



March 30, 2021

1413.001.02

Washington Department of Ecology
Northwest Regional Office Toxics Control Program
3190 160th Ave. SE
Bellevue, WA 98008-5452
Attn: Ms. Tena Seeds

BY EMAIL ONLY

**REMEDIAL INVESTIGATION/FEASIBILITY STUDY
WORK PLAN ADDENDUM NO. 2
AMERICAN LINEN SUPPLY CO DEXTER AVE SITE
AGREED ORDER NO. DE 14302**

Dear Ms. Seeds:

On behalf of BMR-Dexter LLC (“BMRD”), PES Environmental, Inc. (“PES”), has prepared this second remedial investigation and feasibility study (“RI/FS”) work plan addendum (“addendum”) for the American Linen Supply Co Dexter Avenue Site (the “Site”) located at 700 Dexter Avenue North, Seattle, Washington. PES has been performing an RI on behalf of BMRD at the Site consistent with the Final RI/FS Work Plan¹. The RI/FS Work Plan (referred to as the work plan or plan) was prepared consistent with the requirements of Sections VII.A through VII.D of Agreed Order No. DE 14302 (the “AO”) between the State of Washington Department of Ecology (“Ecology”) and BMRD. The RI is intended to investigate the nature and extent of Site contamination outside the 700 Dexter Avenue property.

This addendum provides the scope of work for a focused investigation of the area near monitoring well HMW-9IB on the Seattle Department of Transportation (“SDOT”) Mercer Parcels property², located south of the 700 Dexter Avenue North property. This work will be conducted to assess the concentrations and distribution of chlorinated volatile organic compounds (“CVOCs”) in groundwater near HMW-9IB. The primary CVOCs of concern are tetrachloroethene (“PCE”), trichloroethene (“TCE”), cis-1,2-dichloroethene (“cDCE”), and vinyl chloride (“VC”). The following sections describe the current Site conditions near HMW-9IB, the proposed focused investigation scope of work, and the anticipated schedule for the work. The specific procedures and methods used to install, develop, and sample the proposed monitoring wells will be similar to those previously used in the RI, and this addendum will not repeat those detailed procedures, which are provided in the Final RI/FS Work Plan.

For purposes of this addendum, 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

¹ PES Environmental, Inc. 2019. *Final Remedial Investigation/Feasibility Study Work Plan, American Linen Supply Co-Dexter Avenue Site, 700 Dexter Avenue North, Seattle, Washington*. Prepared for BMR-Dexter LLC. December 4.

² The SDOT Mercer Parcels site is generally located at 800 Mercer Street and is listed in Ecology’s contaminated sites database as Facility Site ID No. 27913.

“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.

CURRENT SITE CONDITIONS NEAR HMW-9IB

HMW-9IB is a 67-foot-deep Intermediate B Zone monitoring well installed by Hart Crowser on February 28, 2020, on the western portion of the SDOT Mercer Parcels property (Figure 1). The well was installed during RI activities for the SDOT Mercer Parcels site, which was conducted by Hart Crowser on behalf of 800 Mercer, LLC. Hart Crowser sampled groundwater from HMW-9IB on March 19, 2020, and the results indicated the presence of elevated CVOCs. The information presented in the SDOT Mercer Parcels Draft RI Report³ indicates that the nature and extent of CVOCs in groundwater on the SDOT Mercer Parcels property, including the area of HMW-9IB, is consistent with the distribution of the American Linen CVOC groundwater plume. PES sampled HMW-9IB on January 26, 2021 to confirm the data and evaluate additional geochemical parameters. PES also sampled Intermediate B Zone monitoring well MW-147, located north of HMW-9IB on the south site of Roy Street, most recently on February 9, 2021. Following are PCE, TCE, cDCE, and VC results in micrograms per liter (“µg/L”):

- **HMW-9IB (3/19/20):** PCE = 660 , TCE = 420, cDCE = 9,100, and VC = 1,900;
- **HMW-9IB (1/26/21):** PCE = 32.1, TCE = 112, cDCE = 3,360, and VC = 1,400; and
- **MW-147 (2/9/21):** PCE = 1.40U, TCE = 9.90, cDCE = 1,750, and VC = 3,450J+.

Hart Crowser sampled two Intermediate A Zone monitoring wells near HMW-9IB (HMW-9IA on March 19, 2020, and HMW-20IA on September 18, 2020), and PES sampled Intermediate A Zone monitoring well MW-146, which is located next to MW-147, most recently on February 8, 2021. Following are the results in µg/L:

- **HMW-9IA (3/19/20):** PCE = 0.42, TCE = 0.23, cDCE = 3.7, and VC = 0.95;
- **HMW-20IA (9/18/20):** PCE = 5.5, TCE = 18, cDCE = 840, and VC = 520; and
- **MW-146 (2/8/21):** PCE = 0.704J+, TCE = 3.52, cDCE = 2,690, and VC = 3,910.

