



July 17, 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. 20 – JUNE 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 June 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., July 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:

- Met with Ecology June 6, 2019, to discuss: (1) the status of Ecology’s review of the Revised Agency Review Draft of the Remedial Investigation and Feasibility Study (“RI/FS”) Work Plan; (2) the status of construction activities, including shoring, mass excavation, and soil treatment; (3)

preliminary results from the April 2019 quarterly groundwater monitoring event; and (4) an update on the master use permit for the project;

- 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 throughout the reporting period. This includes installation of tie-backs E17 through E-21 at elevation 35 feet; soil from these tie-backs was stockpiled separately and tested to confirm that tetrachloroethene (“PCE”) concentrations were below 14 mg/kg. Ecology approved disposal of this soil on June 26, 2019;
 - Completed demolition of former building slab, footings, and other subsurface structures. Concrete was broken up and managed consistent with the Contaminated Media Management Plan (“CMMP”);
 - Completed disposal of the soils characterized as hazardous waste associated with the removal of Sump 5 and the small area of soils that exceeded the contained-in criteria for tetrachloroethene (greater than 14 mg/kg) located within Soil Management Area (“SMA”) 1;
 - Submitted a request on June 20, 2019, to conduct a soil treatment test on 4-foot thick lifts. Ecology approved the request on June 21, 2019, and the test was conducted on June 26, 2019, on soil in SMA-3 between elevations 29 and 25 feet. The test was successful (i.e., all confirmation soil samples were below contained-in criteria);
 - Continued soil treatment activities in SMAs 2, 3 and 4 consistent with Section 3.5 of the CMMP, including:
 - SMA-2. Treated three 2-foot thick lifts between elevations 29 and 23 feet, totaling 600 tons;
 - SMA-3. Treated three 2-foot thick lifts between elevations 35 and 29 feet, and one 4-foot lift between elevations 29 and 25 feet, totaling 566 tons; and
 - SMA-4. Treated three 1.5 to 2-foot thick lifts between elevations 27.5 and 22.5 feet, totaling 41 tons;
 - Met with Byung Maeng of Ecology at the Property on June 25, 2019, to observe treatment of soil located at an elevation of 25 to 23 feet within SMA-2. Ecology observed application of the potassium permanganate to the treatment zone and soil blending activities. Other construction activities observed by Ecology included excavation of soil from SMA-1 and loading transport trucks; and
 - 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 20,550 tons of contained-in soil and 48 tons of soil classified as hazardous waste were

exported from the Property;

- Submitted the Treatment System Operations and Maintenance Manual on June 20, 2019, 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. Ecology provided comments verbally, and via e-mail on June 24, 2019. The document will be finalized during the next reporting period;
- Replaced the well monuments on two monitoring wells (BB-8 and MW105) on June 24, 2019, located in the Roy Street right-of-way;
- Submitted Progress Report No. 19 to Ecology on June 26, 2019; and
- Cleaned up approximately 1 to 1.5 cubic yards of soil spilled from a truck hauling soil from the Property on June 27, 2019. The release occurred at approximately 8:00 a.m. on limited portions of Roy Street, 9th Avenue, and Mercer Street. No soil was near or entered any catch basin or other stormwater conveyance. Cleanup actions, completed within an hour of becoming aware of the release, included shoveling and sweeping the soil into a loader bucket, followed by multiple passes of the affected areas with a street sweeper. Mr. Ron Timm of Ecology was contacted the same day, and the Environmental Reports Tracking System (“ERTS”) coordinator Ms. Katelynn Piazza was contacted on June 28, 2019. Ms. Piazza contacted Daniel Balbiani of PES on July 1, 2019 to confirm the information provided and indicated the incident was assigned ERTS No. 690341. No follow-up actions were required by either Mr. Timm or Ms. Piazza.

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 were validated during the reporting period. PES did not upload any new soil or groundwater data into the EIM during the reporting period. Pending approval by the EIM Coordinator of the location information for the perimeter injection wells, the soil analytical data associated with these wells, along with the validated soil data collected during the soil treatment and excavation work, will be uploaded into the EIM during the next reporting period.

WORK PLANNED AND ANTICIPATED DELIVERABLES DURING UPCOMING REPORTING PERIOD

Work planned during the July 2019 reporting period includes:

- Preparing and submitting the second post-injection quarterly groundwater monitoring event data

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summary;

- Conducting the third quarter 2019 interim action performance groundwater and soil vapor monitoring event;
- Continuing coordination with the City of Seattle regarding street use and right-of-way permit 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;
 - 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; and
 - Conducting air monitoring activities consistent with the Air Monitoring Plan.

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