

23 August 1990

SUBJECT: REVISION TO THE SUITABILITY DECISION ON DREDGED MATERIAL TESTED UNDER PSDDA CRITERIA FOR THE BP OIL COMPANY FERNDALE REFINERY DEEPENING PROJECT (OYB-2-013470) TO BE DISPOSED OF AT A PSDDA OPEN-WATER DISPOSAL SITE.

1. ENSR/Hartman Associates provided a revised project description on August 14, 1990 (Enclosure 1) which included new volume estimates based on a predredging survey. The original project called for a dredging depth to -60 feet MLLW with an additional 2 feet of overdredging depth. Due to a vertical control datum discrepancy between a 1975 survey, upon which PSDDA sampling and testing was based, and the current 1990 predredging survey, the dredging volume estimate increased from 569,000 to 710,400 cubic yards. The project was subsequently revised to a dredging depth of -59 feet MLLW with 1 foot of overdepth to avoid such a large deviation from the original volume estimation.

2. The comparison of the original and revised projects in terms of volume is as follows:

	<u>Surface</u>	<u>Subsurface</u>	<u>Total</u>
Original (-60+2):	279,800	289,200	569,000
Revised (-59+1):	312,000	258,100	570,100

The difference in total volume of 1,100 cubic yards is negligible. There is a decrease in subsurface volume of 31,100 and an increase in surface volume of 32,200 cubic yards.

3. The chemistry data for both the full and partial characterization of the proposed dredged sediment included no detected exceedances of the 1989 PSDDA screening levels for any chemicals of concern in either the surface or subsurface sediments. (Full characterization resulted in 1,2,4-Trichlorobenzene being reported as undetected at detection limits marginally above SL - see suitability decision memorandum dated 23 July 1990.) The corroborating results of these two studies suggest that there is no reason to believe that the additional surface volume to be dredged is unsuitable for open-water disposal at a PSDDA site.

4. The revised project covers approximately 15% greater area than the original project. Most of this area is located away from the refinery dock. The chemistry data accrued during full characterization indicates that the cleanest sediments lie in this area with few detected concentrations of any of the PSDDA chemicals-of-concern. This additional area lies in a narrow strip along the waterward edge of the project and there is no reason to believe that PSDDA chemicals-of-concern exist in these sediments above the PSDDA screening levels.

5. Based on the above discussion, the PSDDA agencies concluded that the revised project was acceptable and that all 570,100 cubic yards of proposed dredged material were suitable for unconfined open-water disposal at either a PSDDA dispersive site or nondispersive site.

BP OIL FERNDALE REFINERY
OYB-2-013470
REVISED SUITABILITY DECISION
23 AUGUST 1990

Concur:

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