



June 26, 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. 19 – MAY 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 May 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., June 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 (“IAWP”), 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;
- Exported both the clean fill and contained-in soil bench material after the upper levels of tie-backs and lagging were completed. All of the clean fill was sampled prior to export to confirm that no cross-contamination had occurred. All sample results were non-detect for site related contaminants;
- Continued installing tie-backs, soil nails, and lagging throughout the reporting period. By the end of the reporting period, lagging had been installed to approximately elevation 24 feet on south, and approximately 30 to 37 feet on west, north, and east walls, depending on location. Tie-backs continued to be installed at various depths, depending on the location and excavation progress;
- Began demolition of former building slab, footings, and other subsurface structures. Concrete was broken up and managed consistent with the Contaminated Media Management Plan (“CMMP”). By the end of the reporting period, approximately 80 percent of the concrete slab and structures had been removed;
- Discovered a small area of soils that exceeded the contained-in criteria for tetrachloroethene (“PCE”; greater than 14 mg/kg) located within Soil Management Area 1. Information related to this discovery was transmitted to Ecology in a May 30, 2019, e-mail. As described in that e-mail, the apparent source of this contamination may have been a sanitary sewer line that was running through this area. Per the procedures in the CMMP, the extent of contamination exceeding the contained-in criteria was established through sampling from test pits, and approximately 150 to 180 tons of soil exceeding the contained-in criteria were excavated on May 28, 2019. The excavated soil was placed in either a lined and covered stockpile or in lined roll-off containers. Additional soil samples were collected from the excavation sidewalls and bottom, all of which confirmed that concentrations were below the contained-in criteria. Completion of the waste profiling, transport, and disposal of these soils as hazardous waste occurred during the next reporting period;
- Began soil treatment activities consistent with Section 3.5 of the CMMP. Environmental Chemical Corporation (ECC) and Titan (treatment subcontractor) mobilized equipment and materials to the Property the week of May 6, 2019. Approximately 70 tons of soil in Soil Management Area 3 were treated on May 20, 2019. Subsequent confirmation sampling demonstrated concentrations of PCE were less than the contained-in criteria, and Ecology approved disposal as contained-in soil in an email dated May 22, 2019;
- Removed Sump No. 5 on May 29, 2019. Inlet and outlet pipes were observed at the south and north ends of the sumps, approximately 1 foot below the top of the sump. The sump was nearly full of sediment, and initial screening did not detect elevated organic vapors using a photoionization detector (“PID”). The sides and bottom of the sump were observed, and no cracks or holes were noted. The soil beneath the sump was also screened, and no elevated readings were detected. During dismantling of the sump, deeper soil present in the sump was exposed, and elevated PID readings were recorded. Dismantling of the sump was stopped, and samples of the soil within the sump and a sample of the concrete were collected and sent to the laboratory for chemical analysis in order to determine the appropriate method of disposal. The sump and soil were placed on

plastic sheeting and covered pending receipt of the analytical results. The sump and soil will be properly disposed of during the next reporting period; 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 22,565 tons of contained-in soil and 300 tons of soil classified as hazardous waste were exported from the Property.
- Submitted Progress Report No. 18 to Ecology on May 15, 2019.
- Completed the second post-injection quarterly groundwater monitoring event on May 3, 2019, except for off-Property monitoring wells MW113, MW115, and MW116. These three wells required additional City of Seattle street use permitting, and these permits have not yet been issued. Given this delay, and the pending start of the third quarterly groundwater monitoring event in July, these three wells will be sampled as part of the third quarterly event. A groundwater data summary memorandum that includes all of the validated results for the second quarterly monitoring event will be presented in the next progress report.

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

PES uploaded the groundwater data from January 2019 quarterly monitoring event and the March 2019 monitoring event into the EIM database during the reporting period. These data have been approved by Ecology's EIM coordinator. Groundwater data for the second post-ISCO quarterly monitoring event (except for wells MW113, MW115, and MW116, as described above) were uploaded into the EIM database during the reporting period and are pending review and approval of Ecology's EIM coordinator. The process of uploading location and analytical data for soil associated with the perimeter injection well installation has begun and will be completed during the next reporting period.

WORK PLANNED AND ANTICIPATED DELIVERABLES DURING UPCOMING REPORTING PERIOD

Work planned during the June 2019 reporting period includes:

- Discussing Ecology's comments on the Revised RI/FS Work Plan and beginning preparation of street use and right-of-way permit applications for the proposed monitoring wells.
- Finalizing the Puget Sound Clean Air Authority's substantive requirements for operation of the air stripping associated with the dewatering and stormwater treatment system.

- Continuing with construction activities, including:
 - Installing the shoring system, including lagging, tie-backs and soil nails;
 - Completing the removal of the slab-on-grade at approximately elevation 40 feet, and 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 June 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