



March 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. 16 – FEBRUARY 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 February 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., March 2019), and (6) summaries of contacts with representatives of the local community, public interest groups, press, and federal, state or tribal governments.

ACTIVITIES CONDUCTED DURING THE REPORTING PERIOD

During the reporting period, BMRD conducted the following work:

- Completed the first post in-situ chemical oxidation (“ISCO”) injection quarterly groundwater monitoring event on February 1, 2019. The complete round of water level measurements was delayed, however, due to the renewal process for access agreements for select off-Property wells. Those measurements will be taken in March 2019.
- Sampled the three additional deep monitoring wells on the Property (MW-162, -163 and -164) on February 5, 2019.
- Met with Ecology on February 7, 2019, to discuss: 1) post-injection groundwater monitoring results after the second round of ISCO injections; 2) resolving final comments on the Draft Contingent Action Addendum (“CAA”); 3) the status of the Contaminated Media Management

Plan (“CMMP”); 4) preliminary data from sampling new deep monitoring wells and 5) RI/FS work plan status, including what data set to include and the proposed location of new wells and borings.

- Received an email from Ecology on February 7, 2019, conditionally approving the CAA, provided that Ecology’s requested changes were made;
- Continued installing perimeter injection wells on 8th Avenue. Well installation and development activities on 8th Avenue continued through the entire reporting period;
- Began the perimeter injection well installation process on Roy Street on February 21, 2019, with concrete coring and air knifing to clear utilities. Numerous utility conflicts were identified. The process of relocating wells to avoid utility conflicts and to comply with Seattle Department of Transportation and Seattle City Light requirements continued into the next reporting period.
- Began injecting emulsified vegetable oil (“EVO”) consistent with the Final Interim Action Work Plan on February 12, 2019. Injections continued throughout the remainder of the reporting period;
- Submitted the Final CAA to Ecology on February 14, 2019;
- Submitted Progress Report No. 15 to Ecology on February 15, 2018;
- Met with Byung Maeng of Ecology’s Hazardous Waste and Toxics Reduction Program on February 20, 2019, to discuss the approach for requesting and obtaining a contained-in determination for the soil generated during construction activities described in the CMMP;
- Submitted the Final Draft CMMP to Ecology on February 21, 2019; and
- Met with Ecology on February 28, 2019, to discuss: 1) the third round ISCO injection summary and groundwater monitoring results; 2) the status of the EVO injections; 3) the status of Ecology’s review of the Final Draft CMMP and 4) status of the revised RI/FS work plan.

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

Groundwater data for the post-ISCO quarterly monitoring event are still being validated. Once the validation is complete, this data will be uploaded into the EIM database.

WORK PLANNED AND ANTICIPATED DELIVERABLES DURING UPCOMING REPORTING PERIOD

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

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- Receiving Ecology's letter documenting approval of the Final CAA;
- Completing the EVO injections;
- Conducting the post-EVO injection groundwater monitoring event;
- Completing installation of perimeter injection wells on 8th Avenue and Roy Street;
- Finalizing the CMMP pursuant to Ecology's comments and receiving Ecology's approval of the Final CMMP;
- Receiving Ecology's approval of the Water Proofing and Vapor Control Memorandum;
- Submitting a request for a contained-in determination to Ecology for disposal of soil generated during the shoring and excavation work in accordance with the CMMP;
- Pending approval of the Final CMMP, decommissioning all injection and monitoring wells located on the Property;
- Pending approval of the Final CMMP, beginning mobilization for shoring and excavation work on or about March 18, 2019; and
- Continuing to revise the RI/FS Work plan to address Ecology's comments.

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