



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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October 15, 2018

David Herrington  
Director of Facilities and Operations  
Bremerton School District  
200 Bruenn Avenue  
Bremerton, WA 98312-3108

**Re: Status of Agreed Order No. DE 11107 and No Further Action to complete Cleanup of the following Contaminated Site:**

- **Site Name:** Bremerton School District Crownhill Elementary School Site
- **Site Address:** 1500 Rocky Point Road NW, Bremerton, WA 98312-2652
- **Cleanup Site ID:** 4487
- **Facility/Site ID:** 99722456

Dear David Herrington:

Thank you for working with the Washington State Department of Ecology (Ecology) on Bremerton School District Crownhill Elementary School Site (Site) under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW, and Agreed Order No. DE 11107, which became effective on April 9, 2015.

This letter provides written notification that, under MTCA and the Agreed Order, no further remedial action is necessary to clean up contamination at the Site, other than further operation and maintenance of the final remedy (including removal of LNAPL, continuous operation of the HVAC system during school hours, and institutional controls and monitoring), and periodically reviewing conditions at the Site. This letter also describes the status of the Agreed Order and the Site.

### **Completion of Cleanup Required by Agreed Order**

The remedial actions required by the Agreed Order are specified in Section VII (Work to Be Performed) and detailed in the Cleanup Action Plan (Exhibit G). Bremerton School District (BSD) was required to implement a final cleanup action plan in accordance with WAC 173-340 with respect to contamination associated with a former Kitsap County landfill at the Site. After inspecting the Site and reviewing the supporting documentation, Ecology has determined that the active cleanup required at the Site under the Agreed Order has been satisfactorily completed,



with the exception of removal of LNAPL and continuous HVAC system operation during the school day.

### **Post-Cleanup Remedial Actions Required by Agreed Order**

Although the cleanup of contamination at the Site has been largely completed, further remedial action is still necessary under MTCA and required under the Agreed Order to remove LNAPL, operate the HVAC system during school hours, and control and monitor the remaining contamination at the Site. BSD's responsibilities are specified in Section VII (Work to Be Performed) and detailed in the Cleanup Action Plan, Environmental Covenants, Groundwater/LNAPL Monitoring and Contingency Plan, a LNAPL Removal Work Plan, and a Cover System Inspection and Maintenance Plan (I&M Plan).

### **Periodic Reviews of Post-Cleanup Conditions Required by Agreed Order**

Ecology will conduct periodic reviews of post-cleanup conditions at the Site to ensure they remain protective of human health and the environment. This requires continued access to the Site, as provided in Section VIII.E (Access) of the Agreed Order. BSD's responsibilities are specified in Section VIII.R (Periodic Review) of the Agreed Order. Any costs incurred by Ecology in conducting periodic reviews may be recovered from BSD.

### **Status of Agreed Order**

Although the active cleanup of contamination at the Site has largely been completed, further implementation of the final remedy (including LNAPL removal, continuous operation of the HVAC system during school hours, and institutional controls and monitoring) is still necessary under MTCA and required by the Agreed Order to control and monitor the remaining contamination and periodically review the conditions at the Site. The Agreed Order will remain in effect until the required post-cleanup remedial actions are completed or are no longer necessary under MTCA.

This letter summarizes BSD's remaining responsibilities under the Agreed Order; it does not alter or expand BSD's responsibilities under the Order.

### **No Further Action Determination**

Ecology has determined that no further active remedial action is necessary to clean up contamination at the Site under MTCA other than LNAPL removal and operation of the HVAC system during the school day. In addition, further operation and maintenance of the final remedy (including institutional controls and monitoring) is still necessary under MTCA to control and monitor the remaining contamination and periodically review the conditions at the Site.

### **Delisting of the Site**

David Herrington  
October 15, 2018  
Page 3

The Site cannot be removed from the Hazardous Sites List because it is a containment site which requires the continuing active remedial work of LNAPL removal and continuous HVAC system operation during the school day. In accordance with Ecology Policy 330B "Removal of Sites from the Hazardous Sites List", the Site will remain on the list indefinitely.

### **Future Communication**

Thank you and congratulations on your work in cleaning up the Site. We look forward to continuing to work with you to make sure your investment in the Site is protected over the long term. Should you have any questions, please do not hesitate to contact Ecology's cleanup project manager for the Site, Jerome Cruz, at (425) 649-7094 or [jerome.cruz@ecy.wa.gov](mailto:jerome.cruz@ecy.wa.gov).

Sincerely,



Robert W. Warren  
Section Manager  
Toxics Cleanup Program, NWRO

cc: Dave Heffner, Aspect Consulting, LLC, Associate Remediation Engineer  
Doug Hillman, Aspect Consulting, LLC, Principal Hydrogeologist  
Ann Essko, Office of the Attorney General  
Beth McKee, Ecology  
Ecology Site File

