ATTACHMENT 4
9/30/2003 CEI

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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

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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

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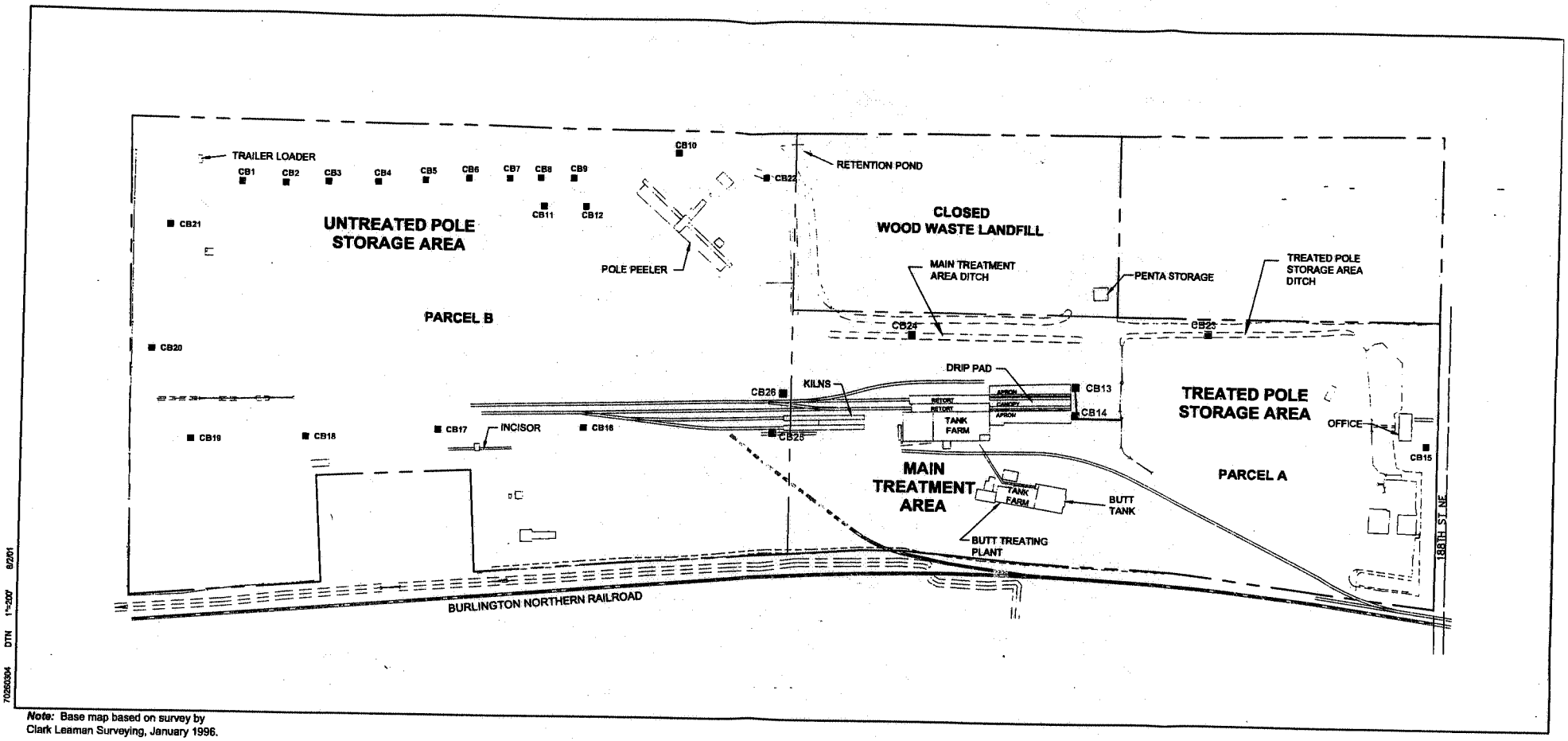
Photograph 1 - Open Excavation.

Photograph 2 - Bentonite placed at bottom of excavation.

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

French Drain and Monitoring Location Map



70260804 DTN 1"=200' 8/2001

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

CB13 French Drain Planned for Closure

CB26 Closed French Drain

N

0 200 400

Scale in Feet

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Photograph 3 - Final grade after closure.

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Figure 2 2/2