

DEQ and US EPA - J.H. Baxter Contamination and Cleanup Investigation Public Meeting – Nov. 13, 2023

Oregon Department of Environmental Quality and U.S. Environmental Protection Agency

J.H. Baxter Wood Treating Facility

Contamination and Cleanup Investigation Public Meeting

Eugene

November 13, 2023

Meeting Summary

Welcome and Introductions

DS Consulting Facilitator, Donna Silverberg, welcomed everyone to the Oregon Department of Environmental Quality (DEQ) and U.S. Environmental Protection Agency's (EPA) virtual public meeting regarding J.H. Baxter Wood Treating Facility's Contamination and Cleanup Investigation. Spanish interpretation was provided and a recording of the meeting is posted on [DEQ's J.H. Baxter webpage](#).

The purpose of this session was to:

- Provide updates on the work that DEQ and EPA have been doing to assess and cleanup contamination at and near the J.H. Baxter wood treatment facility in Eugene, Oregon;
- Inform of the process and opportunities for public engagement in the future; and
- Answer questions that community members may have about the process.

Donna welcomed OR Sen. James Manning Jr. and representatives from U.S. Sen. Jeff Merkley's office, former U.S. Rep. Peter DeFazio's office, OR Rep. Julie Fahey's office, the U.S. Department of Interior, local media, and community members. She introduced the Community Core Team,¹ which DEQ convened in 2021 and has met 21 times since; the Core Team brings community, state agency, and local government agency representatives together to discuss information on environmental pollution regarding the J.H. Baxter facility in west Eugene.

Background and Overview of JH Baxter and Agency Engagement – Randy Nattis, EPA on-scene coordinator, provided a brief history of site and what led to the current cleanup investigation, noting that the wood-treating facility started in 1943 and closed in January 2022. The facility treated utility poles, railroad ties, and other wood products with oil-based chemical preservatives, such as pentachlorophenol. In February 2022, EPA issued a rule that pentachlorophenol use be phased out nationwide, as it poses health risks and there are viable alternatives. Across the street from the facility is a residential community that was created many years after the plant was opened and which is impacted by the pollution and contamination from the facility.

In February 2022, EPA joined DEQ to assess the extent and scope of contamination and to oversee cleanup of the facility and the neighboring properties. In the last two years, EPA has met with community members, attended events, met with former workers, and worked with the Core Team. During that same timeframe, conducted sampling at dozens of properties, conducted environmental sampling downstream, and is doing an assessment of the facility.

¹ The J.H. Baxter Community Core Team includes representatives from Active Bethel Community, Beyond Toxics, City of Eugene, Lane County Public Health Department, Lane Regional Air Protection Agency, Oregon Department of Environmental Quality, Oregon Health Authority, Oregon State University, and the U.S. Environmental Protection Agency.

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Residential Cleanup Efforts, Results, and Next Steps— Brad Shultz, DEQ Western Region Cleanup Manager, provided an update on sampling results, residential cleanup to date, and plans for the future. **See slides 8-14 below.**

In late May 2022, J.H. Baxter declared that they could not clean up the site, so DEQ determined the facility to be an “industrial orphan site,” allowing the agency to take control of cleanup efforts. At that point, DEQ conducted residential soil sampling of 22 yards, 17 of which had levels of dioxin that were above the 4.7 parts per trillion (ppt) residential cleanup level. DEQ worked with the Oregon Health Authority (OHA) to prioritize yards for cleanup and determined that yards with dioxin levels above 40ppt needed to be prioritized. Of the 17 yards above 4.7ppt, 7 had dioxin levels above 40ppt. The 2022 sampling effort led DEQ to believe that the edge of contamination had not yet been found. In March 2023, DEQ and EPA tested an additional 32 yards, of which 25 were above 4.7ppt, and 4 above 40 ppt. The cleanup effort planned for this fall includes the 7 originally found to have dioxin levels above 40 ppt.

Brad provided an overview of the risk associated with the various levels of dioxin, noting that 4.7 ppt and lower is below DEQ’s cleanup threshold because of the very low risk to human health. Between 4.7 ppt-40 ppt also poses very low risk to human health, unless people are consuming eggs from chickens exposed to the soil. OHA determined that above 40 ppt, poses a risk to human health, particularly to children exposed to bare soil every day for more than a year. This is why DEQ is focusing on yards over 40 ppt for cleanup.

An overview of cleanup activities and public engagement is provided in the presentation slides (see below).

This fall, in October 2023, DEQ contractors worked to remove trees and vegetation in preparation for soil removal efforts. Bids for soil removal were due to DEQ today (Nov. 13, 2023). Next steps will be to review any bids and choose a contractor to start soil removal, replacement with clean fill, and replacement of vegetation if any acceptable bids are received. The goal from the bid solicitation was to start residential yard cleanup at the end of November and finish at least some of the yards before the end of the year. Brad noted that the actual schedule will depend on receiving an acceptable bid, progress of work, and the availability of the contractors. DEQ and EPA will continue to evaluate cleanup needs for the additional 4 properties above 40ppt identified in the March 2023 sampling. Additionally, there will be more residential soil sampling conducted to determine the edge of contamination.

