

January 15, 2025

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. 82 – NOVEMBER / DECEMBER 2024
AMERICAN LINEN SUPPLY CO DEXTER AVE SITE
AGREED ORDER NO. DE 14302**

Dear Ms. Seeds:

On behalf of BMR-Dexter LLC (“BMRD”), NV5 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 November and December 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 November/December 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 by NV5 (former environmental consultant) and Aspect (current environmental consultant):

- NV5 completed the Q4 2024 groundwater and soil vapor sampling event consistent with the approved *2023 Groundwater and Soil Vapor Monitoring Plan* from November 4 through November 25, 2024. The Q4 sampling event included collecting water levels from accessible monitoring wells, collection of groundwater samples from monitoring wells within the sampling network and collection of soil vapor samples. A total of 123 groundwater monitoring wells were sampled during this event. Six groundwater monitoring wells were not sampled due to one of the three following reasons - EVO present in three monitoring wells (MW-157, MW-178 and W-MW-02), one monitoring well flush monument was paved over (MW-9), one monitoring well did not have fluid (MW-305) and one monitoring well contained mud (MW112R). A total of two soil vapor probes were sampled (SV-1 and SV-18);
- NV5 submitted Progress Report No. 81 to Ecology on November 15, 2024;
- NV5 continued preparing second iteration Agency Review Draft RI Report to address Ecology's interim comments;
- NV5 continued revisions to Agency Review Draft Interim Action Completion Report in response to Ecology's July 18, 2024, comments;
- NV5 initiated validation of the Q4 2024 groundwater and soil vapor sampling data, which will be completed during the January/February 2025 period;
- Aspect continued preparing the Interim Action Work Plan Addendum No. 3 for additional interim actions at the Site; and,
- Aspect began coordinating the Q1 2025 groundwater sampling and soil vapor sampling event that is scheduled to begin in February 2025.

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:

- Ecology's EIM coordinator accepted data for the following: Q2, Q3, and Q4 2023 monitoring events, and Q1, Q2, and Q3 2024 monitoring events.

WORK PLANNED AND ANTICIPATED DELIVERABLES DURING UPCOMING REPORTING PERIOD

Work planned during the January/February 2025 reporting period includes:

- NV5 will submit the Q1 and Q2 2024 Groundwater and Soil Vapor Data Report;
- NV5 will prepare the Q3 and Q4 2024 Groundwater and Soil Vapor Data Report, which will be submitted to Ecology in March 2025;
- NV5 will submit to the EIM Coordinator Q4 2024 groundwater and vapor data.
- NV5 and Aspect will prepare and submit a revised Interim Action Completion Report that responds to Ecology's comments;
- NV5 and Aspect will 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;
- NV5 and Aspect will draft second iteration Agency Review Draft RI Report to address Ecology's interim comments;
- Aspect will begin the Q1 2025 groundwater and soil vapor sampling, which will be completed in the March/April 2025 reporting period;
- Aspect will continue preparation of the Agency Review Draft Interim Action Work Plan Addendum No. 3 for additional interim actions at the Site and submit to Ecology for review.

There are no other deliverables anticipated to be submitted to Ecology during the January/February 2025 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

cc: John Moshy, BMRD
Elizabeth Dickey, BMR
Ali Cochrane, Aspect Consulting