



November 18, 2019

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. 24 – OCTOBER 2019
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, the 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 2019.

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 2019), 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:

- Submitted a letter to Ecology on October 1, 2019 requesting an increase in the total quantity of soil that can be managed under the March 18, 2019 Contained-In Determination for the Former American Linen Supply Company interim action. The increase of 15,600 tons (for a total approved quantity of 142,700 tons) was associated with changes in the foundation design

that required additional excavation, inclusion of soil generated during installation of lagging, soil from the “over-excavation” areas described in the Contaminated Media Management Plan (“CMMP”), and soil densities that were higher than anticipated in the original request. Ecology approved this request on October 2, 2019;

- Continued construction activities associated with implementing the Final Interim Action Work Plan, and with planned redevelopment of the Property. The following construction-related activities occurred during the reporting period:
 - Conducted routine air monitoring activities consistent with the approved Air Monitoring Plan and prepared weekly Air Monitoring Reports throughout the reporting period;
 - Continued operation of the dewatering system. Water from the dewatering system and water that accumulated in the excavation were treated and discharged consistent with the Operations and Maintenance Manual and the discharge permit. The discharge from the water treatment system was switched from the sanitary sewer to the storm sewer on October 7, 2019;
 - Continued soil management associated with the ongoing excavation activities consistent with the March 18, 2019, Contained-In Determination and the CMMP. The mass excavation portion of the project was completed to approximately elevation 12 feet, and structural excavations (e.g., thickened footings, elevator pit, etc.) continued. During the reporting period, approximately 10,745 tons of contained-in soil were exported from the Property. Thirty-five tons of soil classified as hazardous waste was placed in one cubic yard “supersack”, pending disposal during the next reporting period; and
 - Began installation of the waterproofing and vapor barrier system.
- Completed installation of injection and monitoring wells in the bottom of the excavation on October 28, 2019 consistent with the Final Contingent Action Addendum to the Final Interim Action Work Plan (“CAA”) dated February 14, 2019. A total of 20 injection and monitoring wells were installed during the reporting period, and 35 wells were developed. A total of 26.35 tons of CAA well soil cuttings were placed in supersacks and disposed of as hazardous waste during the reporting period;
- Completed installation of the Remedial Investigation (“RI”) monitoring wells on October 3, 2019, except for one well in the Westlake Avenue North right-of-way (MW-330) that could not be installed due to the presence of extensive subsurface utilities, and one well in the 9th Avenue North right-of-way (MW-321) that was not installed pending groundwater sampling results from a recently installed well (FMW-142) across the street. During the reporting period:
 - Five wells were installed, 9 wells were developed, and all the interim action and RI groundwater monitoring wells were sampled;
 - A total of 55 soil samples and 79 groundwater samples were collected during the reporting period;
 - A total of 23 tons of RI well soil cuttings were placed in 55-gallon drums and disposed of as hazardous waste;
 - Installed pressure transducers in 12 new RI monitoring wells; and

- Measured groundwater levels in all RI network monitoring wells;
- Began data reduction and tabulation for data generated during RI activities;
- Continued addressing Ecology's August 22, 2019 comments on the Revised Agency Review Draft of the Remedial Investigation/Feasibility Study ("RI/FS") Work Plan;
- Continue pursuing a city right-of-way permit to replace damaged monitoring wells MW-144 and MW-145 on the east side of 8th Avenue North;
- Submitted Progress Report No. 23 to Ecology on October 15, 2019; and
- Submitted the Third Quarter 2019 Groundwater and Soil Vapor Data Summary to Ecology on October 23, 2019 via email.

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 validating lab reports for soil data collected during the soil treatment activities. Continued to validate laboratory reports for soil data collected during the structural excavation activities;
- Continued to validate soil and groundwater data collected during the CAA well installation and interim action monitoring activities. Project database upload and EIM submittal are ongoing;
- Continued to validate soil and groundwater data collected during the Remedial Investigation well installation and groundwater sampling activities. Project database upload and EIM submittal are ongoing;
- Addressed comments from Ecology's EIM coordinator for the perimeter injection well location data and began uploading the soil analytical data into the EIM; and
- Addressed comments from Ecology's EIM coordinator regarding the third quarter 2019 groundwater and soil vapor monitoring data that was uploaded during the previous reporting period.

WORK PLANNED AND ANTICIPATED DELIVERABLES DURING UPCOMING REPORTING PERIOD

Work planned during the November 2019 reporting period includes:

- Complete the fourth quarter 2019 groundwater monitoring event of both the interim action monitoring wells and the RI wells. This will include sampling the CAA monitoring wells and other wells installed by Vulcan in the off-property portion of the Site;

- Obtain the city right-of-way permit, and decommission and replace monitoring wells MW-144 and MW-145;
- Continue data reduction, tabulation, and evaluation;
- Conduct data validation reviews of RI soil and groundwater data;
- Survey all new RI monitoring wells and select pre-existing wells; and
- Continue construction activities, including:
 - Continue pumping from the construction dewatering wells and discharging to stormwater consistent with the discharge permit;
 - Complete structural excavation of soil across the Property consistent with the CMMP;
 - Continue installation of the waterproofing and vapor barrier systems;
 - Begin installation of the well monuments for the CAA wells concurrent with the installation of the structural reinforcing steel and structural concrete pour;
 - Manage and export soil generated during excavation activities consistent with the CMMP; and
 - Conduct air monitoring activities consistent with the Air Monitoring Plan.

There are no other deliverables anticipated to be submitted to Ecology during the November 2019 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