



October 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. 11 – SEPTEMBER 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 September 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., October 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:

- Submitted Progress Report No. 10 to Ecology on September 14, 2018.
- Completed installing additional injection wells per the Final IAWP. The last of the 22 additional wells was completed on September 21, 2018.
- Prior to beginning the first round of injections, PES measured the depth to the bottom of the previously installed 132 injection wells to assess whether any sediment had accumulated in these wells after installation. Based on these measurements, 38 injection wells were

determined to need additional development before injecting *in situ* chemical oxidation (ISCO) reagents into these wells. The well redevelopment work was completed on September 24, 2018.

- Mobilized equipment and materials to the Property for the first round of ISCO injections on September 10, 2018, and began injecting ISCO reagents on September 13, 2018. Injections continued through end of reporting period.
- Collected the baseline soil vapor samples from existing soil vapor monitoring probes SV01, SV02, and SV03 on September 25, 2018.
- As part of the ongoing utility improvement work in the City of Seattle right-of-ways surrounding the Property, it became apparent that monitoring well MW-140 was in the area that would be excavated during installation of one of the Seattle City Light electrical vaults. The design engineers were consulted to determine if the vault could be relocated, but other utility conflicts prevented moving it so as avoid conflicts with MW-140. MW-140 was decommissioned by a licensed driller prior to the installation of the vault.

In addition, the four fill ports located in the eastern sidewalk along Dexter Avenue that were associated with the former fuel underground storage tanks (USTs) located on the Property were identified during the utility work in this area. The former USTs were removed during previous cleanup work, and the fill ports are the only remaining elements of the USTs. In advance of further utility work in this area, the fill ports were cleaned and decommissioned by Emerald Recycling Services, Inc. by filling with cement.

- Began preparation of the deliverables specified in the Final IAWP, including the:
  - Contaminated Media Management Plan (CMMP);
  - Cultural Resource Assessment and Inadvertent Discovery Plan;
  - Contingent Action Addendum; and
  - Vapor Intrusion Mitigation Addendum.

#### **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 CMMP (see below for details).

#### **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.

### **WORK PLANNED AND ANTICIPATED DELIVERABLES DURING UPCOMING REPORTING PERIOD**

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

- Completing the first round of ISCO injections;
- Conducting the first inter-round groundwater monitoring event consistent with the IAWP;
- Continued preparation of the deliverables specified in the Final IAWP including the following:
  - Contaminated Media Management Plan (originally due October 15<sup>th</sup> – see below for additional discussion of the CMMP);
  - Cultural Resource Assessment and Inadvertent Discovery Plan (due October 15<sup>th</sup>);
  - Contingent Action Addendum (due October 30<sup>th</sup>); and
  - Vapor Intrusion Mitigation Addendum. (due October 30<sup>th</sup>).
- Conducting an additional soil investigation designed to bound the limits of tetrachloroethene (PCE) contamination in soil at concentrations greater than 14 milligrams per kilogram (mg/kg) surrounding the recently installed injection well IW-54B. Defining the lateral and vertical extent of PCE greater than 14 mg/kg in this area is necessary for the completion of the CMMP, which will describe the appropriate management and disposition of soil removed from the property during implementation of the IAWP and redevelopment. In order to complete this investigation and integrate the results into the CMMP, PES has requested an extension to the due date for submitting the draft CMMP to Ecology until November 26<sup>th</sup>.

There are no other deliverables anticipated to be submitted to Ecology during the October 2018 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 and local governments.

**Ms. Tamara Cardona**  
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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 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