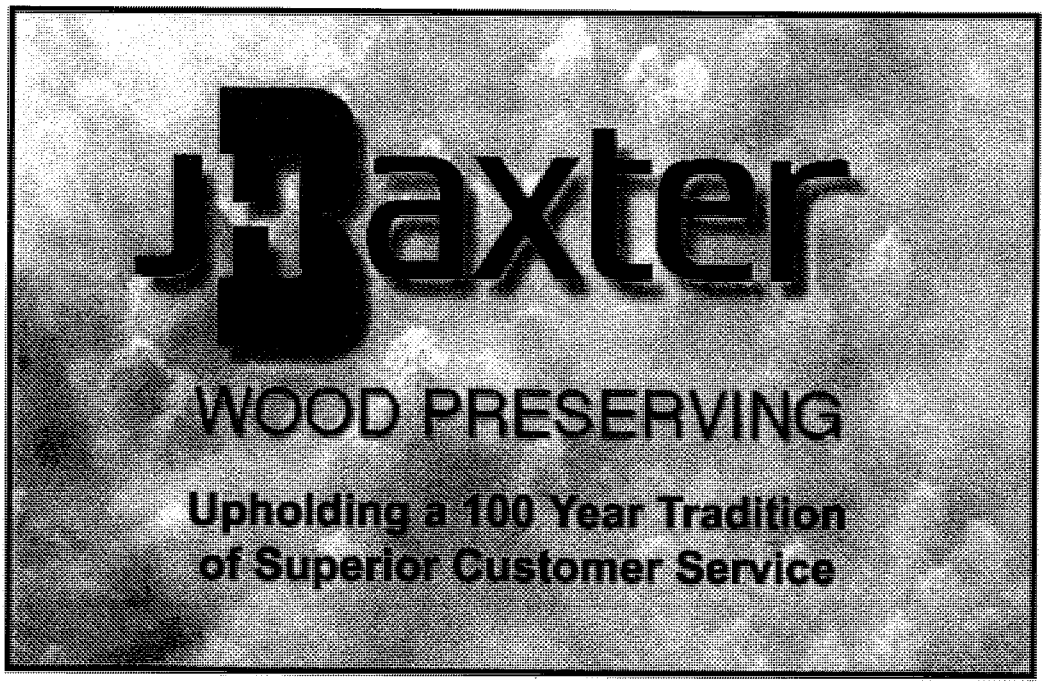
Closure Report for Certain Discrete Units

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:

J. H. Baxter & Company
P.O. Box 10797
Eugene, Oregon 97440

April 30, 2007

Baxter

PREMIER
ENVIRONMENTAL SERVICES, INC

Table of Contents

Attachments

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. 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 µg/L to 4.0 µg/L, indicating the low potential for

---

below the location of D1-1 (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.

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:

1) 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.

RueAnn Thomas

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

4-30-07
Date

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

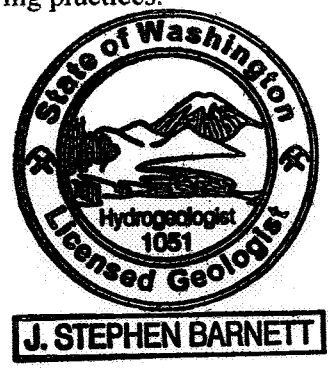
2) regarding these activities, and the Closure Report reflects the activities as described in these documents. Based on the available documentation and interviews with the people responsible for completing catch basin removal activities, all work appears to have been performed in a manner consistent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

EXPIRES 9/16/2008

Joe A. Ricker

Independent Qualified Registered
Professional Engineer

Washington State PE No. 40182
April 30, 2007



J. STEPHEN BARNETT

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

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

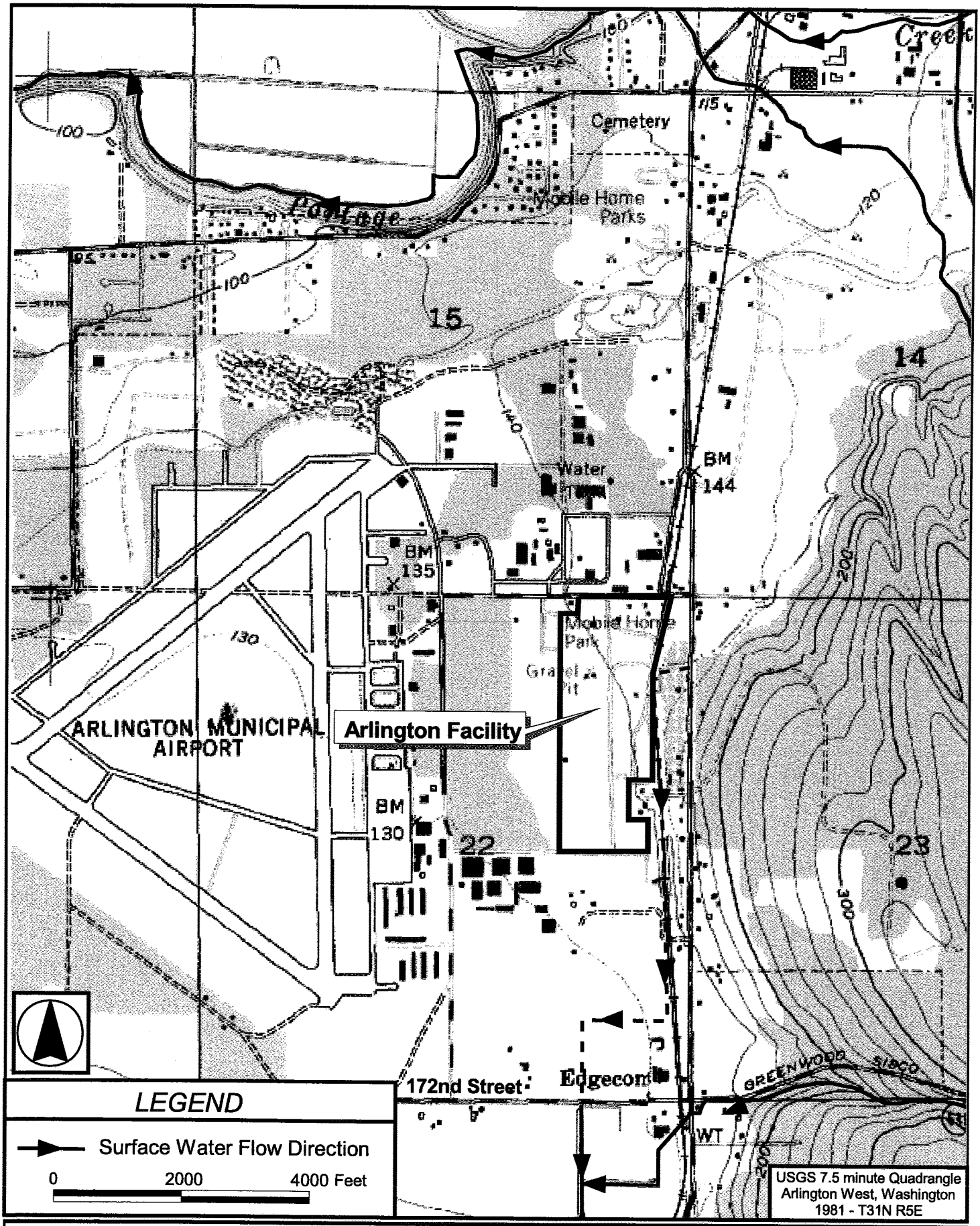
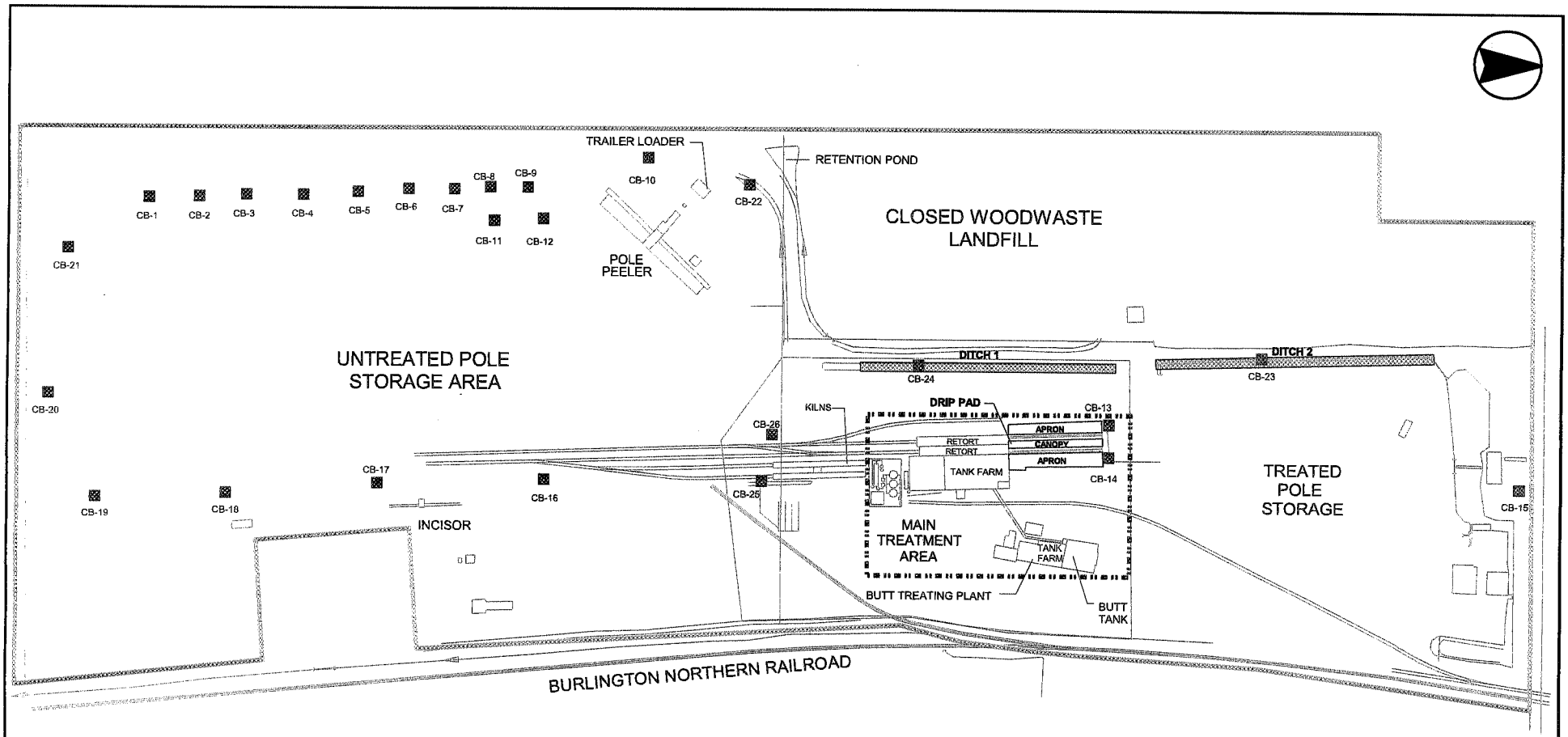


