

CENWS-OD-TS-DM
MEMORANDUM FOR RECORD

4 October 2002

SUBJECT: REGENCY SUITABILITY EXTENSION DETERMINATION ON MATERIAL PROPOSED FOR DREDGING AT THE MANKE LUMBER COMPANY DREDGING SITE (PN 1999-00694) FOR UNCONFINED OPEN-WATER DISPOSAL AT THE COMMENCEMENT BAY DISPOSAL SITE, AS EVALUATED UNDER SECTION 404 OF THE CLEAN WATER ACT.

1. The proposed dredged material at the Manke Lumber Company dredging site underwent DMMP characterization through March 2000. The results of that characterization are documented in a 10 October 2000 suitability determination memorandum, in which 11 of 24 dredged material management units (DMMUs) were found to be suitable for unconfined-open-water disposal at the Commencement Bay disposal site. The proposed dredging site was ranked high for initial testing purposes, which means that the data have a two-year recency guideline that subsequently expired during March 2002.
2. The purpose of this memorandum is to document the DMMP consensus on the recency extension request by the applicant's agent (Anchor Environmental) and the supporting documentation provided as enclosure 1 in support of the extension request. The applicant requests that the DMMP suitability of surface DMMUs evaluated as suitable for unconfined-open-water disposal be extended by 11 months through February 2003, and that subsurface material suitability evaluated as suitable for unconfined-open-water disposal be extended by 23 months through February 2004.
3. This summary reflects a consensus determination of the agencies that comprise the regional Dredged Material Management Program (DMMP) for the State of Washington. The agencies include the U.S. Army Corps of Engineers, Department of Ecology, Department of Natural Resources, and the Environmental Protection Agency.
4. The DMMP agencies evaluated the supporting documentation provided in enclosure 1 and concurred that an extension of the recency date of the surface suitable material through February 2003 is acceptable. Likewise the DMMP agencies concur that a recency date extension of the subsurface suitable material through February 2004 is acceptable.
5. This recency extension is contingent upon no perturbations or unanticipated impacts occurring that would affect the quality of the sediments between the date of this recency extension memorandum and the dredging dates.
6. However, this suitability determination extension does not constitute final agency approval of the project. A dredging plan for this project must be completed as part of the final project approval process. A final decision will be made after full consideration of agency input, and after an alternatives analysis is done under Section 404(b)(1) of the Clean Water Act.

Concur:

10/10/02

Date

David R. Kendall

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

10/14/02

Date

Thomas H. Gries

Tom Gries, Washington Department of Ecology

10/10/02

Date

Justine Barton

Justine Barton, U.S. Environmental Protection Agency, Region 10

10/9/02

Date

Robert Brenner

Robert Brenner, Washington Department of Natural Resources

Copies Furnished:

Randel Perry, Corps Regulatory Branch Project Manager

Justine Barton, EPA

Robert Brenner, DNR

Tom Gries, Ecology

Russ McMillan, Ecology

DMMO File



Anchor Environmental, L.L.C.
1411 4th Avenue, Suite 1210
Seattle, Washington 98101
Phone 206.287.9130
Fax 206.287.9131

Memorandum

To: Dredged Material Management Office (Attn: David Kendall)

From: Clay Patmont, Anchor Environmental

CC: Randel Perry, U.S. Army Corps of Engineers (Regulatory)
John McBride (Manke Lumber Company)
Russ McMillan (Ecology)

Date: September 26, 2002

Re: Proposed Suitability Extension - Manke Lumber Company Site

In a memorandum dated October 10, 2000, the Dredged Material Management Program (DMMP) determined the suitability of sediment to be dredged within the vicinity of the Manke Lumber Company, as well as from other targeted areas within the Upper Turning Basin of the Hylebos Waterway, for unconfined open-water disposal at the Commencement Bay Disposal Site. The suitability determination was based on sampling data conducted through March 22, 2000, which demonstrated that 11 of the 24 dredged material management units (DMMUs) evaluated near the Manke Lumber Company, totaling 48,200 cubic yards (cy), were suitable for unconfined open-water disposal. Both chemical and confirmatory biological testing data were used in the DMMP determination. The need for confirmatory bioassay testing was triggered in many of the subject DMMUs by total volatile solids (TVS) levels exceeding 25 percent (dry weight basis), attributable in part to the presence of woody debris in these sediments. The designations and associated volumes of each DMMU are listed below (see attached figures for DMMU locations):