Environmental Assessment Purpose and Process— Randy provided an overview of EPA’s Superfund, or the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), including the history of the act and where EPA is in the process at J.H. Baxter. **See slides 15-23 below.**

Superfund is a law passed by Congress in 1980 in response to a number of contaminated hazardous waste sites (Love Canal, Times Beach, and Valley of the Drums) that were impacting the health of communities living at or near the waste. The law provided EPA authority to enforce cleanup of contaminated sites and requires that the responsible parties pay for or perform the cleanup. The Superfund process includes emergency response, information gathering and analysis, liability for responsible parties, and site cleanup, and has the following goals:

1. Protect human health and the environment;
2. Make the responsible parties pay for the cleanup work, if possible;
3. Involve communities in the process; and,
4. Return the site to a productive use.

Under the Superfund program there are two types of processes: Removal and Remedial.

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There are three types of actions within the **removal process**: emergency response, time critical removal, and non-time critical removal. All three types of actions in the Removal program include assessment, removal, and post removal phases. Community involvement is integral to the entire process. Removal actions can occur at any time, including during the remedial process (for example at the J.H. Baxter site).

The **remedial process** also has distinct phases, including assessment, characterization, selection of remedy, cleanup, and post construction. [Community involvement](#), enforcement, and emergency response can occur at any time in the remedial process.

1. *Assessment phase* (the J.H. Baxter site is currently in this phase): discovery of contamination, preliminary assessment, site inspection, and then national priorities listing (NPL) of the site or “Superfund” listing. This phase includes air, water, and soil sampling at and around the site to determine what hazardous waste is present and if so, are they a threat to human health. This information is used to determine if the site will be listed as a Superfund site.
2. *Characterization phase*: Remedial investigation/feasibility study, and proposed plan. After Superfund listing, the site is further characterized to assess the extent of the contamination, what technologies can be used to treat the contamination, cost estimates, and eventually a plan of action for cleanup is created.
 - a. As part of this step, the EPA works with the community to develop a Community Involvement Plan (CIP). Community outreach, engagement, and information sharing are important parts of this process and includes interviews, process design, access to information and reports, media, public meetings, etc.
3. *Selection of remedy phase*: Record of Decision or ROD. The ROD is EPA’s action memo clarifying the cleanup actions, cost, and how it will be implemented. This phase also includes public meetings, opportunities to provide input and comments, and once finalized the community involvement plan will be revised and implemented.
4. *Cleanup phase*: Remedial design, remedial action. This phase includes design of the cleanup and implementation of the cleanup actions. This phase also includes multiple opportunities and avenues for public engagement.
5. *Post construction phase*: Once all the cleanup goals are met, the EPA will propose that the site is deleted, or removed, from the NPL. Like other steps in the process, there are opportunities for public meetings and comments. Reuse and redevelopment of the site can be discussed throughout the Superfund process. However, this last step is the best period to determine the future [productive use](#), such as housing, public works facilities, transportation, and other community infrastructure. No matter what the use, the community benefits due to the cleaned-up property. The community and local government will be engaged in this step of the process.

There are [established, proposed, and deleted](#) (or cleaned up) Superfund sites throughout the nation.

J.H. Baxter Facility Site Investigation Efforts, Results, and Next Steps—Randy provided an update on EPA’s activities at J.H. Baxter. EPA has a 24/7 emergency response program that will be operating and available in case of emergency, even in the event of a government shutdown. **See slides 24-27 below.**

EPA finalized field sampling in Fall 2023, including tank, tote, and drum sampling; the data are being evaluated now and will feed into the NPL evaluation. They are also developing a scope of work and cost estimate for the time-critical removal actions which will include emptying the tanks, disposal of contents, as well as disposal of

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asbestos insulating tanks, pipes, and anything else associated with those areas. It is expected that this removal will happen in Spring 2024. Due to the cost, EPA Headquarters approval is required.

EPA is also working on a site-wide (beyond JH Baxter and the residential area) integrated assessment to determine the extent of contamination that may have migrated off the facility property. This integrated assessment is an important step in the Superfund listing process. EPA is still in the assessment phase and is now evaluating the data to see if J.H. Baxter will become a Superfund site.

Question and Answer Session - Participants in the webinar had an opportunity to ask questions of the presenters. The questions and responses are summarized below.

