



September 15, 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. 34 – AUGUST 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 August 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., September 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 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 conducting two rounds of water level monitoring in select wells on August 4 and August 17, 2020;
- Installed the remaining 12 perimeter injection wells (six dual-completion wells) on Roy Street between August 10 and August 25, 2020 consistent with the IAWP. These newly installed wells were developed between August 20 and August 28, 2020;
- Prepared for conducting perimeter injections of emulsified vegetable oil (“EVO”) in September 2020, including locating and exposing previously installed injection wells that have been buried to protect them from construction activities, developed an approach for conducting EVO injections consistent with the IAWP, and coordinated the work with ISOTEC (injection contractor) and Turner Construction;
- Continued implementation of the Remedial Investigation (“RI”) and Feasibility Study (“FS”) Work Plan, including the following activities:
  - Completed the third quarter 2020 groundwater monitoring event with 12 groundwater samples collected in August; and
  - Completed validation of the RI vapor probe installation soil data, the RI vapor probe soil vapor data, and the available third quarter 2020 groundwater monitoring data.
- Continued to work with Mr. Paul Bianco of Ecology’s Hazardous Waste and Toxics Reduction Program regarding the July 9, 2020 Request for Contained-In Policy Determination (“CID Request”) for soils generated during upcoming utility trenching and roadway repair activities. Based on its review of the supplemental data submitted July 29, 2020, Ecology requested that additional data be collected to support its evaluation of the CID Request. Pursuant to this request, PES collected 28 additional soil samples from 16 borings (B-283 through B-298) from August 19 through August 26, 2020;
- Coordinated waste management activities for investigation derived wastes generated during the installation of the remaining perimeter injection wells (soil and development water) and soil generated during tieback de-tensioning work conducted by Turner Construction;
- Submitted Progress Report No. 33 to Ecology on August 17, 2020; and
- Met with Ecology on August 27, 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) a review of the third quarter monitoring results for the Contingent Action Addendum wells, (3) the status of the RI activities including a review of the third quart monitoring results, (4) the overall RI/FS schedule and data set for the RI, and (5) the proposed post-perimeter injection groundwater monitoring approach.

**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:

- Completed validation of the remaining third quarter 2020 groundwater monitoring data.

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

Work planned during the September 2020 reporting period includes:

- Ongoing coordination of the disposal of investigation derived waste (soil and water) associated with injection well installation, tieback de-tensioning, and groundwater sampling;
- Monitoring groundwater levels in select wells around the Property approximately every two weeks prior to conducting the perimeter injections;
- Collecting groundwater samples from 28 perimeter injection wells prior to initiating the perimeter injections;
- Resolving outstanding comments related to the July 9, 2020 CID Request. Pending resolution of the CID Request, conducting oversight of utility excavation adjacent to the Property and coordinating excavated soil management and disposal;
- Monitoring aquifer recharge in select wells around the Property approximately every two weeks until water levels stabilize;
- Collecting groundwater samples from 28 perimeter injection wells per the IAWP, pending stabilization of water levels surrounding the Property;
- Continuing preparations to initiate injection of emulsified vegetable oil into the perimeter injection wells the week of September 21, 2020; and
- Continuing data reduction, tabulation, validation, and evaluation including entering validated soil, soil vapor, and groundwater data into Ecology's EIM.

There are no other deliverables anticipated to be submitted to Ecology during the September 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.

**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.**



Daniel A. Balbiani, P.E.  
Principal Engineer

cc: John Moshy, BMRD