



April 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. 17 – MARCH 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 March 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., April 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” will refer to an area where contamination released at the property located at 700 Dexter Avenue North (“Property”) has come to be located, consistent with the definition of “site” or “facility” in the Washington Model Toxics Control Act (“MTCA”, Chapter 173-340 of the Washington Administrative Code (“WAC”)). The word “Property” will refer 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:

- Completed injecting emulsified vegetable oil (“EVO”) into the 157 Property injection wells consistent with the Final Interim Action Work Plan (“IAWP”) on March 3, 2019;
- Received approval of the Final Contingent Action Addendum (“CAA”) from Ecology in a March 4, 2019, letter to BMRD. This same letter also approved the “700 Dexter – Below Grade

Waterproofing and Vapor Control” memorandum and acknowledged receipt of the “Monitoring and Inadvertent Discovery Plan;”

- Submitted the letter entitled “Request for Contained-In Policy Determination for Shoring System Installation and Excavation Activities – American Linen Supply Co. – Dexter Ave Site” to Byung Maeng of Ecology’s Hazardous Waste and Toxics Reduction Program on March 6, 2019;
- Received comments on the Final Draft Contaminated Media Management Plan (“CMMP”) from Ecology via e-mail on March 6, 2019. PES addressed these comments and submitted a redline of the revised Final Draft CMMP to Ecology on March 8, 2019;
- Submitted a request for extension to the due date for the revised remedial investigation and feasibility study (RI/FS) work plan via e-mail on March 8, 2019. The requested extension was until April 15, 2019, so that the data from the first post *In Situ* Chemical Oxidation (“ISCO”) quarterly groundwater round and Site-wide round of groundwater level monitoring could be incorporated into the work plan. Ecology approved the extension via e-mail on March 11, 2019;
- Received additional comments on the March 8 revised Final Draft CMMP from Ecology via e-mail on March 11, 2019. PES addressed these minor changes the same day and sent them to Ecology, who accepted these final changes and approved the Final CMMP via e-mail on March 11, 2019, and in a letter dated March 21, 2019. The Final CMMP was transmitted electronically to Ecology via FTP link on March 12, 2019;
- Submitted the “Deep Monitoring Well Installation and Sampling Memorandum” to Ecology on March 11, 2019. This memorandum documented the installation and sampling of three additional deep wells on the Property. The e-mail transmitting this memorandum also included a table summarizing the EVO injections;
- Conducted the final (post-EVO) inter-injection groundwater monitoring event of 21 wells between March 11 and March 13, 2019. This included resampling of newly installed deep monitoring wells MW-162, MW-163 and MW-164. The validated results of this monitoring event will be presented in the next progress report;
- Conducted groundwater level measurements of 77 wells on and off the Property on March 14, 2019;
- Completed the development of the perimeter injection wells on 8th Avenue (installed during the February reporting period) on March 11, 2019;
- Received Ecology’s contained-in determination in a March 18, 2019, letter entitled “Contained-In Determination for Contaminated Soils from Former American Linen Supply Company in Seattle, Washington;”
- Continued installation of perimeter injection wells on Roy Street throughout March 2019. A total of 17 dual completion wells were installed during the reporting period. As noted in the previous progress report, significant utility conflicts were present in certain locations, and suitable locations for some of the wells could not be identified before drilling operations had to be terminated to avoid conflicts with the soldier pile installation work. Alternative locations for these remaining wells are being coordinated with the Seattle Department of Transportation and Seattle City Light, and it is anticipated that the remaining wells will be installed after the soldier pile work is completed in early May and before the contingent action wells are installed in the fall of 2019;

- Collected and analyzed 56 soil samples from five of the perimeter injection wells during drilling activities. The primary purpose of these samples was to assist in characterizing soil that will be generated during installation of the shoring system during redevelopment activities (i.e., soldier pile and tie-back installation). The validated results for these samples, along with the results of similar soil sampling efforts conducted during installation of the 8th Avenue perimeter wells, will be presented in the next progress report;
- Decommissioned all on-Property monitoring and injection wells. The injection well decommissioning began after completing the EVO injections, and decommissioning of the monitoring wells began after completing the Site-wide groundwater level measurement event. All on-Property wells were decommissioned by March 15, 2019, prior to initiating construction work;
- Submitted Progress Report No. 16 to Ecology on March 15, 2019;
- Initiated construction activities associated with the planned redevelopment of the Property on March 18, 2019. The following construction-related activities occurred during the reporting period:
 - Mobilizing equipment and personnel to the project site;
 - Modifying site security fencing to facilitate installation of the soldier piles;
 - Constructing the working benches for the soldier pile drill rigs in the western half of the Property. Consistent with the Final CMMP, the bench located in the southwestern corner was constructed using existing site soil from the elevated portion of the southwestern section of the Property, while the northwest bench was constructed using imported recycled concrete fill. The recycled concrete was covered with plastic sheeting and geotextile prior to placing a gravel working course on which the drill rigs can operate;
 - Conducting routine air monitoring activities consistent with the approved Air Monitoring Plan;
 - Beginning construction of the water treatment system;
 - Installing soldier piles; and
 - Initiating associated soil management activities.
- Met with Ecology via conference call on March 28, 2019, to discuss (1) the status of the revised RI/FS work plan, (2) the status of the perimeter injection well installation, (3) baseline air monitoring results associated with the construction work, (4) the construction schedule, (5) the quarterly groundwater monitoring schedule and (6) the status of the City of Seattle Master Use Permit review.

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, with the exception of the requested extension to the due date of the revised RI/FS Work Plan (see below for details).

VALIDATED DATA RECEIVED, AND DATA ENTERED INTO EIM

Groundwater data for the post-ISCO quarterly monitoring event and the post-EVO injection monitoring event, as well as the available soil data associated with the perimeter well installation, were validated. PES began uploading the soil and groundwater data into the EIM database during the reporting period. The uploading of the data to EIM will be completed during the next reporting period.

WORK PLANNED AND ANTICIPATED DELIVERABLES DURING UPCOMING REPORTING PERIOD

Work planned during the April 2019 reporting period includes implementing the interim action activities pursuant to the approved Final Interim Action Work Plan, including:

- Continuing to revise the RI/FS Work plan to address Ecology's comments. The revised RI/FS Work Plan will be submitted to Ecology on April 15, 2019;
- Conducting the second round quarterly groundwater monitoring consistent with the IAWP event;
- Continuing with construction activities, including:
 - Initiating installation of the shoring system, including soldier piles, lagging and tie-backs;
 - Managing and exporting soil generated during shoring system installation consistent with the CMMP;
 - Completing construction of the water treatment system and beginning treatment operations as needed; and
 - Conducting air monitoring activities consistent with the Air Monitoring Plan.

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