

19 March 1990

SUBJECT: DECISION ON THE SUITABILITY OF DREDGED MATERIAL TESTED UNDER PSSDDA CRITERIA FOR THE POPE AND TALBOT PROJECT (OYB-2-013346) IN PORT GAMBLE, HOOD CANAL TO BE DISPOSED OF AT THE ELLIOTT BAY OPEN WATER DISPOSAL SITE.

1. The following summary reflects the PSSDDA agencies' (Corps, Department of Ecology, and the Environmental Protection Agency) consensus decision, reached at a meeting held on February 14, 1990, on the acceptability of the sampling plan and all relevant test data (i.e., contained in report dated February 12, 1990) to make a determination of suitability of the material proposed for dredging from the Pope and Talbot Project site (i.e., Port Gamble Millsite) for disposal at the Elliott Bay disposal site.
2. The PSSDDA approved sampling and testing plan (submitted on December 6, 1989 and approved on December 26, 1989) was followed, and quality assurance/quality control guidelines specified by PSSDDA were generally complied with. The data gathered (enclosure 1) were deemed sufficient and acceptable for regulatory decision making under the PSSDDA program.
3. Chemistry data demonstrated that all Chemicals of Concern (COC) were below the 1989 PSSDDA Screening Level's (SL's) for the two composited samples analyzed except for Pentachlorophenol (PCP), which was reported as undetected at 70 ppb for one analysis. Failure to achieve the new PCP PSSDDA SL detection limit of 69 ppb has been previously noted for all projects undergoing PSSDDA testing since implementing the new SL. The 1988 SL for PCP was 140 ppb, and was lowered to 69 ppb following the 1988 AET (Apparent Effects Threshold) updates. The Low AET for PCP is 360 ppb, which is well above the detection limits reported for this project. The new SL and minimum PSSDDA detection limit is not practically achievable by labs routinely performing PSSDDA testing, particularly in sediments with percent solids less than 70 percent. The PSSDDA agencies agreed to set aside the PCP detection limit exceedences for this project, and subsequently raised the SL to 100 ppb on an interim basis pending review and clarification at the second annual PSSDDA Annual Review Meeting commencing on 11 April 1990 (enclosure 2). Therefore, the PSSDDA agencies determined that the PCP SL exceedences were not a concern for this project, and that biological testing would not be required.
4. Core log descriptions taken at each sample location were used to estimate the depth and volume of wood chips/wood bark and underlying silty sediments within the proposed dredging areas (enclosure 3). The Washington Department of Ecology will require that material designated as "wood chips/wood bark" (approximately 3200 cy of wood chips and 1500 cy of wood bark) be separated from the underlying silty material and disposed of at an Ecology approved upland disposal site. The underlying silty material (approximately 6400 cy) is suitable for disposal at a PSSDDA unconfined openwater disposal site. The actual distinction between woody material (chips and bark) and suitable dredged material will be made in the field by a Department of Ecology Field Inspector (This requirement will be a condition in the State 401 Water Quality Certification).

5. Based on the above discussion and summary of chemical results for the Pope and Talbot Project area, the PSDDA agencies concluded that all the underlying silty material tested (approximately 6400 cy) is suitable for disposal at the Elliott Bay disposal site. The overlying woody material (approximately 4700 cy) is not suitable for openwater unconfined disposal and must be disposed of at an Ecology approved upland disposal site.

Concur:

20 March 1990

Date

David R. Kendall

David R. Kendall, Ph.D
Seattle District Corps of Engineers

8 April 1990

Date

John Malek

John Malek
Environmental Protection Agency
Region X

27 March '90

Date

Russ McMillan

Russ McMillan
Washington Department of Ecology

Enclosures

Copies Furnished:

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PSDDA/John Wakeman
OP-RG/Patrick Cagney
OP-RG/David Kendall
EPA/John Malek
DOE/Russ McMillan
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5 March 1990

MEMORANDUM FOR RECORD

SUBJECT: INTERIM SCREENING LEVEL ADJUSTMENT FOR
PENTACHLOROPHENOL PENDING FINAL REVIEW AND ADOPTION THROUGH THE
PSDDA ANNUAL REVIEW PROCESS.

1. Phase II testing/protocol changes were implemented on December 12, 1989 with the signing of the Record of Decision. This implemented screening level (SL) and maximum level (ML) changes for a number of PSDDA chemicals of concern (COC). Changes implemented for Pentachlorophenol resulted in the 1988/1989 SL dropping from 140 ppb to 69 ppb. The 1989 ML was established at 690 ppb, whereas there was no ML established initially. Based on the 1988 Apparent Affects Threshold (AET) update the LAET and HAET for Pentachlorophenol were established at 360 ppb (amphipod bioassay AET) and 690 ppb (benthic AET), respectively. No defined AET's could be established for two of the four biological AET indicators (Oyster larvae bioassay, and Microtox bioassay), which indicated the PCP AET was greater than 140 ppb.