Figure 1-1. Site Vicinty Map - J.H. Baxter & Co. - Arlington, WA

PREMIER J.H. Baxter



LEGEND

- Catch Basin
- Approximate Site Boundary

0 200 400 Feet

Figure 1-2. Site Layout - J.H. Baxter & Co. - Arlington, WA

PREMIER J.H. Baxter

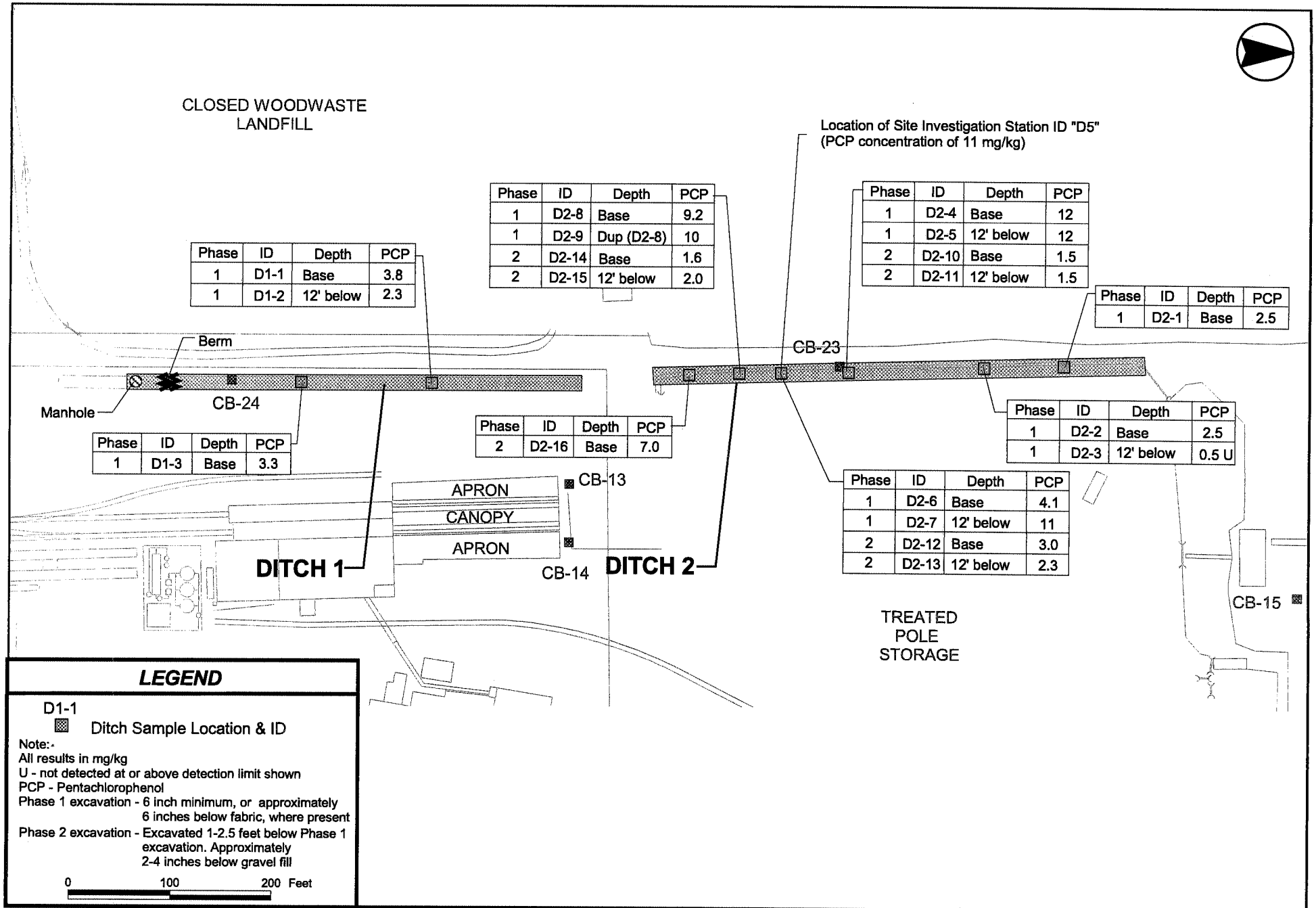


Figure 3-1. Ditch 1 & 2 Confirmation Sampling Results - J.H. Baxter & Co. - Arlington, WA

PREMIER J.H. Baxter

TABLE

Table 3-1. Summary of Ditch Soil Confirmation Results

Sample ID	Date	Ditch	Distance from North End of Ditch[1]	Phase[2]	Depth	Method	PCP (mg/kg)	DRO (mg/kg)	RRO (mg/kg)
D1-1	10/4/2004	Ditch 1	150 feet	1	Base of Phase 1 excavation	EPA 8270	3.8	--	--
D1-2	10/4/2004	Ditch 1	150 feet	1	Base of Phase 1 excavation	EPA 8270	2.3	--	--
D1-3	10/4/2004	Ditch 1	280 feet	1	12 inches below base of Phase 1 excavation	EPA 8270	3.3	--	--
D2-1	9/30/2004	Ditch 2	80 feet	1	Base of Phase 1 excavation	EPA 8270	2.5	--	--
D2-2	9/30/2004	Ditch 2	160 feet	1	Base of Phase 1 excavation	EPA 8270	2.5	--	--
D2-3	9/30/2004	Ditch 2	160 feet	1	12 inches below base of Phase 1 excavation	EPA 8270	0.5 U	--	--
D2-4	10/1/2004	Ditch 2	300 feet	1	Base of Phase 1 excavation	EPA 8270	12	--	--
D2-5	10/1/2004	Ditch 2	300 feet	1	12 inches below base of Phase 1 excavation	EPA 8270	12	--	--
D2-6	10/1/2004	Ditch 2	360 feet	1	Base of Phase 1 excavation	EPA 8270	4.1	--	--
D2-7	10/1/2004	Ditch 2	360 feet	1	12 inches below base of Phase 1 excavation	EPA 8270	11	--	--
D2-8	10/1/2004	Ditch 2	400 feet	1	Base of Phase 1 excavation	EPA 8270	9.2	--	--
D2-9 (Duplicate)	10/1/2004	Ditch 2	400 feet	1	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:

1. 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.

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

Robert Crane

Sworn to me this 28th day of February, 2005.

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

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.

TYSON D. CARLSON
Sr. Staff Hydrogeologist

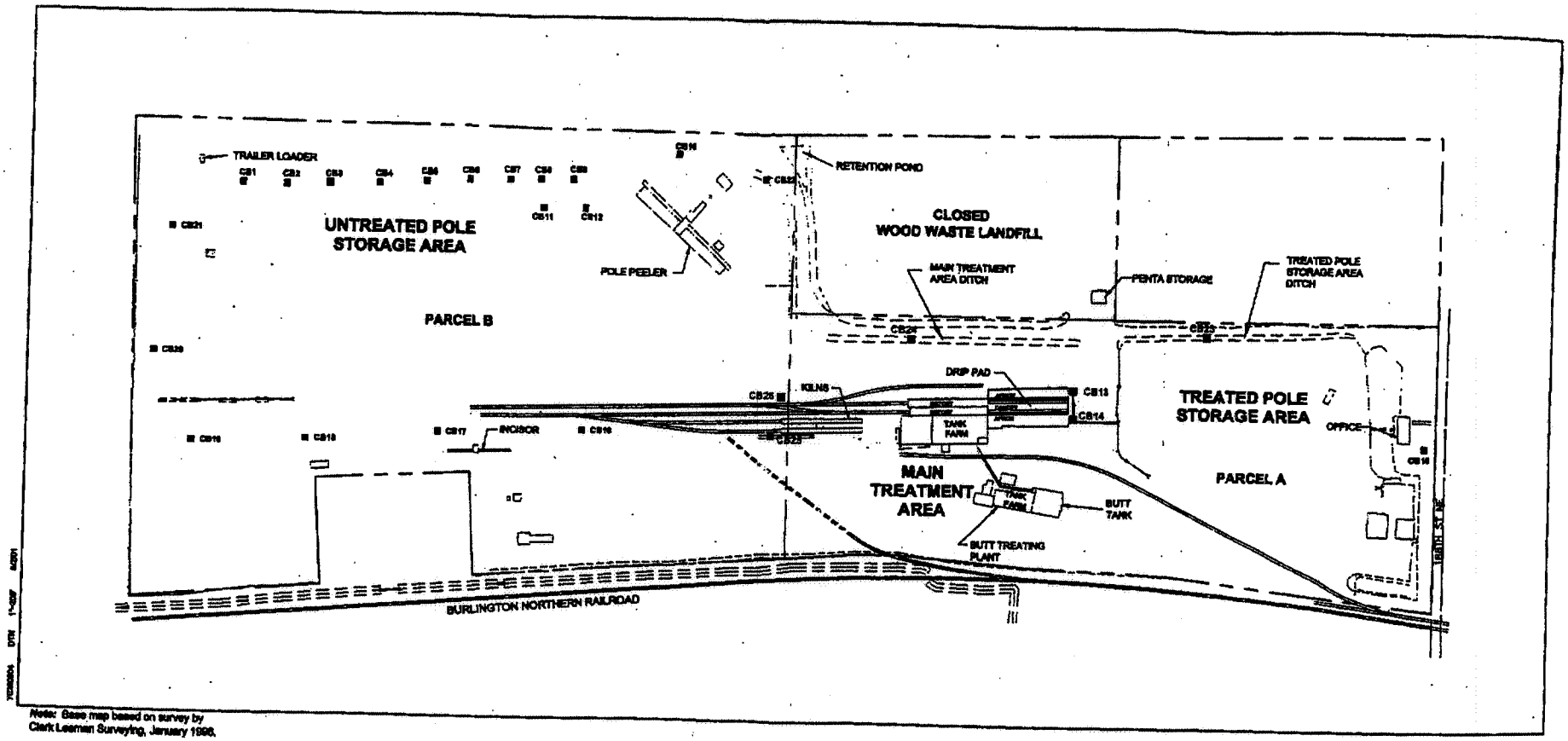
LORI J. HERMAN
Principal Hydrogeologist

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



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

Drainage Ditch and Estimated Flow Direction

Culvert

Property Boundary

Approximate Parcel Boundary

Railroad

French Drain Planned for Closure

Closed French Drain

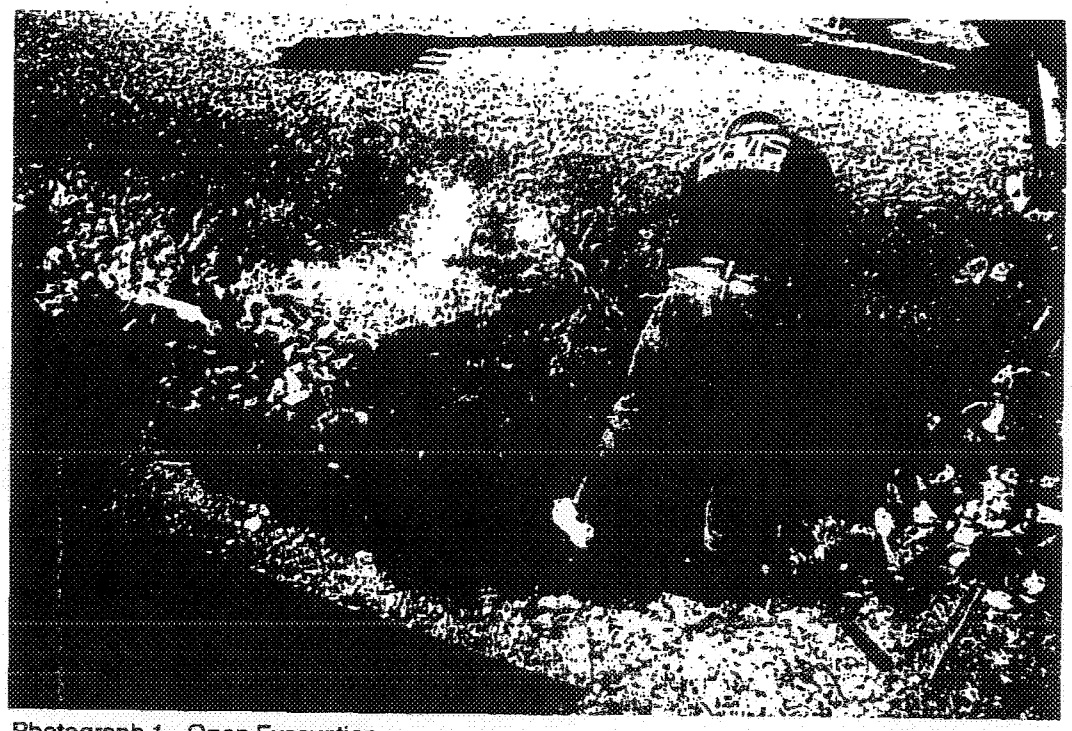
0 200 400

Scale in Feet

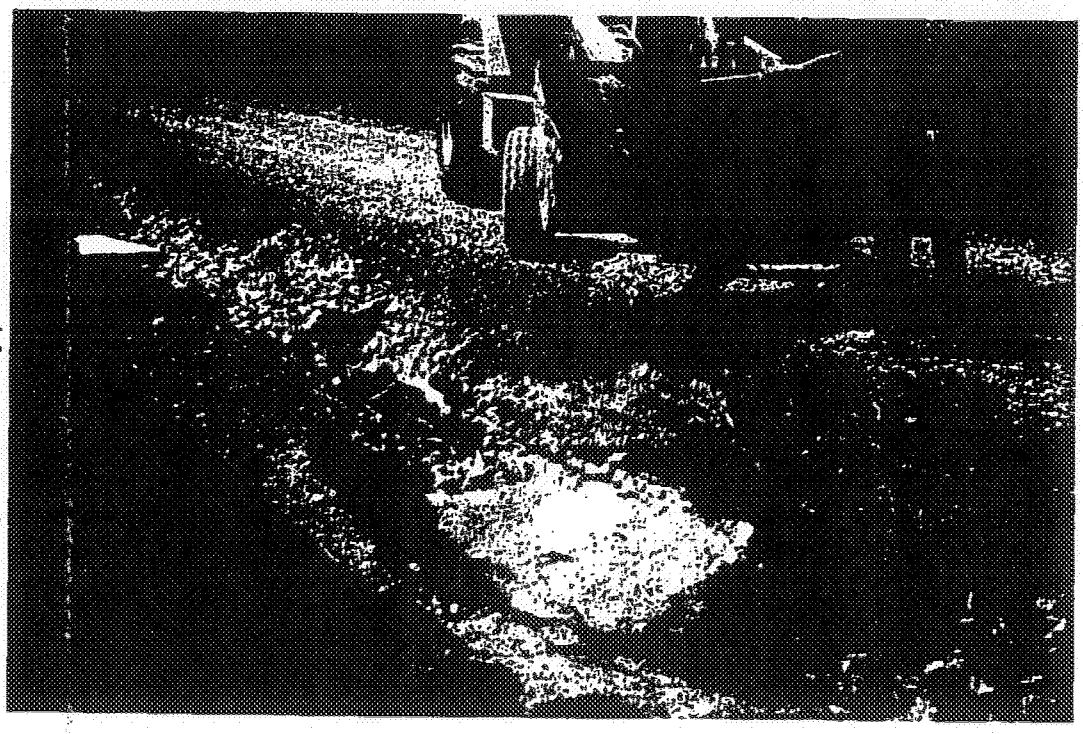
HARTCROWSER

7026-03 8/01

Figure 1



Photograph 1 - Open Excavation.