- *Question:* Is DEQ or EPA involved in the class action lawsuits against J.H. Baxter, and will they be testifying?
 - *Response:* The agencies are not involved in either of the lawsuits.
- *Question:* I have often seen woodpeckers pecking on existing power poles. Are the chemicals harmful to them?
 - *Response:* None of the experts on the panel are veterinarians, so are not able to answer that, but can try to get an answer after the meeting.
- *Question:* Is J.H. Baxter still an active company? Do they have any active offices or plants?
 - *Response:* Baxter is an active company in that it still owns the facility in Eugene, although it stopped treating wood in January 2022. However, there are a few employees who are maintaining environmental protection systems at the facility in Eugene.
- *Question:* Has anyone tested the recycling company soil which is being disrupted daily?
 - *Response:* Pacific Recycling is the neighbor of J.H. Baxter and purchased part of the J.H. Baxter site about 10 years ago. As part of that sale, there was a requirement to test and cap the soil, and there is a management plan in place that does not allow for disruption of the soil.
- *Question:* It sounds like the DEQ/EPA is still trying to define the extent of the contamination. Are most of the properties with elevated concentrations (> 40 ppt) located to the north of Roosevelt Boulevard? Are there impacted properties with soil contamination located to the west of J.H. Baxter?
 - *Response:* The agencies are still actively trying to define the extent of contamination. Over the last 80 years there have been a lot of changes in the area (from farmland to what it is today). The land has been re-worked. The agencies continue to do step out sampling and will do so until they find the edge of the contamination. So far, the areas with the highest levels of contamination are due north of the facility.
- *Question:* Wind patterns are both north and south in this area...is EPA testing the soils of the businesses to the south?
 - *Response:* Not currently. The residential properties are targeted because that is where people spend most of their time. Risk and clean up numbers are based on land use, so commercial and industrial areas have higher risk concentrations than residential areas, where people and children spend more time.
 - *Comment:* True, but it would be important to know if the soils both north and south are contaminated, wouldn't it? Part of the larger area assessment.
 - *Response:* Yes, and DEQ does have some samples that were collected south of the facility. It is in the long-term plan to evaluate the entire area for potential contamination

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from the facility. However, residential areas are most likely to be impacted and are the priority now.

- *Question:* What is the residential perimeter that has been tested so far?
 - *Response:* The southern boundary is Roosevelt Boulevard, the western boundary is La Casa Street, and the eastern boundary is Coraly Drive.
- *Question:* The last sampling done was in March at the Coraly dead end. What were the results and will you be testing further out and when?
 - *Response:* The results were low, either below 4.7 or below 40ppt. It is not highly contaminated and so it is unlikely that there will be further step-out to the east. However, there will be additional sampling and the details for those efforts have not yet been determined.
- *Question:* What exactly is the benefit of becoming a Superfund site? What could you do with that designation that you can't do now?
 - *Response:* The Superfund program provides an enforcement tool to require cleanup action and provides access to funds to implement cleanup of these very expensive cleanups. The Superfund adds fiscal and human resources to the effort.
- *Question:* It looked like, on one of your photos, that the ditch across the street from J.H. Baxter splits around Beltline and the north ditch may go to Golden Garden Ponds. Your photo doesn't go that far north. Do you know if there is a connection?
 - *Response:* Golden Gardens ponds is not downstream from the facility and water from J.H. Baxter would not flow to the ponds.
- *Question:* How far does the stream extend past the J.H. Baxter facility? Does it reach far into other parts of Eugene?
 - *Response:* The waterway follows the 83 channel, it goes behind Danebo to Fern Ridge and then joins the Long John River.
- *Question:* Regarding the history of the area, have you found more info about Baxter Street being the old truck entrance to the facility?
 - *Response:* EPA is evaluating old land use via old ariel imagery. Looking at these photos shows us that Baxter Street used to go into the facility until Roosevelt Blvd was created. It is a possibility that trucks or people who worked there used Baxter Street to go in to the facility.
 - *Comment:* I've lived near J.H. Baxter for 55 years. A lot of trucks and people entered J.H. Baxter off Baxter Street. Baxter Street was just repaved after prob 50+ years, and Alva Park Drive was repaved when my brother was about 9 and he is 63 now. Those roads where dead ends at that time.
- *Question:* Are there reports of sickness that could be contributed to J.H. Baxter?
 - *Response:* That is a hard question to answer. Community members have told the agencies that there are people sick around J.H. Baxter. But there is not a way to tell if their illnesses are attributable to J.H. Baxter. There is not a systematic way to tell if more people are sick around J.H. Baxter and no way to scientifically prove it. So, the OR Health Authority starts with environmental sampling data to see what levels of contaminants are there and compare that to the data available on the risks of those chemicals on public health. OHA conducted a [Health Consultation](#) that showed higher rates of lung cancer and Hodgkin's lymphoma in the area surrounding J.H. Baxter; however, the analysis cannot attribute these higher level to J.H. Baxter. OHA looked at 22 different cancer types, all except those two cancers were the same or lower than found in other

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populations of the same size. The OHA Health Consultation is being finalized and will be released early next year.

