

March 20, 2025

Tena Seeds Washington State Department of Ecology Northwest Regional Office 15700 Dayton Avenue North Shoreline, Washington 98133

Re: Progress Report no. 83, January/February 2025

American Linen Supply Co Dexter Ave Site Facility Site ID No. 3573 | Cleanup Site ID No. 12004 Agreed Order No. DE 14302

Dear Tena:

This progress report was prepared by Aspect Consulting (Aspect) on behalf of BMR-Dexter LLC (BMRD) for the American Linen Supply Co Dexter Ave Site¹ (Site) located in Seattle, King County, Washington. A cleanup action for the Site is being conducted in accordance with the Model Toxics Control Act (MTCA), Chapter 70A.305 Revised Code of Washington (RCW), and the MTCA Cleanup Regulation, Chapter 173-340 Washington Administrative Code (WAC).

This progress report was prepared as a condition to Agreed Order No. DE 14302 (the AO) between BMRD and the Washington State Department of Ecology (Ecology) for the Site, effective October 14, 2017, and describes the following:

- 1. A list of activities that have taken place during the reporting period.
- 2. Description of any deviations from the required AO tasks or project schedule during the reporting period, and any anticipated issues that have the potential to impact the project schedule in the upcoming reporting period, that are not otherwise documented in project plans or amendment requests.
- **3.** Description of validated data received during the reporting period and summary of data submittals to Ecology's Environmental Information Management system (EIM).
- **4.** Summary of communications with the public and/or with government personnel during the reporting period.
- 5. Work planned for the upcoming reporting period.

The following sections describe the actions taken during the reporting period to implement the requirements of the AO.

¹ In this progress report, "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 MTCA.

Activities During the Reporting Period

Activities completed during the reporting period in compliance with the AO consist of the following:

- Provided requests relating to the scope of work for the First Quarter 2025 groundwater and soil vapor monitoring event to Ecology via memorandum dated January 31, 2025, and supplemental email from Aspect Consulting dated February 5, 2025, which included:
 - continuing to implement the 2023 Groundwater and Soil Vapor Monitoring Plan dated January 30, 2023, for monitoring events occurring in 2025;
 - changing the analytical laboratory used to analyze groundwater and soil vapor samples from Pace Analytical in Mount Juliet, Tennessee, to Alliance Technical Group in Seattle, Washington; and
 - collecting groundwater samples at three additional wells, MW110 (Intermediate A Zone), MW-314 (Intermediate B Zone), and MW103 (Deep Zone) and analyzing the groundwater samples from those wells for chlorinated volatile organic compounds and geochemical parameters.

Ecology approved these requests via emails dated January 31 and February 5, 2025, and the changes were implemented during the First Quarter 2025 monitoring event.

- Conducted the First Quarter 2025 monitoring event from February 25 to 27, 2025. The monitoring event included measuring depth to groundwater at 139 groundwater monitoring wells², collecting groundwater samples from 11 groundwater monitoring wells³, and collecting soil vapor samples from two soil vapor probes⁴. Data from the First Quarter 2025 monitoring event will be presented in the First & Second Quarter 2025 Monitoring Report, to be prepared after we receive and validate analytical data from the upcoming Second Quarter 2025 monitoring event.
- Continued to prepare the second draft of the Agency Review Draft Interim Action Completion Report. The second draft will present revisions addressing Ecology's review comments.
- Continued to prepare the second draft of the Agency Review Draft Remedial Investigation Report. The second draft will present revisions addressing Ecology's review comments. Ecology and the BMRD project team participated in a virtual meeting on January 29, 2025, to discuss Ecology's comments and the BMRD project team's proposed revisions.
- Continued to prepare the Agency Review Draft Interim Action Work Plan Addendum No. 3 for additional interim action activities at the Site. The BMRD project team presented the

² Of the 141 groundwater monitoring wells scheduled for depth to groundwater measurements, two were not measured, for the following reasons: MW112R contained suspected sediment in the well casing (first observed during Fourth Quarter 2024 event) and W-MW-02 contained emulsified vegetable oil (EVO).

³ Groundwater samples were collected from MW103, MW107, MW110, HMW-9IB, MW-314, MW-346, MW-347, MW-348, MW-349, MW-350, and W-MW-01. Groundwater samples were not collected from W-MW-02 due to the presence of EVO.

⁴ Soil vapor samples were collected from SV01 and SV-18.

proposed scope of work for the additional interim action activities to Ecology via virtual meeting on January 22, 2025.

- Submitted Progress Report no. 82 for the November/December 2024 reporting period to Ecology on January 15, 2025.
- Submitted the reports presenting data for the 2024 quarterly monitoring events to Ecology on February 28, 2025; both reports are titled "2024 Groundwater and Soil Vapor Data Report," were prepared by NV5 Environmental, and are dated February 28, 2025.

Deviations from Required Tasks or Schedule Not Otherwise Documented

There were no deviations from the required AO tasks or schedule during the reporting period.

Validated Data Received and EIM Submittals

Validated data received and EIM submittals during the reporting period consist of the following:

• Submitted validated groundwater and soil vapor data from the Fourth Quarter 2024 monitoring event to the EIM coordinator on January 13, 2025.

Communications with Public and Government Personnel Not Otherwise Documented

Other than routine communications with Ecology to provide status updates, BMRD did not issue any press releases or fact sheets related to the project, and did not participate in any major meetings with interested public or local governments.

Work Planned for the Next Reporting Period

The next reporting period will cover March 1 through April 30, 2025. Work planned to occur during the next reporting period includes the following:

- Validate and prepare data for submittal to the EIM Coordinator following receipt of laboratory groundwater and soil vapor data from the First Quarter 2025 monitoring event.
- Submit the second draft of the Agency Review Draft Interim Action Completion Report, revised to address Ecology's comments, to Ecology for review and approval.
- Submit the second draft of the Agency Review Draft Remedial Investigation Report, revised to address Ecology's comments, to Ecology for review and approval.
- Submit the Agency Review Draft Interim Action Work Plan Addendum No. 3 to Ecology for review and comment.

Washington State Department of Ecology March 20, 2025

If you have any questions or comments regarding the information presented in this progress report, please reach out to Ali Cochrane at ali.cochrane@aspectconsulting.com.

Sincerely, Aspect consulting

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