Photograph 2 - Bentonite placed at bottom of excavation.

SZS 08/03/01 Drafting/Dwg/Jobs/7026/7026703/Fig2 photos.cdr

HARTCROWSER

7026-03 08/01

Figure 2 1/2

Photograph 3 - Final grade after closure.

SZS 08/03/01 Drafting/Dwg/Jobs/7026/7026603/Fig2 photos.cdr

HARTCROWSER

7026-03 08/01

Figure 2 2/2

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.

- 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.

- 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.

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.

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,

RueAnn Thomas
Environmental Programs Director

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

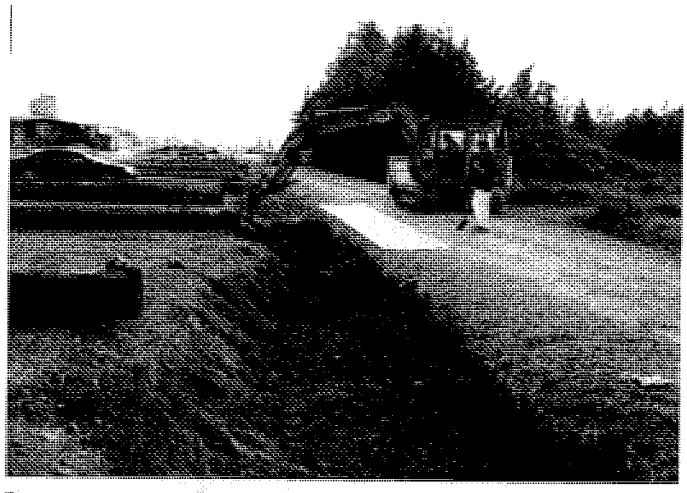


Photo 1:

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.

PREMIER
ENVIRONMENTAL SERVICES, INC

333 SW Fifth Avenue, Suite 625, Portland, OR 97204

PHONE (503) 241-8172 - FAX (503) 241-8210

DNM		

SITE PHOTOGRAPHS

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

DATE Jan. 17, 2005	**PROJECT NO.** 205003	**Att. B-1**

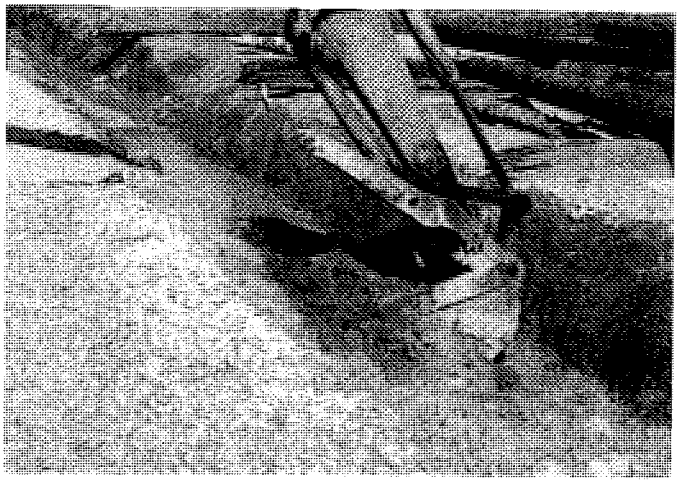


Photo 4:

Northeasterly view of Ditch 2 during phase 2 excavation.

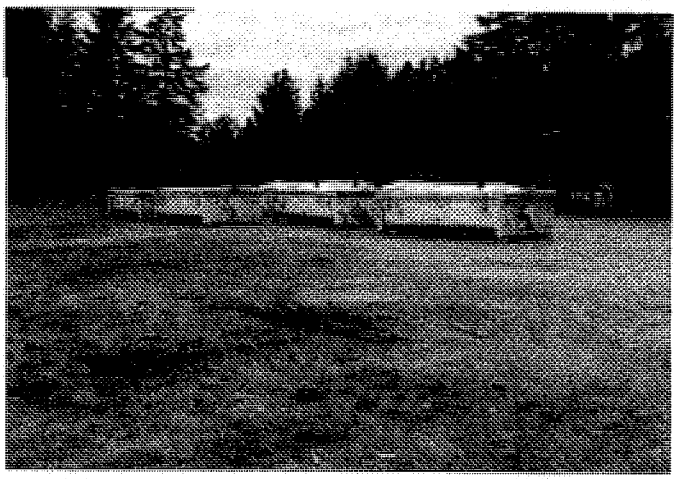


Photo 5:

View of filled, covered, and labled roll-off bins.

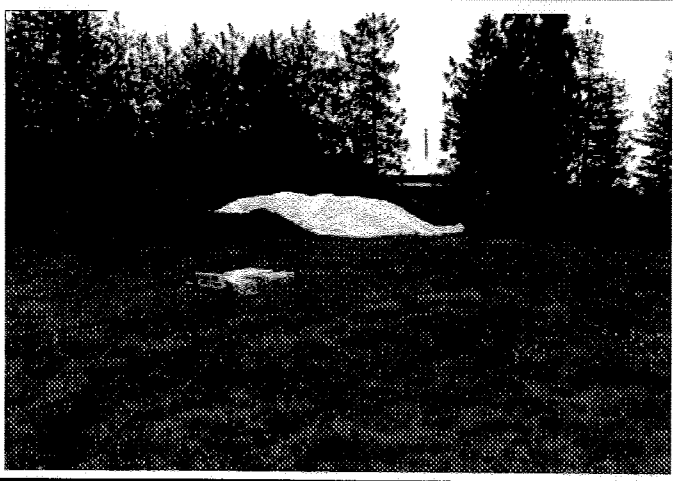


Photo 6:

View of lined and covered Ditch 1 non-hazardous soil pile.

PREMIER
ENVIRONMENTAL SERVICES, INC
333 SW Fifth Avenue, Suite 625, Portland, OR 97204
PHONE (503) 241-8172 - FAX (503) 241-8210

DNM		

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

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/1/04
CCIL JOB #: 409152
CCIL SAMPLE #: 1
DATE RECEIVED: 9/30/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: STEVE BARNETT

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

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS 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: C Rh

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/1/04
CCIL JOB #: 409152
CCIL SAMPLE #: 2
DATE RECEIVED: 9/30/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: STEVE BARNETT

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

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS BY
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

APPROVED BY: C Rd

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

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

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

APPROVED BY: C RA

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/4/04
CCIL JOB #: 410006
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 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: C Rf

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/4/04
CCIL JOB #: 410006
CCIL SAMPLE #: 3
DATE RECEIVED: 10/1/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: STEVE BARNETT

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

* "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: C Rd

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/4/04
CCIL JOB #: 410006
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

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: C Rd

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

CLIENT: PREMIER ENVIRONMENTAL
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

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: C Rd

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/4/04
CCIL JOB #: 410006
CCIL SAMPLE #: 6
DATE RECEIVED: 10/1/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: STEVE BARNETT

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: C Rit

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/4/04
CCIL JOB #: 410006
CCIL SAMPLE #: 7
DATE RECEIVED: 10/1/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: STEVE BARNETT

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

DATA RESULTS

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

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/1/04
CCIL JOB #: 409152
CCIL SAMPLE #: 3
DATE RECEIVED: 9/30/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: STEVE BARNETT

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 LIMIT IS GIVEN IN PARENTHESES.

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

APPROVED BY: C Ruff

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

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

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

APPROVED BY: C RA

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/4/04
CCIL JOB #: 410006
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 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: C RA

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/4/04
CCIL JOB #: 410006
CCIL SAMPLE #: 3
DATE RECEIVED: 10/1/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: STEVE BARNETT

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

* "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: C Pat

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/4/04
CCIL JOB #: 410006
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

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: C Pat

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

CLIENT: PREMIER ENVIRONMENTAL
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

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: C Pat

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/4/04
CCIL JOB #: 410006
CCIL SAMPLE #: 6
DATE RECEIVED: 10/1/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: STEVE BARNETT

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: C Rd

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/4/04
CCIL JOB #: 410006
CCIL SAMPLE #: 7
DATE RECEIVED: 10/1/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: STEVE BARNETT

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

DATA RESULTS

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

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/5/04
CCIL JOB #: 410014
CCIL SAMPLE #: 1
DATE RECEIVED: 10/4/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: STEVE BARNETT

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: C Rt

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/5/04
CCIL JOB #: 410014
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 DATE	ANALYSIS 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 LIMIT IS GIVEN IN PARENTHESES.

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

APPROVED BY: C Rd

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/5/04
CCIL JOB #: 410014
CCIL SAMPLE #: 3
DATE RECEIVED: 10/4/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: STEVE BARNETT

CLIENT PROJECT ID: JH BAXTER ARLINGTON
CLIENT 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

APPROVED BY: C Rd

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/5/04
CCIL JOB #: 410014
CCIL SAMPLE #: 4
DATE RECEIVED: 10/4/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: STEVE BARNETT

CLIENT PROJECT ID: JH BAXTER ARLINGTON
CLIENT 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: C Rd

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/5/04
CCIL JOB #: 410014
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

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS 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

APPROVED BY: C Ph

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/5/04
CCIL JOB #: 410014
CCIL SAMPLE #: 6
DATE RECEIVED: 10/4/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: STEVE BARNETT

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

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS 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

APPROVED BY: C Ph

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/5/04
CCIL JOB #: 410014
CCIL SAMPLE #: 7
DATE RECEIVED: 10/4/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: STEVE BARNETT

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

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS BY
PENTACHLOROPHENOL	EPA-8270	7000	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: C Rd

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/5/04
CCIL JOB #: 410014
CCIL SAMPLE #: 8
DATE RECEIVED: 10/4/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: STEVE BARNETT

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

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS BY
PENTACHLOROPHENOL	EPA-8270	3800	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: C RA

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/5/04
CCIL JOB #: 410014
CCIL SAMPLE #: 9
DATE RECEIVED: 10/4/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: STEVE BARNETT

CLIENT PROJECT ID: JH BAXTER ARLINGTON
CLIENT 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 PARENTHESES.

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

APPROVED BY: C Rl

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/5/04
CCIL JOB #: 410014
CCIL SAMPLE #: 10
DATE RECEIVED: 10/4/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: STEVE BARNETT

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

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS BY
PENTACHLOROPHENOL	EPA-8270	3300	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: C Ph

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

Attachment 6
Laboratory QA/QC Results

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/4/04
CCIL JOB #: 410006

DATE RECEIVED: 10/1/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: 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 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

APPROVED BY: C Ruff

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/1/04
CCIL JOB #: 409152

DATE RECEIVED: 9/30/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: STEVE BARNETT

CLIENT PROJECT ID: J.H. BAXTER ARLINGTON

QUALITY CONTROL RESULTS

SURROGATE RECOVERY

CCIL SAMPLE ID	ANALYTE	SUR ID	% RECV
409152-01	EPA-8270	2,4,6-TRIBROMOPHENOL	106
409152-02	EPA-8270	2,4,6-TRIBROMOPHENOL	99
409152-03	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

APPROVED BY: C RA

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/4/04
CCIL JOB #: 410006

DATE RECEIVED: 10/1/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: 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 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

APPROVED BY: C Rt

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/5/04
CCIL JOB #: 410014

DATE RECEIVED: 10/4/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: 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: C RA

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

Attachment 7
Waste Profiling Laboratory Reports

October 14, 2004

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

Dear Mr. Barnett

On October 6th, 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.

C Raft

Chuck B. Rancatti
Laboratory Director

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/14/04
CCIL JOB #: 410020
CCIL SAMPLE #: 17
DATE RECEIVED: 10/6/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: STEVE BARNETT

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

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS 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
BENZO[A]ANTHRACENE	EPA-8270	ND(<120)	UG/KG	10/12/04	CCN
CHRYSENE	EPA-8270	ND(<120)	UG/KG	10/12/04	CCN
BENZO[B]FLUORANTHENE	EPA-8270	ND(<120)	UG/KG	10/12/04	CCN
BENZO[K]FLUORANTHENE	EPA-8270	ND(<120)	UG/KG	10/12/04	CCN
BENZO[A]PYRENE	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

APPROVED BY: C Rd

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/14/04
CCIL JOB #: 410020

DATE RECEIVED: 10/6/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: STEVE BARNETT

CLIENT PROJECT ID: JH BAXTER

QUALITY CONTROL RESULTS

SURROGATE RECOVERY

CCIL SAMPLE ID	ANALYTE	SUR ID	% RECV
410020-17	EPA-8270	2-FLUOROPHENOL	103
410020-17	EPA-8270	PHENOL-d5	97
410020-17	EPA-8270	NITROBENZENE-d5	96
410020-17	EPA-8270	2-FLUOROBIPHENYL	104
410020-17	EPA-8270	2,4,6-TRIBROMOPHENOL	119
410020-17	EPA-8270	TERPHENYL-d14	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/ SPIKE DUPLICATE RESULTS

METHOD	SPIKE ID	ASSOCIATED SAMPLES	% SPIKE RECOVERY	% SPIKE DUP 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
EPA-8270	PYRENE	410020-17	106	108	3
EPA-6010 (AS)	ARSENIC	410020-17	100	103	3
EPA-6010 (CR)	CHROME	410020-17	104	102	2

APPROVED BY: C Ref

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC.

