J H Baxter – Arlington
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(2014)

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

OFFICE OF
AIR, WASTE AND
TOXICS

APR 17 2014

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

Re: Comments on *Remedial Action Pilot Study Report, Third Quarter* (Report)
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 the above-referenced Report, dated February 2014. EPA's comments on the Report are enclosed. In accordance with Section 12 of the Order, Baxter is hereby required to submit responses to the enclosed comments, and revised text and figures as indicated in the comments, within sixty days of receipt of this letter.

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

Enclosure

cc: James C. Hanken
Wolfstone, Panchot & Bloch

Douglas Fox
Stella-Jones Corp.

J. Stephen Barnett
Premier Environmental, Portland

Georgia Baxter
J.H. Baxter, San Mateo

Dean Yasuda
Washington State Department of Ecology

ENVIRONMENTAL PROTECTION AGENCY REGION 10 (EPA)
COMMMENTS ON REMEDIAL ACTION PILOT STUDY REPORT
THIRD QUARTER 2013
FORMER J.H. BAXTER & COMPANY WOOD TREATING FACILITY
ARLINGTON, WASHINGTON
APRIL 15, 2014

The EPA has reviewed the Remedial Action Pilot Study Report for the Third Quarter 2013 (dated February 2014) and has the following comments.

GENERAL COMMENTS

1. The reports have not been submitted to EPA on a quarterly basis. For example, the fourth quarter 2012 report came in June, 2013, the first quarter 2013 report came in July, 2013. Then no reports were received again until January, 2014, followed by another one a month later, in February, 2014. No explanation is given of the reason for uneven spacing of the reports. Submit the reports every quarter, unless EPA approves a later submittal date.

2. In general the text sections of the report do not include an explanation and evaluation of the data, highlighting what is of importance and different from the previous patterns. Revise the report to include this information in the text, highlighting the information in the tables and figures.

3. Include discussion in the text about some of the major changes in the concentrations of contaminants at the wells, such as for MW-15, MW-22, MW-23, MW-24, MW-40, and MW-41.

4. Include cross-sections in the report to document the shallow and the deep well contamination. Currently this information is only shown in map views in the reports. Without cross sections it is difficult to understand the relationships of the two plumes to each other in the northwest side of site. Note that EPA has made this request for cross sections in comments on previous Baxter reports. Include cross sections in all future groundwater monitoring reports and revise the current report to include cross sections.

SPECIFIC COMMENTS ON FEBRUARY 2014 REPORT

1. **Page 4.** The text states that Figure 6 shows a multi-foot discrepancy in the water elevations, but does not give a clear explanation for it. The discrepancy then occurs again in another sample, again without a clear explanation. Revise the text to provide details about what caused this discrepancy, and why it has occurred more than once.

2. **Page 6, top**. The text states that sample extracts were lost due to evaporation. Include an explanation for why this occurred and how it will be prevented in the future.

3. **Page 6, second paragraph**. The text states that the "composite sample was prepared by combining an equal volume of groundwater from each extraction well using a measuring cup." Provide an explanation as to why the samples could not be taken from the system while pumping. Also provide a detailed description of how the sampling is performed, including use of multiple containers. Organic contaminants in groundwater samples can adhere to the walls of intermediate collection devices, possibly biasing low affected sample results. The water sample extraction procedures in *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods* (SW-846) include a solvent rinse of the sample container to ensure quantitative transfer of the sample. Below is an excerpt from SW-846 Method 3535A, section 11.1, sample preparation, second paragraph:

> Secondly, the majority of the organic analytes are hydrophobic and may preferentially adhere to the surfaces of the sample container. For this reason, most extraction methods have traditionally specified that, once the sample is transferred to the extraction apparatus, the sample container should be rinsed with solvent which is added to the apparatus. As a result, it is generally not appropriate to extract only part of the sample from a sample container, e.g., 250 mL from a 1-L sample bottle.

4. **Appendix A**. Figures showing graphs for MW-25 to MW-29, and MW-31 to MW-37 are missing and no reason is given for why they are missing. Revise the report text and figures to include these wells.