



November 15, 2018

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. 12 – OCTOBER 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 October 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., November 2018), 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 round of ISCO injections on October 3, 2018. PES transmitted a brief summary of the first-round injections to Ecology on November 8, 2018.
- Submitted a letter entitled “Proposed IW-54A/IW-54B Soil Investigation and CMMP Schedule Extension Request” to Ecology via e-mail on October 5, 2018. Ecology approved the scope of the soil investigation in an e-mail on October 11, 2018 and approved the extension request for the Contaminated Media Management Plan (CMMP) in an e-mail dated October 29, 2018.

- Met with Ecology on October 12, 2018 to discuss the implementation of the interim action including providing an overview of the first round of ISCO injections, preliminary discussion of the CMMP components, and the Contingent Action Addendum. The status of the remedial investigation and feasibility study (RI/FS) work plan was also discussed.
- Conducted the IW-54A/IW-54B soil investigation between October 15 and 19, 2018. The results of this investigation will be presented in the Draft CMMP.
- Submitted Progress Report No. 11 to Ecology on October 15, 2018.
- Submitted the Cultural Resource Assessment and Inadvertent Discovery Plan to Ecology on October 15, 2018.
- Proposed locations and provided rationale for installing two additional injection wells (IW-58A and IW-16D) to Ecology on October 15, 2018. The proposed locations were based on the soil sampling results from the installation of the 22 additional injection wells in September. These two additional wells were installed on October 17 and 18, 2018. Soil data collected during the installation of these two new wells and the 22 additional wells installed in September will be presented in the Draft CMMP.
- Submitted a memorandum entitled “700 Dexter – Below Grade Waterproofing and Vapor Control” prepared by Morrison Hershfield to Ecology on October 18, 2018. This memorandum was submitted to fulfill the requirement for the Vapor Intrusion Addendum described in the Final Interim Action Work Plan.
- Conducted additional redevelopment of select injection wells starting October 23 and finishing on November 2, 2018. This additional redevelopment work was conducted to improve the injection capacity of these wells based on the results of the first round of injection. In addition, select electrical resistivity heating (ERH) wells were sealed to prevent surfacing that occurred through these wells during the first injection round; this work was conducted on October 31, 2018.
- Met with Ecology on October 24, 2018 to discuss additional details related to the implementation of the interim action including further discussion of the CMMP components and the Contingent Action Addendum. In a separate meeting with Ecology the same day, discussed issues related to forthcoming variance requests for decommissioning of the ERH wells and the installation of the perimeter injection wells.
- Conducted the first inter-injection round performance groundwater monitoring event consistent with the Final Interim Action Work Plan between October 25 and 29, 2018. The results of this monitoring event will be presented in the next progress report.

- Submitted the Draft Contingent Action Addendum to the Final Interim Action Work Plan to Ecology for review on October 30, 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 approved extension to the due date of the CMMP until November 26, 2018.

VALIDATED DATA RECEIVED, AND DATA ENTERED INTO EIM

During the reporting period, no additional data was validated or entered into the EIM. Data associated with soil sampling conducted during the installation of additional injection wells was received during the reporting period; this data will be validated and entered into the EIM database during the next reporting period. Data from the inter-injection round performance groundwater monitoring event will also be validated and entered in the EIM database.

WORK PLANNED AND ANTICIPATED DELIVERABLES DURING UPCOMING REPORTING PERIOD

Work planned during the November 2018 reporting period includes implementing the interim action activities pursuant to the approved Final IAWP, including:

- Initiating the second round of ISCO injections on November 5, 2018;
- Submitting the CMMP on November 26, 2018;
- Submitting variance requests to Ecology related to the decommissioning of the existing ERH wells and the installation of the proposed perimeter injection wells.

There are no other deliverables anticipated to be submitted to Ecology during the November 2018 reporting period.

CONTACTS WITH PUBLIC AND GOVERNMENTAL PERSONNEL

Routine communications with Ecology regarding the ongoing work as discussed above. BMRD did not issue any press releases or fact sheets related to the project and did not participate in any 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.

A handwritten signature in blue ink that reads "Daniel A. Balbiani". The signature is written in a cursive style with a large initial 'D'.

Daniel A. Balbiani, P.E.
Principal Engineer

cc: John Moshy, BMR-Dexter LLC