2. Recent experience with labs performing PSDDA testing have documented that labs cannot meet the 1989 SL for Pentachlorophenol (PCP) of 69 ppb. Labs report a limit of detection (LOD) for PCP of 100 ppb using modified Contract Lab Program methods. Since the LAET for PCP is 360 ppb, which is well above the 100 ppb LOD, the PSDDA agencies have agreed to set the SL for PCP at the LOD, which will alleviate the QA/QC problems currently being experienced. This adjustment in the SL for PCP will be reviewed and discussed at the Annual Review Meeting on April 11, 1990, and is anticipated to be formally adopted as a clarification to the Evaluation Procedures. A clarification paper documenting this change will be prepared prior to, and distributed and discussed at the ARM.

CONCUR:

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Seattle District Corps of Engineers

6 March 1990
Date

David F. Fox

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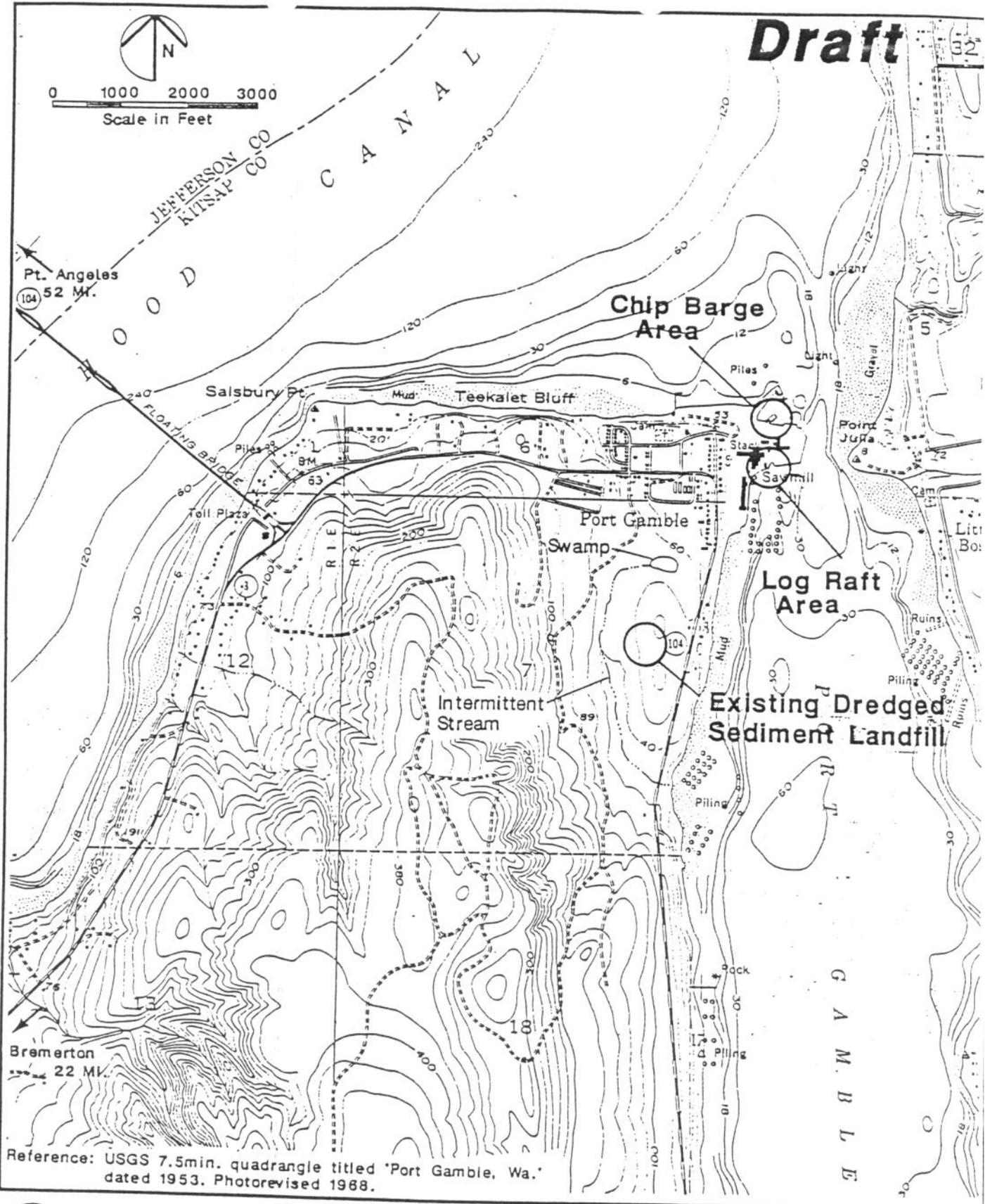
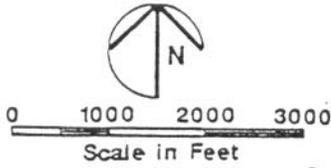
Frank Urabeck/John Wakeman/Justine Smith/Corps