CERTIFICATE OF ANALYSIS

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

DATE: 10/14/04
CCIL JOB #: 410020
CCIL SAMPLE #: BLK
DATE RECEIVED: 10/6/04
WDOE ACCREDITATION #: C142

CLIENT CONTACT: STEVE BARNETT

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

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS 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: C Rl

8620 Holly Drive • Everett, WA 98208 • 425 356-2600 • FAX 425 356-2626 • Seattle 206 292-9059

Form 3

CLIENT ID.

PCDD/PCDF TOXICITY EQUIVALENCE SUMMARY
Use for Sample and Blank Results 410020-17 COMP

Lab Name: Columbia Analytical Services Episode No.:

Lab Code: CAS Method: 8290 Lab Sample ID: E0400997-001.01

Client Name: CCI ENVIRONMENTAL Sample Wt/Vol: 14.726 g or mL: g

Matrix (aqueous/solid/leachate): Solid Initial Calibration Date: 11/01/03

Sample Receipt Date: 10/07/04 Instrument ID: 70S

Ext. Date: 10/07/04 GC Column ID: DB-5

Ext. Vol(ul):20.0 Inj. Vol(ul):1.0 Sample Data Filename: B16998#12

Analysis Date: 13-OCT-04 Time: 19:14:11 Blank Data Filename: B16998#5

Dilution Factor: 1 Cal. Ver. Data Filename: B16998#2

Concentration Units (pg/L or ng/Kg dry weight): ng/Kg % Moisture: 15.90

	CONCENTRATION	TEF(1)	TEF-ADJUSTEL CONCENTRATION
2,3,7,8-TCDD	6.74	X 1.0	6.74e+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	2.50e+01
1,2,3,6,7,8-HxCDD	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-HxCDF	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	1.91e+00
OCDF	15446.42	X 0.001	1.54e+01
		Total:	5.903e+02

(1) 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.)

Form 1

CLIENT ID.

PCDD/PCDF ANALYSIS DATA SHEET
Use for Sample and Blank Results

METHOD BLANK

Lab Name: Columbia Analytical Services Episode No.:

Lab Code: CAS SDG No.: Method: 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: 70S

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 weight): ng/Kg % Moisture/Lipid:

ANALYTE	CONCENTRATION FOUND	DETECTION LIMIT	Qual. (1)	ION ABUND. RATIO (2)	RRT (2)	MEAN RRF
2,3,7,8-TCDD	*	0.184	U	*	*	0.95
1,2,3,7,8-PeCDD	*	0.234	U	*	*	0.97
1,2,3,4,7,8-HxCDD	*	0.256	U	*	*	0.95
1,2,3,6,7,8-HxCDD	*	0.216	U	*	*	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-TCDF	*	0.169	U	*	*	0.91
1,2,3,7,8-PeCDF	*	0.195	U	*	*	0.89
2,3,4,7,8-PeCDF	*	0.190	U	*	*	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	U	*	*	1.04
OCDF	*	0.568	U	*	*	1.30
Total Tetra-Dioxins	*	0.184	U			
Total Penta-Dioxins	*	0.234	U			
Total Hexa-Dioxins	*	0.216	U			
Total Hepta-Dioxins	2.451	0.346				
Total Tetra-Furans	*	0.169	U			
Total Penta-Furans	*	0.190	U			
Total Hexa-Furans	*	0.149	U			
Total Hepta-Furans	0.293	0.185				

(1) Qualifiers: See flag definitions.

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

FORM 2

PCDD/PCDF LABELED COMPOUND AND CLEANUP STANDARD RECOVERIES

CLIENT ID.
METHOD BLANK

Lab Name: Columbia Analytical Services Episode No.:

Lab Code: CAS SDG No.: Method: 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: 70S

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 weight): ng/Kg % Moisture/Lipid:

LABELED COMPOUNDS	SPIKE CONC.(pg)	CONCENT. FOUND(pg)	RECOV. %	Q	ION ABUND. RATIO(2)	RRT (2)	MEAN 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-HpCDD	2500	1997.16	79.89		1.06	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	1904.64	76.19		0.44	1.051	0.96
CLEANUP STANDARD							
37Cl-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 37Cl4-2378-TCDD (cleanup standard).

EB19031 lcs_lcsd

3DFA

PCDD/PCDF SPIKED SAMPLE SUMMARY

CLIENT ID: LCS/LCSD

Lab Name: COLUMBIA ANALYTICAL SERVICES

Lab Code: CAS LAB. ID: EB19031

Matrix: Solid (Solid, Aqueous, Ash, Waste)

CONCENTRATION UNITS:(pg/L or ng/Kg) ng/Kg

ANALYTE	SPIKE ADDED (PG)	LCS SAMPLE CONC.	LCSD SAMPLE CONC.		LCS% RECOV.	#	LCSD% RECOV.	#	RPD %	QC LIMITS
2378-TCDD	200	21.200	21.220		106.00		106.10		0.09	70-130
12378-PeCDD	500	46.921	46.821		93.84		93.64		0.21	70-130
123478-HxCDD	500	55.028	55.317		110.06		110.63		0.52	70-130
123678-HxCDD	500	50.607	48.910		101.21		97.82		3.41	70-130
123789-HxCDD	500	42.745	44.081		85.49		88.16		3.08	70-130
1234678-HpCDD	500	50.454	51.252		100.91		102.50		1.57	70-130
OCDD	1000	96.021	100.434		96.02		100.43		4.49	70-130
2378-TCDF	200	22.100	21.775		110.50		108.88		1.48	70-130
12378-PeCDF	500	48.337	50.827		96.67		101.65		5.02	70-130
23478-PeCDF	500	47.891	50.424		95.78		100.85		5.15	70-130
123478-HxCDF	500	44.760	44.846		89.52		89.69		0.19	70-130
123678-HxCDF	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-HxCDF	500	52.138	48.653		104.28		97.31		6.92	70-130
1234678-HpCDF	500	49.484	48.293		98.97		96.59		2.44	70-130
1234789-HpCDF	500	50.307	43.429		100.61		86.86		14.68	70-130
OCDF	1000	93.189	99.594		93.19		99.59		6.64	70-130

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

Method 8290/Dioxins & Furans
Method Reporting Limits

Congener	Congener Abbreviation	CAS RN	Water pg/L	Solid ng/Kg
2,3,7,8-Tetrachlorodibenzo-p-dioxin	2378-TCDD	1746-01-6	10	1.0
1,2,3,7,8-Pentachlorodibenzo-p-dioxins	12378-PeCDD	40321-76-4	25	2.5
1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin	123678-HxCDD	57653-85-7	25	2.5
1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin	123478-HxCDD	39227-28-6	25	2.5
1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin	123789-HxCDD	19408-74-3	25	2.5
1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin	1234678-HpCDD	35822-39-4	25	2.5
1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin	OCDD	3268-87-9	50	5.0
2,3,7,8-Tetrachlorodibenzofuran	2378-TCDF	51207-31-9	10	1.0
1,2,3,7,8-Pentachlorodibenzofuran	12378-PeCDF	57117-41-6	25	2.5
2,3,4,7,8-Pentachlorodibenzofuran	23478-PeCDF	57117-31-4	25	2.5
1,2,3,6,7,8-Hexachlorodibenzofuran	123678-HxCDF	57117-44-9	25	2.5
1,2,3,7,8,9-Hexachlorodibenzofuran	123789-HxCDF	72918-21-9	25	2.5
1,2,3,4,7,8-Hexachlorodibenzofuran	123478-HxCDF	70648-26-9	25	2.5
2,3,4,6,7,8-Hexachlorodibenzofuran	234678-HxCDF	60851-34-5	25	2.5
1,2,3,4,6,7,8-Heptachlorodibenzofuran	1234678-HpCDF	67562-39-4	25	2.5
1,2,3,4,7,8,9-Heptachlorodibenzofuran	1234789-HpCDF	55673-89-7	25	2.5
1,2,3,4,6,7,8,9-Octachlorodibenzofuran	OCDF	39001-02-0	50	5.0
Total Tetra-Dioxins	*	*	10	1.0
Total Penta-Dioxins	*	*	25	2.5
Total Hexa-Dioxins	*	*	25	2.5
Total Hepta-Dioxins	*	*	25	2.5
Total Tetra-Furans	*	*	10	1.0
Total Penta-Furans	*	*	25	2.5
Total Hexa-Furans	*	*	25	2.5
Total Hepta-Furans	*	*	25	2.5

For solid samples: Soil samples are reported on a dry-weight basis and tissue samples are reported on a wet-weight 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; maxiumum 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'

8620 Holly Drive
Everett, WA 98208
Phone (425) 356-2600
(206) 292-9059 Seattle
(425) 356-2626 Fax
http://www.ccilabs.com

Chain of Custody/ Laboratory Analysis Request

Date 10/6/04 Page 1 Of 1

PROJECT ID. 410020
REPORT TO COMPANY: CCI Analytical Laboratories
PROJECT MANAGER: C. Romcatti
ADDRESS: 8620 Holly Drive
Everett, WA 98208
PHONE: 425-356-2600 FAX: 425-356-2626
P.O. NUMBER: E MAIL:
INVOICE TO COMPANY:
ATTENTION: SAME
ADDRESS:

ANALYSIS REQUESTED: NWTPH-HCID; NWTPH-DX; NWTPH-GX; BTEX by EPA-8021; MTBE by EPA-8021 ☐ EPA-8260 ☐; Halogenated Volatiles by EPA 8260; Volatile Organic Compounds by EPA 8260; Ethylene dibromide (EDB) by EPA-8260 ☐ EPA-504.1 ☐; 1,2 Dichloroethane (EDC) by EPA-8260; Semivolatile Organic Compounds by EPA 8270; Polycyclic Aromatic Hydrocarbons (PAH) by EPA-8270 SIM ☐; PCB ☐ Pesticides ☐ by EPA 8081/8082; Metals-MTCA-5 ☐ RCRA-8 ☐ Pri Pol ☐ TAL ☐; Metals Other (Specify); TCLP-Metals ☐ VOA ☐ Semi-Vol ☐ Pest ☐ Herbs ☐

OTHER (Specify): ~~8280~~ Dioxin 8290 ok per Rick AK 10/7/04

SAMPLE I.D.	DATE	TIME	TYPE	LAB#	Dioxin 8290	NUMBER OF CONTAINERS	RECEIVED IN GOOD CONDITION?
1. 410020-1Comp	10/1		Soil		X	1	
2.							
3.							
4.							
5.							
6.							
7.							
8.							
9.							
10.							

LABORATORY COPY

SPECIAL INSTRUCTIONS: Rush 6 Calendar Days Please Fax results by noon 10/13/04

CCI Analytical Laboratories, Inc accepts and processes this request on the terms and conditions set forth on the reverse side. By its signature hereon, Customer accepts these terms and conditions.