DMMU	Estimated Dredge Volume (cy)	Log or Large Debris Accumulation	Basis for Determination
Surface:			
A-13	3,800	Moderate	Passed Confirmatory Bioassays
A-15	3,400	Little or None	Passed Confirmatory Bioassays
A-17	3,500	Little or None	Passed Confirmatory Bioassays
A-18	3,600	Little or None	Passed Confirmatory Bioassays
A-23	3,600	Moderate	Passed Confirmatory Bioassays
A-25	3,600	Little or None	Passed Confirmatory Bioassays
A-26	3,300	Little or None	Passed Confirmatory Bioassays
A-27	3,700	Little or None	Passed Confirmatory Bioassays

DMMU	Estimated Dredge Volume (cy)	Log or Large Debris Accumulation	Basis for Determination
Subsurface:			
A-3	4,600	Potentially Abundant	Passed Confirmatory Bioassays
A-20	4,500	Potentially Abundant	Chemical Levels Below SLs
A-S1	10,600	Little or None	Chemical Levels Below SLs

Because the Upper Turning Basin was ranked by the DMMP as a "high" concern area, the recency determination expired in March 2002.

Consistent with the April 2002 DMMP Clarification Paper "Recency Guidelines: Program Considerations", this memorandum summarizes the basis for extending the recency determination for the surface DMMUs listed above by up to 11 months (to February 2003), and for subsurface DMMUs by up to 23 months (to February 2004). Specifically, this memorandum clarifies that testing results conducted through March 22, 2000 still represent conditions at the prospective Manke Lumber Company dredge site.

The Endangered Species Act consultation process for this project is now nearing completion, and has resulted in the following implementation schedule:

1. November 1, 2002 – Begin segregation of logs within the 8 surface DMMUs listed above, and transfer such materials for upland beneficial reuse;
2. November 2002 to January 2003 – Perform PSDDA dredging and disposal at the Commencement Bay Disposal Site of the 8 surface DMMUs listed above (up to a total of 28,500 cy);
3. January 2003 to February 2003 – Segregate logs from all other DMMUs near the Manke Lumber Company, and transfer such materials for upland beneficial reuse;
4. November 2003 to January 2004 – Perform dredging and off-site confined disposal of unsuitable sediments near the Manke Lumber Company, as required to implement the Washington Department of Ecology (Ecology) Cleanup Action Plan for this site, as set forth in a Consent Decree between Ecology and Manke Lumber Company;
5. January 2004 to February 2004 – Following confirmation monitoring to verify that unsuitable sediments have been removed, perform PSDDA dredging and disposal at the Commencement Bay Disposal Site of the 3 subsurface DMMUs listed above (up to a total of 19,700 cy); and

6. February 14, 2004 – Complete all in-water work.

The sections below summarize pertinent source control information and site characteristics that are relevant the recency extension, as generally set forth in the April 2002 DMMP Clarification Paper.

SOURCE CONTROL

Ecology has been designated the lead agency for source control throughout the Commencement Bay Nearshore/Tideflats Superfund Site, which includes the Upper Turning Basin of the Hylebos Waterway. On June 14, 2000, Ecology issued its Milestone 5 report, the final administrative milestone for source control, documenting completion of activities for Hylebos Waterway. At that time, Ecology and the U.S. Environmental Protection Agency (EPA) declared source control complete for all major sources to the Hylebos Waterway, along with nearly all of the remaining other sources around the waterway. The limited remaining source control actions within the Upper Turning Basin are being addressed by Ecology and EPA as isolated nearshore cleanup actions. Sediment cleanup within the nearby Weyerhaeuser and Louisiana-Pacific areas was completed in 2001.

Recent monitoring data collected by Ecology and EPA within the Hylebos Waterway, including post-construction verification sampling at cleanup sites, have continued to verify the effectiveness of source controls in this area. Ecology's incident response database also has not reported any spill of hazardous substances within the Upper Turning Basin of the Hylebos Waterway since at least 1999, well before the March 2000 sediment characterization sampling event.

