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.

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- 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.

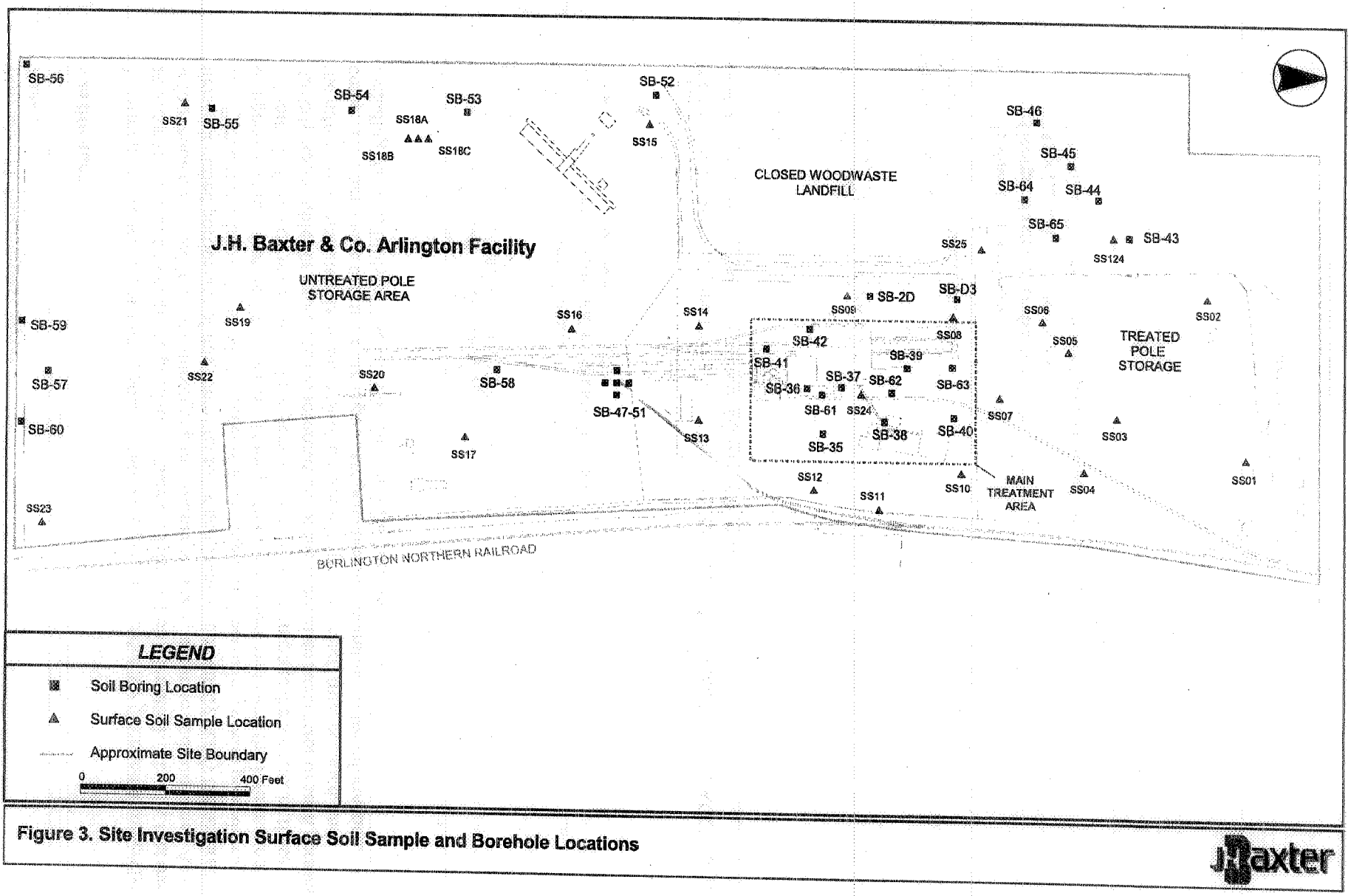

Figure 3. Site Investigation Surface Soil Sample and Borehole Locations

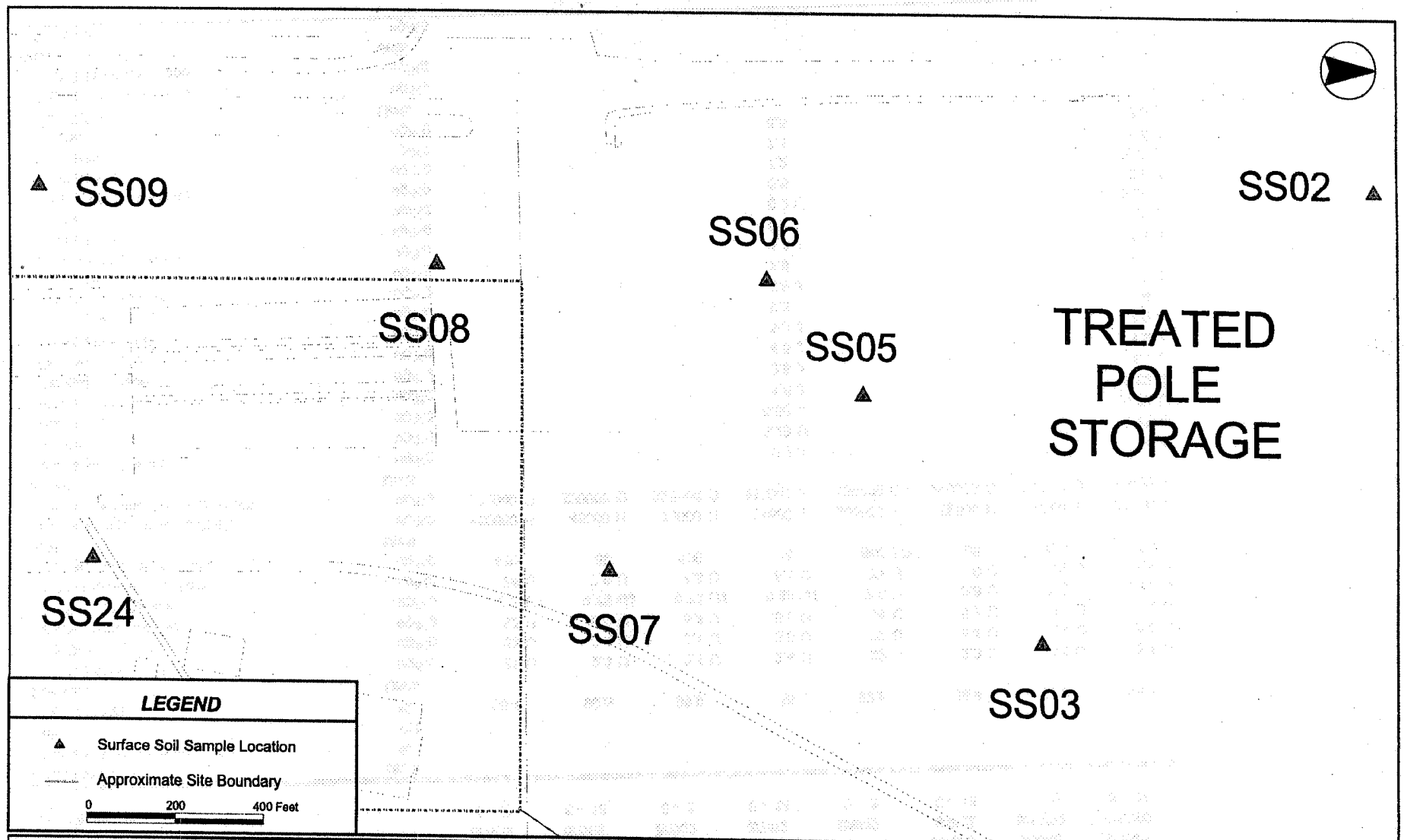

Figure 3A. Detail of Figure 3 from 2003 SADD

Table 4.1 Site Investigation - Surface Soil Data

Station		SS01	SS01	SS02	SS02	SS03	SS03	SS04	SS04
Sample ID		SO001	SO002	SO003	SO004	SO024	SO025	SO045	SO046
Date		8/7/02	8/7/02	8/7/02	8/7/02	8/9/02	8/9/02	8/13/02	8/13/02
Depth in inches		0 - 2	6 - 18	0 - 2	6 - 18	0 - 2	6 - 18	0 - 2	6 - 18
Conventionals	Units								
Carbon, Total Organic (TOC)	%								
pH	PH								
Solids, Total	%	96.4	90.5	96.9	85	92.6	88.4	97.8	96.4
Phenols	Units								
