



# Oregon

John A. Kitzhaber, M.D., Governor

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March 15, 2011

J.H. Baxter  
C/O RueAnn Thomas  
Bluefields Holdings  
333 SW Fifth Ave, Suite 510  
Portland, OR 97204

Regarding: Remedial Investigation Summary Report, Revision 1, March 2010  
JH Baxter  
ECSI 55

Dear Ms. Thomas:

DEQ has reviewed the above document, which is a revision of a 2002 Draft RI report. Thank you for completing the revisions of the document and for updating it to reflect subsequent events and current data. DEQ has a single comment on the document.

Comment 11 discusses background samples and the range of background values for various constituents, including arsenic, without saying what any of the background values are. As we have discussed, the background value for arsenic at the site is seven mg/Kg, which is based on DEQ default background values for naturally occurring metals and supported generally by Baxter's background data for arsenic.

With this consideration, DEQ approves the revised RI summary report.

If you have any questions about this letter, please contact Geoff Brown at (541)686-7819.

Sincerely,

Geoff Brown  
Project Manager

Enclosure: Staff Memorandum

Cc: ECSI File #55  
Ecc: Steve Barnett, Premier Environmental