



DEPARTMENT OF
ECOLOGY
State of Washington

**Crownhill Elementary School
Bremerton School District
Cleanup Site ID#: 4487**

**Responsiveness Summary, Proposed Interim Action
Agreed Order DE 7916**

August 6, 2013

Washington State Department of Ecology
Northwest Regional Office – 3190 160th Avenue S.E.
Bellevue, WA 98008

Site Background

The Crownhill Elementary School site is located at 1500 Rocky Point in the City of Bremerton, Kitsap County, Washington. The Site was originally used for the mining of sand and gravel during the 1930s. The resulting mining pits were used as a landfill for various materials including municipal and industrial wastes. The original Crownhill Elementary School was constructed on the Property in 1956. The school partially burned in 1993. Site work for a new school was started on the Property in 1994, and the new school opened in 1996.

September 20, 2010, Washington State Department of Ecology (Ecology) and the Bremerton School District entered into an Agreed Order to conduct a Remedial Investigation, Feasibility Study and Draft Cleanup Action Plan. In 2011, Ecology and the Bremerton School District conducted a comprehensive investigation of contamination resulting from past uses of the property.

Interim Action Work Plan

Based on the results of the Remedial Investigation, an Interim Action was proposed for the Site. The proposed Interim Action will place clean soil and geofabric to cover and isolate two locations. The Interim Action will install a geotextile fabric and 1 foot of clean soil at two areas (north of the portable, approximately 4,900 square feet, and east of the asphalt turn around area, approximately 2,400 square feet). This will result in a minimum of two feet of clean soil covering these two areas that contain lead above state cleanup levels. At the completion of this Interim Action, all areas where lead in soil were observed to be above state cleanup levels at the Site will be covered with a minimum of two feet of clean soil, or an impervious surface, such as asphalt or concrete.

A public comment period on the proposed Interim Action was held from July 5 – August 5, 2013. The Kitsap Public Health District was the only written comment received. Their comments dated July 9, 2013, are addressed below. A copy of the letter is attached to this Responsiveness Summary.

Comment	Ecology's Response
Steps be taken to control fugitive dust in the neighborhood	The potential generation of fugitive dust from the interim action is a concern to Ecology. Best management practices will be implemented to minimize the generation of dust. The proposed interim action will not involve digging or excavating contaminated soil.
Ensure areas of construction have protective barriers to prevent injury to the public.	The interim action will take place during summer vacation ensuring minimal public access to the school grounds. In addition, the area will be blocked off to prevent injury to the public. The Health Department will be notified five working days before actual construction begins.
The Health Department also expressed concern if contaminated soil is excavated during the interim action	The proposed Interim Action, as designed, will not dig or excavate into soil that is contaminated by past uses of the Site. Soil with levels of lead above Model Toxic Control Act (MTCA) cleanup levels are more than one foot below the existing grade. Care will be taken to ensure that contaminated soils are not disturbed or excavated. Actions listed in the Health Department letter will be implemented if contaminated soil is disturbed, excavated, or moved during the interim action.



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DEPT OF ECOLOGY
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July 9, 2013

Libby Goldstein - Site Manager
Washington State Department of
Ecology-Toxics Cleanup Program
3190 160th Ave SE
Bellevue, WA 98008

RE: CROWNHILL ELEMENTARY SCHOOL SITE PROPOSED INTERIM ACTION
COMMENTS

Dear Ms. Goldstein:

The Kitsap Public Health District (Health District) is writing to provide comments to the Washington State Department of Ecology (Ecology) on the proposed interim action for the Crownhill Elementary School site in Bremerton, WA.

The Health District has the following comments on this proposal:

- 1) The Health District recommends that steps be taken to control fugitive dust in the neighborhood.
- 2) Please ensure that the areas of construction have protective barriers to prevent injury to the public.
- 3) Please inform the Health District five working days prior to when construction begins and when it ends.

The Health District understands that no excavation of contaminated soils is planned for this Interim Action. However, should any excavation of contaminated soils take place the Health District requests that the following concerns be addressed:

- 1) Prevent dust from contaminated soils leaving the site and take the necessary measures to ensure any children on site are protected.
- 2) Ensure that dust from contaminated soils does not enter the school buildings on site.
- 3) If dust from contaminated soils does enter the buildings, ensure that adequate cleaning take place.
- 4) Take steps to protect the portable classroom at the site from dust from contaminated soils.
- 5) If necessary, sample the interior of the buildings to ensure they are free from contamination.
- 6) Dispose of all excavated contaminated soils appropriately.

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In accordance with Washington Administrative Code 246-366-040, the Health District has responsibility for review of construction activities at schools to ensure that minimum environmental health and safety standards are met. Thank you for the opportunity to comment. Please feel free to contact me if you have any questions or concerns.

Sincerely,



Grant A. Holdcroft, RS
Environmental Health Specialist
Solid & Hazardous Waste Program

cc: Jan Brower, Kitsap Public Health District
Paul Giuntoli, Kitsap Public Health District
Ron Carpenter, Bremerton School District
Doug Hillman, Aspect Consulting