



January 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. 14 – DECEMBER 2018
FORMER AMERICAN LINEN SUPPLY CO.
AGREED ORDER NO. DE 14302**

Dear Ms. Cardona:

On behalf of BMR-Dexter LLC (“BMRD”), PES Environmental, Inc. (“PES”) 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 December 2018.

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., January 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 second round of in-situ chemical oxidation (“ISCO”) injections on December 1, 2018. Table 1 (attached) provides the Round 2 injection statistics for each treatment zone.
- Received approval for the two variance requests to the minimum standards for well construction from Ecology’s Water Resources Program on December 7, 2018. The variance requests addressed (1) the approach for decommissioning the former electrical resistance heating (“ERH”) wells, and (2) installation of the perimeter injection wells as dual

completion (nested) wells.

- Submitted a request on December 11, 2019, to extend the January 25, 2019 due date for the revised remedial investigation and feasibility study (“RI/FS”) work plan addressing Ecology’s comments. Ecology approved this extension request on December 12, 2019.
- Submitted a request to Ecology on December 12, 2018, to collect additional water quality data during the second inter-injection round of groundwater sampling. This additional data focused on (1) confirming data collected during the baseline monitoring event last April regarding the geochemical parameters used to evaluate monitored natural attenuation, and (2) providing field water quality parameter data in representative injection wells after an ISCO injection event. Ecology approved this request during the December 13, 2018 meeting.
- Conducted the second inter-injection round of groundwater monitoring on December 12 through December 17, 2018. This monitoring included collecting additional water quality information summarized in PES’s December 12, 2018 email to Ecology. The validated results of this monitoring event will be presented in the next progress report.
- Received comments on December 13, 2018, from the City of Seattle on the Draft Contaminated Media Management Plan (“CMMP”) via e-mail from Ecology.
- Met with Ecology on December 13, 2018, to discuss the results of the first inter-injection round of groundwater monitoring, the status of the second round of ISCO injections, resolution of Ecology’s comments on the Draft Contingent Action Addendum (“CAA”), preliminary comments on the CMMP, and the status of the RI/FS workplan.
- Submitted on December 13, 2018, via email the first of two partial responses to Ecology’s comments on the Draft CAA.
- Received comments on December 17, 2018 from Farallon Consulting (for Vulcan) on the CMMP via e-mail from Ecology.
- Submitted on December 18, 2018 via email the second of two partial responses to Ecology’s comments on the Draft CAA addressing Ecology’s comments.
- Began the third round of ISCO injections on December 18, 2018.
- Submitted Progress Report No. 13 to Ecology on December 21, 2018.
- Received Ecology’s comments on the Draft CMMP on December 21, 2018.
- Began decommissioning the ERH wells pursuant to the approved variance request on December 26, 2018.

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

Data associated with the soil sampling conducted during the installation of additional injection wells and the IW-54A/IW54B investigation as well as the first inter-injection performance groundwater monitoring event were uploaded into the EIM database during this reporting period. The data from the inter-injection performance groundwater monitoring event will be validated and uploaded into the EIM during the January 2019 reporting period.

WORK PLANNED AND ANTICIPATED DELIVERABLES DURING UPCOMING REPORTING PERIOD

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

- Completing the third round of ISCO injections;
- Beginning to install the perimeter injection wells on 8th Avenue. Final locations for the perimeter injection wells on Roy Street are under discussion with the City of Seattle to accommodate the significant utility conflicts present in this area;
- Responding to Ecology's comments on the Draft CMMP;
- Finalizing the CAA pursuant to Ecology's comments;
- Continuing to revise the RI/FS Work plan to address Ecology's comments; and
- Beginning the first quarterly groundwater monitoring event after the completion of the third and final round of ISCO injections.

There are no other deliverables anticipated to be submitted to Ecology during the January 2019 reporting period.

CONTACTS WITH PUBLIC AND GOVERNMENTAL PERSONNEL

In addition to 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.

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PES Environmental, Inc.

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

Attachment: Table 1 – Round 2 ISCO Injection Statistics

cc: John Moshy, BMR-Dexter LLC

Table 1
Round #2 ISCO Injection Statistics
Former American Linen Supply Co
Seattle, Washington

Treatment Zone	Number of Wells	Total Reagent Injected	Average Reagent Per Well	Wells Receiving Minimum Volume (380 gal)	Wells Exceeding 500 gallons
A	56	28,565	510	39	36
B	56	29,250	522	38	38
C	28	11,075	396	16	16
D	15	9,325	622	13	13
Overall	155	78,215	505	106	103