- *Question:* How close is the site to any residential area? Is there a Community Involvement Plan (CIP) in place for this project?
 - *Response:* The residential community is about 100 yards from the facility. The CIP would be created if and when the site becomes a Superfund site. Already, there is community involvement, but there is not a formal CIP at this time.
- *Question:* How are EPA and DEQ holding J.H. Baxter responsible for their fine and cost of cleanup?
 - EPA has sent a general notice letter informing J.H. Baxter that there are environmental concerns. EPA also sent a financial information request, received J.H. Baxter financial documents, and is conducting an “ability to pay analysis.” Based on the results of the analysis, EPA will require J.H. Baxter to pay or to support EPA in the cleanup efforts (either financially or with technical assistance onsite). The OR Department of Justice is also working to recoup the cost of DEQ’s fines. J.H. Baxter fines are accruing interest on the hazardous waste enforcement violations in the meantime.
- *Question:* Do we know how many months, possibly years, neighbors will be waiting who are under 40 ppt to have their yards decontaminated?
 - *Response:* Unfortunately, at this point that is unknown.
- *Question:* In the first photo shown there was a playhouse in the yard that you are cleaning up. Is there a danger of contamination in the playhouse?
 - *Response:* The concern is for dioxins that have concentrated over many years in the soil. Because of their chemical properties, dioxins tend to stick to soil particles, they do not dissolve in water, and they do not move much. Any dioxin will be stuck to soil particles. Getting rid of dirt using soap and water is helpful, cleaning the playhouse could be helpful to remove any soil particles that may have dioxins attached.
- *Question:* I understand that some fill dirt was moved from J.H. Baxter and used as fill in construction of a new local park. What level of contamination is seen at this park and are there other records of material movement from the site?
 - *Response:* DEQ and the City of Eugene have been in close coordination on cleanup efforts at J.H. Baxter and Trainsong Park. Representatives from the agencies were not aware of any soil being moved from J.H. Baxter to Trainsong Park or any other local park.

Closing and Next Steps – Donna thanked everyone for their participation and questions. She noted that the next public meeting will likely be in spring 2024 and adjourned the session.

J.H. Baxter Investigation and Cleanup

Investigación y limpieza de J.H. Baxter



** Interpretación en español **

November 13, 2023 | 13 de noviembre de 2023

1

¡Tenemos un intérprete!

Para escuchar la presentación en español...

Uno:

Haga clic aquí

Dos:

Seleccione español

Tres:

Silenciar el audio original

2



3

Agenda/Temario

-
- 6:00** Welcome and Introductions/Bienvenida y presentaciones

 - 6:10** Background and Overview of JH Baxter and Agency Engagement/Antecedentes y descripción general de J.H. Baxter y el compromiso de la agencia

 - 6:20** Residential Clean-Up Efforts, Results, and Next Steps/Esfuerzos de limpieza de suelos residenciales, resultados y próximos pasos

 - 6:30** J.H. Baxter Facility Site Investigation Efforts, Results, and Next Steps/Esfuerzos de investigación del sitio de la instalación de J.H. Baxter, resultados y próximos pasos

 - 6:40** Integrated Assessment Purpose and Process/Propósito y proceso de la evaluación integrada

 - 7:00** Question and Answer Session/Sesión de preguntas y respuestas

 - 7:25** Closing/Conclusión

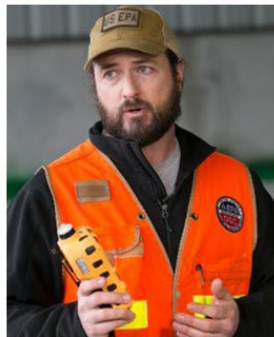
 - 7:30** Adjourn/Cierre de sesión
-

Core Team / Grupo Central



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Tonight's presenters/Presentadores de esta noche



Randy Nattis, U.S. EPA
On scene coordinator



Brad Shultz, Oregon DEQ
Western Region Clean-up
Manager

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Background and overview/Antecedentes y resumen



7

Neighborhood yard sampling/Muestreo de jardines vecinales

Initial Residential Sampling

- Late May 2022
 - 22 yards tested
 - 17 yards above 4.7 parts per trillion (ppt)
 - Seven yards above 40 ppt

Muestreo de salida residencial

- Finales de mayo de 2022
 - 22 jardines probados
 - 17 jardines por encima de 4,7 parts per trillón (ppt)
 - Siete jardines por encima de 40 ppt