As part of implementation of the requirements of the Consent Decree between Ecology and the Manke Lumber Company, as well as other efforts undertaken by Manke, a range of Best Management Practices (BMPs) have been instituted at the Manke Lumber Company facility to further reduce the potential for releases of woody debris and associated TVS to the Hylebos Waterway. These BMPs are set forth in the Operations, Maintenance, and Monitoring Plan for the Hylebos Wood Debris Site, as approved by Ecology in 2000.

All information considered, there is no evidence of changes in source control within the Upper Turning Basin of the Hylebos Waterway that would adversely affect the representativeness of prior sampling data within the subject DMMUs (i.e., collected through March 2000) to apply to current conditions. Continuing source control actions appear to have steadily improved sediment quality conditions in this area.

SITE CHARACTERISTICS

Surface sediments within the DMMUs listed in the table above were previously characterized as sandy, clayey, silt materials, with the fine fraction (clay + silt) ranging from approximately 45 to 91 percent. Subsurface DMMUs contained somewhat coarser material, grading into the native mudflat/sandflat, with fines ranging from 19 to 73 percent. No temporal changes in grain size characteristics are expected in this sediment depositional area, and no such visual change has been observed to date.

Sedimentation rates within the Upper Turning Basin of the Hylebos Waterway have been estimated using a range of different techniques, including analysis of historical dredging records, evaluation of changes in bathymetry, interpretation of core profiles (including stable radioisotope determinations), and deployment of sediment traps. These various determinations are summarized in the Cleanup Study Report for the Hylebos Wood Debris Site, as approved by Ecology in 2000, and in other Ecology publications referenced in that report. A relatively wide range of estimated net sedimentation rates – ranging from 0.5 to 20 centimeters per year (cm/yr) – have been reported by these various studies, with an overall average reported rate in this area of roughly 2 to 5 cm/yr (0.06 to 0.16 feet/yr).

The source of observed sedimentation within the Upper Turning Basin has not been characterized in detail, but has been attributed in various reports (including Hylebos Cleanup Committee documents approved by EPA) to a combination of fluvial inputs from Hylebos Creek and the Puyallup River, and phytoplankton (e.g., diatom) production within the Upper Turning Basin. The aggregate source materials contain relatively low chemical concentrations (well below PSDDA screening levels [SLs]).

No significant recent episodic events have been reported within the Upper Turning Basin that would have affected the stability of sediments near the Manke Lumber Company. The site area is protected from storms and is well removed from fluvial influence. No local shoreline damage was reported during recent seismic events. Navigation activity within this area has generally declined in recent years, though operations continue at both the Manke and Weyerhaeuser facilities.

No dredging has been performed in the immediate vicinity of the subject Manke DMMUs since collection of samples for suitability determination. As discussed above, post-construction verification sampling data collected at other sediment cleanup sites in the general Upper Turning Basin area (e.g., Weyerhaeuser site) have verified that sediment contaminants were not redistributed by these actions (data are on file at Ecology; contact Russ McMillan for more information).

Thus, the information available for the Manke Lumber Company area suggests that the site has been stable since the DMMUs were originally characterized. Prior sampling data collected within the subject DMMUs (i.e., through March 2000) is therefore representative of current conditions.

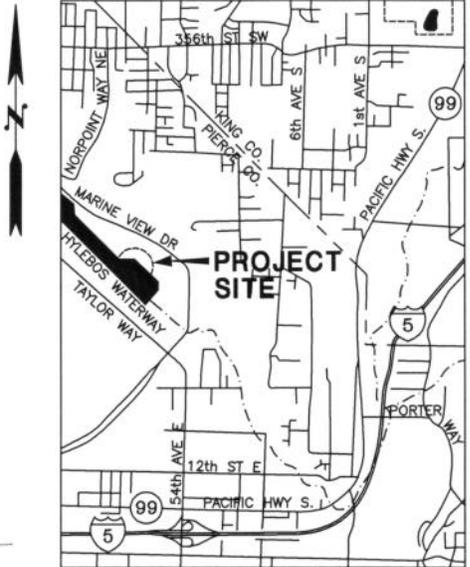
PATH FORWARD

In consideration of the information presented above, we request that the DMMP extend the recency determination for the Manke Lumber Company surface DMMUs listed above by up to 11 months (to February 2003), and for subsurface DMMUs by up to 23 months (to February 2004). Consistent with the April 2002 DMMP Clarification Paper "Recency Guidelines: Program Considerations", this information confirms that testing results conducted through March 22, 2000 still represent conditions at the prospective Manke Lumber Company dredge site. Following receipt of a formal DMMP extension for these materials, we will provide a detailed dredge plan to the DMMP.

