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

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June 27, 2003
Ms. Christy Brown, RCRA Project Manager
United States EPA, Region 10
Mail Stop WCM-126
1200 Sixth Avenue
Seattle, WA 98101

Re: Excavation of Ditch Material
J.H. Baxter & Co. Arlington, Washington facility
AOC Docket No. RCRA-10-2001-0086
EPA ID #: WAD 05382 3019

Dear Ms. Brown:

As we have previously discussed, J.H. Baxter & Co. (Baxter) plans to excavate material from two ditches at the Arlington Wood Treating Facility as part of the planned Stormwater Improvement Measures. The purpose of the ditch excavation is to remove material with low levels of site-related chemicals from areas with direct contact with surface water. The activities associated with the ditch excavation will be conducted under the provisions of Paragraph 63 of the Administrative Order on Consent (AOC) regarding other work at the facility.

Material within Ditches 1 & 2 includes eroded soil and rock ditch base material and is collectively identified as ditch material. Current plans call for excavation of ditch material from Ditch 1 and Ditch 2 as shown on the attached Figure 1. Baxter has sampled the material in these ditches as part of the Site Investigation and the results are summarized on Figure 1. Sampling results indicate that pentachlorophenol (PCP) concentrations range from 1.9 mg/kg to 11 mg/kg, with the highest concentrations just slightly above the United States Environmental Protection Agency's (EPA) Region IX's Preliminary Remediation Goal (PRG) of 9 mg/kg for direct contact with soil.

A Synthetic Leaching Precipitation Procedure (SPLP) was also implemented to evaluate the potential of PCP leaching from the ditch material. The results of the SPLP ranged from 0.820 µg/L to 4.0 µg/L, indicating the low potential for PCP to leach from the ditch material.

In addition, concentrations of diesel-range organics were also detected in the soils. The concentrations ranged varied from 140 mg/kg to 2,100 mg/kg.

The ditch material will be excavated from the entire lengths of Ditches 1 & 2. The material will be excavated using a backhoe or similar excavation equipment to approximately six inches below the geotextile base fabric that is present in the ditches. The backhoe will place the excavated material directly into a dump truck and it will be transported to a bermed area for material management purposes (Figure 1). Excavated ditch material will be temporarily

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stockpiled onsite in the bermed area and then used as engineered fill during implementation of the stormwater improvement measures.

It is anticipated that the geotextile fabric will be torn into pieces by the backhoe during excavation. Larger pieces of fabric will be removed by hand, cleaned of loose debris and washed (if necessary), and placed in a dumpster for disposal as solid waste. Small pieces of fabric will remain mixed in with the material that will be used as fill.

The stockpiled ditch material will be used as engineered fill during construction of the stormwater collection sumps and associated piping. The design of the stormwater improvement measures is not 100 percent complete, but preliminary design indicates that there will be at least two sumps and associated piping immediately south and southwest of the Main Treatment Area, in addition to stormwater collection and conveyance sumps/ditches in the Treated Pole Storage area. The depth to groundwater in this area is approximately 20 to 30 feet below the ground surface (BGS). The sumps are estimated to extend to approximately 8 to 10 feet BGS, and associated piping will be placed at approximately this same depth interval. The ditch material will be used as engineered bedding material and fill around the sumps and piping during construction. The ditch material will be placed above the groundwater table and will not affect groundwater.

If you have any questions, please call me at (541) 689-3801.

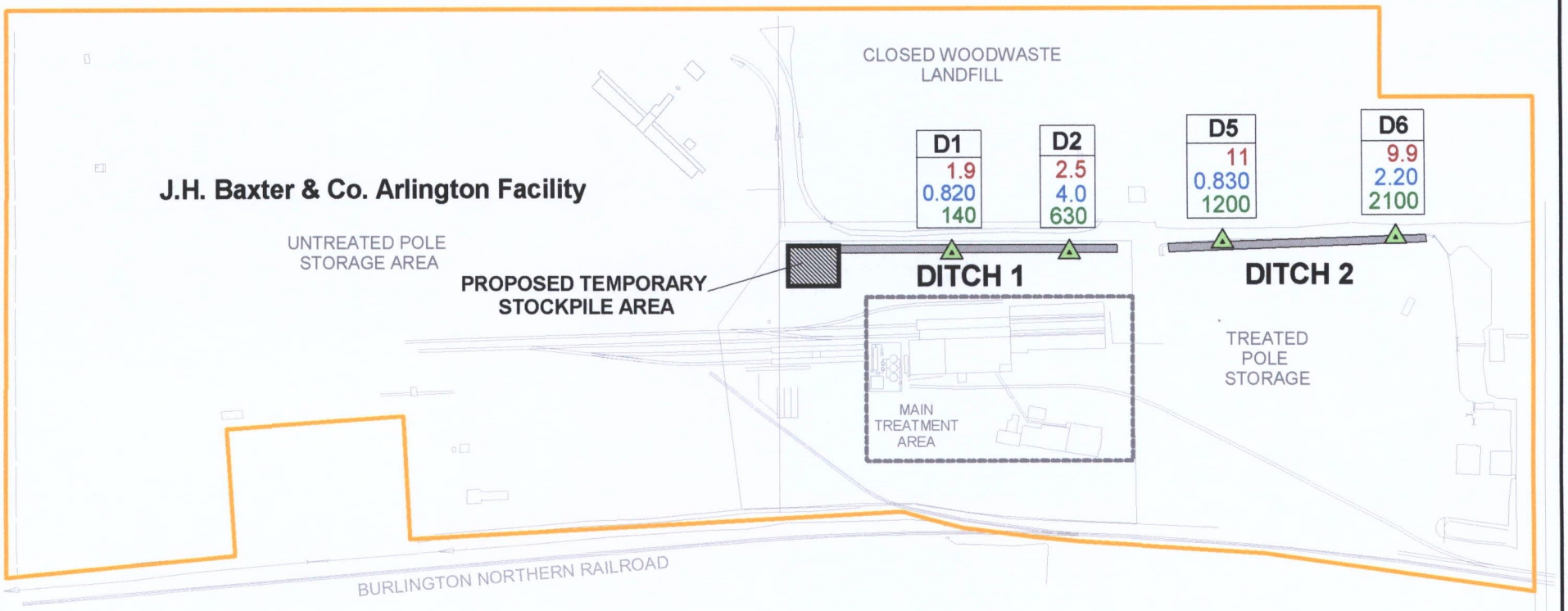
Sincerely,

RueAnn Thomas

RueAnn Thomas
Environmental Programs Director

cc: Jeanne Tran, Department of Ecology
Georgia Baxter, J.H. Baxter & Co.
Mary Larson, J.H. Baxter & Co.
Norm Kennel, Premier Environmental Services, Inc.

enclosure



LEGEND

Sample location

D1	Station ID
1.9	Pentachlorophenol (PCP) (mg/kg)
0.820	SPLP Analysis PCP (ug/L)
140	Diesel Range Organics (mg/kg)

Site boundary

0 200 400 Feet

Figure 1. Ditch Excavation Area and Ditch Material Concentrations - Arlington, WA

JHBaxter