

November 15, 2024

1413.001.10

Washington State Department of Ecology
Northwest Regional Office Toxics Control Program
Attn: Ms. Tena Seeds
15700 Dayton Avenue North
Shoreline, Washington 98133

**PROGRESS REPORT NO. 81 – SEPTEMBER/OCTOBER 2024
AMERICAN LINEN SUPPLY CO DEXTER AVE SITE
AGREED ORDER NO. DE 14302**

Dear Ms. Seeds:

On behalf of BMR-Dexter LLC (“BMRD”), NV5, Inc, DBA PES Environmental, Inc. (NV5), is submitting this bimonthly progress report, in accordance with the requirements of Agreed Order No. DE 14302 (AO), between the Washington State Department of Ecology (Ecology) and BMRD. Specifically, this progress report was prepared to fulfill the requirements of Sections VII.F and VII.G of the AO. In an email dated May 29, 2024, Ecology revised the progress report submittal frequency from monthly to bimonthly. This progress report provides information pertaining to work conducted during September and October 2024.

This progress report describes: (1) activities that took place during the reporting period, (2) deviations from approved work plans or other required tasks not already documented in project plans or reports, (3) deviations or anticipated problems in meeting the schedule or objectives set forth in the AO or approved work plans, (4) validated laboratory data received and data entered into Ecology’s Environmental Information Management (“EIM”) database during the reporting period, (5) work planned and anticipated deliverables for the next reporting period (i.e., November/December 2024) and (6) summaries of contacts with representatives of the local community, public interest groups, press, and federal, state or tribal governments.

For this progress report, the word “Site” refers to an area where contamination released at the property located at 700 Dexter Avenue North has come to be located, consistent with the definition of “site” or “facility” in the Washington Model Toxics Control Act (Chapter 173-340 of the Washington Administrative Code). The word “Property” refers to the area within the 700 Dexter Avenue North property boundary activities conducted during the reporting period.

During the September/October 2024 reporting period, BMRD continued to implement the Remedial Investigation (“RI”) and Feasibility Study (“FS”) Work Plan, and the Final Interim Action Work Plan and addenda, including the following activities:

- Completed the Q3 2024 groundwater and soil vapor sampling event consistent with the approved *2023 Groundwater and Soil Vapor Monitoring Plan* from September 3 through September 6, 2024. The Q3 sampling event included collecting water levels from 114 wells. Water levels were not measured in wells MW-343 and MW-345 because they were inaccessible due to parked vehicles and in W-MW-02 because EVO was present in the well. Groundwater samples were collected from eight of the nine planned wells. Monitoring well W-MW-02 was not sampled due to the presence of EVO. Soil vapor samples were collected from two vapor probes (SV-01 and SV-18);
- Participated in a phone call with Ecology on September 4, 2024, to discuss status of project deliverables and overall project schedule;
- Submitted the 2023 Groundwater and Soil Vapor Data Report to Ecology on September 13, 2024. This document provided the data collected from the Q2, Q3, and Q4 2023, including data from interim action performance monitoring wells, RI monitoring wells, and soil vapor probes;
- Submitted Progress Report No. 80 to Ecology on September 16, 2024;
- Continued preparing second iteration Agency Review Draft RI Report to address Ecology's interim comments;
- Completed the internal draft of the Q1 and Q2 2024 groundwater and soil vapor data report for submittal to Ecology during the next reporting period;
- Continued preparing Interim Action Work Plan Addendum for additional interim actions at the Site;
- Began revisions to Agency Review Draft Interim Action Completion Report in response to Ecology's July 18, 2024, comments;
- Met with Ecology on September 23, 2024, to: (1) review the 2023 groundwater and soil vapor monitoring results, (2) discuss the preliminary approach an additional interim action, and (3) discuss the status of the second iteration of the Agency Review Draft RI report;
- Notified Ecology on October 15, 2024, that BMRD changed consultant teams for the project from NV5 to Aspect Consulting;
- Coordinated the Q4 2024 groundwater sampling and soil vapor sampling event that began on November 4, 2024;
- Validated the Q3 2024 groundwater and soil vapor sampling data; and
- Met with Ecology on October 29, 2024, to (1) introduce the Aspect Consulting team; and (2) discuss the status of (a) project deliverables, target submittal dates, and division of the work between consultant teams during the consultant transition; (b) EIM coordinator

review of data previously uploaded into the system; and (c) environmental activities on nearby properties.

DEVIATIONS FROM REQUIRED TASKS NOT ALREADY REPORTED

No unreported deviations from required tasks occurred during the reporting period.

DEVIATIONS FROM THE SCHEDULE

No deviations were encountered during the reporting period, and there are no anticipated problems in meeting the schedule or objectives set forth in the AO.

VALIDATED DATA RECEIVED, AND DATA ENTERED INTO EIM

Activities conducted during the reporting period related to data validation and management include:

- Completed uploading validated Q2 and Q3 2024 groundwater and soil vapor data into Ecology's EIM; and
- Awaiting review by Ecology's EIM coordinator for the following: Q2, Q3, and Q4 2023, and Q1, Q2, and Q3 2024 groundwater and soil vapor monitoring data previously uploaded.

WORK PLANNED AND ANTICIPATED DELIVERABLES DURING UPCOMING REPORTING PERIOD

Work planned during the November/December 2024 reporting period includes:

- Perform Q4 2024 groundwater and soil vapor sampling;
- Submit the Q1 and Q2 2024 Groundwater and Soil Vapor Data Report;
- Meet with Ecology as needed to discuss Ecology's comments on the Agency Review Draft RI Report and Agency Review Draft Interim Action Completion Report;
- Prepare and submit a revised Interim Action Completion Report that responds to Ecology's comments (tentatively December 27, 2024);
- Prepare Agency Review Draft Interim Action Work Plan Addendum for additional interim actions at the Site;

- Draft second iteration Agency Review Draft RI Report to address Ecology's interim comments;
- Begin validating Q4 2024 groundwater and soil vapor data as it is received; and
- Respond to the EIM Coordinator's comments, if any, on Q2, Q3, and Q4 2023; and Q1, Q2, and Q3 2024 groundwater and vapor data.

There are no other deliverables anticipated to be submitted to Ecology during the November/December 2024 reporting period.

CONTACTS WITH PUBLIC AND GOVERNMENTAL PERSONNEL

Other than routine communications with Ecology regarding the ongoing work, BMRD did not issue any press releases or fact sheets related to the project and participated in no major meetings with interested public or local governments. Please call if you have any questions or comments regarding information included in this progress report.

Sincerely,

NV5

Craig J. Peterson, P.E.
Principal Environmental Engineer



Jennifer Aylor Norman, AICP
Vice President

cc: John Moshy, BMRD
Elizabeth Dickey, BMR