Attachments:

- Figure 1 – Existing Conditions
- Figure 2 – Wood Waste Debris and Dredge Limits
- Figure 3 – DMMU Limits

LATITUDE: 47° 15' 50"
 LONGITUDE: 122° 21' 48"



VICINITY MAP

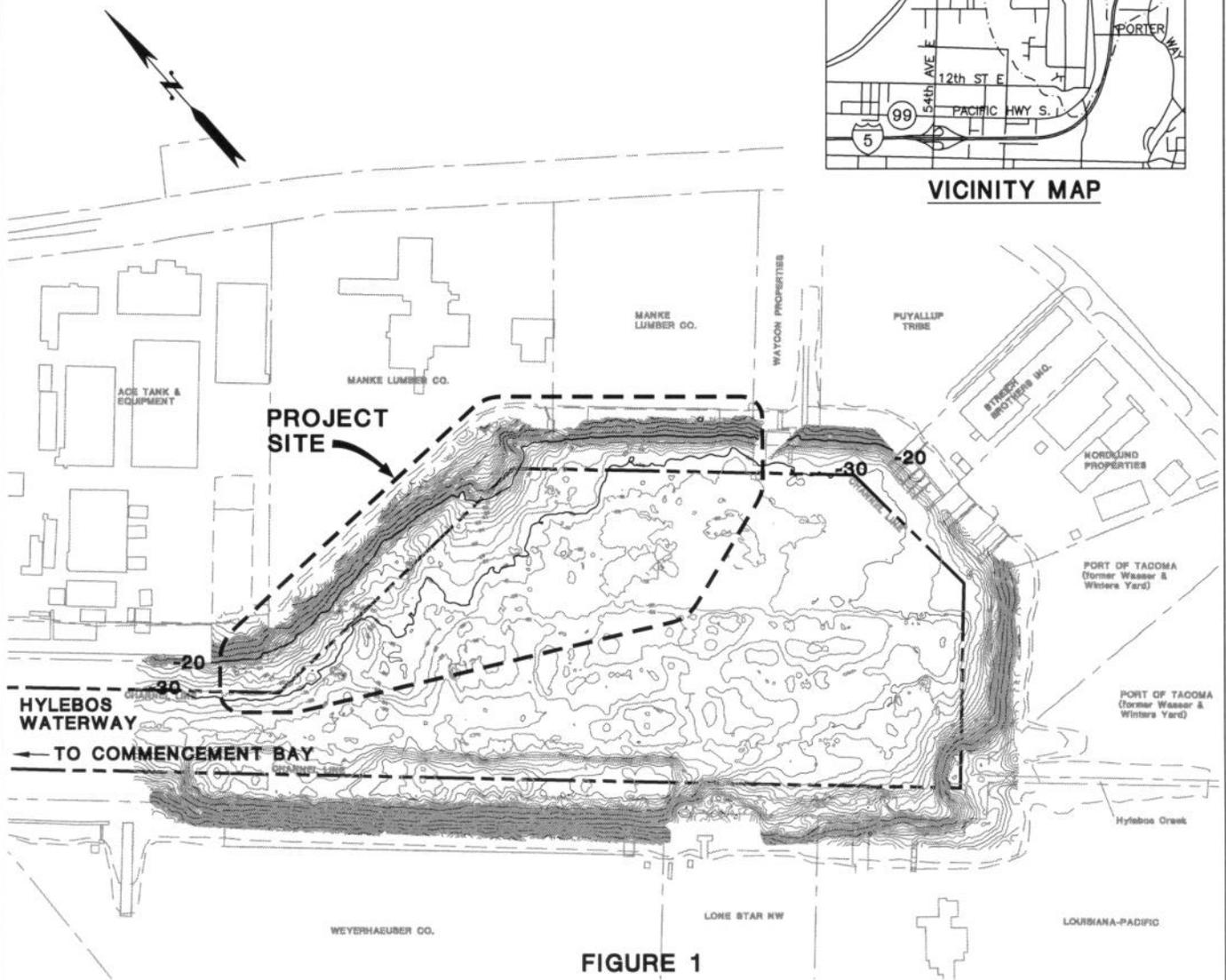


FIGURE 1

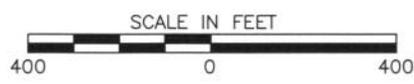
9/5/02 RC MLB-02018501-01.dwg

PURPOSE: REMOVE & DISPOSE OF WOOD WASTE DEBRIS, DREDGE TO ALLOWABLE DEPTH

DATUM: MLLW = 0.0'

- ADJACENT PROPERTY OWNERS:
1. WAYLON PROPERTIES
 2. ACE TANK & EQUIPMENT
 - 3.