3,4-Dichlorophenol	ug/Kg	21 U	2.3 U	2.1 U	2.4 U	22 U	2.3 U	21 U	2.1 U
3,5-Dichlorophenol	ug/Kg	32 U	3.4 U	3.1 U	3.6 U	33 U	3.4 U	31 U	3.2 U
2,4,5-Trichlorophenol	ug/Kg	52 U	5.6 U	5.2 U	5.9 U	54 U	5.7 U	52 U	5.2 U
2,4,6-Trichlorophenol	ug/Kg	7.3 UJ	0.78 UJ	0.73 UJ	0.83 UJ	7.6 U	0.8 U	7.2 U	0.73 U
Tetrachlorophenols, Total	ug/Kg	74 U	7.9 U	7.3 U	8.4 U	77 U	8 U	72 U	7.4 U
Pentachlorophenol (PCP)	ug/Kg	430	89	100	18	840 PD	95	790	65
TPH	Units								
Diesel Range Organics (DRO)	ug/Kg	120000 H	45000 H	73000 H	24000 J	200000 Y	59000 H	74000 Y	23000 J
Residual Range Organics (RRO)	ug/Kg	870000 O	320000 O	320000 O	110000 J	590000 O	290000 O	250000 O	78000 J
PAHs	Units								
2-Methylnaphthalene	ug/Kg				2.2 J				1 J
Acenaphthene	ug/Kg				0.25 U				0.22 U
Acenaphthylene	ug/Kg				0.66 J				0.17 U