Neighborhood yard sampling/Muestreo de jardines vecinales

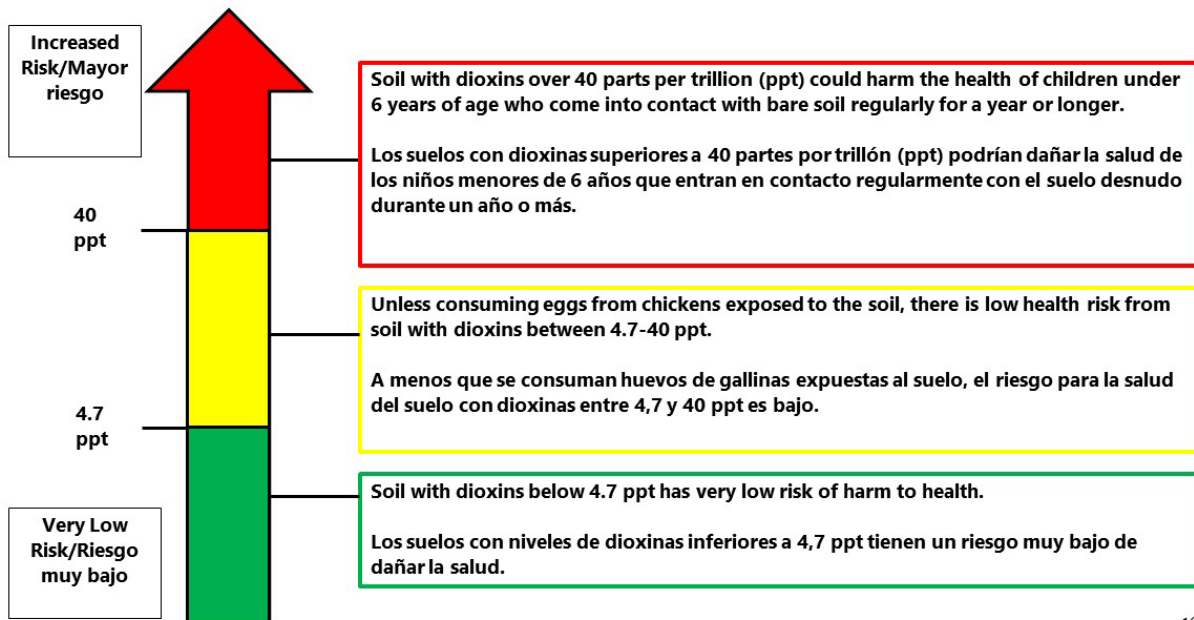
Residential Step Out Sampling

- Early March 2023
 - 32 yards tested
 - 25 yards above 4.7 ppt
 - Four yards above 40 ppt

Muestreo de salida residencial

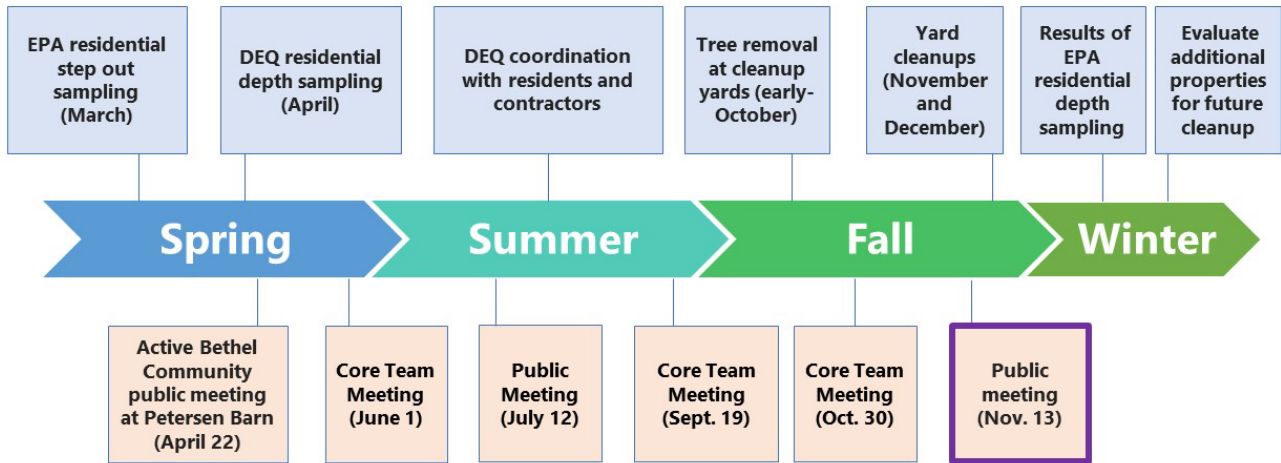
- Principios de marzo de 2023
 - 32 jardines probados
 - 25 jardines por encima de 4,7 ppt
 - Cuatro yardas por encima de 40 ppt

