



December 15, 2017

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. 1 – OCTOBER 24 TO NOVEMBER 30, 2017
FORMER AMERICAN LINEN SUPPLY CO.
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 is the first progress report submitted pursuant to the AO and, therefore, provides information pertaining to work conducted since the effective date of the AO (i.e., October 24, 2017) through November 30, 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., December 2017), 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:

- Prepared the Agency Review Draft Interim Action Work Plan (the “IAWP”) and submitted it to Ecology for review on November 8, 2017;
- Prepared a scope of work for additional investigation to bound the limits of tetrachloroethene contamination in soil at concentrations greater than 14 milligrams per

kilogram. The investigation was proposed as an independent action pursuant to the requirements of WAC 173-340-515. The information obtained from the proposed investigation will be used to evaluate potential methods for treating this soil in advance of the redevelopment so that it can be managed as a contained-out waste rather than a dangerous waste. This scope of work was submitted to Ecology on November 9, 2017, via e-mail, and discussed during the November 16, 2017, progress meeting. The additional soil investigation began on November 27, 2017, and is expected to be completed in December 2017;

- Submitted a draft SEPA Checklist for the proposed interim action described in the IAWP to Ecology on November 17, 2017;
- Met with Ecology on November 16, 2017, to review the contents of the IAWP and get any initial comments on the plan; and
- Received Ecology's preliminary comments on the draft IAWP.

DEVIATIONS FROM REQUIRED TASKS NOT ALREADY REPORTED

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

DEVIATIONS FROM THE SCHEDULE

On November 21, 2017, BMRD requested an extension to the due date for the Agency Review Draft of the RI/FS Work Plan, consistent with Section VII of the AO. The proposed new due date for submittal of the Agency Review Draft RI/FS Work Plan to Ecology is January 8, 2018. Ecology approved this extension request the same day via e-mail.

No other deviations or anticipated problems in meeting the schedule or objectives set forth in the AO or approved work plans were encountered during the reporting period.

VALIDATED DATA RECEIVED AND DATA ENTERED INTO EIM

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

No other validated data was 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 December 2017 reporting period includes:

- Meeting with Ecology on December 8, 2017, to discuss Ecology's comments on the IAWP

and to plan the public comment process associated with the IAWP;

- Revise draft IAWP to address Ecology's comments and prepare a public review draft of the IAWP and submit the same to Ecology;
- Submit the Underground Injection Control Registration forms to Ecology to register the planned interim action injection wells;
- Assist Ecology with preparation of a fact sheet for the public comment period;
- Begin preparation of the draft RI/FS Work Plan and provide Ecology with a list of remaining data gaps and a summary of proposed investigations; and
- Complete the additional soil investigation, validate the data, and upload the validated data into the EIM database.

Deliverables anticipated to be submitted to Ecology during the December 2017 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, BMRD-Dexter LLC