R10_RCRA_Records

From: Palumbo, Janice
Sent: Friday, August 20, 2021 11:14 AM
To: R10_RCRA_Records
Subject: RCRA Records Submittal WA 3019 14F FW: Baxter Arlington RCRA Site - August Monthly Progress Report (August 15 - September 15 Period)
Attachments: August 2019 Baxter Progress Report.pdf

Jan Palumbo (MS 15-H04)
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From: Josh Bale <jbale@gsiws.com>
Sent: Tuesday, September 17, 2019 2:49 PM
To: Palumbo, Janice <Palumbo.Jan@epa.gov>
Cc: Georgia Baxter <gbaxter@jhbaxter.com>; Randy Pratt <rpratt@gsiws.com>; christopher.martin@ecy.wa.gov
Subject: Baxter Arlington RCRA Site - August Monthly Progress Report (August 15 - September 15 Period)

Jan,

Attached is the August 2019 Progress Report for the Arlington RCRA Site for J.H. Baxter. Please note we have made a request to discontinue the SADD report or at a minimum merge the 2nd Half report and SADD together. No rush on an answer as we will not start on the SADD for another two months or so but would appreciate consideration of this adjustment to reporting.

Please let me know if you have any questions.

Thank you,

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

September 17, 2019

Ms. Jan Palumbo (AWT-150)
United States EPA, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Subject: August 2019 Progress Report
J.H. BAXTER ARLINGTON FACILITY
Docket No. RCRA-10-2001-0086

Dear Ms. Palumbo:

This letter provides the August 2019 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from August 15, 2019 to September 15, 2019.

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:

- The Third Quarter 2019 sampling event was conducted on September 14 and 15, 2019. Baxter has completed the switch in analytical laboratory support services from ALS out of Kelso, WA to Eurofins (formerly TestAmerica) out of Seattle, WA and Third Quarter 2019 results will be reported by Eurofins.

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 (recirculation system) during the next reporting period.
- The CMS Version 4 was submitted during the First Quarter 2017. We anticipate comments from EPA.

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.

- In the April 30, 2001 Administrative Order on Consent (AOC), Attachment B (Scope of Work for Site Investigation Work Plan), under Section C, EPA requires an annual Stand Alone Data Document (SADD) be submitted that includes 1) a facility map 2) sampling results 3) groundwater evaluation data, and 4) well and boring logs. The Semi-Annual Operations and Monitoring (O&M) Report provides updates to any of the AOC requirements included in the SADD requirements. Baxter is requesting the removal of the requirement for submittal of an annual Stand Alone Data Document (SADD) since the Semi-Annual Reports provide the required information. If necessary, additional tables and figures that have historically been included in the SADD can be added to the Second Half O&M Report. The development of the SADD document requires a significant administration burden independent of the

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Semi-Annual reports without presenting any new unique information. As an alternative, if the SADD requirement continues, Baxter requests merging the First and Second Half Semi-Annual report into one annual submittal that would include the critical SADD information and annual activities.

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:

Name: Georgia Baxter

Title: Chief Executive Officer
Date: September 17, 2019

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
Chief Executive Officer

cc: Chris Martin, Ecology

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