Levels of dioxins in yards/Niveles de dioxinas en patios

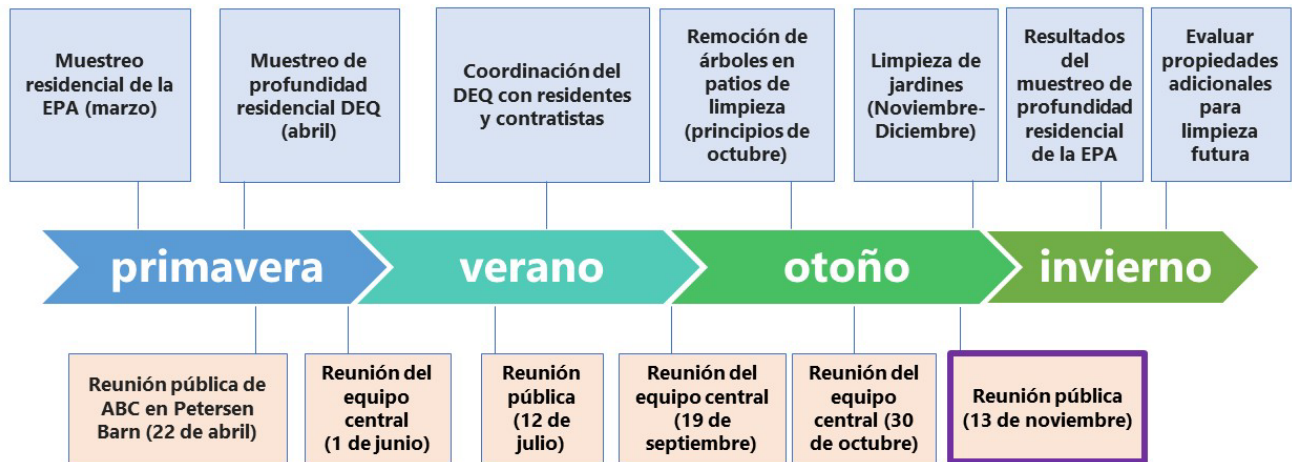


10

DEQ residential cleanup 2023: Completed and planned activities



Limpieza residencial del DEQ 2023: actividades completadas y planificadas



Tree removal/Remoción de árboles



Crews cleared trees and brush in early October./Los equipos talaron árboles y maleza a principios de octubre.



Before and after./ Antes y después de.



13

Next steps for residential cleanup/Próximos pasos para la limpieza residencial



Examples of residential cleanup/Ejemplos de limpieza residencial

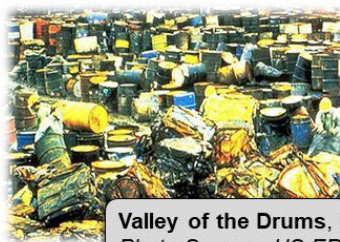


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Superfund Overview

What is 'Superfund'? A law that allows EPA to clean up contaminated sites and forces parties responsible for the contamination to either perform cleanups or reimburse the government for EPA-led cleanup work.



www.epa.gov/superfund



Superfund Overview



Photo Sources: [EPA](#)

CERCLA

- 1980 – Comprehensive Environmental Response, Compensation, and Liability Act

Commonly referred to as the 'Superfund law'

- Address the dangers of abandoned or uncontrolled hazardous waste by developing a nationwide program for:
 - emergency response;
 - information gathering and analysis;
 - liability for responsible parties; and
 - site cleanup



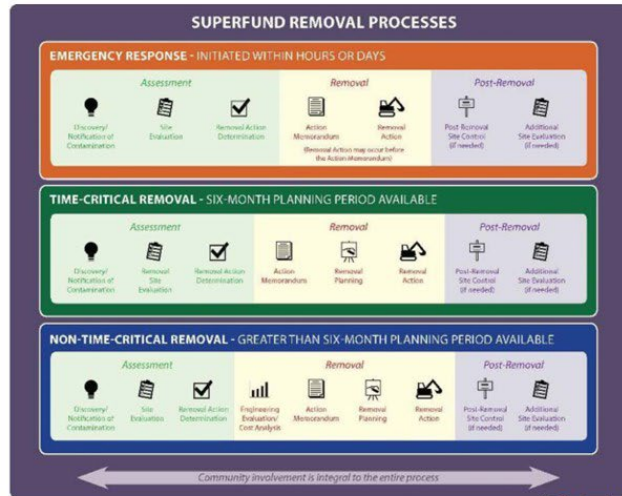
Goals of the Superfund Program

- Protect human health and the environment by cleaning up contaminated sites;
- Make responsible parties pay for cleanup work;
- Involve communities in the Superfund process; and
- Return Superfund sites to productive use.

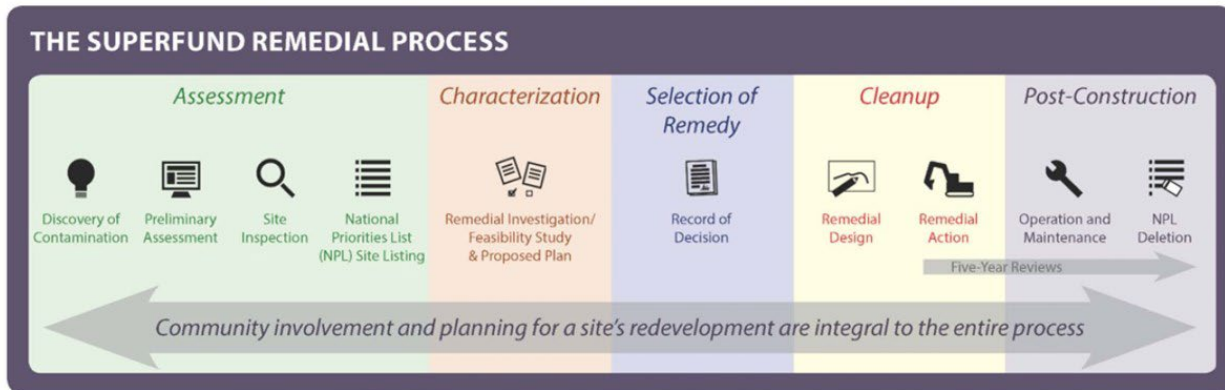


EPA SUPERFUND REMOVAL PROCESSES

- Emergency Response
 - Initiated within hours or days
- Time-Critical Removal
 - Six-month planning period available
- Non-Time Critical Removal
 - Greater than six-month planning period available