The geochemical parameter analytical results for the January 26, 2021 HMW-9IB sample indicate subsurface conditions conducive to biodegradation, with detectable ethene (137 µg/L), low dissolved oxygen (0.83 mg/L), and a negative oxidation-reduction potential (-544 millivolts).

Based on groundwater elevations in the SDOT Mercer Parcels Draft RI Report and data collected during groundwater monitoring events performed for the American Linen Site, the groundwater flow directions in the HMW-9IB area are to the east-northeast in both the Intermediate A Zone and Intermediate B Zone, with a groundwater high located near the southwest corner of the parcel in the Intermediate B Zone. This groundwater flow direction indicates that CVOCs in Intermediate A and B groundwater are moving toward Roy Street in the HMW-9IB area. Most of the RI water level data were collected during periods of dewatering at the American Linen property and the Block 38 West property (520 Westlake

³ Hart Crowser. 2021. *Draft 3, Remedial Investigation, Seattle DOT Mercer Parcels, 800 Mercer Street, Seattle, Washington*. Prepared for 800 Mercer, LLC. January 15.

Avenue North), which is approximately 850 feet to the southeast of the HMW-9IB area. The groundwater flow directions in these zones may differ when dewatering activities are not occurring.

SCOPE OF WORK

Based on the results summarized above, PES, on behalf of BMRD, proposes an investigation near HMW-9IB to confirm the approximate extent and concentration of the CVOCs at HMW-9IB. The investigation will focus on the area near HMW-9IB to (1) estimate the nature and extent of elevated CVOCs in the Intermediate B Zone around HMW-9IB and (2) determine the concentrations of CVOCs in the Intermediate A and Intermediate B Zones between MW-146/MW-147 and HMW-9IB. The data from this investigation will be used to supplement the RI data set for the American Linen Site and may be used to inform potential cleanup action alternatives for the FS. Following is the scope of work for the focused investigation:

- Installation of six Intermediate B Zone monitoring wells (see Figure 2) screened at a similar elevation to HMW-9IB (approximately -2 to -12 feet relative to the North American Vertical Datum 1988 (“NAVD88”). The wells are located to confirm the extent of CVOCs around HMW-9IB, with an emphasis on the downgradient (eastern) side of HMW-9IB;
- Installation of one Intermediate A Zone monitoring well (see Figure 2) screened at a similar elevation to MW-146 and HMW-20IA (both screened from 12.8 to 2.8 feet NAVD88);
- Collection of continuous soil samples with the Sonic drill rig for lithologic logging;
- Submittal of soil samples collected every 5 feet below the proposed base of the redevelopment excavation (starting at an elevation of 5 feet) for laboratory analysis of volatile organic compounds (“VOCs”) by US Environmental Protection Agency (“EPA”) Method 8260. These data will supplement the shallower soil data collected during the SDOT Mercer Parcels RI, will characterize soil CVOC concentrations in an area with CVOCs in groundwater, and provide data for waste characterization purposes. Soil samples will not be collected at or above the base of the proposed redevelopment excavation since this zone was characterized during the SDOT Mercer Parcels RI;
- Development and surveying of the seven new monitoring wells;
- Measurement of one round of groundwater levels in the new wells and surrounding wells, likely coordinated with a Site-wide groundwater level monitoring event;
- Collection of one groundwater sample each from HMW-9IB, HMW-9IA, HMW-20IA, and each new monitoring well for laboratory analysis of VOCs by EPA Method 8260 and geochemical parameters (alkalinity, chloride, total iron, total manganese, nitrate, dissolved gases, sulfate, and total organic carbon⁴), with one duplicate sample and one trip blank sample also analyzed; and
- Processing of the data, including data validation, data tabulation, groundwater elevation contouring, and preparation of figures depicting the CVOC results; and
- Storage of the residual soil and water in drums on the SDOT Mercer Parcels, profiling the waste, and transporting the waste soil and water drums to appropriate facilities for disposal.

⁴ The samples will be analyzed by Methods 2320B (alkalinity), 9056A (chloride, nitrate, and sulfate), 9060A (total organic carbon), 6020A (iron and manganese), and RSK-175 (dissolved gases).

As noted above, the procedures used in the RI will be followed in the HMW-9IB investigation.