SIGNATURES (Name, Company, Date, Time):
1. Relinquished By: [signature] CCIAL 10/6/04 3:00
Received By: [signature] CAS 10/7/04 10:00
2. Relinquished By:
Received By:

TURNAROUND REQUESTED in Business Days*
Organic, Metals & Inorganic Analysis: 10 Standard | 5 | 3 | 2 | 1 | Same Day
Fuels & Hydrocarbon Analysis: 5 Standard | 3 | 1 | Same Day

OTHER:
Specify:

* Turnaround request less than standard may incur Rush Charges

Attachment 8

Ditch Soil - Shipping Manifests and Certificates of Disposal

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 375219 Form Approved. OMB No. 2050-0039. CWMI

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. WAD053823019 Manifest Document No. 10905
2. Page 1 of 2 Information in the shaded areas is not required by Federal law. BMS 12-7-04

3. Generator's Name and Mailing Address
JH BAXTER & CO
6520 188TH ST NE PO Box 305
ARLINGTON WA 98223-0305
4. Generator's Phone (415) 849-0201

A. State Manifest Document Number
B. State Generator's ID

5. Transporter 1 Company Name: P.S.L.
6. US EPA ID Number: WAH000012500
C. State Transporter's ID
D. Transporter's Phone 800-354-3988

7. Transporter 2 Company Name: Union Pacific Railroad
8. US EPA ID Number: NED001792910
E. State Transporter's ID
F. Transporter's Phone 800-346-3488

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
17629 CEDAR SPRINGS LANE
ARLINGTON OR 97812-9709
10. US EPA ID Number: ORD089452343
G. State Facility's ID
H. Facility's Phone (541) 454-2643

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, HAZARDOUS WASTE, SOLID, N.O.S, 9, NA3077, III, (PENTACHLOROPHENOL) F032	X	001	CM	00018	T	F032
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
a. CS7807 DITCH SPOILS/ F032 WASTE RQ = 10 LBS
BIN # 8504

K. Handling Codes for Wastes Listed Above
D80 35,750P 17.88T
L14

15. Special Handling Instructions and Additional Information
a. CS7807 ERG # 171

Emergency Contact# (800)424-9300 (VWI Contract)

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: MaryLee Larson — Signature — Month Day Year: 11 11 04

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Wayne H. Pirkis — Signature — Month Day Year: 11 11 04

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: Cynthia Crop — Signature: Cynthia Crop — Month Day Year: 11 19 04

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Michelle Brandt — Signature: M Brandt — Month Day Year: 11-29-04

Style CF 17 LABELMASTER® (800) 621-5808 www.labelmaster.com

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

PRINTED ON RECYCLED PAPER USING SOYBEAN INK — PRINTED WITH SOY INK

ORIGINAL-RETURN TO GENERATOR

RMS

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 375219

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator's US EPA ID No.	Manifest Document No.	22. Page	Information in the shaded areas is not required by Federal law.
WAH 053823019	10405	2/2	

23. Generator's Name: JH Baxter + Co.

24. Transporter 3 Company Name	25. US EPA ID Number
Columbia Ridge Landfill	ORD 987173457
26. Transporter 4 Company Name	27. US EPA ID Number
K.T.S.	ORQ000071665

	28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	29. Containers No.	29. Containers Type	30. Total Quantity	31. Unit Wt/Vol	32. Waste No.
a.							
b.							
c.							
d.							
e.							
f.							
g.							
h.							
i.							

GENERATOR

33. Additional Descriptions for Materials Listed Above

34. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

TRANSPORTER

33. Transporter 3 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date (Month Day Year)
Carmela Hughes	Carmela Hughes	1 1 29 04

34. Transporter 4 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date (Month Day Year)
Ty Wilkins	Ty Wilkins	1 1 29 04

FACILITY

35. Discrepancy Indication Space

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 above-described waste material was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

Becky Sumner

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

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 375200 Form Approved. OMB No. 2050-0039. CWMI B

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. WAD053823919 Manifest Document No. 10406
2. Page 1 of 2 Information in the shaded areas is not required by Federal law. BMS 11-30-04

3. Generator's Name and Mailing Address
JH BAXTER & CO
6520 188TH ST NE PO Box 305
ARLINGTON WA 98223-0305
4. Generator's Phone (415) 349-0201

A. State Manifest Document Number
B. State Generator's ID

5. Transporter 1 Company Name: P.S.L.
6. US EPA ID Number: WAH000012500
C. State Transporter's ID
D. Transporter's Phone 800-354-3998

7. Transporter 2 Company Name: Union Pacific Railroad
8. US EPA ID Number: NED001792910
E. State Transporter's ID
F. Transporter's Phone 800-346-3498

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
17629 CEDAR SPRINGS LANE
ARLINGTON OR 97812-9709
10. US EPA ID Number: ORD089452343
G. State Facility's ID
H. Facility's Phone (541) 454-2643

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, HAZARDOUS WASTE, SOLID, N.O.S, 9, NA3077, III, (PENTACHLOROPHENOL) F032	X	001	CM	16.23 ~~00018~~	T	F032
b.				mm 12-2-04		
c.						
d.						

J. Additional Descriptions for Materials Listed Above
a. CS7807 DITCH SPOILS/ F032 WASTE RQ = 10 LBS
Cumm
Bin# 8509 ~~Cumm~~

K. Handling Codes for Wastes Listed Above
L14 32,450-P 16.23T

15. Special Handling Instructions and Additional Information
a. CS7807 ERG # 171

Emergency Contact# (800)424-9300 (WMI Contract)

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: MaryLee Larson — Signature — Month 11 Day 19 Year 04

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Wayne H. Parks — Signature — Month 11 Day 19 Year 04

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: Cynthia Cresso — Signature: Cynthia Cresso — Month 11 Day 19 Year 04

FACILITY

19. Discrepancy Indication Space 13a-Corrected total quantity per Rue Anne Thomas/JH Baxter
mm 12-2-04

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Michelle Brandt — Signature — Month 11 Day 23 Year 04

Style CF 17 LABELMASTER® (800) 621-5808 www.labelmaster.com

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

PRINTED ON RECYCLED PAPER USING SOYBEAN INK PRINTED WITH SOY INK

ORIGINAL-RETURN TO GENERATOR

AMS

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 375200

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator's US EPA ID No.: WAH 053823019 | Manifest Document No.: 10406

22. Page 2/2

Information in the shaded areas is not required by Federal law.

23. Generator's Name: JH Baxter + Co.

24. Transporter 3 Company Name: Col Pacific Landfill | 25. US EPA ID Number: ORD 987173457

26. Transporter 4 Company Name: Riverside Transport Service | 27. US EPA ID Number: IDQ000011668

28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	29. Containers No.	29. Containers Type	30. Total Quantity	31. Unit Wt/Vol
a.					
b.					
c.					
d.					
e.					
f.					
g.					
h.					
i.					

32. Special Handling Instructions and Additional Information

TRANSPORTER

33. Transporter 3 Acknowledgement of Receipt of Materials

Printed/Typed Name: Carmela Hughes | Signature: Carmela Hughes | Date: Month 11 Day 23 Year 04

34. Transporter 4 Acknowledgement of Receipt of Materials

Printed/Typed Name: Ty Wilkins | Signature: Ty Wilkins | Date: Month 11 Day 23 Year 04

FACILITY

35. Discrepancy Indication Space

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 #:	10406
CWM TRACKING ID:	375200-01
PROFILE #:	CS7807
LINE ITEM:	11a
QUANTITY:	1 CM
RECEIVED DATE:	11/23/04
DISPOSAL PROCESS(ES):	LANDFILL
FINAL DISPOSAL LOCATION:	LANDFILL 14
DISPOSAL DATE:	11/24/04

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

Becky Sumner

CWMNW RECORDS DEPARTMENT

Certificate #:	119412
Date:	12/06/04

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 375199 mB CWMI

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. WAD053823019 Manifest Document No. 10407
2. Page 1 of 2 — Information in the shaded areas is not required by Federal law. BMS12-04

3. Generator's Name and Mailing Address
JH BAXTER & CO
6520 188TH ST NE PO Box 305
ARLINGTON WA 98223-0305
4. Generator's Phone (415) 849-0201

A. State Manifest Document Number
B. State Generator's ID

5. Transporter 1 Company Name: P.S.L.
6. US EPA ID Number: WAH000012500
C. State Transporter's ID
D. Transporter's Phone

7. Transporter 2 Company Name: UNION PACIFIC RAILROAD
8. US EPA ID Number: NED001792910
E. State Transporter's ID
F. Transporter's Phone (800) 346-3488

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
17629 CEDAR SPRINGS LANE
ARLINGTON OR 97812-9709
10. US EPA ID Number: ORD089452351
G. State Facility's ID
H. Facility's Phone 3 (541) 454-2643

	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	RQ, HAZARDOUS WASTE, SOLID, N.O.S, 9, NA3077, III, (PENTACHLOROPHENOL) F032	X	001	CM	24	T	F032
b.					mm 11-30-04		
c.							
d.							

J. Additional Descriptions for Materials Listed Above
a. CS7807 DITCH SPOILS/ F032 WASTE RQ = 10 LBS
CWMU
Bin # 8507

K. Handling Codes for Wastes Listed Above
L4 48000P 24.00T

15. Special Handling Instructions and Additional Information
a. CS7807 2000 ERG # 171

Emergency Contact# (800)424-9300 (WMI Contract)

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: Mary Lee Larson — Signature: Mary Lee Larson — Month Day Year: 11 19 04

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: DANIEL E. PAGE — Signature: Daniel E. Page — Month Day Year: 11 19 04

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: Cynthia Creasap — Signature: Cynthia M Creasap — Month Day Year: 11 19 04

FACILITY

19. Discrepancy Indication Space: Baxter MLM 11-30-04 13a- Corrected total quantity per Rue and Thomas/JH

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Michelle Brandt — Signature: Michelle Brandt — Month Day Year: 11 23 04

Style CF 17 LABELMASTER® (800) 621-5808 www.labelmaster.com

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

ORIGINAL-RETURN TO GENERATOR

BMS

PRINTED ON RECYCLED PAPER USING SOYBEAN INK — PRINTED WITH SOY INK

375199

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator's US EPA ID No. WAD 053823019	Manifest Document No. 10407	22. Page 2/2	Information in the shaded areas is not required by Federal law.

23. Generator's Name
JH Baxter + Co.

L. State Manifest Document Number

M. State Generator's ID

24. Transporter 3 Company Name: Col Rdty Landfill
25. US EPA ID Number: ICRD 987173457

N. State Transporter's ID

O. Transporter's Phone

26. Transporter 4 Company Name: Riverside Transport Service
27. US EPA ID Number: 10RQ000011668

P. State Transporter's ID

Q. Transporter's Phone

	HM	28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	29. Containers No.	29. Containers Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a.							
b.							
c.							
d.							
e.							
f.							
g.							
h.							
i.							

S. Additional Descriptions for Materials Listed Above

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

33. Transporter 3 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year
Carmela Hughes	Carmela Hughes	11	23	04

34. Transporter 4 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year
Ty Wilkes	Ty Wilkes	11	23	04

35. Discrepancy Indication Space

GENERATOR / TRANSPORTER / FACILITY

Style F16 · LABELMASTER ® (800) 621-5808 www.labelmaster.com

EPA Form 8700-22A (Rev. 9-88) Previous editions are obsolete.

PRINTED ON RECYCLED PAPER

ORIGINAL - RETURN TO GENERATOR

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 #:	10407
CWM TRACKING ID:	375199-01
PROFILE #:	CS7807
LINE ITEM:	11a
QUANTITY:	1 CM
RECEIVED DATE:	11/23/04
DISPOSAL PROCESS(ES):	LANDFILL
FINAL DISPOSAL LOCATION:	LANDFILL 14
DISPOSAL DATE:	11/24/04

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

Becky Sumner

CWMNW RECORDS DEPARTMENT

Certificate #:	119368
Date:	12/02/04

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 375220

Form Approved. OMB No. 2050-0039. CWMI

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. WAD053823019 Manifest Document No. 10408

2. Page 1 of 2 Information in the shaded areas is not required by Federal law. BMS 12-3-04

3. Generator's Name and Mailing Address
JH BAXTER & CO
6520 188TH ST NE PO Box 305
ARLINGTON WA 98223-0305

4. Generator's Phone (415 849-0201

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name P.S.L.

6. US EPA ID Number WAH000012500

C. State Transporter's ID

D. Transporter's Phone 800-354-3978

7. Transporter 2 Company Name United Pacific Railroad

8. US EPA ID Number WED.001792910

E. State Transporter's ID

F. Transporter's Phone 800-344-3978

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
17629 CEDAR SPRINGS LANE
ARLINGTON OR 97812-9709

10. US EPA ID Number ORD089452353

G. State Facility's ID

H. Facility's Phone (541)454-2643

	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
GENERATOR a.	RQ, HAZARDOUS WASTE, SOLID, N.O.S, 9, NA3077, III, (PENTACHLOROPHENOL)F032	X	001	CM	12.98 0.0184 T		F032
b.					mm 12-2-04		
c.							
d.							

J. Additional Descriptions for Materials Listed Above
a. CS7807 DITCH SPOILS/ F032 WASTE RQ = 10 LBS

Bin#8520

K. Handling Codes for Wastes Listed Above
H4 25950P 12.98T

15. Special Handling Instructions and Additional Information
a. CS7807 2000 ERG # 171

Emergency Contact# (800)424-9300 (WMI Contract)

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name Manuel Larson — Signature — Month Day Year 11 12 04

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name Wyneth Pirks — Signature — Month Day Year 11 12 04

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name Cynthia Crespo — Signature Cynthia Crespo — Month Day Year 11 12 04

FACILITY

19. Discrepancy Indication Space mm 12-2-04 Bin-Corrected total quantity per Ruanne Thomas JH Baxter

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name Sue McAhren — Signature Sue McAhren — Month Day Year 12 2 04

Style CF 17 LABELMASTER® (800) 621-6308 www.labelmaster.com

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

PRINTED ON RECYCLED PAPER USING SOYBEAN INK — PRINTED WITH SOY INK

ORIGINAL-RETURN TO GENERATOR

BMS

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 375220 Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator's US EPA ID No. WAD 053823019
Manifest Document No. 10408
22. Page 2/2
Information in the shaded areas is not required by Federal law.

