CENPS-OP-TS-DMMO

3 September 1996
Revised

MEMORANDUM FOR RECORD

SUBJECT: DETERMINATION OF THE SUITABILITY OF MATERIAL FOR DREDGING AND IN-WATER DISPOSAL FROM THE MT. COFFIN ACCESS CHANNEL TO WEYERHAEUSER BERTH AT LONGVIEW WASHINGTON.

1. The Weyerhaeuser Company proposes to dredge up to 200,000 cubic yards of material from the Mt. Coffin Access Channel in the Columbia River near its facility at Longview WA. Proposed disposal of the material is in water in the main channel of the Columbia River, near River Mile 62. Disposal activities will be coordinated with Portland District, Corps of Engineers.

2. The three agencies with jurisdiction (Corps of Engineers, Environmental Protection Agency and Washington Department of Ecology) used a "reason to believe" approach in the evaluation of the material. The agencies determined that there was little reason to believe that chemical contamination would be a problem in sediments that consisted predominantly of sands and gravels, while silts and clays would pose a greater concern and require more careful evaluation. Using a tiered approach, the agencies determined that the first level of evaluation was determination of sediment grain-size. If the sediment consisted of greater than 80% sand and gravel, no further evaluation was necessary.

3. Grain-size samples were collected on July 27, 1996 from seven locations within the proposed dredging prism. Grain-size analysis was performed according to PSEP protocols, and completed on August 14, 1996. Triplicate analyses were performed on Sample 1. Sediment conventionals were also completed for each sample.

4. Grain-size analysis showed the material to be predominantly medium to coarse sand. All samples were at least 99% sand.

5. Based on the above information, the agencies have determined that no additional testing is required.

Stephanie Stirling
Biologist

Copies Furnished:
Jaack Kennedy/OP-RG
Rick Vining/Ecology
Ted Benson/DNR
John Malek/EPA
John Vlastelicia/Ogden Beeman & Associates

CENPS-OP-TS
Dredged Material Management Office

2 December 1996

MEMORANDUM FOR RECORD

TO: Jack Kennedy, OP-RG

SUBJECT: US FISH AND WILDLIFE SERVICE LETTER, DATED 6 NOVEMBER 1996, RE. WEYERHAEUSER MT. COFFIN CHANNEL DREDGING (96-2-01299)

I have reviewed the subject letter and have spoken to Jeremy Buck of the USFWS Oregon State Office. Jeremy did not prepare the letter, but did approve it. The letter was prepared by an intern who is no longer with the office. Response to the specific points raised in the letter are as follows:

1. Dredged material evaluation follows a tiered process, beginning with the evaluation of existing information. This review constitutes the "reason to believe" that contamination may exist in the area, and leads to the determination whether additional testing is required. A summary of the existing information is contained in the sampling and analysis plan prepared by Ogden Beeman (1996). There is no reason to believe that contamination exists in this area, based on the location, source, current speed, previous sampling in near-by, backwater areas, and grain-size. The agencies required the applicant to complete grain-size, Total Organic Carbon (TOC) and Total Volatile Solids analysis in order to confirm the physical nature of the material. This review constitutes a Tier I evaluation under the draft Inland Testing Manual, and becomes the cut-off point for any further analysis.

2. Core sampling is not possible in this type of sandy location in the Columbia River. Core tubes will not penetrate the compacted sand. The likelihood of any lenses of fine-grained material is small, given the energy of the area. If there were any lenses, they would constitute a small portion of the dredge prism.

3. The level recommended for PCB analysis are well below the detection limits routinely achievable by the accredited labs in the Puget Sound region. They are an order of magnitude below the PSDDA bioaccumulation trigger (38 ppm, TOC normalized) and the Washington State Sediment Quality Standards (12 ppm, TOC normalized). The PSDDA detection limit is 67 ppb (dry weight) and the State Sediment Management Standards detection limit is 6 ppb (dry weight). The letter does not indicate a screening level, leaving the impression that any sediment with PCBs above 0.05 ppb would be considered contaminated. Testing at a detection limit of 0.05 ppb is 1) rarely achievable by the labs and 2) not justified by any of the literature on PCB effects levels. Is this number a typographical error?

