



May 1, 2015

Mr. Greg Aitken
Hydrogeologist
Western Region Cleanup Program
165 E. 7th Ave., Ste 100
Eugene, OR 97401-3049

**Subject: Revised Monitoring Program May 2015
J.H. BAXTER Eugene Site
ECSI No. 55**

Dear Mr. Aitken:

Thank you for meeting with us on April 29, 2015. At the meeting we agreed upon a revised monitoring program for the Site. Rationale for the reduction in sampling was based on a review of trend plots, current plume configuration, groundwater elevation contour maps, and ongoing operation of the pump and treat system. A request for reduction in sampling was submitted on February 6, 2015 and supplemental material was provided on April 2, 2015. This letter represents the documentation of decisions regarding the sampling program based on those above mentioned deliverables coupled with the in person meeting with DEQ. Table 1 summarizes the program as revised at the April DEQ meeting and Figure 1 shows which wells will be sampled. Groundwater, where sampled, will be analyzed for phenols using EPA method 8270C Low Level.

There are a number of wells where groundwater will not be sampled but are still a part of the monitoring program, and therefore, will not be abandoned. These wells, shown on Figure 1, will be used to obtain water levels to construct potentiometric groundwater surface elevation maps (contour maps) to demonstrate that the pump and treat system is functioning as intended in terms of hydraulic capture. It also provides an opportunity to verify that the wells are in good condition.

There are 2 wells with special conditions:

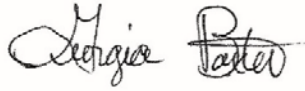
- Well W-16AI: PCP has not been detected in Well W-16AI for many years, however, the detection limit has been elevated the past few years. Therefore, it will be sampled annually for 2 additional years. If PCP is not detected at a reasonably low method detection limit (below 1 ug/L), sampling will be discontinued.
- Well W-12D: This is a deep well completed between 125 and 135 feet below ground surface. There are 40 feet of clayey gravels between the intermediate water-bearing zone and the deep water-bearing zone. The well has been sampled bi-annually (every other year) since 2001. In 2009, there was a low level detection and otherwise PCP has not been detected. However, the last 2 events (2011 and 2013), the detection limits were elevated. Therefore, it will be sampled one additional time (September 2015), and if it is not detected at a reasonably low detection limit, sampling will be discontinued.

In addition to the groundwater sampling and water level measurement, a well search of Oregon's water Resource Department will be conducted annually to check for any new well construction within or directly adjacent to the groundwater plume. Although unlikely, new wells for residential use are of particular concern in the residential area directly north of the Site. A contingency plan (consisting of locating the well, contacting the owner to determine well usage, and remedial measures, if appropriate) for new wells will be included in an addendum to the Feasibility Study which is expected to be submitted to DEQ in June 2015. We understand that



this monitoring program will be periodically reviewed to ensure it meets the monitoring needs of the project. If you have any questions, please contact me at (650) 349-0201.

Sincerely,

A handwritten signature in cursive script that reads "Georgia Baxter".

Georgia Baxter
Chief Executive Officer

cc: Heidi Blischke/GSI
Scott Thielke/Baxter



Table 1: Groundwater Monitoring Program; revised May 2015

JH Baxter, Eugene Site

May 1, 2015

Well Number	Water Level/Flow Rate	Sampling Program May 1, 2015	
		Frequency	Parameters ¹
Pumping Wells			
W-13S	W	Annual	Phenols
W-13I	W	Annual	Phenols
W-20I	W	Annual	Phenols
On-Site Monitoring Wells			
W-1S	Semi-annual	--	--
W-2S	Semi-annual	--	--
W-2I	Semi-annual	--	--
W-3S	Semi-annual	--	--
W-4S	Semi-annual	--	--
W-5I	Semi-annual	--	--
W-6I	Semi-annual	Annual	Phenols
W-7S	Semi-annual	Annual	Phenols
W-8S	Semi-annual	--	--
W-8I	Semi-annual	--	--
W-9S	Semi-annual	--	--
W-9I	Semi-annual	--	--
W-11S	Semi-annual	Annual	Phenols
W-11I	Semi-annual	Annual	Phenols
W-12I	Semi-annual	Annual	Phenols
W-12D	Semi-annual	Sept 2015 only ²	Phenols
W-13D	Semi-annual	--	--
W-14I	Semi-annual	--	--
W-15S	Semi-annual	--	--
W-18AS	Semi-annual	--	--
W-18AI	Semi-annual	--	--
W-21S	Semi-annual	--	--
W-21I	Semi-annual	--	--
W-22S	Semi-annual	--	--
W-23	Semi-annual	Annual	Phenols
Off-Site Monitoring Wells			
W-16AS	Semi-annual	--	--
W-16AI	Semi-annual	Annual (2015, 2016) ³	Phenols
W-17AS	Semi-annual	Annual	Phenols
W-17AI	Semi-annual	Annual	Phenols
W-17BI	Semi-annual	--	--
W-18BI	Semi-annual	--	--
W-19AS	Semi-annual	--	--
W-24	Semi-annual	Semi-annual	Phenols
W-25	Semi-annual	Semi-annual	Phenols
W-26	Semi-annual	Semi-annual	Phenols
W-28	Semi-annual	--	--
W-29	Semi-annual	Semi-annual	Phenols
W-32	Semi-annual	Annual	Phenols
W-34	Semi-annual	--	--
W-35	Semi-annual	--	--
W-36	Semi-annual	--	--
Off-Site Production Wells			
Zippo-Log	--	Annual	Phenols

Notes:

W = weekly

Semi-annually = March and September

Annual = September

1 Phenols per EPA Method 9270C Low Level

2 Well W-12D will be sampled in September 2015. Sampling will be discontinued in 2016.

3 Well W-16AI will be sampled annually in 2015 and 2016. Sampling will be discontinued in 2017.

