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JH Baxter - Arlington
WA0053823019
H2W 6.2 CA Correspondence

May 29, 2002

Kim Ogle
USEPA - Region 10
Waste and Chemical Management
1200 Sixth Avenue
WCM-126
Seattle, WA 98101

Re: Excess Stormwater Management Work Plan
J.H. Baxter & Co. Arlington, Washington facility
AOC Docket No. RCRA-10-2001-0086
EPA ID #: WAD 05382 3019

Dear Ms. Ogle:

We appreciate you taking the time to meet with us on April 25, 2002 to discuss the long-term storm water improvement measures for the J.H. Baxter & Co. (Baxter) Wood Treating site in Arlington, Washington, (the site) and the subsequent phone conference calls that we have held with the USEPA and State of Washington Department of Ecology (the Agencies) regarding this matter. As previously discussed, this letter will serve as a letter work plan to amend the previously approved Excess Stormwater Management Work Plan (ESMWP) so that Baxter may proceed with a Pilot Study at the site in the near future. The Pilot Study will allow Baxter to demonstrate constituent removal efficiency and will provide information for the long-term storm water improvement measures design, construction and operation.

We have reviewed the approved ESMWP and propose the following amendments as we have previously discussed with the Agencies:

1. The Pilot Study treatment system equipment will consist of a portable trailer mounted system with secondary containment. *System details are attached.* Baxter plans on using the system at several locations throughout the facility (as discussed below) to evaluate the effectiveness of the system for constituent removal.
2. The portable treatment system will be modified from the treatment system presented in the ESMWP in the following respects:
 - Solids removal (if performed) will be conducted within the settling tank with Sodium Hydroxide (NaOH) instead of the polymer-enhanced system described in the ESMWP. Baxter has successfully utilized this proposed process at our facility in Weed, California. Solids handling and disposal will be consistent with the methods previously described in the approved ESMWP.
3. Stormwater to be used in the Pilot Study will be collected from standing water currently present in both the treated and untreated wood storage areas at the site.
 - Batch treatment (10,000 gallons) of site stormwater will be conducted - this is consistent with the approved ESMWP.
 - The effluent from each batch will be tested in the manner described in the ESMWP, and discharge of the effluent meeting the criteria specified in the ESMWP will be conducted in the manner described in the ESMWP with the following exception - effluent will not be discharged to the subsurface, rather it will be placed back on the ground per the conditions of the existing State Waste Discharge Permit

If you have any questions regarding this letter please call me at 541-689-3801, or Norm Kennel with Premier Environmental Services, Inc. at 901-850-5404.

Sincerely,

A handwritten signature in black ink that reads "RueAnn Thomas". The signature is fluid and cursive, with the first name "RueAnn" and last name "Thomas" clearly distinguishable.

RueAnn Thomas
Environmental Programs Director

CC: Georgia Baxter, J.H. Baxter & Co.
Mary Larson, J.H. Baxter & Co.
Jim Hanken, Law Offices of James C. Hanken
SaraBeth Watson, Steptoe & Johnson, LLP
Shawn Severn, Premier Environmental Services, LLC
Jeanne Tran, Department of Ecology
Dean Yasuda, Department of Ecology