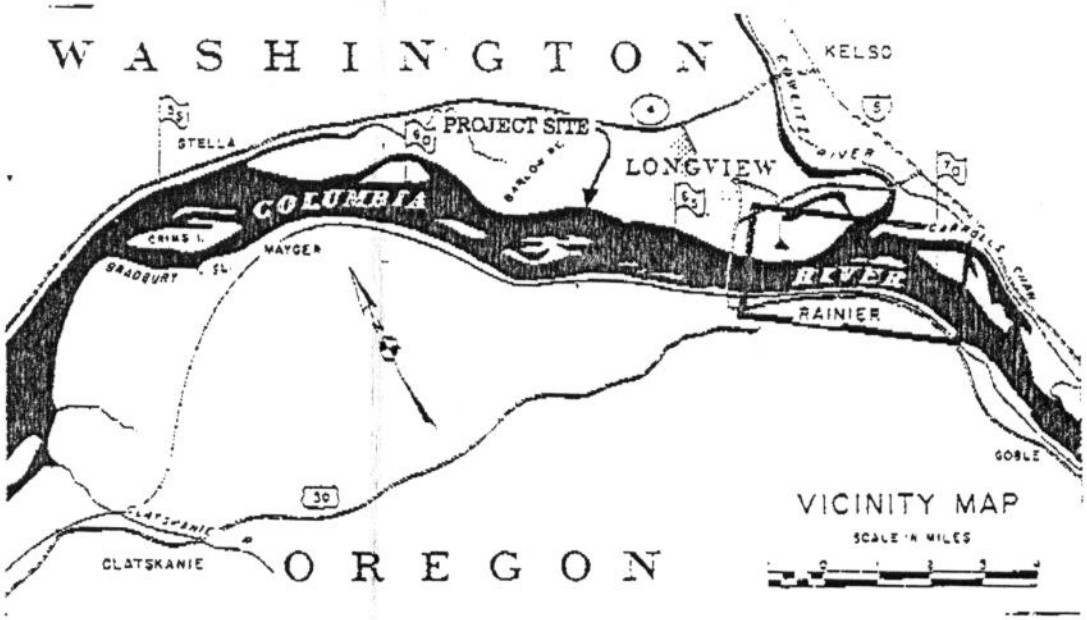
4. Turbidity will not be measured for this project. This was suggested by Jeremy Buck in our phone conversation as a way of assessing the amount of fine-grained material in the dredged sediment. There is low reason-to-believe (see #1) that any contamination exists. Also, based on information from the Department of Ecology, it would be almost impossible to measure turbidity at the time of disposal, and it would be impossible, given the inputs in the Columbia River system, to determine if any turbidity that was measured was caused by the disposal.

