

Exhibit F

BREMERTON SCHOOL DISTRICT CROWNHILL ELEMENTARY SCHOOL SITE REMEDIAL INVESTIGATION/FEASIBILITY STUDY SCOPE OF WORK

PURPOSE

The purpose of this Remedial Investigation/Feasibility Study (RI/FS) and Draft Cleanup Plan (DCAP) Scope of Work (SOW) for the Bremerton School District Crownhill Elementary School Site (the Site) is to implement the Agreed Order (AO) entered into by the Department of Ecology (Ecology) and Bremerton School District (BSD), to which this SOW is an Exhibit.

The RI/FS is intended to provide sufficient data, analysis, and evaluations to enable Ecology to select a cleanup action for the Site.

The RI/FS Scope of Work (SOW) is divided into five major tasks as follows:

- 1) Progress Reports
- 2) Work Plan
- 3) Other Project Plans
- 4) Remedial Investigation
- 5) Feasibility Study
- 6) Draft Cleanup plan
- 7) Interim Action (if required by Ecology)

TASK 1 PROGRESS REPORTS

The BSD shall submit progress reports quarterly unless a longer reporting period is approved by Ecology in writing. Progress reports shall be submitted to Ecology until satisfaction of the AO. Progress Reports shall be submitted to the Ecology project coordinator by the 10th of every third month following the effective date of the AO. If this day is a weekend or holiday, deliverables shall be submitted to Ecology on the next business day. At a minimum, progress reports shall contain the following information regarding the preceding reporting period:

- A description of the actions which have been taken to comply with the AO and SOW during the previous reporting period;
- Description of sampling and testing activities completed during the reporting period, including laboratory data reports received by the BSD;
- Summaries of deviations from approved work plans;
- Summaries of contacts with representatives of the local community, public interest groups, press, and federal, state or tribal government;
- Summaries of problems or anticipated problems in meeting the schedule or objectives set forth in the SOW and Work Plan;
- Summaries of solutions developed and implemented or planned to address any actual or anticipated problems or delays;

- Changes in key personnel; and
- A description of work planned for the next reporting period.

TASK 2 WORK PLAN

In order to plan and manage the RI/FS, the Parties shall document project tasks and management strategies in a RI/FS Work Plan (Work Plan), which shall be developed and submitted to Ecology for review and approval in accordance with this SOW, including the schedule contained below, and in accordance with the SOW described in Tasks 4 and 5 below. The Work Plan shall not be implemented until approved by Ecology. Once approved by Ecology, the BSD shall implement the Work Plan according to the schedule contained in this SOW — and according to any subsequent amendments to the Work Plan or schedule made under the Order.

The Work Plan shall specify and describe all tasks to be accomplished to complete an RI/FS that meets the requirements of WAC 173-340-350, in accordance with the AO and this SOW.

The Work Plan shall clearly describe the overall project management strategy for implementing and reporting on RI/FS activities. The responsibility and authority of all organizations and key personnel involved in conducting the RI/FS shall be outlined.

Elements of the Work Plan include, but are not limited to, the following:

- A project management strategy including a description of individual RI/FS subtasks;
- A review of existing and available data to support the development of RI/FS tasks which may include, as appropriate, the following:
 - a) Physical features, including topography, structure locations, and utilities;
 - b) Soil, surface water and groundwater data, including contaminant concentrations and conventional parameters, depths and location of samples, which are necessary to determine the nature and extent of the contaminant(s), and comparison to MTCA;
 - c) Hydrogeologic data;
 - d) Natural resource data including plant and animal species, habitat types, and sensitive ecosystems;
 - e) Location and composition of current and historical contaminant sources;
 - f) Current property ownership and zoning;
 - g) Current or planned land uses and their location, which may affect investigation and cleanup activities, including tribal and recreational;
 - h) Historical, archeological, and cultural uses of the site including recent and historical photographs; and
 - i) A list of potential permits or approvals that may be required for sampling activities, or the substantive requirements of applicable permits or approvals that are procedurally exempt under RCW 70.105D.090
- Data Gaps identified for completion of the RI/FS;

- A draft outline of the final RI and FS Reports including the types of data evaluation, figures, and tables that shall be included;
- A proposed schedule for completion of all RI/FS subtasks not currently accounted for in the schedule; and
- Project personnel and responsibilities.

