STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47600, Olympia, WA 98504-7600 • 360-407-6000

July 13, 2022

Mark A. Wicklein, P.E.
Environmental Restoration Team Supervisor
Naval Facilities Engineering Command, Northwest
1101 Tautog Circle, Suite 203
Silverdale, WA 98315-1101

Re: Partial Approval of the *Draft* Sampling and Analysis Plan for Site Inspection of Per- and Polyfluoroalkyl Substances at Bremerton Naval Complex, Bremerton, Washington

Site Name: US NAVY PSNS
Facility/Site ID: 175
Cleanup Site ID: 130

Dear Mark Wicklein:

The Department of Ecology (Ecology) has reviewed the following document in accordance with the Model Toxics Control Act (Chapter 70A.305 RCW; Chapter 173-340 WAC) and applicable Toxics Cleanup Program (TCP) policies and guidance.

> *Draft* Sampling and Analysis Plan, Site Inspection for Per- and Polyfluoroalkyl Substances, Bremerton Naval Complex, Bremerton, Washington, dated July 2022

Approval

Ecology approves the Sampling and Analysis Plan (SAP) for the following three (3) sites as identified in the Per- and Polyfluoroalkyl Substances (PFAS) Site Inspection (SI) SAP and Preliminary Assessment (PA).

- 2017 USS Stennis AFFF Release
- USS Missouri Parking Lot (OU A/Zone 2)
- Mooring A and Drydock 5 Fill Area

Disapproval

Ecology disapproves the SAP for the following twenty (20) sites as identified in the SI SAP and PA.

- Former Building 513 Parking Lot
- Building 435
- Former Building 871
- Former Building 99
- Building 503
- Former Building 432
- Building 494
- Farragut Ave/Barclay Rd Car Crashes
- Building 434
- Auto/Hobby Shop Fire
- 2018 AFFF Spill
- Building 457
- Building 873
- Former Defense Reutilization Marketing Office Drum Storage Area
- Lift Station 1
- Lift Station 3
- Former Building 426
- Building 455
- Building 59
- OU D

Ecology's Rationale for Disapproval and Next Steps

Ecology believes that there is sufficient information to conclude from the conceptual site model (CSM) for the above twenty (20) sites that surface water, and/or sediment, and/or stormwater system sampling (catch basin and outfall area sediment, stormwater) is necessary in addition to soil and groundwater sampling to evaluate all possible pathways to Sinclair Inlet from the release areas. The Bremerton Naval Complex is mostly paved and any spill/AFFF release would have been transported through the stormwater system. Therefore, evaluation of this pathway is very critical. The scope of these additional sampling will need to be site specific; therefore, a work plan will need to be developed for each site. While Ecology recommends that surface water, and/or sediment, and/or seep sampling occur concurrently with the soil and groundwater sampling, you may proceed with soil and groundwater sampling at these twenty (20) sites concurrently with the other two (2) sites as approved above. Ecology understands surface water and sediment sampling are proposed for collection at 2017 USS Stennis AFFF Release site.

Without the needed surface water, sediment, and/or seep data for the other twenty (20) sites, pathway evaluation for the CSM will be incomplete and a No Further Action (NFA) determination cannot be made.

Please let me know, if you have any questions or concerns. You can reach me at (360) 628-1977, or by email at nicholas.acklam@ecy.wa.gov. If you have any technical questions, please contact Mahbub Alam at (360) 280-6274 or at mahbub.alam@ecy.wa.gov .

Sincerely,

Nicholas M. Acklam
HQ Cleanup Section Manager
Toxics Cleanup Program

cc: Andrew Schmeising, Suquamish Tribe
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