

ECY received 7/13/02



JH Baxter - Arlington

WAD 053823019

H2W 6.2 Correction Action
correspondence

July 15, 2002

Kim Ogle
US Environmental Protection Agency
Region 10
1200 Sixth Avenue
WCM-126
Seattle, WA 98101

Jeanne Tran
State of Washington
Department of Ecology
Northwest Regional Office
3190 160th Avenue, SE
Bellevue, WA 98008-5452

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

Dear Ms. Ogle & Ms. Tran:

At your request, we have researched the treatment processes and effluent limits for stormwater of similar wood-treating facilities in Northwest Washington. These facilities include the following:

- The Oeser Company, Bellingham, Washington (Oeser)
- Brooks Manufacturing Company, Bellingham, Washington (Brooks)
- Cascade Pole and Lumber Company, Tacoma, Washington (Cascade)

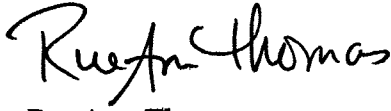
The attached Table 1 *Description of Wood Treating Sites* was developed based on reviews of Ecology's files. Table 1 contains a general description, current regulatory status, the lead agency, wood treatment chemicals used, stormwater treatment requirements, and discharge locations for the J.H. Baxter & Co. (Baxter) Wood Treating site in Arlington, Washington, and each of the above-referenced facilities. Table 2 *Comparison of Permit Effluent Limits* (also attached) provides detail on each facility's stormwater treatment requirements and discharge locations.

I would like to discuss this file review information, our recent document submissions, and our phased approach to Stormwater Management at the Site at our meeting on July 18th.



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

Sincerely,



RueAnn Thomas
Environmental Programs Director

Attachments

cc: Dean Yasuda, Department of Ecology
Cheryl Williams, US EPA
Georgia Baxter, J.H. Baxter & Co.
Mary Larson, J.H. Baxter & Co.
Paul Richart, P.E., City Engineer, City of Arlington
Bill Blake, Environmental Coordinator, City of Arlington
Jim Hanken, Law Offices of James C. Hanken
SaraBeth Watson, Steptoe & Johnson, LLP
Norm Kennel, Premier Environmental Services



Table 1. Description of Wood Treating Sites

| Site | Type of Site | Regulatory Status | Wood Treatment Chemicals Used | Type of Stormwater Treatment Facility |
|----------------------------|--|--|--|--|
| JH Baxter Arlington, WA | US EPA RCRA - Administrative Order on Consent (AOC). | In accordance with AOC - constructing pilot stormwater treatment system by July 2002. | PCP with oil. | Treated Product Storage Area - None currently. Chemical precipitation, filtering, and activated carbon to be installed. Untreated Wood Storage Area - None currently. To be routed to above treatment system if it doesn't meet permit limits. |
| Oeser Bellingham, WA | US EPA Superfund | RI/FS to be complete in summer 2002. ROD is scheduled for December 2002. The interim stormwater effluent limits in the NPDES Permit were extended in the mid-1990s to offset impacts of EPA clean-up activities. | PCP with oil. | Outfall 001 (untreated wood storage area) - appears to be no treatment. Outfall 002 (retort and treated wood storage area) - oil/water separator, coalescing plate filter, bag filters, and activated carbon. Outfall 003 (downstream of Outfalls 001 and 002) - no treatment at Outfall 003. |
| Brooks Bellingham, WA | No current Order or similar agreement noted during file review. Site activities have apparently been conducted under State authority. | Recent Draft NPDES Permit not available to public. No current information noted in file review regarding possible installation of a new treatment system. | PCP with oil. Fact sheet for NPDES permit indicates former creosote storage tanks. | Outfall 001 (Site stormwater discharge from settling pond to tributary) It is not apparent whether there is other treatment. Material in files is dated. Outfall 002 (discharge from tributary to Whatcom Creek) - no treatment at Outfall 002. |
| Cascade Tacoma, WA | No current Order or similar agreement noted during file review. Site activities have apparently been conducted under State authority. | NPDES Permit recently renewed in February 2002. Compliance schedule for meeting final effluent limits is in permit. | PCP, oil, creosote (liquid), and chromated copper arsenate (CCA). | Outfall 001 (Creosote and PCP treated wood storage area discharge to Blair Waterway via ditch and storm sewer) - oil/water separator, filters, and activated carbon. Outfall 002 (CCA treated wood & untreated wood storage area discharge to Puyallup River) - None currently. A treatment system including activated carbon was proposed in March 2002. |

