J.H. BAXTER & CO., a California Limited Partnership

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Office of Air, Waste & Toxics

August 15, 2013

Ms. Jan Palumbo (AWT-121)
United States EPA, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Subject: **August 2013 Progress Report**
J.H. BAXTER ARLINGTON FACILITY
Docket No. RCRA-10-2001-0086

Dear Ms. Palumbo:

This letter provides the August 2013 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from July 15, 2013, to August 15, 2013.

SIGNIFICANT DEVELOPMENTS THIS PERIOD

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- On July 15, 2013, Baxter submitted to EPA the First Quarter 2013 Operations and Monitoring Report.
- On July 25, 2013, Baxter met with EPA in Seattle to discuss additional needs for the Source Area Investigation and Chemical Oxidation Pilot Test Work Plan. Baxter has continued the development of the Work Plan in accordance with the meeting discussions.
- The Remedial Action Pilot System continued to operate during the reporting period.

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ANTICIPATED DEVELOPMENTS NEXT PERIOD

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to operate the Pilot Study remediation system during the next reporting period.
- Baxter has scheduled routine quarterly groundwater monitoring activities (third quarter event) beginning August 25, 2013.

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OTHER INFORMATION

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Baxter has no other information to report.

CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, i certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: Georgia Baxter

Name: Georgia Baxter
Title: Chief Executive Officer
Date: August 15, 2013

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,

Georgia Baxter

Georgia Baxter
Chief Executive Officer

cc: Jeanne Tran, Ecology
Jamie Hillery, Stella-Jones Corp.
RueAnn Thomas, Nattura Group
J. Stephen Barnett, AMEC

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