EXISTING CONDITIONS

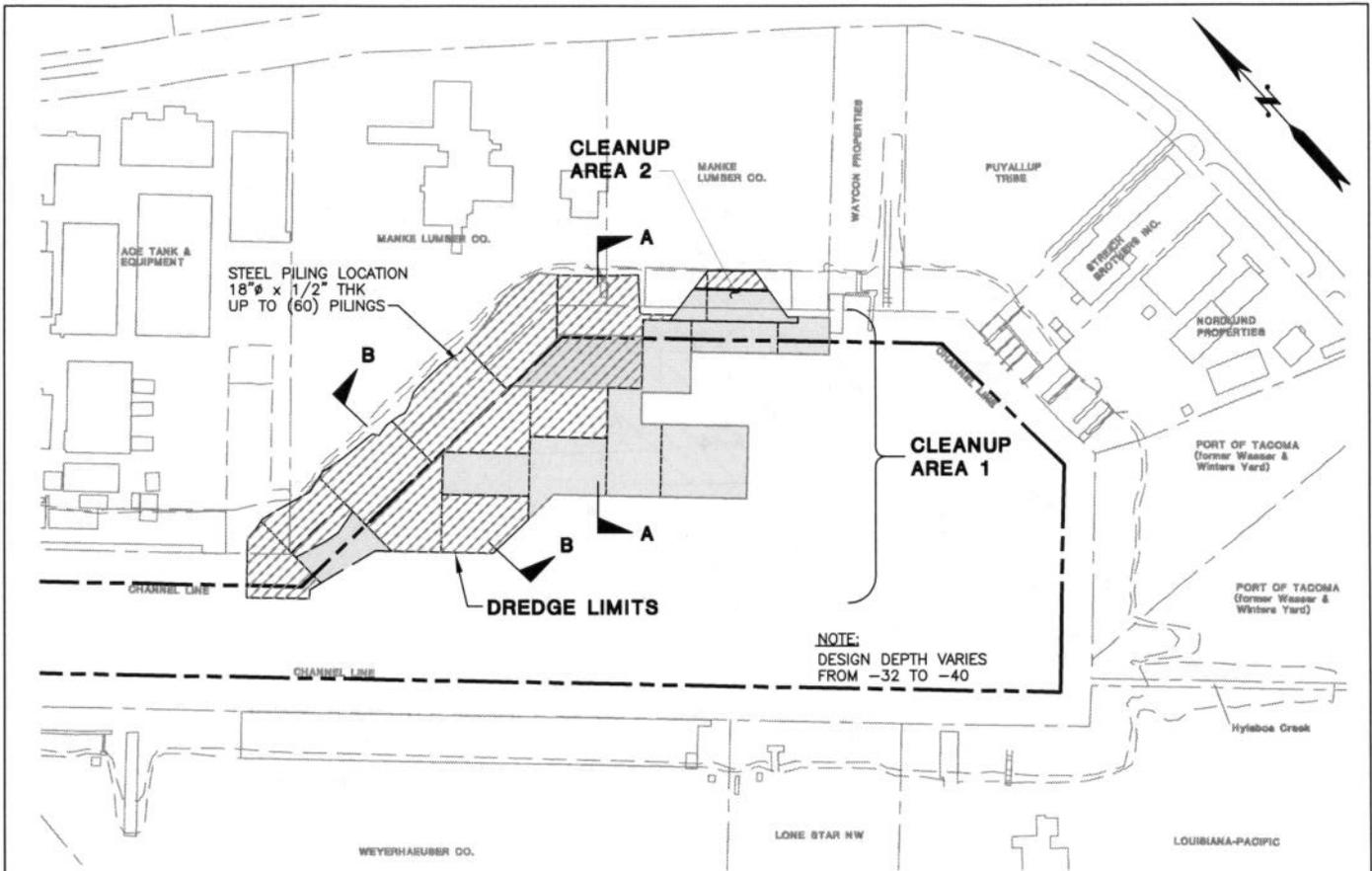


MANKE LUMBER CO.
 1717 MARINE VIEW DRIVE
 TACOMA, WA 98422

 **ANCHOR**
 ENVIRONMENTAL, L.L.C. 1411 4th Avenue, Ste 1210
 Seattle, WA 98101
 Ph: 206-287-9130

IN: HYLEBOS WATERWAY
 AT: TACOMA, WASHINGTON
 COUNTY OF: PIERCE
