

October 15, 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. 23 – SEPTEMBER 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 September 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., October 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:

• Continued construction activities associated with implementing the 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 pumping of the perimeter dewatering system. During the reporting period, approximately 371,578 gallons of 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;
- Completed soil treatment activities in Soil Management Areas 2, 3, and 4 ("SMA-2, -3, and -4") consistent with Section 3.5 of the Contaminated Media Management Plan ("CMMP"), including:
 - SMA-2: Completed all treatment in SMA-2 in August, 2019;
 - SMA-3: Treated lifts between elevations 14 and 5 feet, totaling 388 tons, including soils adjacent to and south of SMA-3 that required additional treatment. All treatment in and adjacent to SMA-3 was completed on September 10, 2019; and
 - SMA-4: Treated one lift between elevations 7.5 and 5 feet, totaling 140 tons, including soils adjacent to and north of SMA-4 that required additional treatment. All treatment in and adjacent to SMA-4 was completed on September 3, 2019; and
- Continued soil management associated with the above activities consistent with the March 18, 2019, Contained-In Determination and the CMMP. The majority of the mass excavation was completed to approximately elevation 12 feet, and excavation of the structural excavations (e.g., thickened footings, elevator pit, etc.) began. During the reporting period, approximately 20,760 tons of contained-in soil were exported from the Property. Soil classified as hazardous waste was generated by excavation activities during the reporting period, was placed in a lined and covered stockpile per the CMMP, and will be disposed of during the next reporting period.
- Continued installation of injection and monitoring wells in the bottom of the excavation consistent with the Final Contingent Action Addendum to the Final Interim Action Work Plan ("CAA") dated February 14, 2019. A total of 59 injection and monitoring wells were installed during the reporting period, and 53 wells were developed. A total of 20.72 tons of CAA well soil cuttings were placed in supersacks and disposed of as hazardous waste during the reporting period;
- Began installation of Remedial Investigation ("RI") monitoring wells on September 9, 2019. During the reporting period, 25 wells were installed, including two Interim Action wells located on the south side of Valley Street, and 20 of these wells were developed. A total of 213 soil samples were collected from selected monitoring well borings. A total of 23 tons of RI well soil cuttings were placed in 55-gallon drums and disposed of as hazardous waste during the reporting period. The City of Seattle issued a street use permit allowing monitoring well installations on Roy Street and Dexter Avenue North;
- Submitted Progress Report No. 22 to Ecology on September 13, 2019; and
- Continued addressing Ecology's additional comments on the Revised Agency Review Draft of the Remedial Investigation/Feasibility Study ("RI/FS") Work Plan on August 22, 2019.

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 to validate soil data collected during the excavation and soil treatment activities described above, which will be uploaded into the EIM during the next reporting period;
- 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 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 October 2019 reporting period includes:

- Complete installation of the RI monitoring wells, including development;
- Install the pressure transducers in the RI monitoring wells;
- Conduct the third quarter groundwater monitoring event of both the interim action monitoring wells and the RI wells;
- Complete installation and development of injection and monitoring wells consistent with the CAA throughout the reporting period;
- Continue construction activities, including:
 - Continue pumping from the construction dewatering wells. The discharge from the water treatment system is anticipated to switch from sanitary sewer to storm sewer in October;
 - Continue structural excavation of soil across the Property consistent with the CMMP;
 - 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 October 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.**

Janiel Bollson

Daniel A. Balbiani, P.E. Principal Engineer

cc: John Moshy, BMRD