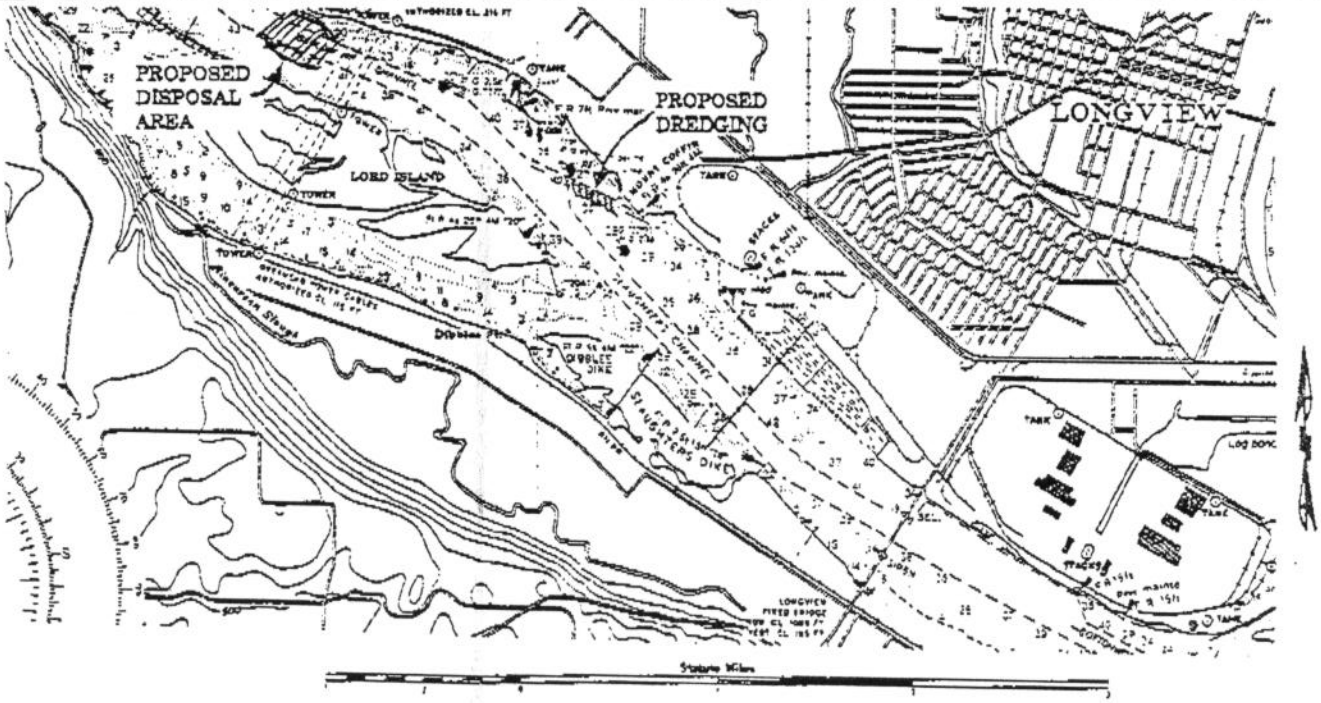
5. Dredged material is exempt from RCRA regulation.

A second area of concern was raised in the letter relative to timing restrictions on in-water work. None of my discussions with USFWS or the other agencies dealt with this issue. It is my understanding that Regulatory Branch will be responding to that portion of the letter.

This response has been coordinated with the Washington Department of Ecology, EPA Region 10, Portland District and North Pacific Division, and reflects my discussion with them.

Stephanie Stirling
Biologist.





LOCATION MAP

NOTE 1. VICINITY MAP OBTAINED FROM US ARMY CORPS OF ENGINEERS CHART NO. CL-67-367.
NOTE 2. LOCATION MAP OBTAINED FROM NOAA CHART NO. 18524.

Ogden Beeman & Associates, Inc.
Consulting in the development of ports, waterways, and marine facilities

