



October 15, 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. 35 – SEPTEMBER 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 September 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., October 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:

- Continued groundwater level monitoring consistent with the IAWP to record the recovery of water levels around the Property after ceasing operation of the dewatering system on July 20, 2020. Work included conducting two rounds of water level monitoring in select wells on September 3 and September 21, 2020, respectively;
- Continued preparation for conducting perimeter injections of emulsified vegetable oil (“EVO”) in September 2020, including locating and exposing previously installed injection wells that have been buried to protect them from construction activities, finalizing the approach for conducting EVO injections consistent with the IAWP, and coordinating the work with ISOTEC (injection contractor) and Turner Construction. During the process of exposing the previously installed wells and checking them for sediment accumulation, it was discovered that three individual wells (D14, D18, and D19) were damaged during construction activities and are not useable. These damaged wells will be decommissioned and replaced with new single completion wells in November or December 2020 and injected with EVO at a date to be determined;
- Conducted groundwater sampling of 28 perimeter injection wells from September 14 to September 21, 2020 prior to initiating the perimeter injections;
- Submitted the Perimeter Injection Plan to Ecology on September 16, 2020. This plan described the approach for conducting the perimeter injections consistent with the IAWP. Ecology stated that they did not have any questions regarding the proposed approach in a September 18, 2020 e-mail;
- ISOTEC (injection subcontractor) mobilized to the Property on September 21, 2020 and began injecting EVO into the perimeter injection wells consistent with the Perimeter Injection Plan. Injections began on September 23, 2020 and continued through the remainder of the reporting period.
- Observed water in areas throughout parking level P3 (lowest parking level in the building) on September 28, 2020, due to heavy rains on previous days. Discolored liquid was also observed on September 28, 2020 in several locations. PES and Turner began an evaluation of the source of this discolored liquid on September 29, 2020 and it was decided that injections would be temporarily paused late on September 30, 2020 to accommodate the source evaluation and remained paused through the remainder of the reporting period;
- Continued implementation of the Remedial Investigation (“RI”) and Feasibility Study (“FS”) Work Plan, including the following activities:
 - Data reduction, tabulation, validation, and evaluation of the RI soil, groundwater, and soil vapor data;
 - Began preparation and updating of geologic cross sections; and,
 - Began preparation of a Groundwater and Soil Vapor Monitoring Plan for the period between the end of EVO injections in the perimeter wells and finalization of the cleanup action plan.
- Continued to work with Mr. Paul Bianco of Ecology’s Hazardous Waste and Toxics Reduction Program regarding the July 9, 2020 Request for Contained-In Policy Determination (“CID Request”) for soils generated during upcoming utility trenching and roadway repair activities.

Submitted additional data requested by Ecology to support its evaluation of the CID Request on September 2, 2020. Ecology approved the CID Request in a letter dated September 20, 2020;

- Initiated excavation of soil associated with utility trenching adjacent to the Property subsequent to Ecology's approval of the CID Request. A total of approximately 125 tons of contained-in soil were excavated and transported for disposal during the reporting period;
- Coordinated waste management activities for investigation derived wastes generated during the installation of the remaining perimeter injection wells (soil and development water) and soil generated during tieback de-tensioning work conducted by Turner Construction; and,
- Submitted Progress Report No. 34 to Ecology on September 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 remaining third quarter 2020 groundwater monitoring data; and,
- Began 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 October 2020 reporting period includes:

- Ongoing coordination and oversight of utility excavation adjacent to the Property, coordinating related excavated soil management and disposal, and required monthly reporting to Ecology;
- Completing the source evaluation of the discolored liquid in parking level P3 and continuing injection of EVO into the perimeter injection wells;
- Coordinating and scheduling the decommissioning and replacement of three damaged perimeter injection wells;
- Finalizing and submitting the Groundwater and Soil Vapor Monitoring Plan to Ecology for review and approval;
- Continuing data reduction, tabulation, validation, and evaluation including entering validated soil, soil vapor, and groundwater data into Ecology's EIM.

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There are no other deliverables anticipated to be submitted to Ecology during the October 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.

A handwritten signature in blue ink that reads "Daniel Balbiani". The signature is written in a cursive style with a large initial 'D'.

Daniel A. Balbiani, P.E.

Principal Engineer

cc: John Moshy, BMRD