



August 17, 2020

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. 33 – JULY 2020
AMERICAN LINEN SUPPLY CO-DEXTER AVE SITE
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, this 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 July 2020.

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., August 2020), and (6) summaries of contacts with representatives of the local community, public interest groups, press, and federal, state or tribal governments.

For the purpose of this progress report, the word “Site” refers to an area where contamination released at the property located at 700 Dexter Avenue North has come to be located, consistent with the definition of “site” or “facility” in the Washington Model Toxics Control Act (Chapter 173-340 of the Washington Administrative Code). The word “Property” refers to the area within the 700 Dexter Avenue North property boundary.

ACTIVITIES CONDUCTED DURING THE REPORTING PERIOD

During the reporting period, BMRD conducted the following work:

- Continued construction activities associated with implementing the Final Interim Action Work Plan (“IAWP”), and with planned redevelopment of the Property. The following construction-related activities occurred during the reporting period:

- Continued operation of the dewatering system through July 20, 2020 at which time the system was shut down and decommissioning of the water treatment system commenced. While the dewatering system was in operation, water was treated and discharged consistent with the Operations and Maintenance Manual and the discharge permit; and
- Conducted groundwater level monitoring consistent with the IAWP to record the recovery of water levels around the Property after ceasing operation of the dewatering system on July 20, 2020. Work included installation of four new transducers in wells around the Property on July 17, 2020, and conducting a limited round of water level monitoring on July 21, 2020;
- Continued implementation of the Remedial Investigation (“RI”) and Feasibility Study (“FS”) Work Plan, including the following activities:
 - Completed installation of the RI soil vapor probes between July 1 and July 10, 2020 with 18 new RI soil vapor probes installed and 18 soil samples collected for laboratory analysis;
 - Conducted a Site-wide groundwater level monitoring event on July 11, 2020;
 - Continued the third quarter 2020 groundwater monitoring event with 108 groundwater samples collected in July, including wells in both the RI and IA monitoring programs;
 - Collected soil vapor samples from 27 soil vapor probes between July 14 and July 17, 2020; and
 - Continued data reduction, tabulation, and evaluation.
- Submitted a Request for Contained-In Policy Determination to Ecology on July 9, 2020 for soils to be generated during utility trenching and roadway repair activities. Ecology provided comments to this request in a July 21, 2020 e-mail. PES discussed these comments with Mr. Paul Bianco from Ecology’s Hazardous Waste and Toxics Reduction Program on July 22, 2020 and submitted supplemental information to Mr. Bianco on July 29, 2020;
- Submitted Progress Report No. 32 to Ecology on July 15, 2020; and
- Met with Ecology on July 23, 2020, via conference call to discuss (1) the status of construction activities and related IA tasks including an update on the schedule for completing perimeter injections, (2) the status of the RI activities, and (3) the current conceptual site model, including the regional geology and hydrogeology, the Site geology and hydrogeology, and the distribution and transport of contaminants of concern at the Site.

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.

VALIDATED DATA RECEIVED, AND DATA ENTERED INTO EIM

Activities conducted during the reporting period related to data validation and management included:

- Began validation of the RI vapor probe installation soil data, the RI vapor probe air data, and the

available third quarter 2020 groundwater monitoring data.

WORK PLANNED AND ANTICIPATED DELIVERABLES DURING UPCOMING REPORTING PERIOD

Work planned during the August 2020 reporting period includes:

- Coordinating disposal of investigation derived waste (soil and water) associated with soil vapor probe installation and groundwater sampling;
- Resolving outstanding comments related to the July 9, 2020 Request for Contained-In Policy Determination. Pending resolution of the contained-in request, conducting oversight of utility excavation adjacent to the Property and coordinating waste management and disposal;
- Continuing to monitor aquifer recharge in select wells around the Property approximately every two weeks until water levels stabilize;
- Installing and developing the six remaining perimeter injection wells in the Roy Street right-of-way;
- Collecting groundwater samples from 28 perimeter injection wells per the IAWP, pending stabilization of water levels surrounding the Property;
- Completing the third quarter groundwater sampling event. Sampling of select Shallow Zone wells near the Property is contingent on water levels recovering to the elevation of the well screens;
- Beginning preparations to initiate injection of emulsified vegetable oil into the perimeter injection wells in late September; and
- Continuing data reduction, tabulation, validation, and evaluation.

There are no other deliverables anticipated to be submitted to Ecology during the July 2020 reporting period.

CONTACTS WITH PUBLIC AND GOVERNMENTAL PERSONNEL

Other than 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.

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