

CLARIFICATION PAPER

SAMPLING AND TESTING COST RELIEF FOR SMALL PROJECTS UNDERGOING PSDDA EVALUATION

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INTRODUCTION

Some cost relief for small projects is already provided in the PSDDA program. For very small projects in areas ranked low, low-moderate and moderate, no testing is required. In low-ranked areas, projects under 8,000 cubic yards are not required to perform sampling and testing prior to disposal. For low-moderate and moderate ranked areas, the no test volume is less than 500 cubic yards. Projects in high ranked areas must perform some testing.

For projects above the no test volumes, but less than 4,000 cubic yards (except for low ranked projects) reduced biological testing is used. Only the amphipod and Microtox[®] bioassays are required. Despite these adjustments to the evaluation procedures, it is the perception among applicants with small projects that project costs are extraordinarily high and that some cost relief is needed.

PROBLEM IDENTIFICATION

Small project cost data is attached in Table 1. This review of projects under 10,000 cubic yards indicates an average sampling and testing cost per cubic yard of \$3.06 for projects requiring some testing. If projects for which no testing was required are included, the average cost is reduced to \$2.35. The average cost for all projects in dredging years 1989-1993 was \$0.49 a cubic yard. The reasons for the higher costs for small projects are several. Cost of sampling and analysis plan preparation, mobilization for sampling, chemistry QA/QC, and report preparation are not spread across a large volume of material, so the unit cost is substantially higher.

POSSIBLE SOLUTIONS

A number of possible options have been suggested to help reduce costs. These include reduced sampling requirements, reduced chemistry QA/QC, less stringent positioning; a reduced sampling plan, or the use of grab samples or drop corers. Another option would be to eliminate chemical testing and go straight to biological testing. The Management Plan Report, Phase II specifies reduced testing requirements for projects under 500 cubic yards in high ranked areas (Page A-13). This specifies the option of using either chemical or biological testing (with reduced QA/QC for the chemical testing). The dredger would have the choice of which option to pursue. One possible solution might be to extend this option to a larger volume of material and in areas of other ranks. The consequence would be less certainty about the quality of the material going to the disposal sites. The larger volume

would mean an increased environmental risk, at a time when monitoring efforts may be reduced.

These cost relief issues deal solely with the costs of doing sampling and testing for PSDDA projects, and do not address the substantial costs involved in the other aspects of obtaining permits. Another possible area of cost relief could be a streamlined permit approval for small PSDDA-related dredging projects (the specifics to be negotiated between the Corps' Regulatory Branch and the Department of Ecology's Permit Coordination Unit).

PROPOSED ACTION/MODIFICATION

The PSDDA agencies are reluctant to make major changes to the evaluation procedures due to the site management implications. Monitoring at the PSDDA disposal sites has demonstrated that the current sampling and testing guidelines are meeting the site conditions specified in the management plan reports. At the same time, the agencies are aware that the small dredging projects pay a substantially higher cost for evaluation and testing. Therefore, the PSDDA agencies propose the following program modifications/ suggestions:

- 1) For low-moderate and moderate ranked areas, raise the no-test volume to 1,000 cubic yards.
- 2) QA2 data is no longer required to be submitted to the PSDDA agencies for projects under 8,000 cubic yards.
- 3) A reduced list of chemicals of concern for testing in particular areas may be instituted on a case by case basis. For example, in certain areas, analysis for volatiles or pesticides may not require analysis. This reduced list would be limited to projects under 8,000 cubic yards.
- 4) With advance planning, small projects may be able to "piggy-back" with another project to share sampling and mobilization costs and chemistry QA/QC costs. The PSDDA agencies will attempt to facilitate such coordination whenever possible.

Table 1. Cost data for small projects from DY91 to DY93

Project	Year	Rank	Volume	Cost per CY	Total Cost
Chevron USA	1991	M	9600	\$3.51	\$33,703
Hurlen Construction	1991	H	4000	\$3.27	\$13,075
Redmond et.al.	1991	LM	378		no test
Tristar Marine	1991	H	5500	\$4.20	\$23,104
Day Island Yacht Club	1992	M	9000	\$2.85	\$25,613
LaConner Boatworks	1992	L	4200		no test
LOTT Olympia Outfall	1992	H	7975	\$3.91	\$31,210
Morton Marine	1992	H	4000	\$3.59	\$14,362
South Park Marina	1992	H	8000	\$1.60	\$12,802
Navy Keyport KB Dock	1992	M	7400	\$1.48	\$10,969
Pratt/Todd Moorage	1993	M	700		no test
Indian Cove Marina	1994	M	8000	\$3.79	\$30,314
Port of Brownsville	1994	M	10000	\$2.47	\$24,652
Average cost				\$3.06	
Average cost (including no test)				\$2.35	

Some projects are omitted due to lack of cost data.