Upon completion of the scope of work outlined above, PES will discuss the results of the investigation with Ecology as well as any next steps that may be needed prior to redevelopment of the SDOT Mercer Parcels property by 800 Dexter, LLC and implementation of the Site-wide FS. The results of this investigation will be incorporated into the American Linen Supply Co Dexter Avenue Site RI Report.

ANTICIPATED SCHEDULE

Obtaining access to the property has already been initiated with SDOT, with scheduling of utility clearance, drilling, and laboratory work to follow. Assuming timely receipt of a property access agreement and driller availability, PES anticipates completing the work by the end of May. PES will notify Ecology when the drilling schedule has been finalized and will also notify Ecology if the overall schedule changes for any reason.

We appreciate your review of the scope of work. Please let us know if you have any questions or need additional information prior to your review.

Sincerely,

PES ENVIRONMENTAL, INC.



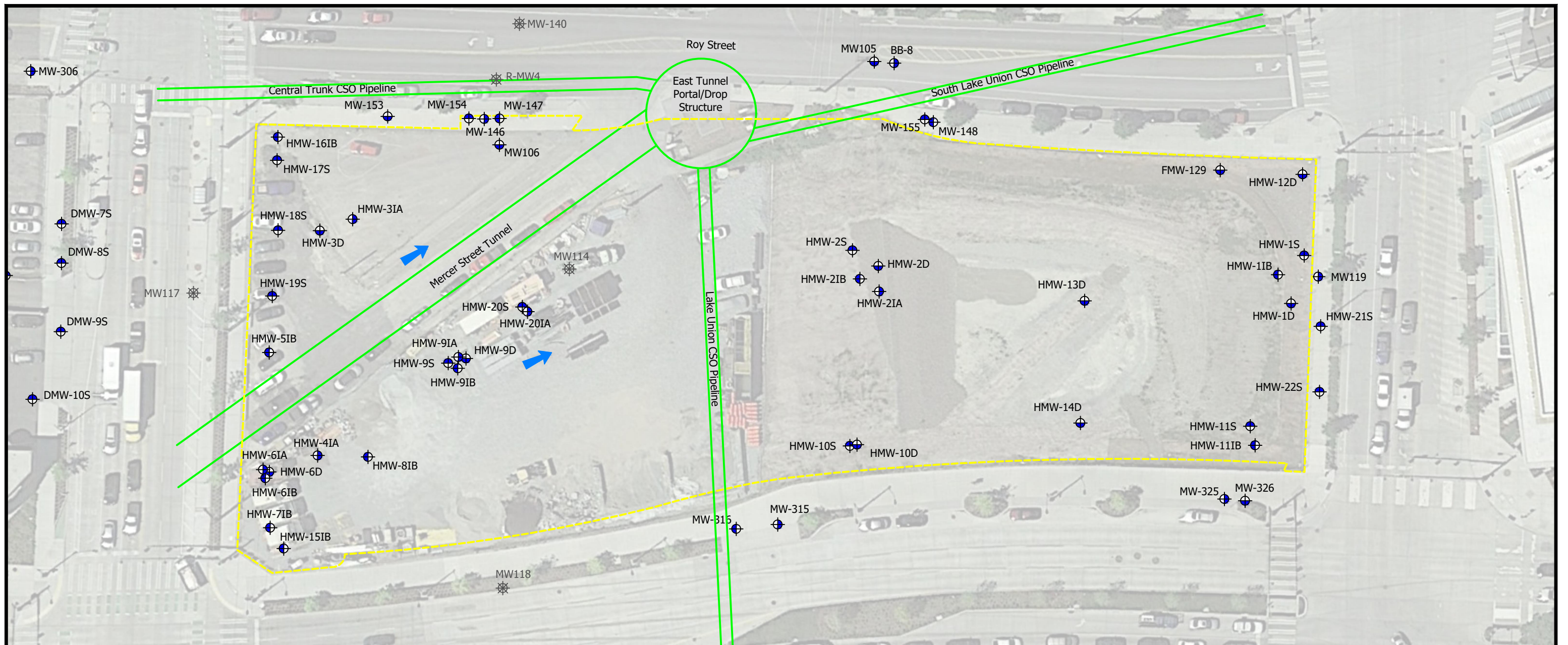
Daniel A. Balbiani, P.E.
Principal Engineer



William R. Haldeman, LHG, R.G.
Associate Hydrogeologist

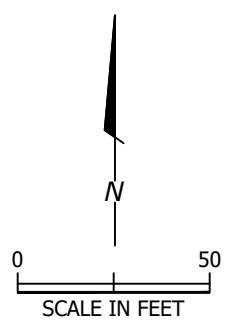
Attachments: Figure 1 – Existing SDOT Mercer Parcels Exploration Locations
Figure 2 – Proposed Monitoring Well Locations