Table 2. Comparison of Permit Effluent Limits

| Site | Outfall/ Placement Point | PCP | pH | Dioxin | Oil & Grease | PAHs | Arsenic | Chromium | Copper | Reference and Comments |
|---|--------------------------------------|----------|-----------|---------|-----------------|----------|----------|-----------|----------|--|
| JH Baxter (Treated Product Storage Area) | Ground | | | | | | | | | Permit No. ST-7425 Iss. Date 4/12/00, Exp. Date: 6/30/2004 |
| - Interim | | 215 µg/L | 6.5 - 8.5 | None | 10 mg/L | None | None | None | None | |
| - Final | | 1 µg/L | 6.5 - 8.5 | 0.6 ppq | 10 mg/L | None | None | None | None | |
| JH Baxter (Untreated Wood Storage Area) | Ground | | | | | | | | | |
| - Interim | | 215 µg/L | 6.5 - 8.5 | None | 10 mg/L | None | None | None | None | |
| - Final | | 1 µg/L | 6.5 - 8.5 | 0.6 ppq | 10 mg/L | None | None | None | None | |
| Oeser Outfall 001 | Open ditch | | | | | | | | | Permit No. WA-003081-3 Iss. Date 6/7/01, Exp. Date: 6/7/2006 |
| - Interim | | 50 µg/L | N/A | None | 10 mg/L | None | None | None | None | |
| - Final | | 9 µg/L | N/A | None | 10 mg/L | None | None | None | None | |
| Oeser Outfall 002 | Catch basin | | | | | | | | | |
| - Interim | | 9 µg/L | N/A | None | 10 mg/L | None | None | None | None | |
| - Final | | 9 µg/L | N/A | None | 10 mg/L | None | None | None | None | |
| Oeser Outfall 003 | Culvert on south side | | | | | | | | | |
| - Interim | | 9 µg/L | 6.0 - 9.0 | None | N/A | None | | | | |
| - Final | | N/A | 6.0 - 9.0 | None | N/A | None | None | None | None | |
| Brooks Outfall 001 | Discharge from pond to tributary | | | | | | | | | Permit No. WA-003080-5 Iss. date 2/97, Exp. Date: approx. 2/2002 New Draft Permit not available. |
| - See comments | | 50 µg/L | 6.0 - 9.0 | None | 10 mg/L | None | None | None | None | |
| Brooks Outfall 002 | Discharge from tributary to creek | | | | | | | | | |
| - See comments | | 9 µg/L | 6.0 - 9.0 | None | N/A | None | None | None | None | |
| Cascade Outfall 001 | Ditch via storm sewer | | | | | | | | | Permit No. WA-0037953 Iss. date 2/7/02, Exp. Date: 3/15/2007 |
| - Interim | | 215 µg/L | 6.0 - 9.0 | None | 10 mg/L | 100 µg/L | 360 µg/L | 660 µg/L | 310 µg/L | |
| - Final | | 81 µg/L | 6.0 - 9.0 | None | 10 mg/L | 100 µg/L | 360 µg/L | 138 µg/L | 159 µg/L | |
| Cascade Outfall 002 | Puyallup River | | | | | | | | | |
| - Interim | | 63 µg/L | 6.0 - 9.0 | None | 10 mg/L | 100 µg/L | 650 µg/L | 1030 µg/L | 390 µg/L | |
| - Final | | 20 µg/L | 6.0 - 9.0 | None | 10 mg/L | 100 µg/L | 360 µg/L | 137 µg/L | 156 µg/L | |

Note

1 If storm water is discharged to surface water Ecology has stated the limit will be 0.013 ppq.

DRAFT

JH Baxter
June 20, 2002