



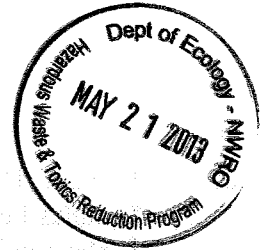
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

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AIR, WASTE AND
TOXICS

Ms. RueAnn Thomas
Environmental Programs Director
J.H. Baxter & Co.
85 N. Baxter Road
P.O. Box 10797
Eugene, OR 97440-2797



Re: Preliminary Comment on Corrective Measures Study and Request for Work Plan for Pilot Study of Chemical Oxidation Feasibility
Former J.H. Baxter & Co. ("Baxter"), Arlington Facility ("Facility")
§ 7003 Administrative Order on Consent ("Order")
Docket No.: RCRA-10-2001-0086
EPA ID No.: WAD 05382 3019

Dear Ms. Thomas:

The U.S. Environmental Protection Agency, Region 10 ("EPA") has reviewed Baxter's Corrective Measures Study (CMS) – Revision 3, dated April 2013, submitted as a requirement of the above-mentioned Order. This version of the CMS proposes chemical oxidation as a potential alternative for soil remediation at the Facility. Chemical oxidation has not been discussed in previous versions of the CMS and its effectiveness and feasibility at the Facility is unknown. If Baxter wishes to retain this alternative for consideration, Baxter must:

- Submit a work plan for a pilot study of chemical oxidation as a potential remedy at the Facility, including a schedule for its implementation, to EPA for review and approval within thirty (30) days of receipt of this letter.
- or
- Provide references to published reports that support the efficacy of chemical oxidation for the matrices and contaminants at the Facility.

Please note that, as with any new alternative, EPA is not in any way endorsing chemical oxidation as part of the remedy for the Facility. Results of the pilot study must be provided and evaluated before EPA will consider this alternative.

Please contact me at (206) 553-6702 or at palumbo.jan@epa.gov, or have your legal counsel contact Jennifer MacDonald at (206) 553-8311, if you have any questions.

Sincerely,



Jan Palumbo
Project Coordinator

cc: James C Hanken, Wolfstone, Panchot & Bloch
Douglas Fox, Stella-Jones Corp.
J. Stephen Barnett, Premier Environmental, Portland
Gary Dupuy, Geomatrix, Seattle
Georgia Baxter, J.H. Baxter, San Mateo
Dean Yasuda, Washington State Department of Ecology