23. Generator's Name JH Baxter + Co.

L. State Manifest Document Number
M. State Generator's ID

24. Transporter 3 Company Name Col Ridge Landfill
25. US EPA ID Number IDRD 987173457
N. State Transporter's ID
O. Transporter's Phone

26. Transporter 4 Company Name KTS
27. US EPA ID Number IDRQ 000011668
P. State Transporter's ID
Q. Transporter's Phone

28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a.						
b.						
c.						
d.						
e.						
f.						
g.						
h.						
i.						

S. Additional Descriptions for Materials Listed Above
T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

33. Transporter 3 Acknowledgement of Receipt of Materials
Printed/Typed Name: Carmela Hughes
Signature: Carmela Hughes
Date: Month 11 Day 29 Year 04

34. Transporter 4 Acknowledgement of Receipt of Materials
Printed/Typed Name: Ty Wilkins
Signature: Ty Wilkins
Date: Month 11 Day 29 Year 04

35. Discrepancy Indication Space

Style F16 LABELMASTER® (800) 621-5808 www.labelmaster.com

EPA Form 8700-22A (Rev. 9-88) Previous editions are obsolete.

ORIGINAL - RETURN TO GENERATOR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 375201 Form Approved. OMB No. 2050-0039. ✓ 10 CWMI

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. WAD053823019 Manifest Document No. 10409
2. Page 1 of _____ Information in the shaded areas is not required by Federal law.

GENERATOR

3. Generator's Name and Mailing Address
JH BAXTER & CO
6520 188TH ST NE PO Box 305
ARLINGTON WA 98223-0305
4. Generator's Phone (415) 849-0201

A. State Manifest Document Number
B. State Generator's ID

5. Transporter 1 Company Name: P.S.L.
6. US EPA ID Number: WAH000012500
C. State Transporter's ID
D. Transporter's Phone (800) 354-3998

7. Transporter 2 Company Name: UNION PACIFIC RAILROAD
8. US EPA ID Number: NED001792910
E. State Transporter's ID
F. Transporter's Phone (800) 346-3488

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
17629 CEDAR SPRINGS LANE
ARLINGTON OR 97812-9709
10. US EPA ID Number: ORD089452353
G. State Facility's ID
H. Facility's Phone (541) 454-2643

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, HAZARDOUS WASTE, SOLID, N.O.S, 9, NA3077, III, (PENTACHLOROPHENOL) F032	X	001	CM	20.13 ~~00.01~~ T		F032
b.				mim 11-30-04		
c.						
d.						

J. Additional Descriptions for Materials Listed Above
a. CS7807 DITCH SPOILS/ F032 WASTE RQ = 10 LBS
cwmu
BIN #8519

K. Handling Codes for Wastes Listed Above
L14 40250P 20.13T

15. Special Handling Instructions and Additional Information
a. CS7807 2000 ERG # 171

Emergency Contact# (800)424-9300 (WMI Contract)

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: MaryLee Larson — Signature: [signature] — Month Day Year: 11 11 1994

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: DANIEL E. PAGE — Signature: [signature] — Month Day Year: 11 11 1994

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: Cynthia Crespo — Signature: Cynthia Crespo — Month Day Year: 11 11 1994

FACILITY

19. Discrepancy Indication Space: mim 11-30-04 13a Corrected total quantity per Lu Anne Thomas/JH Baxter

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Michelle Brandt — Signature: MBrandt — Month Day Year: 11 23 04

Style CF 17 LABELMASTER® (800) 621-5808 www.labelmaster.com

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

PRINTED ON RECYCLED PAPER USING SOYBEAN INK — PRINTED WITH SOY INK

ORIGINAL-RETURN TO GENERATOR

ams

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 375201

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator's US EPA ID No. WAD 053823019 | Manifest Document No. 10409 | 22. Page 2/2 | Information in the shaded areas is not required by Federal law.

23. Generator's Name: JH Baxter + Co.

24. Transporter 3 Company Name: Col River Landfill | 25. US EPA ID Number: ORD 987173457

26. Transporter 4 Company Name: Riverside transport | 27. US EPA ID Number: ORQ000011606 8

L. State Manifest Document Number
M. State Generator's ID
N. State Transporter's ID
O. Transporter's Phone
P. State Transporter's ID
Q. Transporter's Phone

	28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	Waste No.
a.							
b.							
c.							
d.							
e.							
f.							
g.							
h.							
i.							

GENERATOR

S. Additional Descriptions for Materials Listed Above

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

TRANSPORTER

33. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name: Carmela Hughes | Signature: Carmela Hughes | Date: Month 11 Day 23 Year 04

34. Transporter 4 Acknowledgement of Receipt of Materials

Printed/Typed Name: Ty Wilkins | Signature: Ty Wilkins | Date: Month 11 Day 23 Year 04

FACILITY

35. Discrepancy Indication Space

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 375430 Form Approved. OMB No. 2050-0039. CWMI

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. WAD053823019 Manifest Document No. D412

2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
JH BAXTER & CO
6520 188TH ST NE PO Box 305
ARLINGTON WA 98223-0305
4. Generator's Phone (415) 849-0201

A. State Manifest Document Number
B. State Generator's ID

5. Transporter 1 Company Name: M.P. Environmental
6. US EPA ID Number: CAT000624247
C. State Transporter's ID
D. Transporter's Phone: 800 458-3866

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
17629 CEDAR SPRINGS LANE
ARLINGTON OR 97812-9709
10. US EPA ID Number: ORD089452353
G. State Facility's ID
H. Facility's Phone: (541)454-2643

	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	RQ, HAZARDOUS WASTE, SOLID, N.O.S, 9, NA3077, III, (PENTACHLOROPHENOL)F032	X	001	CM	00018	T	F032
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
a. CS7807 DITCH SPOILS/ F032 WASTE RQ = 10 LBS
BW#6984

K. Handling Codes for Wastes Listed Above
L14 35,300P 17.65T

15. Special Handling Instructions and Additional Information
a. CS7807 2000 ERG # 171

Emergency Contact# (800)424-9300 (WMI Contract)

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: MaryLee Larson | Signature: MaryLee Larson | Month Day Year: 1/24/2014

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Aaron Mills | Signature: [signature] | Month Day Year: 1/24/2014

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Sue McAfee | Signature: Sue McAfee | Month Day Year: 1/27/2014

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 #:	10412
CWM TRACKING ID:	375430-01
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 above-described waste material was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

Becky Dumas

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

625 5 TS TSC 625 V8 CWMI

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: WAD053822019 | Manifest Document No.: 0413 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
JH BAXTER & CO
6520 188TH ST NE PO Box 305
ARLINGTON WA 98223-0305

4. Generator's Phone (415 349-0201

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name: MP Environmental
6. US EPA ID Number: ILAT000624247
C. State Transporter's ID
D. Transporter's Phone 800 458-3036

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
17629 CEDAR SPRINGS LANE
ARLINGTON OR 97812-9709

10. US EPA ID Number: ORD089452353

G. State Facility's ID

H. Facility's Phone (541)454-2643

	HM	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	RQ, HAZARDOUS WASTE, SOLID, N.O.S, 9, NA3077, III, (PENTACHLOROPHENOL)F032	001	CM	00098	T	F032
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
a. CS7807 DITCH SPOILS/ F032 WASTE RQ = 10 LBS

K. Handling Codes for Wastes Listed Above
L14 33450P 16.73T.

15. Special Handling Instructions and Additional Information
a. CS7807 2000 ERG # 171

Emergency Contact# (800)424-9300 (WMI Contract)

Bin 52655

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month Day Year
Mary Lee Larson	[signature]	1 21 09 04

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year
Aaron Mills	[signature]	1 21 09 04

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month Day Year
Michelle Brandt	[signature]	12 10 04

GENERATOR / TRANSPORTER / FACILITY

BMS

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 #:	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 above-described waste material was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

Becky Lumper

CWMNW RECORDS DEPARTMENT

Certificate #:	119645
Date:	12/15/04

of5 375459 JWS CWMI

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. WAD053823019 Manifest Document No. 10914

2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
JH BAXTER & CO
6520 188TH ST NE PO Box 305
ARLINGTON WA 98223-0305
4. Generator's Phone (415) 349-0201

A. State Manifest Document Number
B. State Generator's ID

5. Transporter 1 Company Name: MP Environmental
6. US EPA ID Number: CAT000624247
C. State Transporter's ID
D. Transporter's Phone: 800 458-3031

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
17629 CEDAR SPRINGS LANE
ARLINGTON OR 97812-9709
10. US EPA ID Number: ORD089452353
G. State Facility's ID
H. Facility's Phone: (541) 454-2643

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, HAZARDOUS WASTE, SOLID, N.O.S, 9, NA3077, III, (PENTACHLOROPHENOL) F032	X	001	CM	00020	T	F032
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
a. CS7807 DITCH SPOILS/ F032 WASTE RQ = 10 LBS
Bin # 45168

K. Handling Codes for Wastes Listed Above
U4 40,900P 20.45 T

15. Special Handling Instructions and Additional Information
a. CS7807 2000 ERG # 171

Emergency Contact# (800)424-9300 (WMI Contract)

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: MaryLee Larson | Signature | Month Day Year: 1/12/09/04

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Aaron Mills | Signature | Month Day Year: 1/12/09/04

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Month Day Year

FACILITY

19. Discrepancy Indication Space
weight added by owner 12/13/04 MB

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Michelle Brandt | Signature | Month Day Year: 1/2/13/04

Style CF 17 LABELMASTER® (800) 621-5808 www.labelmaster.com

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

ORIGINAL-RETURN TO GENERATOR

PRINTED ON RECYCLED PAPER USING SOYBEAN INK | PRINTED WITH SOY INK

AMS

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 #:	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 above-described waste material was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

Becky Lumper

CWMNW RECORDS DEPARTMENT
Certificate #: 119649
Date: 12/15/04

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 375511 Form Approved. OMB No. 2050-0039. CWMI

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. WAD053823019 Manifest Document No. 04615
2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

GENERATOR

3. Generator's Name and Mailing Address
JH BAXTER & CO
6520 188TH ST NE PO Box 305
ARLINGTON WA 98223-0305
4. Generator's Phone (415) 349-0201

A. State Manifest Document Number
B. State Generator's ID

5. Transporter 1 Company Name: MP Environmental
6. US EPA ID Number: CAT000624247
C. State Transporter's ID
D. Transporter's Phone: 800 458-3036

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
17629 CEDAR SPRINGS LANE
ARLINGTON OR 97812-9709
10. US EPA ID Number: ORD089452353
G. State Facility's ID
H. Facility's Phone: (541) 454-2643

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, HAZARDOUS WASTE, SOLID, N.O.S, 9, NA3077, III, (PENTACHLOROPHENOL)F032	X	001	CM	00018	T	F032
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
a. CS7807 DITCH SPOILS/ F032 WASTE RQ = 10 LBS
Bin # 5194

K. Handling Codes for Wastes Listed Above
L14 32,850P 16.43T

15. Special Handling Instructions and Additional Information
a. CS7807 2000 ERG # 171

Emergency Contact# (800)424-9300 (WNI Contract)

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month Day Year
Marilee Larson	Marilee Larson	1/12/04

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year
JACK Houston	Jack Houston	1/12/04

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month Day Year
Sue McAthren	Sue McAthren	1/12/04

Style CF 17 LABELMASTER® (800) 621-5808 www.labelmaster.com

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

PRINTED ON RECYCLED PAPER USING SOYBEAN INK PRINTED WITH SOY INK

ORIGINAL-RETURN TO GENERATOR

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 #:	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 above-described waste material was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

Nicole D. Wypcaver

CWMNW RECORDS DEPARTMENT

Certificate #:	119835
Date:	12/22/04

615 375547 WMI

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. WAD053823019 — Manifest Document No. 18416

2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
JH BAXTER & CO
6520 188TH ST NE PO Box 305
ARLINGTON WA 98223-0305
4. Generator's Phone (415 349-0201

A. State Manifest Document Number
B. State Generator's ID
C. State Transporter's ID
D. Transporter's Phone 800 458-3336
E. State Transporter's ID
F. Transporter's Phone
G. State Facility's ID
H. Facility's Phone (541)454-2643

5. Transporter 1 Company Name: MP Environmental — 6. US EPA ID Number: CAT000624247
7. Transporter 2 Company Name — 8. US EPA ID Number

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
17629 CEDAR SPRINGS LANE
ARLINGTON OR 97812-9709
10. US EPA ID Number: ORD089452353

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, HAZARDOUS WASTE, SOLID, N.O.S, 9, NA3077, III, (PENTACHLOROPHENOL)F032	X	001	CM	13.68	T	F032
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
a. CS7807 DITCH SPOILS/ F032 WASTE RQ - 10 LBS
Bin #5325 WC00282

K. Handling Codes for Wastes Listed Above
L4 2735DF 13.68T

15. Special Handling Instructions and Additional Information
a. CS7807 2000 ERG # 171
Emergency Contact# (800)424-9300 (WMI Contract)

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR — Printed/Typed Name: MaryLee Larson — Signature — Month Day Year: 1 0 1 5 0 4