THE SUPERFUND REMEDIAL PROCESS



Note: Removal actions can occur at any time, including simultaneously.



Community Involvement Plan (CIP)

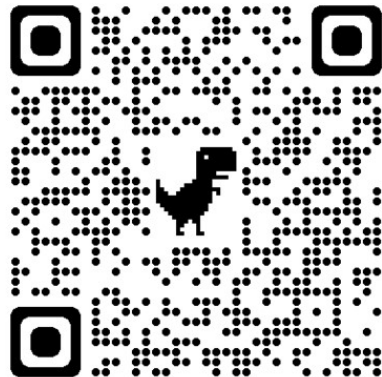
- The CIP outlines EPA’s site-specific strategy for **informing** and **engaging** community members in the Superfund process.
- The CIP document typically: Describes the site and the community that lives there. It also lists their questions, concerns, and technical assistance needs.
- **Community interviews** are an essential element of the process for developing the CIP.
- A well-written CIP should enable community members affected by a Superfund site to understand **the ways in which they can participate in decision-making** throughout the process.
- Community feedback on the draft CIP is **encouraged**.

Reuse/Redevelopment

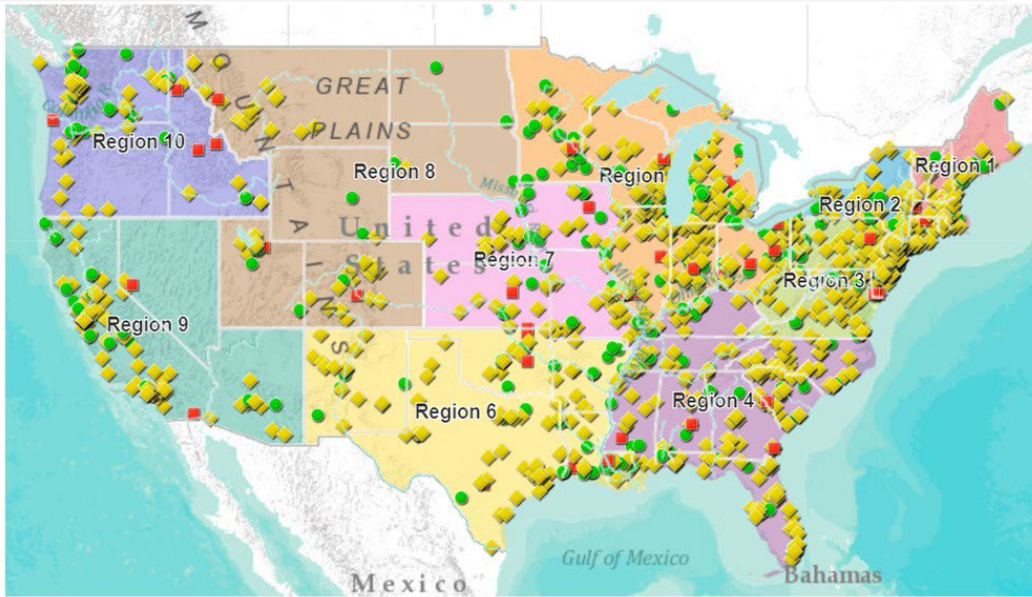
- **Once sites have been cleaned up, EPA works with communities through an array of tools, partnerships, and activities to help to return these sites to productive uses.**
 - These uses can be industrial or commercial, such as factories and shopping malls.
 - Some sites can be used for housing, public works facilities, transportation, and other community infrastructure.
 - Some sites can be for recreational facilities, such as golf courses, parks and ball fields; or for ecological resources, such as wildlife preserves and wetlands.

No matter what use is appropriate for a site, the community benefits from restoring the site to productivity, because the property can once again add to the economic, social, and ecological value of the community.

- **Opportunities for Community Involvement related to Reuse of the Site**
 - Work with EPA, your local government, and your neighbors to plan the redevelopment of the site.
 - Explore the redevelopment tools and resources provided by EPA.
 - www.epa.gov/superfund-redevelopment
 - Be supportive of redevelopment plans once they have been agreed upon.



National Priority List “Superfund” Sites Nationwide



- ◆ NPL Site
- Deleted NPL Site
- Proposed NPL Site

Source: EPA Superfund National Priorities (NPL) Where you Live Map



What is happening - JH Baxter?

