



March 15, 2021

1413.001.02

Washington Department of Ecology
Northwest Regional Office Toxics Control Program
3190 160th Ave. SE
Bellevue, WA 98008-5452
Attn: Ms. Tena Seeds

BY EMAIL ONLY

**PROGRESS REPORT NO. 40– FEBRUARY 2021
AMERICAN LINEN SUPPLY CO – DEXTER AVE SITE
AGREED ORDER NO. DE 14302**

Dear Ms. Seeds:

On behalf of BMR-Dexter LLC (“BMRD”), PES Environmental, Inc. is submitting this monthly progress report in accordance with the requirements of Agreed Order No. DE 14302 (the “AO”) between the State of Washington 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. This progress report provides information pertaining to work conducted during February 2021.

This progress report discusses: (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., March 2021), and (6) summaries of contacts with representatives of the local community, public interest groups, press, and federal, state or tribal governments.

For the purpose of 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 reporting period, BMRD conducted the following work:

- Continued construction activities associated with implementing the Final Interim Action Work Plan (“IAWP”), and with planned redevelopment of the Property. The following construction-related activities occurred during the reporting period:

- ISOTEC mobilized to the Property on February 8, 2021 and, after shipping-related delays to the injection equipment, began injecting emulsified vegetable oil (“EVO”) into the perimeter injection wells on February 16, 2021. Injections continued through the end of the reporting period;
- Continued implementation of the Remedial Investigation (“RI”) and Feasibility Study (“FS”) Work Plan, including the following activities:
 - Continued the first quarter 2021 groundwater and vapor monitoring event consistent with the Revised Groundwater and Soil Vapor Monitoring Plan approved by Ecology. Groundwater and soil vapor monitoring activities in the available wells and probes were completed on February 17, 2021;
 - Continued data reduction, tabulation, validation, and evaluation of first quarter 2021 data; and
 - Continued data evaluation and preparation of the draft RI report;
- Collected soil samples along the proposed alignment of the Puget Sound Energy (“PSE”) gas line trench on Valley Street to support preparation of a Contained-In Determination (“CID”) Policy Request. The soil sampling occurred on February 1, 2021 and the CID request was submitted to Ecology’s Hazardous Waste Division on February 12, 2021. Paul Bianco of Ecology approved the CID Request via e-mail on February 19, 2021;
- Submitted Progress Report No. 39 to Ecology on February 16, 2021; and
- Met with Ecology on February 18, 2021, via conference call to discuss issues related to monitoring well HMW-9IB, located on the SDOT Mercer Parcels, including (1) the HMW-9IB resampling results, (2) the estimated groundwater flow rates and travel times, and (3) a proposed plan forward with respect to investigating the extent of contamination surrounding well HMW-9IB.

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 included:

- Continued validation of the first quarter 2021 groundwater and soil vapor monitoring results; and,
- Updated the project database with validated soil vapor data collected in the first quarter 2021.

WORK PLANNED AND ANTICIPATED DELIVERABLES DURING UPCOMING REPORTING PERIOD

Work planned during the March 2021 reporting period includes:

- Coordinating and overseeing utility excavation adjacent to the Property; coordinating related excavated soil management and disposal; and conducting required monthly reporting to Ecology;
- Concluding the first quarter 2021 groundwater and soil vapor monitoring event in the locations not available in February (if accessible) consistent with the Revised Groundwater and Soil Vapor Monitoring Plan approved by Ecology;
- Completing the injection of EVO into the perimeter injection wells;
- Submitting a draft RI/FS work plan addendum that outlines the proposed HMW-9IB investigation, initiating updating the SDOT Mercer Parcels access agreement, and beginning mobilization activities for the work;
- Continuing data reduction, tabulation, validation, and evaluation, including entering validated soil vapor and groundwater data into Ecology's EIM; and,
- Continuing preparation of the draft RI report.

There are no other deliverables anticipated to be submitted to Ecology during the February 2021 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,
PES ENVIRONMENTAL, INC.



Daniel A. Balbiani, P.E.
Principal Engineer

cc: John Moshy, BMRD