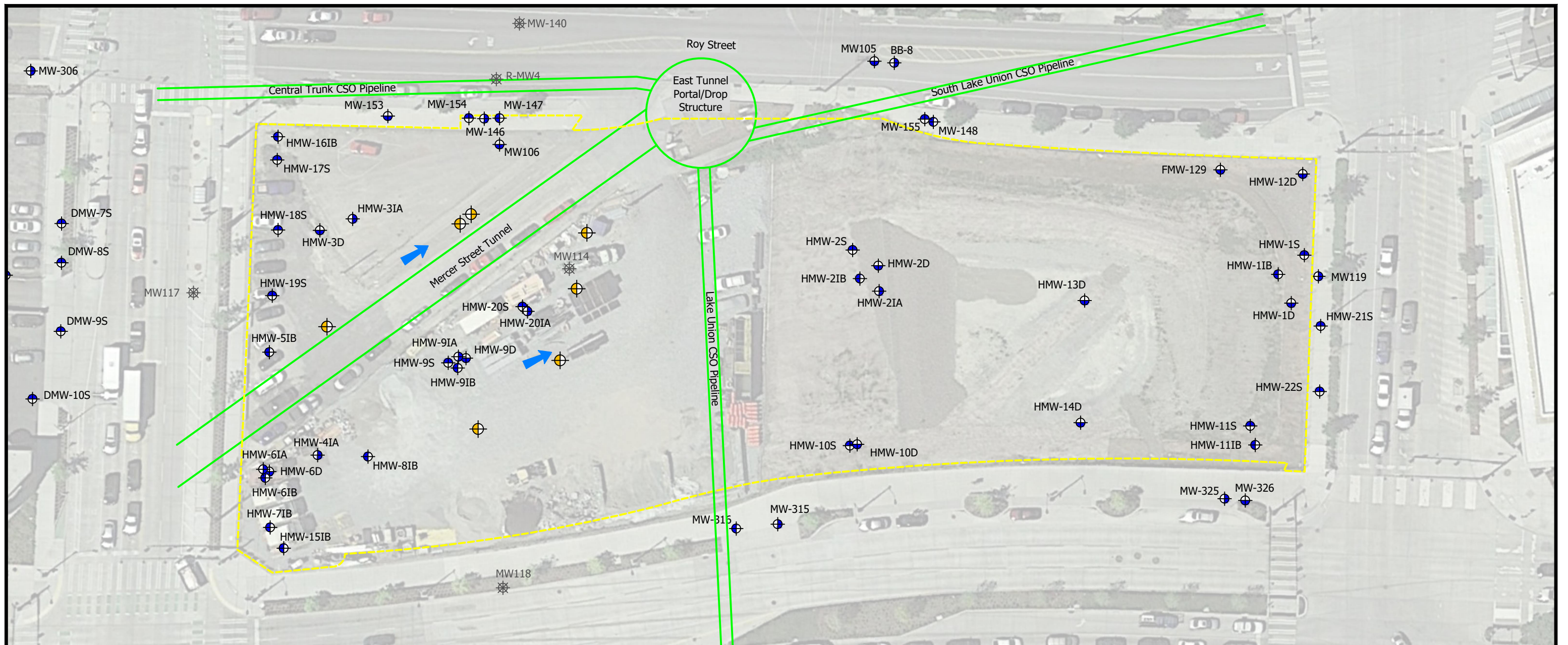
cc: John Moshy, BMRD



Explanation

- Approximate SDOT Mercer Parcels Property Boundary
- Sanitary Sewer Pipe
- MW-310 Shallow Zone Monitoring Well
- MW116 Intermediate A Zone Monitoring Well
- W-MW-02 Intermediate B Zone Monitoring Well
- MW105 Deep Zone Monitoring Well
- MW-140 Decommissioned Monitoring Well
- Approximate Groundwater Flow Direction





Explanation

- Approximate SDOT Mercer Parcels Property Boundary
- Sanitary Sewer Pipe
- MW-310 Shallow Zone Monitoring Well
- MW116 Intermediate A Zone Monitoring Well
- W-MW-02 Intermediate B Zone Monitoring Well
- MW105 Deep Zone Monitoring Well
- MW-140 Decommissioned Monitoring Well
- Proposed Intermediate A Monitoring Well
- Proposed Intermediate B Monitoring Well
- Approximate Groundwater Flow Direction

