



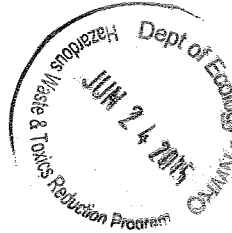
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

JUN 22 2015

OFFICE OF
AIR, WASTE AND
TOXICS

Mr. Baxter - Arlington
WAD 053823019
H2W 6-2
(2015)

Ms. Georgia Baxter, Chief Executive Office
J.H. Baxter and Co.
PO Box 5902
San Mateo, California 94402



Re: Comments on Workplan for Installation of Oxygen Infusers and Rehabilitation of Recirculation Trench
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. Baxter:

The U.S. Environmental Protection Agency, Region 10 has received Baxter's *Workplan for Installation of Oxygen Infusers and Rehabilitation of Recirculation Trench (Workplan)*, dated May 2015, submitted by GSI Water Solutions, Inc. by email on May 18, 2015. This Workplan is required under the above referenced Order. The EPA's comments on the Workplan are below.

Page 3, Recirculation trench rehabilitation, paragraphs 3iii, 3iv, 3vi:

References are made to drilling a series of geotechnical borings within the existing trench. Open bottom pipe casings must also be installed in the borings so that the top of the casing is at the bottom of the limestone treatment material in the trench.

Figure 5:

Revise the figure and the legend to show that the crushed rock or gravel will be installed inside of an open bottom pipe casing.

The reason for these changes is that a boring filled with rock or gravel without a casing will not force the water to flow out of the additional limestone treatment material.

In accordance with Paragraph 27 of the Order, submit a revised Workplan which addresses these comments within fifteen 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 or MacDonald.Jennifer@epa.gov, if you have any questions.

Sincerely,

Jan Palumbo
Project Coordinator

cc: Mr James C. Hanken
Wolfstone, Panchot & Bloch

Ms. Rue Ann Thomas
Nattura Group

Mr. Edward C. Smith
McFarland Cascade Holdings Inc.
Stella-Jones Corp.

Mr. Dean Yasuda
Washington State Department of Ecology

Ms. Heidi Blischke
GSI Water Solutions, Inc.