



November 16, 2020

**1413.001.02**

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

**BY EMAIL ONLY**

**PROGRESS REPORT NO. 36 – OCTOBER 2020  
AMERICAN LINEN SUPPLY CO – DEXTER AVE SITE  
AGREED ORDER NO. DE 14302**

Dear Ms. Cardona:

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 October 2020.

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., November 2020), 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:

- Began coordinating and scheduling replacement of three damaged injection wells (D14, D18, and D19), including conducting a down-well video inspection of the wells on October 20, 2020. Replacement well drilling activities are currently scheduled for the week of November 30, 2020;
- Completed the evaluation of the source of discolored liquid observed in the P3 Parking level in early October 2020. Approximately 200 gallons of the liquid and rainwater were collected and placed in a tote for testing. The specific source of the liquid could not be ascertained and laboratory testing did not detect any volatile organic compounds. The collected liquid and water is being profiled for disposal; and
- Restarted emulsified vegetable oil (“EVO”) injections into select perimeter wells on October 7, 2020 and this phase of injections was completed on October 18, 2020 when the injection subcontractor (ISOTEC) demobilized from the Property. Injections focused on the C- and D-zone injections wells and, to a limited extent, on select A- and B-zone wells that had been started prior to pausing injections in late September. Overall, ISOTEC injected EVO at the design dosage of 9 percent on a total of 22 days, with the following results:
  - EVO was injected into 63 wells (roughly 2/3 of the total wells). A total of 59,250 gallons of 9 percent EVO solution was injected out of the target total of approximately 120,000 gallons;
  - A total of 47 wells was bioaugmented;
  - A summary of the EVO injections and bioaugmentation by treatment zone is provided below;
    - A-Zone: 10 of 23 wells received EVO and 6 were bioaugmented;
    - B-Zone: 13 of 24 wells received EVO and 9 were bioaugmented;
    - C-Zone: 20 of 23 wells received EVO and 15 were bioaugmented; and
    - D-Zone: 20 of 24 wells received EVO and 17 were bioaugmented.
- Continued implementation of the Remedial Investigation (“RI”) and Feasibility Study (“FS”) Work Plan, including the following activities:
  - Prepared for the fourth quarter groundwater and soil vapor monitoring event, including coordinating laboratory analyses, arranging access at nearby properties, and coordinating access in the construction zone.
  - Performed data reduction, tabulation, validation, and evaluation of the IAWP groundwater data;
  - Continued updating and drafting geologic cross sections; and
  - Submitted the Proposed Groundwater and Soil Vapor Monitoring Plan to Ecology on October 7, 2020. The plan described the proposed monitoring approach for the period between the end of EVO injections in the perimeter wells and finalization of the cleanup action plan. The plan was revised based on Ecology’s comments for more detail in the monitoring table and periodic analysis of the full geochemical suite. The Revised Groundwater and Soil Vapor Monitoring Plan was submitted to Ecology on October 27, 2020.
- Continued excavation of soil associated with utility trenching adjacent to the Property subsequent to Ecology’s September 20, 2020 approval of the Request for Contained-In Policy Determination

("CID Request"). A total of approximately 202 tons of contained-in soil was excavated and transported for disposal during the reporting period. Monthly reporting required by Ecology's CID Request approval was submitted to Ecology on October 1, 2020, for soil transported in September, and on October 30, 2020 for soil transported during October; and

- Submitted Progress Report No. 35 to Ecology on October 15, 2020.

#### **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:

- Completed validation of the groundwater monitoring data from the September 2020 baseline sampling of select perimeter injection wells; and
- Continued compiling third quarter 2020 groundwater and soil vapor monitoring results for uploading into EIM and responded to the Ecology EIM Coordinator's comments regarding the second quarter data upload.

#### **WORK PLANNED AND ANTICIPATED DELIVERABLES DURING UPCOMING REPORTING PERIOD**

Work planned during the November 2020 reporting period includes:

- Coordinating and overseeing utility excavation adjacent to the Property; and coordinating related excavated soil management and disposal, and required monthly reporting to Ecology;
- Coordinating and scheduling the decommissioning and replacement of three damaged perimeter injection wells;
- Coordinating completion of the perimeter injections with Turner Construction and ISOTEC. Out of an abundance of caution, completion of the injections is being deferred until Turner and its subcontractor have completed the installation and warranty testing of the waterproofing and vapor intrusion barrier that is scheduled to be completed in February 2021;
- Conducting the fourth quarter 2020 groundwater and soil vapor monitoring event, including a Site-wide groundwater level monitoring event. The groundwater and soil vapor sample collection and analysis will be consistent with the Revised Groundwater and Soil Vapor Monitoring Plan approved by Ecology;
- Continuing data reduction, tabulation, validation, and evaluation, including entering validated soil, soil vapor, and groundwater data into Ecology's EIM; and

- Beginning preparation of RI report sections.

There are no other deliverables anticipated to be submitted to Ecology during the November 2020 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