TASK 3 OTHER PROJECT PLANS

Pursuant to WAC 173-340-350(7)(c)(iv), the BSD shall prepare and submit for Ecology review and approval a Sampling and Analysis Plan (SAP) which provides specific guidance for field and laboratory methodology. A Quality Assurance Project Plan (QAPP) and Health and Safety Plan (HASP) shall also be submitted as appendices to the SAP. The HASP is subject to comment by Ecology, but not subject to Ecology approval. Details of these plans are provided below.

Sampling and Analysis Plan - BSD shall prepare a SAP for RI sampling and analysis activities in accordance with WAC 173-340-820, WAC 173-204-600, and the Sediment Sampling and Analysis Appendix, as updated. The purpose of the SAP is to provide an overview of the RI sampling program that shall obtain information needed to meet the data needs described in Task 4 of the SOW.

The SAP shall describe the sampling objectives and the rationale for the sampling approach. A detailed description of sampling tasks shall then be provided, including specifications for sample identifiers; the type, number, and location of samples to be collected; the analyses to be performed; descriptions of sampling equipment and collection methods to be used; description of sample documentation; sample containers, collection, preservation and handling. The SAP shall describe sample custody and handling procedures, decontamination procedures, and the handling of investigative-derived wastes.

Quality Assurance Project Plan (Appendix to SAP). The BSD shall prepare a QAPP for RI sampling and analysis activities. The QAPP shall identify and describe laboratory methods and the QA/QC measures that shall be taken during the performance of all sampling and analysis tasks to ensure the fulfillment of data quality objectives. Data quality objectives shall reflect the criteria or threshold values used for remedial decisions. Laboratory methodology and QA/QC requirements shall be developed in accordance with Ecology guidance and the requirements of the Ecology Laboratory Accreditation Program and shall include the following elements:

- A brief project description, referencing the Work Plan and/or SAP for details;
- Project management and QA responsibilities;
- Quality assurance objectives;
- Procedures for analysis of samples and reporting of results, including:
 - a) Detection or quantitation limits;
 - b) Analytical techniques and procedures;
 - c) Quality assurance and quality control procedures; and
 - d) Data reporting procedures and validation procedures.

The BSD shall use an Ecology-accredited laboratory for the specific analyses to be performed under this AO. If an unaccredited lab is proposed to be used, the results of recent performance audits and systems audits shall be provided to Ecology prior to use of the lab.

Health and Safety Plan (Appendix to SAP) - The BSD shall prepare a HASP for RI activities in accordance with WAC 173-340-810. The HASP must be consistent with the requirements of the Washington Industrial Safety and Health Act of 1973, Chapter 49.17 RCW and implementing regulations, including any updates or amendments. The HASP shall identify specific monitoring and management responsibilities and activities to ensure the protection of human health activities associated with the RI.

TASK 4 REMEDIAL INVESTIGATION (RI)

The BSD shall conduct a remedial investigation that meets the requirements of WAC 173-340-350(7), according to the Work Plan as approved by Ecology and the schedule contained below. The remedial investigation may incorporate data and information from reports previously submitted to Ecology, including the draft Remedial Investigation Report dated May 4, 2010. Key components of the RI for this Site that may be captured in the Work Plan are as follows:

