To: SCHMIDT, LINDIE (DNR)[LINDIE.SCHMIDT@dnr.wa.gov]
From: Barnes, Abby (DNR)
Sent: Mon 2/26/2018 5:03:41 PM
Subject: FW: Bremerton Sediment Meeting 21 Feb
CCF02242018.pdf

Hi Lindie,
Here is the summary from the Bremerton meeting last week. Mostly sediment sampling for the next permit cycle was discussed and some discussion on to whether the outfall is located in the PSNY cleanup area.
Let me know if you have any questions.

Abby Barnes
DNR Aquatics
(360) 902-1713

From: Bill Fox [mailto:bfox@cosmopolitaneng.com]
Sent: Sunday, February 25, 2018 4:36 PM
To: Brown, Sharon R. (ECY) <sbro461@ECY.WA.GOV>; Adolphson, Peter (ECY) <pado461@ECY.WA.GOV>; Leung, Kevin (ECY) <KLEU461@ECY.WA.GOV>; Eleuterio, Lazaro (ECY) <LELE461@ECY.WA.GOV>; Barnes, Abby (DNR) <Abby.Barnes@dnr.wa.gov>
Cc: Patric Coxon <Patric.Coxon@ci.bremerton.wa.us>
Subject: Bremerton Sediment Meeting 21 Feb

See attached the figure from the 2009 USGS Report 2009-1285 that I scaled on the location of the Bremerton outfall. It is my belief that it is within Operable Unit B Marine based on that figure, which includes latitude and longitude tick marks on the margins.

Below is my summary of what I think we concurred on at the meeting (please email to all with exceptions):

- The 2015 sediment sampling results for outfalls in Port Washington Narrows included (1) sites that were unable to be sampled by the Ponar sampler due to hard and/or gravelly sediments, and (2) sediment samples where PQLs exceeded SQS:
    - All of the sites where samples were able to be collected and sent to the lab were either all gravel or mixed sand and gravel. In order to conduct chemical analysis the laboratory was forced to prepare dilutions of 5 or 10, which drove up the dry-weight PQLs.
    - A number of the sites had TOC below 0.5%, and per Ecology guidance were compared to dry-weight LAETs rather than carbon-normalized SQS. All these sites met LAETs.
    - Several sites had TOC in the 0.5% to 0.8%, but per Ecology guidance are to be carbon normalized and compared to SQS. Due to the elevated PQLs and carbon normalization with relatively low TOC, the carbon-normalized PQLs exceeded the SQS at several sites. All of these samples where carbon normalized PQLs exceeded SQS were non-detect. The dry weight PQLs at all of these sites met LAETs.
    - Ecology did not express concern over the Port Washington sample site results, though the City recognizes that additional sampling of those sites where carbon normalized PQL exceeded SQS is within Ecology's discretion and could be required in the next NPDES permit.
- Westside WWTP outfall:
    - The 2015 sediment sampling results had detected SQS exceedances of mercury (all six stations), PCB (all stations), and two phthalates (2 stations)
    - Ecology EIM database confirmed pervasive PCB and mercury exceedences in the area, but the phthalate exceedences revealed a spatial relationship to the Westside outfall location.
    - The city shared that there is a major municipal and DOT 54" outfall located on the beach just

inshore from the Westside diffuser. All concurred that this could also be a significant source of the observed phthalate contamination.

- Ecology will be conducting a "reasonable potential" evaluation of the Westside outfall for toxicants, including the phthalates in question. This result may trigger actions to be conducted in the next NPDES cycle, potentially including:
  - Additional, more frequent effluent testing for phthalates
  - Investigate the stormwater outfall as a potential source, potentially including additional phthalate sampling and source investigations (this would bring in other divisions of the city and other parties).
  - Ecology may require in the upcoming NPDES for additional sediment chemistry sampling in the vicinity of the Westside diffuser to further investigate the spatial pattern of the phthalate SQS exceedences.
- PCBs and mercury:
  - The Westside outfall is located at the western edge, but within Operable Unit B Marine of the PSNS Superfund Site. This determination was based on plotting the known latitude and longitude on one of the Shipyard Cleanup documents that included grid ticks. That figure is attached to this email. All parties agreed that this would be worth confirming another way given that the survey basis for the figure in the report is unknown. Pete Adolfson (sp?) agreed to look into this.
  - There is an October 2017 5-year review document by the Navy (includes EPA concurrence letter) that documents the status of Operable Unit B Marine for PCB and mercury. See link below.
    - The review states that the PCB cleanup is meeting objectives
    - The review states that mercury cleanup is not meeting objectives and that a "stakeholder" group exists and is working to advance solutions.
    - All parties agreed that the Superfund project has precedent over all others in relation to PCB and mercury. The City of Bremerton wastewater utility should not advance chemical and biological sampling around the outfall until the actual presence of the outfall in Operable Unit B is confirmed and the stakeholder status and plan forward is known.

- Action list:
  - Pete will look into confirmation of the location of the Westside outfall relative to OU B, and status and plans forward of the Navy and stakeholder groups under the PSNS Superfund project.
  - The City of Bremerton report of the 2015 sediment testing will be revised and resubmitted in response to the comments on pages 7 and 8 of the 2/15/2018 review memorandum from Sharon Brown to Kevin Leung.
  - Kevin Leung will be conducting the "reasonable potential" analysis for the Westside outfall and drafting the NPDES permit in the next few months. Following this analysis he will coordinate with Sharon Brown to determine what needs to be included in the next NPDES permit for additional effluent sampling for the phthalates and additional sediment sampling around the Westside outfall.
  - If the City is required in the NPDES permit to conduct additional sampling, an SSAP will be prepared and submitted to Ecology for review and approval. A dive inspection would likely be conducted for the SSAP because there is uncertainty as to whether the published latitude/longitude coordinates represent the end of the diffuser or a midpoint.

Here is the link to the October 2017 Navy report on the Shipyard Cleanup:
https://semspub.epa.gov/work/10/100067799.pdf

- -

William P. Fox, PE

Cosmopolitan Marine Engineering
PO Box 623 ~ Gig Harbor, WA 98335
(253) 265-2958 ~ (253) 265-2658 fax
(b) (6) mobile
BFox@cosmopolitaneng.com