- Safety– (Superfund Removal process– Emergency Response)
 - EPA has a 24 / 7 emergency response program with on call duty officers and contract support



- Tank Farm sampling (Superfund Removal process– Time Critical Removal Action)
- Integrated Sampling (Superfund Remedial process)
- Other activities– Enforcement activities




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On-site - Removal Site Evaluation

- Conduct field sampling in Fall 2023 of the JH Baxter facility with a focus on the product and treatment tank farms. This effort will provide the additional data needed to evaluate the need for a Time Critical Removal Action (TCRA).



Waste Stream	Waste Stream Group	Estimated Quantity (gallons)	Total Estimated Quantity by Waste Stream Group (gallons)
off Copper Zinc Anodes	ACCA Anode product	177,776	238,793.23
	ACCA Condensate	96,796	
	ACCA Condensate	250	
	ACCA Sludge Tank	13,480	
	ACCA Anode water	5,579.25	
ephend	ACCA Anode water	5,579.25	157,063.58
	ACCA Anode water	5,579.25	
	ACCA Anode water	5,579.25	
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	ACCA Anode water	5,579.25	
w product	ACCA Anode water	5,579.25	76,063.58
	ACCA Anode water	5,579.25	
	ACCA Anode water	5,579.25	
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	ACCA Anode water	5,579.25	
	ACCA Anode water	5,579.25	
	ACCA Anode water	5,579.25	
ewery	ACCA Anode water	5,579.25	76,063.57
	ACCA Anode water	5,579.25	
	ACCA Anode water	5,579.25	
	ACCA Anode water	5,579.25	
	ACCA Anode water	5,579.25	
eal	ACCA Anode water	5,579.25	46,446.63
	ACCA Anode water	5,579.25	
Waste quarterly (AQ2)	ACCA Anode water	5,579.25	85,689.39
	ACCA Anode water	5,579.25	
	ACCA Anode water	5,579.25	
	ACCA Anode water	5,579.25	
	ACCA Anode water	5,579.25	
Waste	ACCA Anode water	5,579.25	8,476.75
	ACCA Anode water	5,579.25	
Remediation Complex	ACCA Anode water	5,579.25	1,100
	ACCA Anode water	5,579.25	
Waste/SLR	ACCA Anode water	5,579.25	855,995.08



Timeline / Anticipated schedule

March 2023 – Conducted an initial reconnaissance, asbestos survey, and preliminary inventory of the Tank Farm

- June 2023 - Developed a sampling strategy and plan
- September 2023 – Product and treatment tank farm sampling event
- Currently – Developing a SOW and cost estimate for a TCRA
- Winter - Spring 23/24 – Begin TCRA



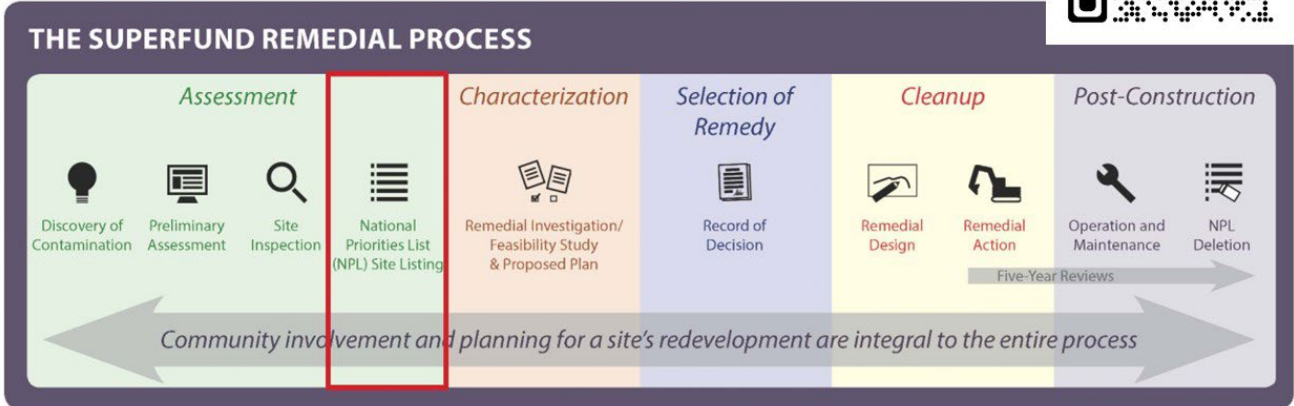
Purpose of Site-Wide Integrated Assessment

- Conduct one field sampling event that provides the data needed to evaluate the eligibility of the site for possible inclusion on the National Priorities List (NPL) and the potential for on-facility removal activities.



[Hazard Ranking System \(HRS\) website](#)

ASSESSMENT STEPS



Questions and answers preguntas y respuestas

For more information/Para obtener más información

J.H. Baxter StoryMap: ordeq.org/JHBaxter-StoryMap

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