- Describe the basis for the characterization of the Site, including:
 - a) The nature and extent of any investigations.
 - b) Whether off-property areas were investigated.
 - c) Whether alternatives to off-property investigations were used, such as assuming off property affects, modeling off-property affects, or establishing cleanup levels to protect off-property media or receptors.
- Describe the conceptual model of the Site.
 - a) Conceptual model of the Site developed for each contaminant;
 - b) All Site exposure pathways identified for each media;
 - c) All potential Site receptors identified for each media;
 - d) Considerations on off-property impacts and nearby surface waters issues.
- Describe the nature and extent of contamination at the Site.
- Investigation necessary to establish cleanup standards for the Site, including both cleanup levels and points of compliance.
 - a) Contaminants of concerns identified (list them);
 - b) Extent of contamination delineated (lateral & vertical extents);
 - c) Media affected (soil, groundwater, air, surface water, sediments);
 - d) Pathways for each media;
 - e) Discussion of applicable land use;
 - f) Classification: ground water and beneficial use of surface water.
- Establishment of Cleanup Standards for the Site.
 - a) The indicator hazardous substances and cleanup standards (cleanup levels and points of compliance) established for those substances.
 - b) The land or resource use the cleanup levels are based on (e.g., for soil, cleanup levels may be based on unrestricted land use).
 - c) The method used to establish the cleanup levels (e.g., Method B), and whether that method was modified.

- d) The pathway the cleanup levels are based on (e.g., for soil, the cleanup levels may be based on protection of ground water quality).
- e) Whether the point of compliance is standard or conditional, and the basis for the point of compliance (e.g., for soil, the point of compliance may be based on protection of ground water quality).
- Evaluation of soil cleanup standards for protection of terrestrial ecological receptors.
 - a) Attach the appropriate terrestrial ecological evaluation or exclusion form to document the evaluation.
- Areas requiring cleanup.
 - a) Soil – vertical and lateral
 - b) Ground water – vertical and lateral
 - c) Soil Vapor/air
- Source control and recontamination evaluation.
- All the associated figures, tables, and photos.

TASK 5 FEASIBILITY STUDY (FS)

The BSD shall use the information obtained in the RI to conduct a Feasibility Study that meets the requirements of WAC 173-340-350(8). The FS shall include:

- Areas requiring cleanup;
- Identification and screening of cleanup technologies;
- Basis for assembly of cleanup action alternatives;
- Selection and description of cleanup alternatives;
- MTCA requires:
 - a) A reasonable number and type of alternatives
 - b) Alternatives that protect human health and the environment by eliminating, reducing, or otherwise controlling risks
 - c) Alternatives that have the standard point of compliance for all affected media, unless they are not technically possible or are disproportionately costly for the benefit obtained.
 - d) At least one permanent cleanup action alternative, unless it is not technically possible or is disproportionately costly for the benefit obtained.
- Detailed evaluation of cleanup alternatives;
 - A cleanup action must meet these minimum requirements [WAC 173-340-360(2)(a)]:
 - Threshold requirements
 - a) Protect human health and the environment
 - b) Comply with cleanup standards
 - c) Comply with applicable state and federal laws
 - d) Provide for compliance monitoring
 - Other requirements
 - a) Use permanent solutions to the maximum extent practicable (PEMP)
 - b) Provide for a reasonable restoration time frame
 - c) Consider public concerns
 - Project-specific requirements

- a) Engineering criteria established for the specific project, as appropriate)
- Identification of a preferred cleanup alternative.
- All the associated figures, tables and photos.

Task 6 Submit First Draft of Draft Cleanup Action Plan(DCAP)

The BSD will submit the first draft of the Draft Cleanup Plan (DCAP) to Ecology. The DCAP will include, but not be limited to, the information listed in WAC 173-340-380.

DELIVERABLES

The BSD shall prepare and submit all plans, reports, and studies listed below (items a through c) as required by the Order. In particular:

- All deliverables shall be submitted to Ecology in both electronic (Word and Adobe Portable Document Format [PDF] formats) and hard-copy formats;
- A draft shall be submitted to Ecology for review and approval in accordance with this SOW, including the schedule outlined below, and the Work Plan;
- Ecology will provide written comments on a draft as necessary. Technical comments will be provided under separate cover in addition to any redline editorial comments, directly from Ecology's Project Coordinator to the Parties after Ecology's Project Coordinator has reviewed the comments for relevance and edited them appropriately, so that Ecology speaks with a unified voice when communicating with the Parties;
- If Ecology provides comments on a draft document, the BSD shall revise the draft document by incorporating and/or otherwise addressing Ecology's comments. The BSD shall resubmit an electronic redlined/strikeout revised draft to Ecology for review and approval (only revised sections shall be reviewed by Ecology for completion, unless necessary to review the document more comprehensively due to revisions);
- For the DCAP, once Ecology approves a draft as the final version, it shall be considered the final draft for public review purposes (the public review draft or draft final document);
- Following public review of the draft DCAP final document, the BSD shall prepare and submit for approval by Ecology a final version, which addresses public comments as Ecology determines necessary (if changes to the document following public comment are determined to be substantial, the revised document shall be subject to additional public notice and comment);
- Upon Ecology approval, the final version submitted shall be considered the final DCAP document; and
- Ecology, in its discretion, and with assistance from the BSD pursuant to the terms of the Order, may prepare a Responsiveness Summary to public comments.