Anthracene	ug/Kg				1.6 J				0.52 J
Benz(a)anthracene	ug/Kg				2.8 J				1.1 J
Benzo(a)pyrene	ug/Kg				4.5 J				1.9 J
Benzo(b)fluoranthene	ug/Kg				5.5 J				2.9 J
Benzo(g,h,i)perylene	ug/Kg				9.3				5.4
Benzo(k)fluoranthene	ug/Kg				4.9 J				1.7 J
Chrysene	ug/Kg				7.6				5.8
Dibenz(a,h)anthracene	ug/Kg				1.4 J				1.1 J
Fluoranthene	ug/Kg				6.1				2.1 J
Fluorene	ug/Kg				0.2 U				0.24 J
Indeno(1,2,3-cd)pyrene	ug/Kg				6.5				2.9 J
Naphthalene	ug/Kg				7.2				0.48 J
Phenanthrene	ug/Kg				7.1				1.4 J
Pyrene	ug/Kg				6.5				2.8 J
Other SVOCs	Units								
1,2,4-Trimethylbenzene	ug/Kg								
1,3,5-Trimethylbenzene	ug/Kg								
VOCs	Units								
Benzene	ug/Kg								

Note:
(nv) after sample ID indicates that the result has not been validated.

Table 4.1 Site Investigation - Surface Soil Data (Continued)