 APPLICATION BY: MANKE LUMBER CO.

SHEET 1 OF 3 DATE: 9/5/02



PLAN-DREDGE LIMITS

SCALE: 1" = 400'

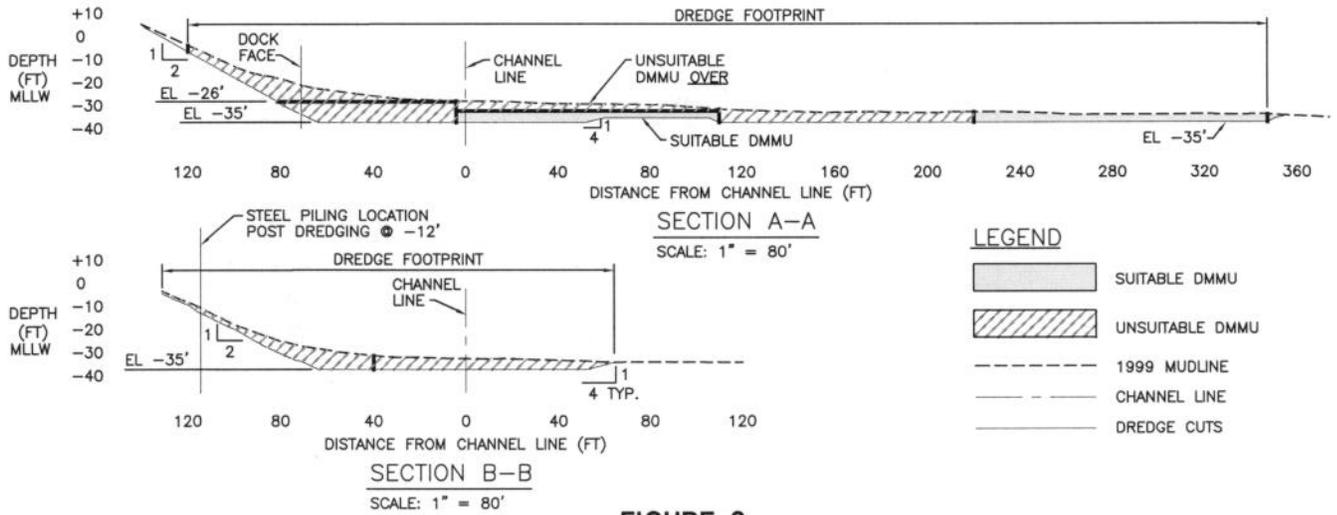


FIGURE 2

9/5/02 RC MLB-02018501-02.dwg

PURPOSE: REMOVE & DISPOSE OF WOOD WASTE DEBRIS, DREDGE TO ALLOWABLE DEPTH

DATUM: MLLW = 0.0'

ADJACENT PROPERTY OWNERS:

1. WAYLON PROPERTIES
2. ACE TANK & EQUIPMENT
- 3.

WOOD WASTE DEBRIS AND DREDGE LIMITS

SCALE IN FEET



MANKE LUMBER CO.
1717 MARINE VIEW DRIVE
TACOMA, WA 98422



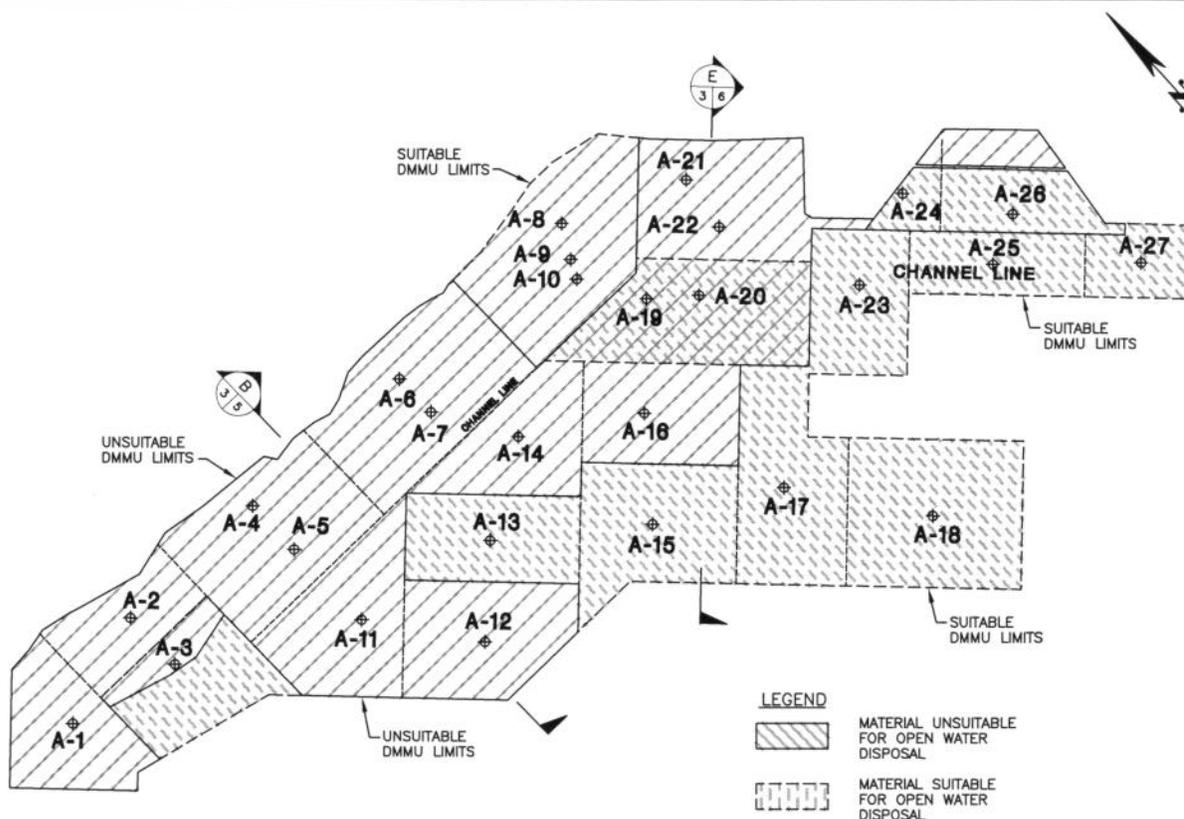
ANCHOR
ENVIRONMENTAL, L.L.C.

1411 4th Avenue, Ste 1210
Seattle, WA 98101
Ph: 206-287-9130

HYLEBOS WATERWAY
AT: TACOMA, WASHINGTON
COUNTY OF: PIERCE
APPLICATION BY: MANKE LUMBER CO.

SHEET 2 OF 3

DATE: 5/20/02



PLAN-DREDGE LIMITS

SCALE: 1" = 200'

DMMU #	VOLUME
A-1	3800
A-2	4800
A-3	4600
A-4	4500
A-5	4800
A-6	4900
A-7	4800
A-8	3500
A-9	3600

DMMU #	VOLUME
A-10	3300
A-11	3600
A-12	3400
A-13	3800
A-14	5200
A-15	3400
A-16	4300
A-17	3500
A-18	3600

DMMU #	VOLUME
A-19	4100
A-20	4500
A-21	4800
A-22	4700
A-23	3600
A-24	3400
A-25	3600
A-26	3300
A-27	3700

FIGURE 3

9/5/02 RC MLB-02018501-03.dwg

PURPOSE: REMOVE & DISPOSE OF WOOD WASTE DEBRIS, DREDGE TO ALLOWABLE DEPTH

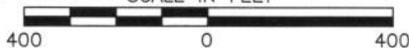
DATUM: MLLW = 0.0'

ADJACENT PROPERTY OWNERS:

1. WAYLON PROPERTIES
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DMMU LIMITS

SCALE IN FEET



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ENVIRONMENTAL, L.L.C.

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SHEET 3 OF 3

DATE: 5/20/02