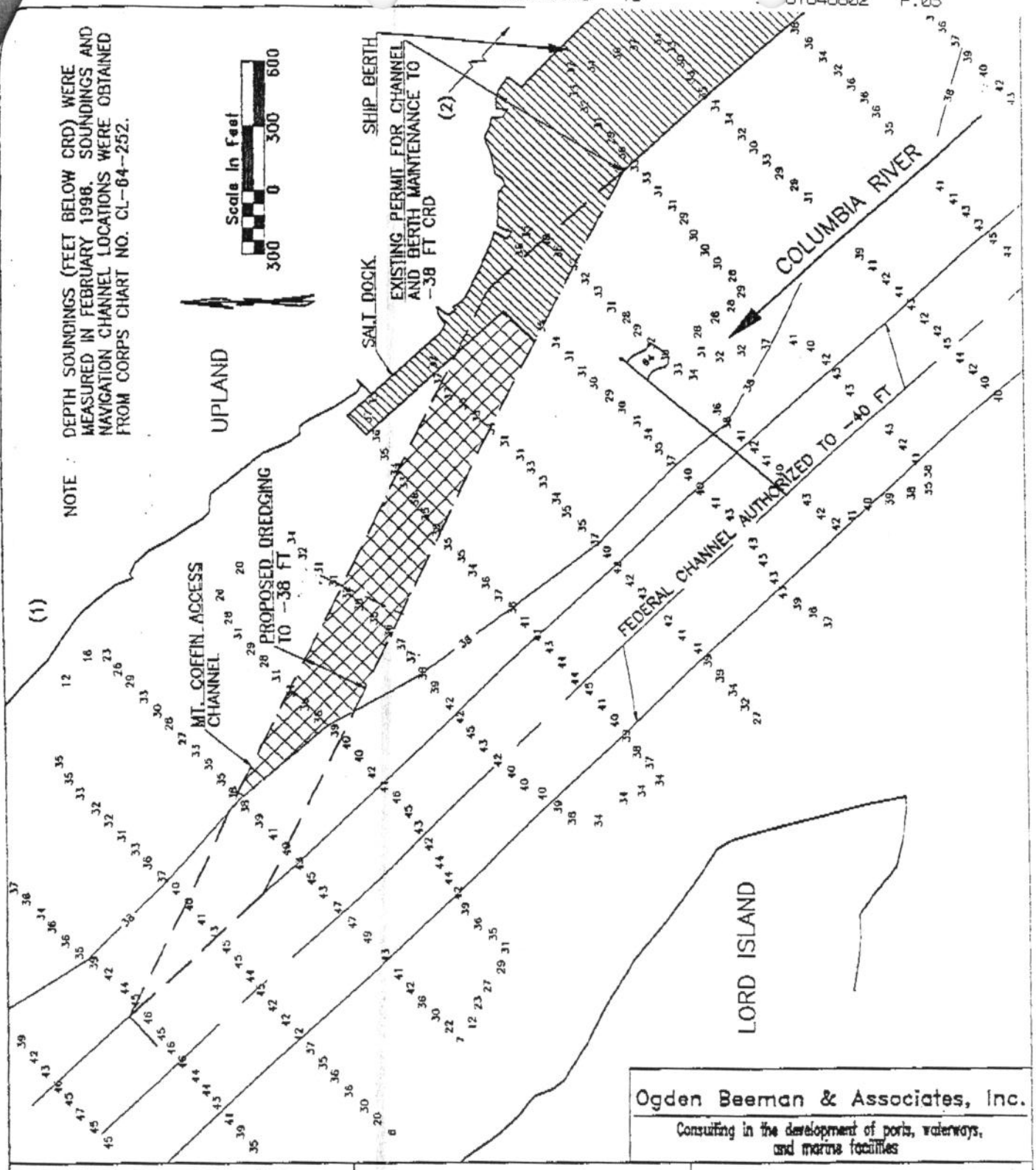
PURPOSE: MAINTAIN MT. COFFIN ACCESS CHANNEL TO -38 FT CRD
DATUM: COLUMBIA RIVER DATUM (CRD) CRD IS 0.4' BELOW NGVD AT COLUMBIA RIVER MILE 63.5
ADJACENT PROPERTY OWNERS:
1. REYNOLDS ALUMINUM
2. PORT OF LONGVIEW

LATITUDE: 46° 07' 49"
LONGITUDE: 122° 59' 41"

PROPOSED DREDGING IN MT. COFFIN ACCESS CHANNEL

IN: COLUMBIA RIVER
AT: RIVER MILE 63.2 TO 63.8
COUNTY OF: COWLITZ
APPLICATION BY: WEYERHAEUSER
SHEET 1 OF 4 DATE: 6/20/96

FIGURE 1. Vicinity and Location Maps



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ADJACENT PROPERTY OWNERS:
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2. PORT OF LONGVIEW

SCALE: 1" = 600'

PROPOSED DREDGING IN MT. COFFIN ACCESS CHANNEL

IN: COLUMBIA RIVER
AT: RIVER MILE 63.2 TO 63.8
COUNTY OF: COWLITZ
APPLICATION BY: WEYERHAEUSER
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FIGURE 2. Mt. Coffin Access Channel Dredging Plan