



September 13, 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. 22 – AUGUST 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 August 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., September 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;
- Completed installing tie-backs, soil nails, and lagging. Lagging generally extended down to approximately elevation 10 to 16 feet throughout the Property;
- Initiated pumping of the perimeter dewatering system. This system includes two legs: one leg generally consisting of the west and north sides of the excavation (north-west leg), and the other consisting of the south and east sides (south-east leg). Pumping of the north-west leg started on August 6, 2019, and pumping of the south-east leg started on August 19, 2019. During the reporting period, approximately 276,625 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;
- Continued soil treatment activities in SMA-2, -3, and -4 consistent with Section 3.5 of the Contaminated Media Management Plan (“CMMP”), including:
 - SMA-2: Treated four lifts between elevations 15 and 5 feet, totaling 618 tons. This completed treatment activities in SMA-2, and the portion of SMA-2 that extended below approximately elevation 11 feet was backfilled with controlled density fill on August 22, 2019;
 - SMA-3: Treated four lifts between elevations 21 and 12.5 feet, totaling 382 tons. This completed the planned work at SMA-3, although field screening adjacent to and south of SMA-3 indicated that additional soil will require treatment. The additional soil treatment will be conducted in September; and
 - SMA-4: Treated two lifts between elevations 12.5 and 7.5 feet, totaling 230 tons. This completed the planned work at SMA-4, although field screening adjacent to and north of SMA-4 indicated that additional soil will require treatment. The additional soil treatment will be conducted in September; and
- Continued soil management activities associated with the above activities consistent with the March 18, 2019, Contained-In Determination and the CMMP. Portions of the excavation were completed down to approximately elevation 12 feet in preparation for installation of the Contingent Action Addendum (“CAA”) injection wells. During the reporting period, approximately 13,545 tons of contained-in soil were exported from the Property. There was no soil classified as a hazardous waste generated during the reporting period;
- Began mobilizing for the upcoming installation of the Remedial Investigation (“RI”) monitoring wells, including coordination of street use and right-of-way permits with the City of Seattle, identification of the utilities near the drilling locations, and coordination with Holt Drilling and Pace Analytical;
- Submitted Progress Report No. 21 to Ecology on August 15, 2019;
- Received and began addressing additional comments on the Revised Agency Review Draft of the Remedial Investigation/Feasibility Study (“RI/FS”) Work Plan on August 22, 2019. In the transmittal of these comments, Ecology concurred with the proposed locations of the RI monitoring wells, with the understanding that additional wells may be required based on the initial

monitoring results;

- Submitted a letter entitled “American Linen Supply Co. 700 Dexter Hazardous Waste Site Operations Procedures Closeout”, prepared by EMB Consulting, to Ecology via e-mail on August 21, 2019. This letter describes the timing and rationale for the phased discontinuation of Hazardous Waste Site Operations as the bottom of the excavation begins to be covered by concrete surfaces;
- Met with Ecology August 22, 2019, to discuss (1) the status of construction activities, including shoring, mass excavation, and soil treatment, (2) discussion of the status of the July 2019 quarterly groundwater monitoring event, (3) the status of Ecology’s review of the Revised Agency Review Draft of the RI/FS Work Plan, and (4) an update on the Master Use Permit for the project; and
- Began installation of injection and monitoring wells in the bottom of the excavation consistent with the Final CAA to the Final Interim Action Work Plan dated February 14, 2019. Drill rigs, support equipment and materials were mobilized into the excavation on August 26, 2019, and a total of seven injection wells were installed by the end of the reporting period.

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:

- Received notification from Ecology’s EIM Coordinator that they have completed their review of the data generated by the second quarter groundwater and soil vapor monitoring event, and this data was successfully uploaded into the EIM on August 15, 2019;
- 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;
- Awaiting approval by the EIM Coordinator of the location information for the perimeter injection wells, which was still pending by the end of the reporting period. Once approval is received, the soil analytical data associated with these wells will be uploaded into the EIM during the next reporting period; and
- Completed validation of data generated by the third quarter groundwater and soil vapor monitoring event, which was uploaded into the EIM on August 22, 2019, for review by the EIM Coordinator.

WORK PLANNED AND ANTICIPATED DELIVERABLES DURING UPCOMING REPORTING PERIOD

Work planned during the September 2019 reporting period includes:

- Finish mobilization for RI field work, finalize utility clearance at the drilling locations with an air knife rig, install the RI monitoring wells, and continue coordination of Dexter Avenue North street use and right-of-way permits with the City of Seattle;
- Continue installation and development of injection and monitoring wells consistent with the CAA throughout the reporting period. This work is expected to continue into mid- to late October; and
- Continue construction activities, including:
 - Complete installation of the shoring system, including all lagging, tie-backs and soil nails;
 - Continue pumping from the construction dewatering wells;
 - Continue mass excavation of soil across the Property, including completing additional *in situ* treatment of soils exceeding the contained-in criteria, consistent with the CMMP;
 - Manage and export soil generated during mass excavation and shoring system installation 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 September 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