Station		SS05	SS05	SS06	SS06	SS07	SS07	SS08	SS08
Sample ID		SO039	SO040	SO041	SO042	SO043	SO044	SO026	SO027
Date		8/13/02	8/13/02	8/13/02	8/13/02	8/13/02	8/13/02	8/9/02	8/9/02
Depth in inches		0 - 2	6 - 18	0 - 2	6 - 18	0 - 2	6 - 18	0 - 2	6 - 18
Conventionals	Units								
Carbon, Total Organic (TOC)	%		0.53			0.3			
pH	PH		5.88			8.08			
Solids, Total	%	98	95.2	97.5	93.2	96.6	94.9	96	94.4
Phenols	Units								
3,4-Dichlorophenol	ug/Kg	210 U	2.2 U	16 UI	2.2 U	2.1 U	8.8 UI	21 U	22 U
3,5-Dichlorophenol	ug/Kg	310 U	3.2 U	3.1 U	3.3 U	3.2 U	3.2 U	32 U	32 U
2,4,5-Trichlorophenol	ug/Kg	520 U	5.3 U	5.2 U	5.4 U	5.2 U	5.3 U	53 U	53 U
2,4,6-Trichlorophenol	ug/Kg	72 U	0.74 U	0.72 U	0.76 U	0.73 U	0.74 U	7.3 U	7.5 U
Tetrachlorophenols, Total	ug/Kg	720 U	7.5 U	9 J	7.6 U	7.4 U	7.5 U	74 U	75 U
Pentachlorophenol (PCP)	ug/Kg	4700	140	260	34	140	62	840	490
TPH	Units								
Diesel Range Organics (DRO)	ug/Kg	85000 Y	48000 Y	57000 Y	19000 J	26000 J	19000 J	190000 Y	74000 Y
Residual Range Organics (RRO)	ug/Kg	300000 O	230000 O	280000 O	49000 J	140000 O	56000 J	450000 O	230000 O
PAHs	Units								
2-Methylnaphthalene	ug/Kg		2.2 J		0.74 J		0.87 J		
Acenaphthene	ug/Kg		0.23 U		0.23 U		0.23 U		
Acenaphthylene	ug/Kg		0.34 J		0.18 U		0.34 J		
Anthracene	ug/Kg		1.4 J		0.21 U		0.49 J		
Benz(a)anthracene	ug/Kg		3.9 J		0.23 J		2 J		
Benzo(a)pyrene	ug/Kg		8		0.59 J		3.4 J		
Benzo(b)fluoranthene	ug/Kg		6.4		0.83 J		6.3		
Benzo(g,h,i)perylene	ug/Kg		24		1.2 J		4.7 J		
Benzo(k)fluoranthene	ug/Kg		1.9 J		0.27 J		4.4 J		
Chrysene	ug/Kg		17		1.1 J		6.2		
Dibenz(a,h)anthracene	ug/Kg		5 J		0.29 J		0.93 J		
Fluoranthene	ug/Kg		3.3 J		0.52 J		2.8 J		
Fluorene	ug/Kg		0.4 J		0.19 U		0.18 U		
Indeno(1,2,3-cd)pyrene	ug/Kg		6.7		0.75 J		4.9 J		
Naphthalene	ug/Kg		0.83 J		0.37 J		0.76 J		
Phenanthrene	ug/Kg		4.3 J		0.82 J		1.8 J		
Pyrene	ug/Kg		12		0.89 J		3.6 J		
Other SVOCs	Units								
1,2,4-Trimethylbenzene	ug/Kg								
1,3,5-Trimethylbenzene	ug/Kg								
VOCs	Units								
Benzene	ug/Kg								

Note:
(nv) after sample ID indicates that the result has not been validated.

Table 4.1 Site Investigation - Surface Soil Data (Continued)

Station		SS09	SS09	SS10	SS10	SS10	SS10	SS11	SS11
Sample ID		SO037	SO038	SO452	SO452	SO453	SO453	SO030	SO031
Date		8/12/02	8/12/02	10/10/02	10/10/02	10/10/02	10/10/02	8/12/02	8/12/02
Depth in inches		0 - 2	6 - 18	0 - 2	0 - 2 Lab dup	6 - 18	6 - 18 Lab dup	0 - 2	0 - 2 Field dup
Conventionals	Units								
Carbon, Total Organic (TOC)	%							1.04	1.01
pH	PH							5.74	5.83
Solids, Total	%	90	87.8	95.5	94.4	95.1		89.6	90
Phenols	Units								
3,4-Dichlorophenol	ug/Kg	230 U	23 U	21 U		22 U		23 U	23 U
3,5-Dichlorophenol	ug/Kg	340 U	35 U	32 U		32 U		34 U	34 U
2,4,5-Trichlorophenol	ug/Kg	560 U	57 U	53 U		53 U		56 U	56 U
2,4,6-Trichlorophenol	ug/Kg	78 U	8 U	7.4 UJ		7.4 UJ		7.9 U	7.8 U
Tetrachlorophenols, Total	ug/Kg	790 U	81 U	74 U		130 J		79 U	79 U
Pentachlorophenol (PCP)	ug/Kg	10000	740	300		2000		1100	1100
TPH	Units								
Diesel Range Organics (DRO)	ug/Kg	480000 Y	26000 J	42000 Y		2100000 F	2200000	72000 H	70000 H
Residual Range Organics (RRO)	ug/Kg	1300000 O	85000 J	190000 O		1500000 O	1700000	400000 O	380000 O
PAHs	Units								
2-Methylnaphthalene	ug/Kg								
Acenaphthene	ug/Kg								
Acenaphthylene	ug/Kg								
Anthracene	ug/Kg								
Benz(a)anthracene	ug/Kg								
Benzo(a)pyrene	ug/Kg								
Benzo(b)fluoranthene	ug/Kg								
Benzo(g,h,i)perylene	ug/Kg								
Benzo(k)fluoranthene	ug/Kg								
Chrysene	ug/Kg								
Dibenz(a,h)anthracene	ug/Kg								
Fluoranthene	ug/Kg								
Fluorene	ug/Kg								
Indeno(1,2,3-cd)pyrene	ug/Kg								
Naphthalene	ug/Kg								
Phenanthrene	ug/Kg								
Pyrene	ug/Kg								
Other SVOCs	Units								
1,2,4-Trimethylbenzene	ug/Kg								
1,3,5-Trimethylbenzene	ug/Kg								
VOCs	Units								
Benzene	ug/Kg								