TRANSPORTER
17. Transporter 1 Acknowledgement of Receipt of Materials — Printed/Typed Name: James Phillips — Signature — Month Day Year: 1 0 1 5 0 4
18. Transporter 2 Acknowledgement of Receipt of Materials — Printed/Typed Name — Signature — Month Day Year

FACILITY
19. Discrepancy Indication Space
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. — Printed/Typed Name: Mindy McClure — Signature — Month Day Year: 1 0 1 6 0 4

Style CF 17 LABELMASTER® (800) 621-5808 www.labelmaster.com

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

ORIGINAL-RETURN TO GENERATOR

PRINTED ON RECYCLED PAPER USING SOYBEAN INK — PRINTED WITH SOY INK

BMS

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 #:	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 above-described waste material was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

Becky Sumner

CWMNW RECORDS DEPARTMENT
Certificate #: 119762
Date: 12/20/04

634

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 375587 CWMI

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. WAD053823019 Manifest Document No. 04617

2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
JH BAXTER & CO
6520 188TH ST NE PO Box 305
ARLINGTON WA 98223-0305
4. Generator's Phone (415) 849-0201

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name: NP Environmental | 6. US EPA ID Number: UTAT000624247 | C. State Transporter's ID | D. Transporter's Phone: 800 458-3036

7. Transporter 2 Company Name | 8. US EPA ID Number | E. State Transporter's ID | F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
17629 CEDAR SPRINGS LANE
ARLINGTON OR 97812-9709
10. US EPA ID Number: ORD089452353 | G. State Facility's ID | H. Facility's Phone: (541) 454-2643

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, HAZARDOUS WASTE, SOLID, N.O.S, 9, NA3077, III, (PENTACHLOROPHENOL) F032	X	001	CM	14.85	T	F032
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
a. CS7807 DITCH SPOILS/ F032 WASTE RQ = 10 LBS
Bin# S207 WL00785

K. Handling Codes for Wastes Listed Above
L14 29, 7001P 14.85T

15. Special Handling Instructions and Additional Information
a. CS7807 2000 ERG # 171

Emergency Contact# (800)424-9300 (WMI Contract) W

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name	Signature	Month Day Year
Mark Lee Larson		12 16 04

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year
James Phillips		12 16 04

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year

FACILITY

19. Discrepancy Indication Space
Weight added by Driver 12/17/04 MB

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month Day Year
Sue McAhren	Sue McAhren	12 17 04

Style CF 17 LABELMASTER® (800) 621-5808 www.labelmaster.com

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

PRINTED ON RECYCLED PAPER USING SOYBEAN INK PRINTED WITH SOY INK

ORIGINAL-RETURN TO GENERATOR

BMS

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 #:	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 above-described waste material was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

Nicole D Wyscaver

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

627

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 375601

Form Approved. OMB No. 2050-0039. CWNI

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. WAD052823019 Manifest Document No. 10418

2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
JH BAXTER & CO
6520 188TH ST NE Po Box 305
ARLINGTON WA 98223-0305
4. Generator's Phone (415 849-0201

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name: MP Environmental | 6. US EPA ID Number: ICAT000624247

C. State Transporter's ID

D. Transporter's Phone 800 458-3336

7. Transporter 2 Company Name | 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
17629 CEDAR SPRINGS LANE
ARLINGTON OR 97812-9709

10. US EPA ID Number: ORD089452353

G. State Facility's ID

H. Facility's Phone (541)454-2643

	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	RQ, HAZARDOUS WASTE, SOLID, N.O.S, 9, NA3077, III, (PENTACHLOROPHENOL) F032	X	001	CM	000018	T	F032
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
a. CS7807 DITCH SPOILS/ F032 WASTE RQ = 10 LBS
B.O # 4880

K. Handling Codes for Wastes Listed Above
L4 35050P 17.53T

15. Special Handling Instructions and Additional Information
a. CS7807 2000 ERG # 171

Emergency Contact# (800)424-9300 (WMI Contract)

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
MaryLee Larson		11	24	10

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Greg Dahle		11	24	10

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
Mary McClure		11	24	2010

Style CF 17 LABELMASTER® (800) 621-5808 www.labelmaster.com

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

PRINTED ON RECYCLED PAPER USING SOYBEAN INK

ORIGINAL-RETURN TO GENERATOR

AMS

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 #:	10418
LINE ITEM:	11a
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 above-described waste material was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

Nicole D Wyscaver

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

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 375600 CWMI

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. WAD053823019 Manifest Document No. 10420

2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

GENERATOR

3. Generator's Name and Mailing Address
JH BAXTER & CO
6520 188TH ST NE PO Box 305
ARLINGTON WA 98223-0305
4. Generator's Phone (415) 849-0201

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name: MP Environmental
6. US EPA ID Number: CAT000624247
C. State Transporter's ID
D. Transporter's Phone: 800-458-3036

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
17629 CEDAR SPRINGS LANE
ARLINGTON OR 97812-9709
10. US EPA ID Number: ORD089452353
G. State Facility's ID
H. Facility's Phone: (541)454-2643

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, HAZARDOUS WASTE, SOLID, N.O.S, 9, NA3077, III, (PENTACHLOROPHENOL) F032	X	001	CM	13.33	lbs	F032
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
a. CS7807 DITCH SPOILS/ F032 WASTE RQ = 10 LBS
BIN #4869

K. Handling Codes for Wastes Listed Above
L14 26.650P B33T

15. Special Handling Instructions and Additional Information
a. CS7807 2000 ERG # 171

Emergency Contact# (800)424-9300 (WMI Contract)

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
Mary Lee Larson		11	21	04

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Guy Carpenter		11	21	04

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space
Weight changed by driver sn 12-20-04

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
Sue McAhren		12	20	04

Style CF 17 LABELMASTER® (800) 621-5808 www.labelmaster.com

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

PRINTED ON RECYCLED PAPER USING SOYBEAN INK PRINTED WITH SOY INK

ORIGINAL-RETURN TO GENERATOR

BMS

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 above-described waste material was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

Nicole D. Wyslawer

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:

1. 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.

Mary Larson

Sworn to me this 28th day of February 2005.

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

ENVIRONMENTAL RESOLUTIONS, INC.
20372 North Sea Circle, Lake Forest, CA, 92630 Ph 949-457-8950 Fx 8956
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.

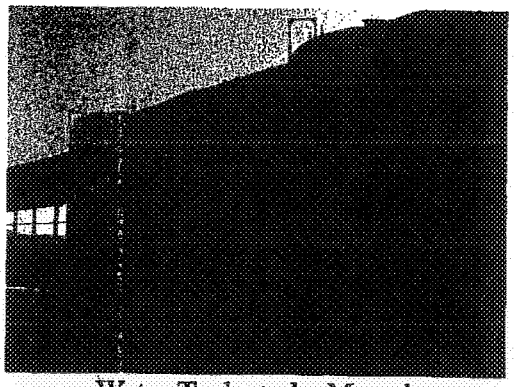
T21 will contain one submersible pump capable of delivering 50 gpm of water at 100 ft of head. The pump (P1) will handle all the storm water from the apron and will push the water through the sand filter, Calgon unit and into the accumulation tanks. In the event stormwater accumulation exceeds the capacity 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.

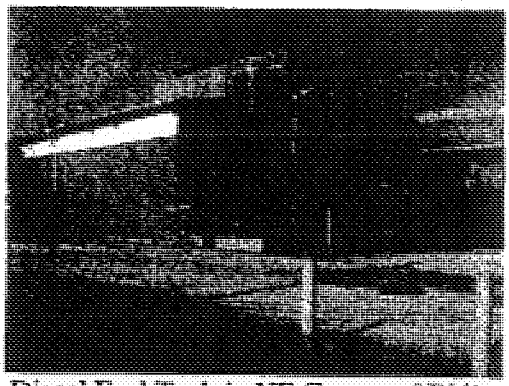
Tanks: Existing tanks T18, T19 and T20 will be used to contain treated water and excess stormwater. The tanks will be moved from the west side of the treatment building to the east side. Tank T20 will be placed on an existing pad, which drains into the treatment building. Tanks T18 and T19 will be placed 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.

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.

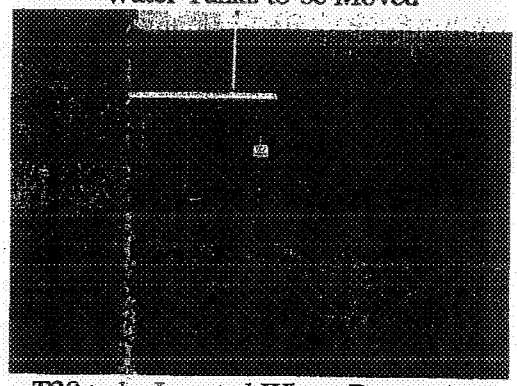
Timing: Construction is anticipated to take four weeks.