John Malak/EPA

Rick Vining/Ecology

Russ McMillan/Ecology

Draft



Reference: USGS 7.5min. quadrangle titled "Port Gamble, Wa." dated 1953. Photorevised 1968.



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Vicinity Map

Pope & Talbot, Inc.
Port Gamble, Washington

FIGURE

1

JOB NUMBER
15,434.001

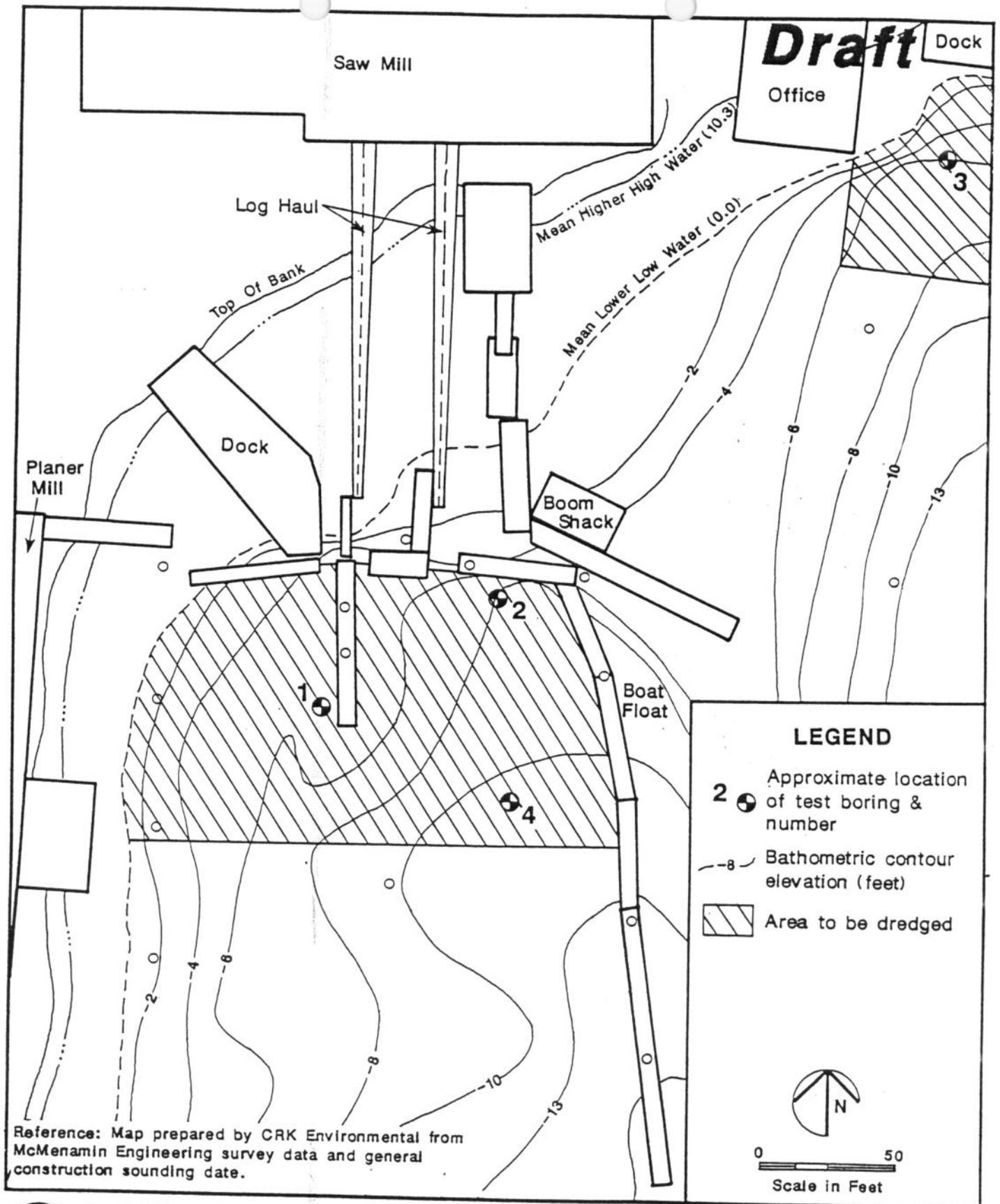
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APPROVED