Note:
(nv) after sample ID indicates that the result has not been validated.

Table 4.1 Site Investigation - Surface Soil Data (Continued)

Station		SS22	SS22	SS23	SS23	SS24	SS24	SS25
Sample ID		SO007	SO008	SO005	SO006	SO448	SO449	SO4009 (nv)
Date		8/9/02	8/9/02	8/9/02	8/9/02	9/19/02	9/19/02	9/30/03
Depth in inches		0 - 2	6 - 18	0 - 2	6 - 18	0 - 2	6 - 18	0 - 6
Conventionals	Units							
Carbon, Total Organic (TOC)	%							
pH	PH							
Solids, Total	%	94.2	96.6	93.3	91.8	96.5	95.9	95.6
Phenols	Units							
3,4-Dichlorophenol	ug/Kg	2.2 U	2.1 U	2.2 U	2.2 U	21 U	21 U	21 U
3,5-Dichlorophenol	ug/Kg	3.2 U	3.2 U	3.3 U	3.3 U	32 U	32 U	32 U
2,4,5-Trichlorophenol	ug/Kg	5.4 U	5.2 U	5.4 U	5.5 U	52 U	53 U	53 U
2,4,6-Trichlorophenol	ug/Kg	0.75 UJ	0.73 UJ	0.76 UJ	0.77 UJ	7.3 U	7.3 U	7.4 U
Tetrachlorophenols, Total	ug/Kg	8.2 J	7.4 U	7.6 U	7.7 U	74 U	74 U	74 U
Pentachlorophenol (PCP)	ug/Kg	53	12	51	5 J	230	560	1900
TPH	Units							
Diesel Range Organics (DRO)	ug/Kg	55000 H	11000 U	8100 U	4600 U	35000 H	73000 H	58000 Y
Residual Range Organics (RRO)	ug/Kg	260000 O	57000 J	21000 U	8600 U	170000 O	270000 O	230000 O
PAHs	Units							
2-Methylnaphthalene	ug/Kg						4.6 J	4.9
Acenaphthene	ug/Kg						0.38 J	0.23 J
Acenaphthylene	ug/Kg						0.32 J	0.42 J
Anthracene	ug/Kg						3 J	2.5 J
Benz(a)anthracene	ug/Kg						5.9	5.4
Benzo(a)pyrene	ug/Kg						9.8	6.3
Benzo(b)fluoranthene	ug/Kg						21	11
Benzo(g,h,i)perylene	ug/Kg						25	12
Benzo(k)fluoranthene	ug/Kg						7.7	7.6
Chrysene	ug/Kg						16	13
Dibenz(a,h)anthracene	ug/Kg						2.8 J	1.9 J
Fluoranthene	ug/Kg						13	11
Fluorene	ug/Kg						0.51 J	1.1 J
Indeno(1,2,3-cd)pyrene	ug/Kg						21	11
Naphthalene	ug/Kg						2.1 J	2.3 J
Phenanthrene	ug/Kg						7	8.5
Pyrene	ug/Kg						16	12
Other SVOCs	Units							
1,2,4-Trimethylbenzene	ug/Kg							
1,3,5-Trimethylbenzene	ug/Kg							
VOCs	Units							
Benzene	ug/Kg							

Note:
(nv) after sample ID indicates that the result has not been validated.