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

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November 15, 2008

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

Subject: **November 15, 2008, Progress Report**
J.H. BAXTER ARLINGTON FACILITY
Docket No. RCRA-10-2001-0086

Dear Ms. Palumbo:

This letter provides the October 15, 2008, progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from October 15, 2008, to November 15, 2008.

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:

- During the week of October 20, 2008, groundwater monitoring activities associated with the *Remedial Action Pilot Study Performance Monitoring Plan* were conducted.
- The *3rd Quarter 2008 Operations and Monitoring Report - Remedial Action Pilot Study* (O&M Report) will be sent by courier to EPA on November 17, 2008. The O&M Report contains a summary of activities completed during the third quarter 2008, groundwater elevation data, groundwater monitoring data, and a quality assurance review.
- Groundwater elevation data from newly installed and select existing wells are currently being collected monthly.

Anticipated Developments Next Period

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

- The Remedial Action Pilot System will continue to be evaluated during the next reporting period, including monthly groundwater elevation data collection.

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- Baxter will provide a work plan for a supplemental groundwater investigation by December 5, 2008.

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: November 15, 2008

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
CEO

cc: Jeanne Tran, Ecology
RueAnn Thomas, Bluefield Holdings
Douglas Fox, Stella-Jones Corp.
J. Stephen Barnett, Premier Environmental Services, Inc.