



January 16, 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. 2 – DECEMBER 2017
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 2017.

This progress report includes discussions of: (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 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 additional investigation to bound the limits of tetrachloroethene contamination in soil at concentrations greater than 14 milligrams per kilogram, pursuant to the scope of work submitted to Ecology via e-mail on November 9, 2017. Drilling and soil sampling was completed on December 6, 2017 consistent with the November 9 email. One boring (B-224) in the Mw-135 area was extended to a total depth of 60 feet, which was deeper than planned. The laboratory data is currently being validated;

- Met with Ecology on December 8, 2017, to review Ecology’s comments on the agency review draft of the Interim Action Work Plan (“IAWP”) and to discuss additional comments on the plan, discuss the IAWP public comment period and public meeting, and discuss the timing of the RI/FS Work Plan;
- Submitted Progress Report No. 1 to Ecology on December 15, 2017;
- Submitted the Underground Injection Control (“UIC”) Well Registration for Class V Injection Well forms to Mary Shaleen-Hansen at Ecology on December 19, 2017. This UIC registration is for the injection wells described in the IAWP;
- Submitted revised draft IAWP files, including a redline/strikeout version of the text, updated tables, and a revised monitoring program figure on December 18, 2017;
- Met with Ecology on December 21, 2017, to review Ecology’s comments on the revised draft of the IAWP sections, to resolve outstanding issues related to the IAWP, and discuss the public comment period and public meeting requirements;
- Submitted a revised draft SEPA Checklist for the proposed interim action described in the IAWP to Ecology on December 26, 2017; and
- Received additional comments on the IAWP from Ecology via e-mail on December 26, 2017, and held a follow-up conference call to discuss the comments on December 28, 2017.

DEVIATIONS FROM REQUIRED TASKS NOT ALREADY REPORTED

No unreported deviations from required tasks occurred during the reporting period.

DEVIATIONS FROM THE SCHEDULE

Aside from the previously granted extension to the due date for the Agency Review Draft of the RI/FS Work Plan, no other 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

The data collected during the pre-interim action investigation were reported in the IAWP submitted on November 8, 2017. All data from this pre-interim action investigation have been validated and entered into the Ecology EIM database.

No other validated data were received, and no other data were entered into the EIM database during the reporting period.

WORK PLANNED AND ANTICIPATED DELIVERABLES DURING UPCOMING REPORTING PERIOD

Work planned during the January 2018 reporting period includes:

- Meeting with Ecology on January 5, 2018, to discuss Ecology's final comments on the IAWP, plan the public comment process associated with the IAWP, and provide Ecology with a list of remaining RI/FS data gaps and a summary of proposed investigations;
- Finalize the IAWP and prepare a public review draft of the IAWP and submit the same to Ecology;
- Assist Ecology with preparation of a fact sheet needed for the public comment period and documents and presentation materials needed for the public meeting;
- Begin preparation of the draft RI/FS Work Plan; and
- Validate the data associated with the additional investigation conducted in early December and upload the validated data into the EIM database.

Deliverables anticipated to be submitted to Ecology during the January 2018 reporting period include:

- A public review draft IAWP.

CONTACTS WITH PUBLIC AND GOVERNMENTAL PERSONNEL

Aside from routine communications with Ecology regarding the ongoing work, BMRD made no contact with representatives of the local community, public interest groups, press, or federal, state, or tribal 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, BMR-Dexter LLC