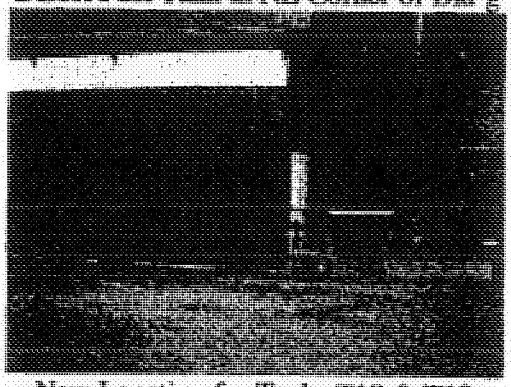
Water Tanks to be Moved



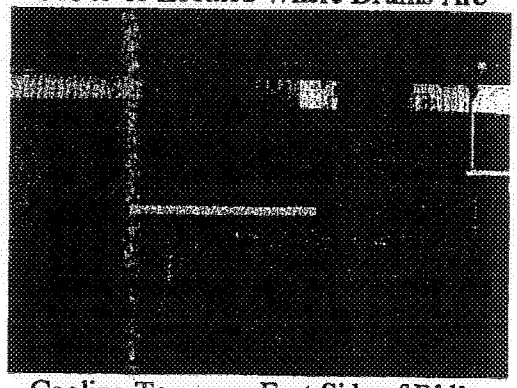
Diesel Fuel Tank in NE Corner of Bld'g



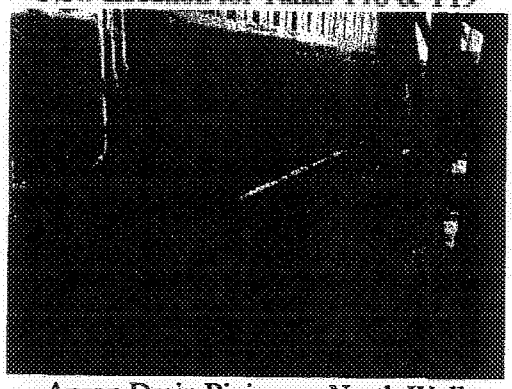
T20 to be Located Where Drums Are



New Location for Tanks T18 & T19

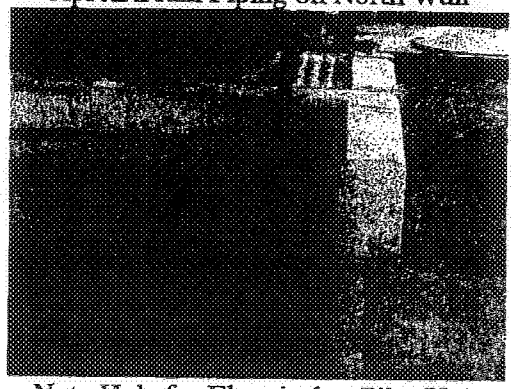


Cooling Tower on East Side of Bld'g

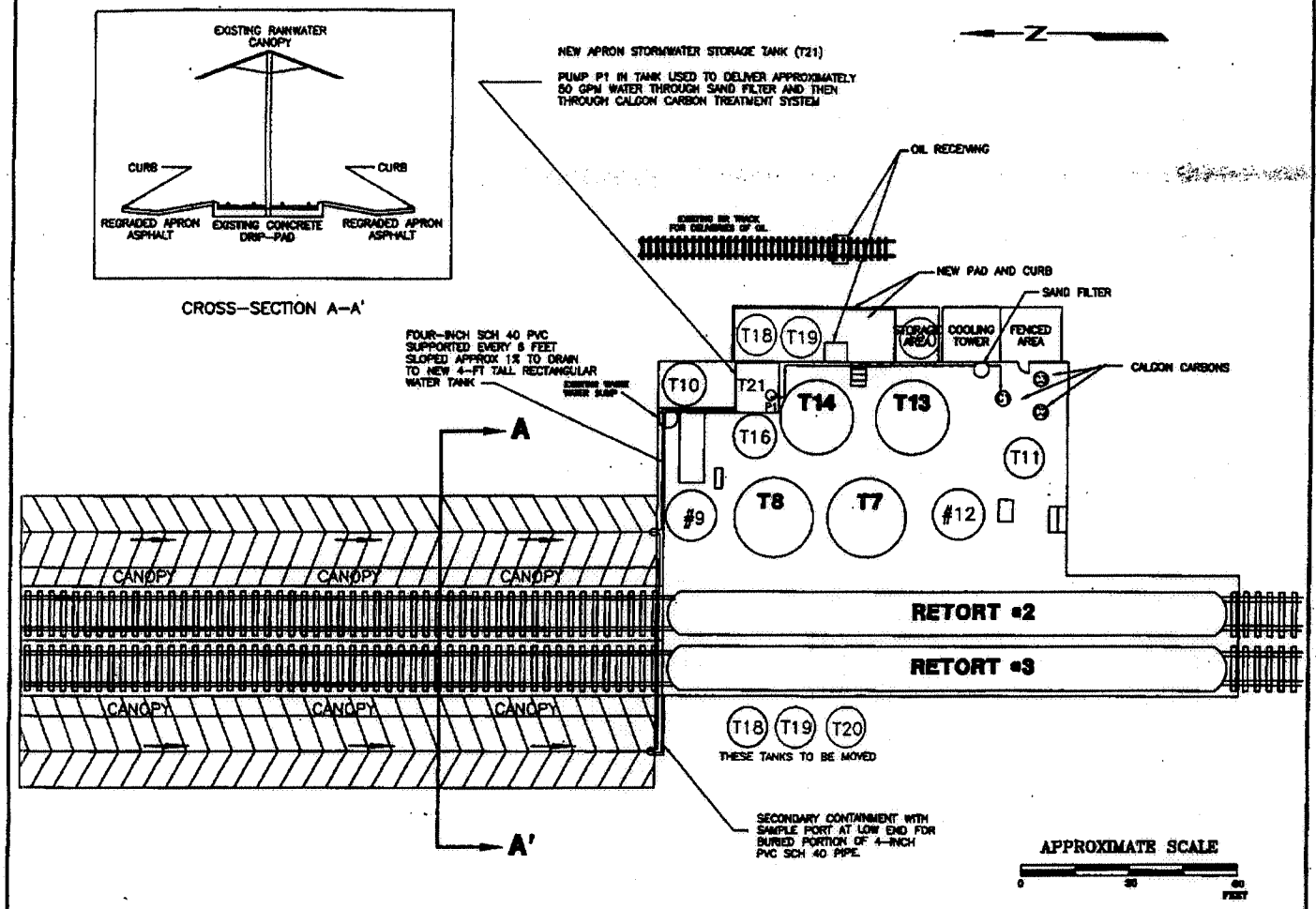


Apron Drain Piping on North Wall

Apron Water Will Drain to Sump



Note Hole for Electrical to Pilot Unit



TANK No. **TANK DESIGNATIONS**

7. PRESSURE TREATING SOLUTION PCP-A 85,000 GAL 21'6" X 48' TALL
8. PRESSURE TREATING SOLUTION PCP-A 85,000 GAL 21'6"X 48' TALL
9. MIX TANK 9,000 GAL 14' dia X 8' TALL
10. DIESEL STORAGE TANK 20,000 GAL 18'6" X 32' TALL
11. OIL WATER SEPARATOR 20,000 GAL 10' 6" X 32' TALL
12. OIL WATER DECANTER 1,000 GAL
13. BUTT TREATING SOLUTION PCP-A 60,000 GAL 20'3" X 30' TALL
14. BASE OIL STORAGE P-9 OIL 60,000 GAL 20'3" X 30' TALL
15. BOIL-OFF TANK
16. WATER STORAGE TANK 16,000 GAL
17. WATER IN BUTT TANK AREA 10,000 GAL
18. TREATED WATER STORAGE 16,000 GAL
19. TREATED WATER STORAGE 16,000 GAL
20. TREATED WATER STORAGE 16,000 GAL
21. APRON STORMWATER ACCUMULATION TANK 3,700 GAL - 13'8" X 12' X 3'

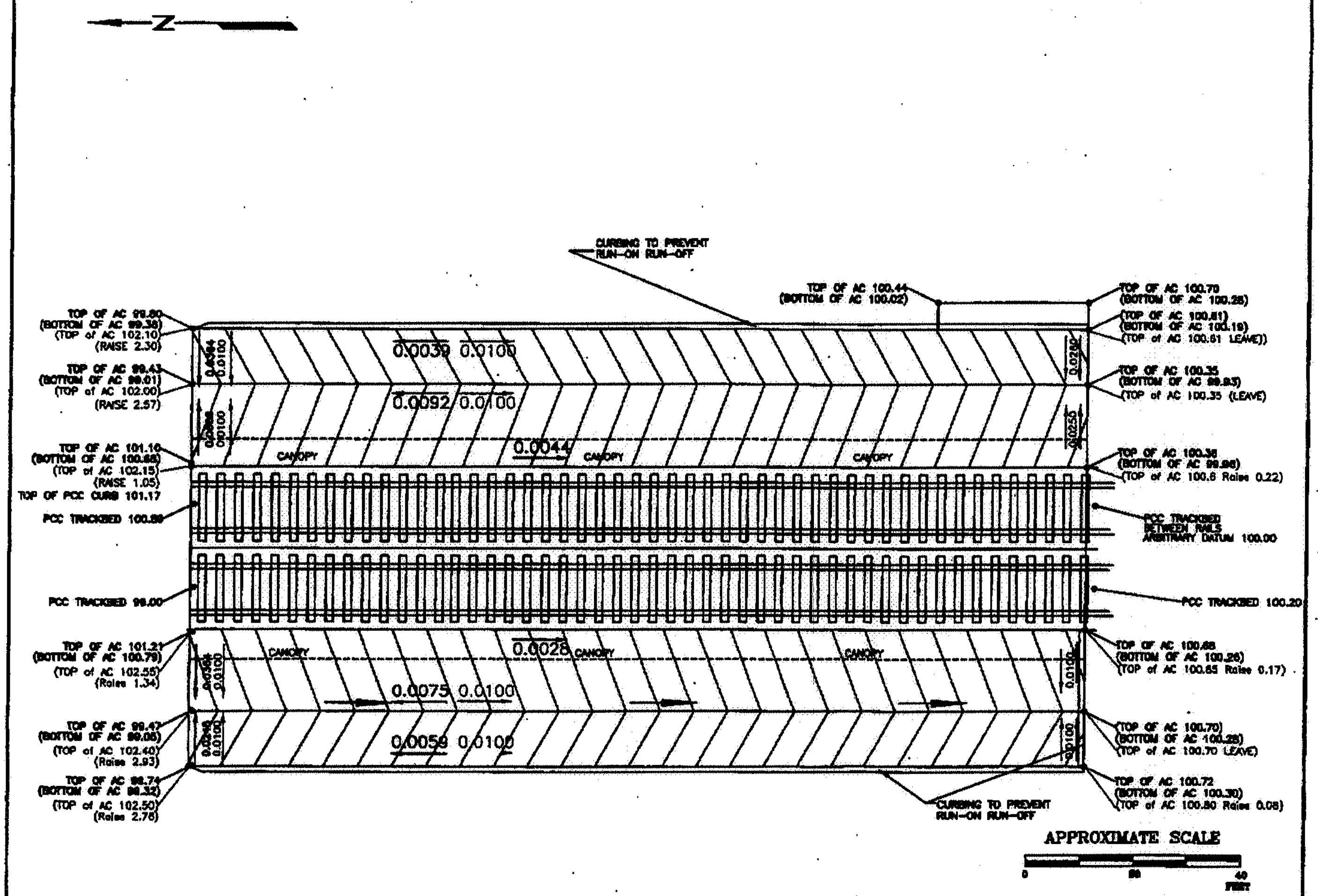
REV #	REVISION	BY	DATE
#4	ADD TANK T21 AND P1	JOC	10/8
#3	NEW PAD FOR TANKS 18 & 19	JOC	7/1
#2	OIL RR TRACK & CROSS-SECTION	JOC	6/11
#1	FIELD CHECK TANK LOCATIONS	SMD	6/4

LEGEND

ISSUED: Drawing prepared from information provided by Baxter Arlington. Critical measurements like tank center distance were field verified and incorporated into the final "as-built" drawings

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

TITLE: **PROPOSED APRON WATER COLLECTION**
DRAWING No. **G1**



NOTES:

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

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

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

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

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

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

LEGEND

PROJECT: 1178-Apron

FACILITY: BAXTER ARLINGTON

6520 188th ST NE

Arlington, Washington

DATE: 6/20/02 SHEET 2 of 2

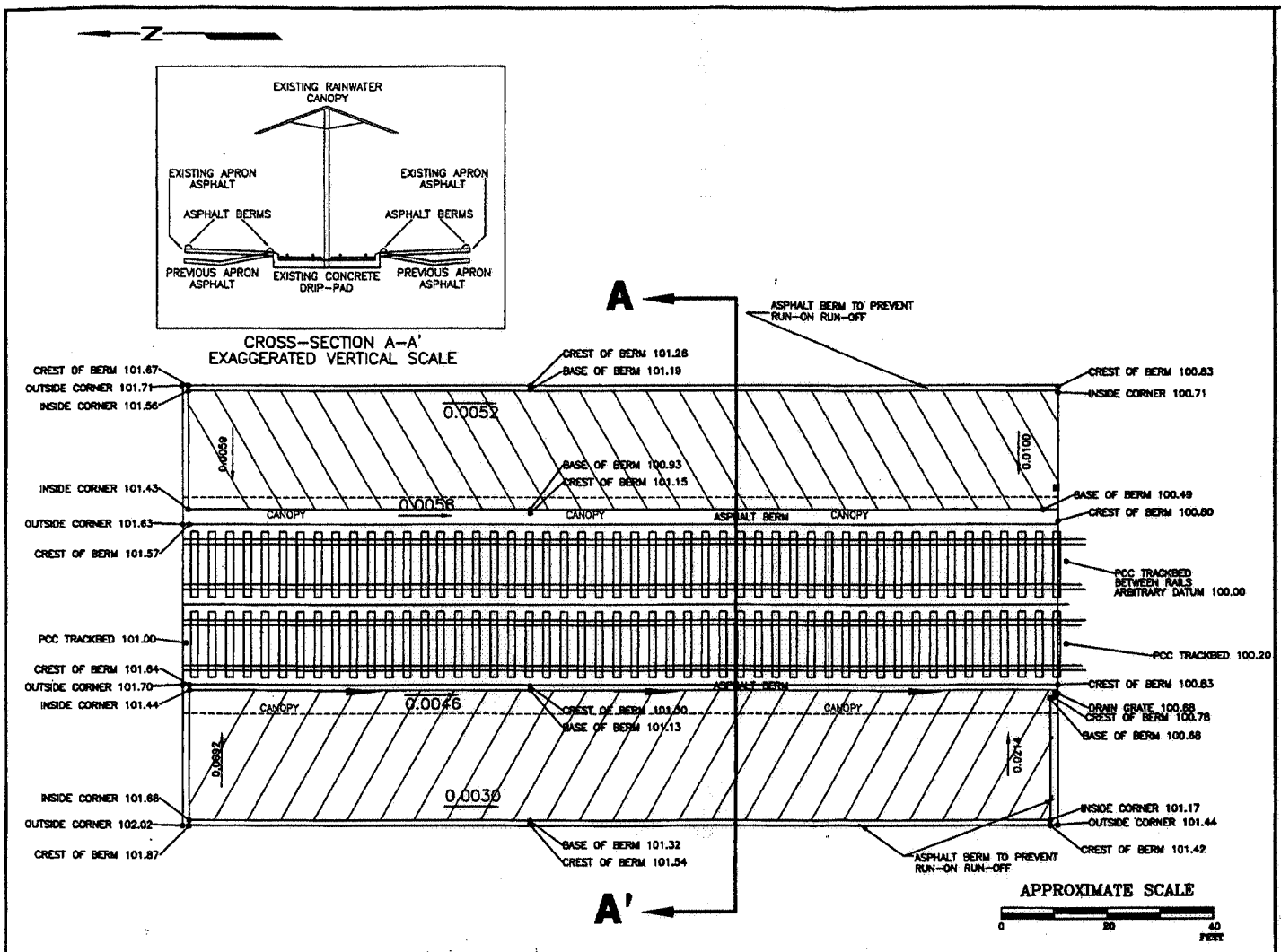
TITLE:

LOADING AREA APRON GRADING

DRAWING No. G2

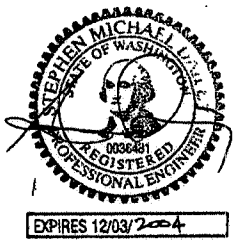
Attachment 11

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



NOTES:

ARBITARY DATUM = 100.00 FT
CONCRETE TRACKBED MIDWAY BETWEEN EAST RETORT RAILS



EXPIRES 12/03/2004

REV #	REVISION	BY	DATE

LEGEND

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

PROJECT: Apron Regrading
FACILITY: BAXTER ARLINGTON
6520 188th ST NE
Arlington, Washington
DATE: 02/18/03 SHEET 1 of 1

TITLE:
LOADING AREA APRON GRADING

DRAWING No. G2