



August 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. 21 – JULY 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 July 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., August 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 the revised Treatment System Operation and Maintenance Manual (“O&M Manual”), dated June 28, 2019, to Ecology on July 1, 2019. The revised O&M Manual addresses Ecology comments on the draft O&M Manual and provides information related to the water treatment

system being used to treat dewatering water during construction. This document was prepared by WaterTectonics and describes how the substantive requirements of the Puget Sound Clean Air Agency regulations related to vapor treatment will be met;

- Received confirmation from Ecology in a July 8, 2019, e-mail that the water treatment system used to treat stormwater and dewatering water during the construction work is exempt from any laws requiring or authorizing local government permits during remedial actions conducted at the Property. This e-mail further confirmed that, during the interim action and construction work at the Site, the treatment system must meet the substantive requirements for a permit from the Puget Sound Clean Air Agency (“PSCAA”) consistent with the final O&M Manual;
- Submitted the second quarter 2019 “Groundwater and Soil Vapor Data Summary” on July 23, 2019;
- 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 weekly Air Monitoring Reports throughout the reporting period;
 - Continued installing tie-backs, soil nails, and lagging. Lagging extended down to approximately elevation 16 feet around the south, west and north walls of the excavation, and the row of tie-backs at elevation 24 feet were installed;
 - Submitted the results of a soil treatment test on a 4-foot-thick lift in Soil Management Area (“SMA”) 3 to Ecology on July 15, 2019. The test was conducted on June 26, 2019, and all confirmation soil samples were below contained-in criteria. These results were discussed briefly during the July 17, 2019, meeting (see below), at which time Ecology indicated that treatment of up to 4-foot-thick lifts was acceptable as long as additional confirmation soil samples were collected to account for the additional volume;
 - Continued soil treatment activities in SMAs-2, -3 and -4 consistent with Section 3.5 of the Contaminated Media Management Plan (“CMMP”), including:
 - SMA-2: Treated five 2-foot-thick lifts between elevations 23 and 13 feet, totaling 825 tons;
 - SMA-3: Treated three 2-foot-thick lifts between elevations 25 and 19 feet, totaling 265 tons; and
 - SMA-4: No treatment was conducted in SMA-4;
 - Continued soil management activities associated with the above activities, including coordination with Ecology’s Hazardous Waste and Toxics Reduction Program staff regarding disposal of soil from select soldier piles consistent with the March 18, 2019, Contained-In Determination and the CMMP. During the reporting period, approximately 32,365 tons of contained-in soil were exported from the Property. There was no soil classified as a hazardous waste generated during the reporting period;
- Conducted the 2019 third quarter groundwater and soil vapor monitoring event between July 15 and August 1, 2019. This event included sampling of 46 monitoring wells, a complete round of

water levels conducted on July 16, and installation of 11 transducers in select wells between July 29 and July 31, 2019. PES could not access monitoring well FMW-131 on Block 37 to collect groundwater samples because it is covered by a portable office building. Due to FMW-131 being inaccessible, PES sampled deep zone monitoring well MW128 instead. Soil vapor samples were collected from vapor probes SV01 and SV02. Two attempts to collect a sample from vapor probe SV03 were unsuccessful. Water from condensation was observed in the vapor tubing during the first sampling attempt. During the second attempt, a sample could not be collected for an unknown reason. An attempt to collect a sample from SV03 will be made not later than the next quarterly event in October. If this attempt is not successful, corrective actions will be evaluated and implemented;

- Continued to interact with the City of Seattle regarding the right of way permits related to installing the proposed remedial investigation monitoring wells;
- Submitted Progress Report No. 20 to Ecology on July 17, 2019; and
- Met with Ecology July 25, 2019, to discuss: (1) the status of construction activities, including shoring, mass excavation, and soil treatment; (2) a summary of the results from the April 2019 quarterly groundwater monitoring event; (3) the status of Ecology's review of the Revised Agency Review Draft of the Remedial Investigation and Feasibility Study ("RI/FS") Work Plan; and (4) an update on the Master Use Permit for the project.

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

Soil data collected during the excavation and soil treatment activities described above continued to be validated, and soil data generated primarily during the May and June 2019 excavation and soil treatment activities were uploaded into the EIM during the reporting period. Approval by the EIM Coordinator of the location information for the perimeter injection wells is still pending; once approval is received, the soil analytical data associated with these wells will be uploaded into the EIM during the next reporting period. PES also began validation of data generated by the third quarter groundwater and soil vapor monitoring event.

WORK PLANNED AND ANTICIPATED DELIVERABLES DURING UPCOMING REPORTING PERIOD

Work planned during the August 2019 reporting period includes:

- Continuing coordination with the City of Seattle regarding street use and right-of-way permits for the proposed RI/FS monitoring well installation; and

- Continuing with construction activities, including:
 - Installing the shoring system, including lagging, tie-backs, and soil nails;
 - Installing and beginning pumping from the construction dewatering wells;
 - Continuing the mass excavation of soil across the Property, including conducting additional *in situ* soil treatment of soils exceeding the contained-in criteria, consistent with the CMMP;
 - Managing and exporting soil generated during mass excavation and shoring system installation consistent with the CMMP;
 - Beginning installation of the injection and monitoring wells described in the Final Contingent Action Addendum dated February 14, 2019;
 - Completing the validation of the third quarter groundwater and vapor sampling data, and beginning preparation of the associated data summary report; and
 - Conducting air monitoring activities consistent with the Air Monitoring Plan.

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