CENPS-OP-DMMO
MEMORANDUM FOR RECORD

November 24, 1993

ADDENDUM TO THE SUITABILITY DETERMINATION FOR KB DOCK (OYB-2-01437) U.S. NAVY SUBMARINE BASE BANGOR, FOR DISPOSAL AT THE PSDDA PORT TOWNSEND OPEN WATER DISPERSIVE SITE.

1. During the Public Notice period for the TRF Drydock at Bangor, the PSDDA agencies were made aware of additional testing in the area of the proposed dredging on this project. This sediment sampling and testing was undertaken as part of the Remedial Investigation/Feasibility Study for Operable Unit 7 of Naval Submarine Base Bangor Superfund site. Site 26 of Operable Unit 7 includes the subtidal area along the Hood Canal shoreline. KB Dock is one of the facilities located within Site 26. This information was not disclosed during the development of the sampling and analysis plan for PSDDA testing.

2. Three types of sampling were undertaken under the RI/FS; surface grabs of the top two centimeters; twelve foot deep sediment cores, benthic infauna sampling. The sampling effort for the RI/FS was reviewed and approved by EPA, Federal Facilities Superfund, and the Washington Department of Ecology.

3. The U.S. Navy proposes to dredge 4,500 cubic yards of material from the southeast side of KB dock (Attachment 1). A sampling and analysis plan was approved on 3 January 1993. 1992. A suitability determination was signed by the PSDDA agencies in April 1992, with a public notice issued on 10 August 1992 and a permit issued on 2 April 1993. The area was ranked moderate, and two DMMU were characterized. DMMU C1 consisted of composited surface sediments from two sample locations. DMMU C2 consisted of composited subsurface sediments from the same sample locations.

The original bathymetry data for this project was in error and the proposed dredging volume was reduced from 8000 cubic yards to 4500 cubic yards. The surveying error was not discovered until after the samples had been taken and composited for laboratory analysis. The surface sediment sample actually extended 2 feet beyond overdepth, and the subsurface sample was entirely from beyond the overdepth. As documented in the suitability deter- mination, the PSDDA agencies determined that composite C1 was "still representative of surface sediments and was sufficient, in and of itself, to fully characterize the dredge prism."

4. All chemicals of concern analyzed during the PSDDA testing were below screening levels. For this reason, bioassay testing was not required under PSDDA evaluation guidelines.

5. One sample location from the RI/FS sampling effort was located within the proposed dredge prism (Attachment 1). Sample MS 68 was a 2 cm surface grab sample. LPAHs and HPAHs were detected in this location. Metals were also detected. Analytes above RI/FS background values at Station MS 68 are summarized in Attachment 2. (These background values are not directly applicable to PSDDA evaluation criteria, but are provided for reference purposes.) Ordnance compounds were not detected at this location, although they were detected at one location at KB Dock (RI/FS page 4-211). Tributyltin was not analyzed as a chemical of concern for any RI/FS sampling location since there is no record of its use at SubBase Bangor, nor was it used on the type of vessels that routinely with boat maintenance. No other chemicals associated with boat maintenance, such as mercury, were detected above SL in the proposed dredge prism.

CENPS-OP-DMMO
KB Dock

6. During the RI/FS, bioassay tests were conducted on a number of samples from KB Dock, although none were within the area of proposed dredging. Bioassay results were within PSDDA interpretive guidelines in all of the eight test sediments analyzed. Test protocols outlined in the State Sediment Management Standards were followed in conducting the 10-day amphipod and 20-day Neanthes test. (RI/FS pages 6-164 to 6-169).

7. Analysis of chemical and biological results provided in the RI/FS tend to corroborate the information gathered during PSDDA sampling and analysis. It is the consensus determination of the PSDDA agencies that the 4,500 cubic yards of proposed dredged material from KB dock is suitable for open-water disposal at either a PSDDA dispersive or non-dispersive site.

Concur:

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