Specific deliverables described in this SOW include:

- a) RI/FS Work Plan and Other Project Plans – The BSD shall submit for Ecology review and approval an RI/FS Work Plan, SAP, and QAPP in accordance with the schedule below. The HASP shall also be submitted but not approved by Ecology.
- b) RI/FS Report – The BSD shall summarize and compile the results of Tasks 4 and 5 into an RI/FS Report. The RI/FS report shall follow the draft outline contained in the work

plan as revised during the course of work. Revision of the outline shall require approval of Ecology.

- c) DCAP will select the cleanup action and specify cleanup standards and other requirements of the cleanup action as specified in WAC 173-340-380.

Task 7 Submit Draft Interim Action Work Plan

If required by Ecology, the BSD will submit a draft and final Interim Action Work Plan for Ecology's review and approval.

- The draft Interim Action Work Plan will also include the design and implementation of interim actions to facilitate protection of human health and the environment. The scope of the interim action may include excavation and off-site disposal, confirmational sampling, backfill with clean material, and groundwater monitoring in major areas of contamination at the site as identified in preliminary remedial investigative work. The Interim Action Work Plans shall include, as appropriate, submittal requirements in accordance with WAC 173-340-430(7).
- The interim action shall be designed in a manner that will not foreclose reasonable alternatives for the final cleanup action in accordance with WAC 173-340-430(3)(b).
- Implement Approved Interim Action: Implement approved interim action(s) after Ecology review and approval and public review and comment necessary under WAC 173-340-600(16) and the State Environmental Policy Act.
- Interim Action Report: An Interim Action Report shall be prepared as a separate deliverable that includes the information listed in WAC 173-340-430(7). A draft and final Interim Action Report shall be submitted for Ecology review and approval.

SCHEDULE

The schedule for all tasks described in this SOW is presented below. If, at any time during the RI/FS process, unanticipated conditions or changed circumstances are discovered which may result in a schedule delay, the BSD shall bring such information to the attention of Ecology. Pursuant to Section VIII.K of the AO, Ecology shall determine whether a schedule extension is warranted.

Completion times are calendar days. Any deadline which falls on a holiday or weekend shall be extended to next business day.

Actions

Draft RI/FS Work Plan, SAP, QAPP,
and HASP

Completion Time

90 calendar days from effective date of AO

Final RI/FS Work Plan, SAP, QAPP,
and HASP incorporating Ecology's
comments

60 calendar days from receipt of
Ecology's comments on Draft
RI/FS Work Plan, SAP, and QAPP and
HASP pursuant to review process described
in the Deliverable Section

Completion of RI work
and Submittal of RI data

360 calendar days from Ecology's
approval of Final RI/FS Work Plan, SAP,
and QAPP documents, or as set forth in the
Final RI/FS Work Plan schedule

Draft RI/FS Report

180 calendar days from completion of RI
work and submittal of RI data

Provide final RI/FS Report

90 calendar days from receipt of
Ecology's comments on the Draft RI/FS
Report pursuant to review process described
in the Deliverable Section

Draft Interim Action Work Plan

30 calendar days from Ecology notice to
draft an Interim Action Work Plan

Implement the Interim Action Work Plan

30 calendar days from Ecology notice to
implement the Interim Action Work Plan

Submittal of first draft Cleanup Action Plan

First draft of Draft Cleanup Action Plan to
Ecology 90 days from the issuance of the
final RI/FS