DATE
25 Jan. 90

REVISED

DATE



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Log Raft Area Boring Locations

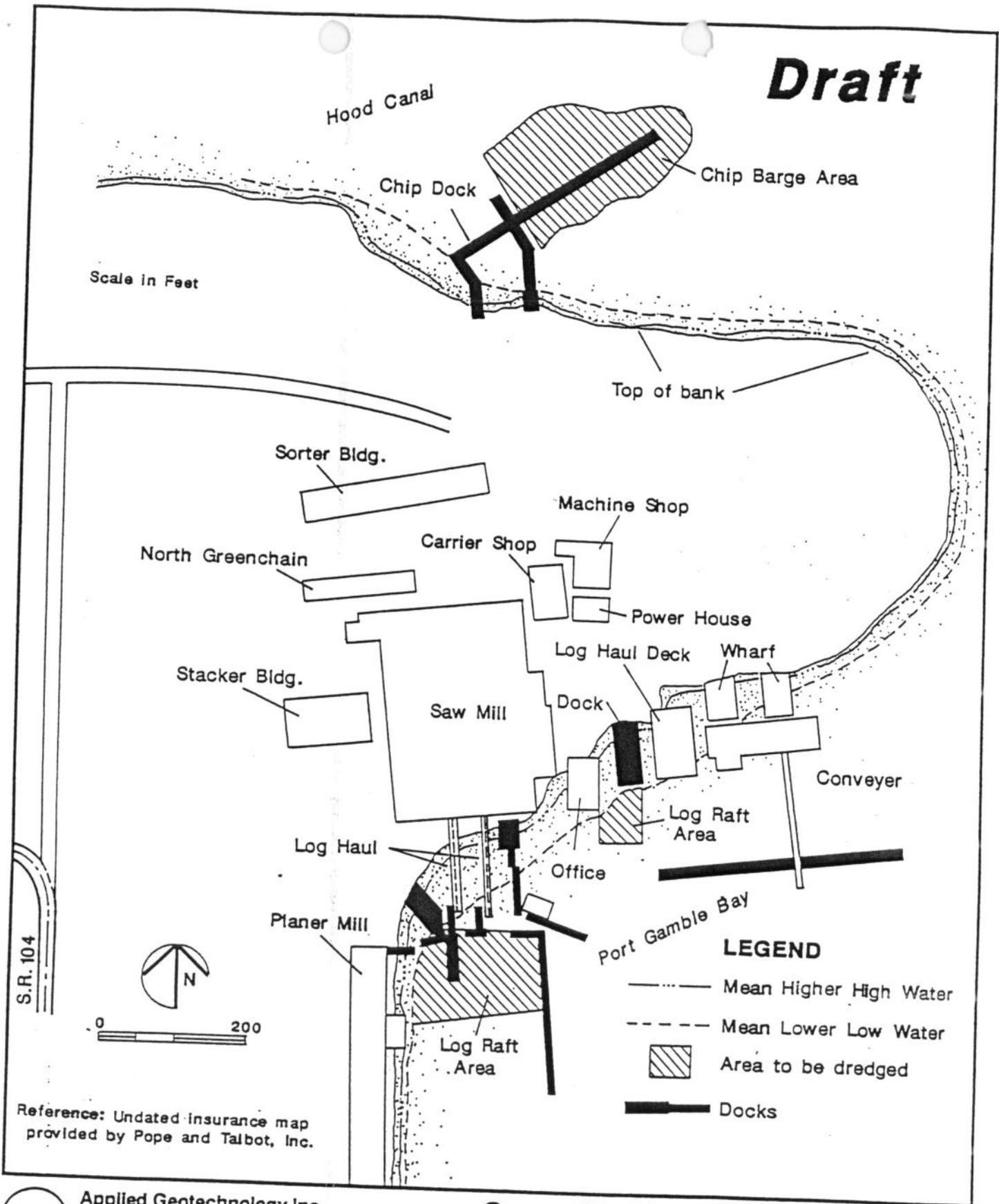
FIGURE

3

Pope & Talbot, Inc.
 Port Gamble, Washington

JOB NUMBER	DRAWN	APPROVED	DATE	REVISED	DATE
15,434.001	DFF		25 Jan. 90		

Draft



Reference: Undated insurance map provided by Pope and Talbot, Inc.



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Sawmill Site Plan

Pope & Talbot, Inc.
Port Gamble, Washington

FIGURE

2

JOB NUMBER	DRAWN	APPROVED	DATE	REVISED	DATE
15,434.001	DFP		25 Jan. 90		