

DRAFT RSET ISSUE PAPER #25 - Integrating Range of Disposal Options into SEF

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QUESTION/ISSUE: Integrating Range of Disposal Options into SEF.

DISCUSSION: Currently the DMEF provides a process for evaluating whether dredge material is suitable for open water placement. RSET consensus is that the SEF should be expanded to include procedures, or references to existing guidelines, for evaluating the suitability of dredge material for other disposal/management options. The SEF will also identify, or reference appropriate guidelines for, any associated long-term monitoring/management requirements associated with particular disposal options and indicate the appropriate regulatory authority for overseeing these requirements. It would also be helpful if the SEF included discussion of how unconfined or confined aquatic disposal sites are established or how suitable upland disposal sites are identified.

REFERENCES: None.

RECOMMENDATION: Specific text and table revision to appropriate sections of DMEF.

PROPOSED LANGUAGE CHANGES: Chapter 1 - Introduction

- Revise introduction to reflect that manual will address all 5 basic dredge material disposal options: unconfined aquatic, unconfined upland, confined aquatic, confined nearshore, and confined upland.
- Expand discussion of unconfined aquatic disposal to describe types of available sites (e.g., flow-lane, near shore,??) and indicate that particular locations may have site-specific criteria for determining suitability.
- Include general discussion of how sampling requirements may differ for different disposal options and what efficiencies may be gained by considering these sampling needs during the initial characterization of the material to be dredged.
- Reference appendix that lists and includes location maps for unconfined aquatic disposal sites.

Chapter 2 – Dredged Material Management Regulation

- Revise discussion of federal regulations to include an overview of RCRA as it pertains to upland disposal. Careful with this one. The HW folks just promulgated HWIR which exempts sediment from a consideration as a HW.
- Revise discussion of state regulations to include an overview of pertinent State authority/requirements for management of solid waste (only pertinent to Oregon?). If we can get WA to talk too, we might all learn something...

Chapter 4 – Overview of Regulatory Processes

- Expand flow charts and discussion to include approval and, as necessary permitting

by State solid waste program where upland disposal at a non-permitted site is proposed.

- Indicate that disposal at a permitted landfill will require approval by the landfill owner/operator.
- Expand flow charts and discussion to include approval by appropriate authority (likely State agency) where CAD or CDF disposal or disposal in a particular unconfined disposal site is proposed. Reference appendix with list of particular available facilities, identified contacts, and maps with disposal site locations.

Chapter 5 – Tiered Evaluation Process and Tier I

- Include discussion that material meeting exclusion ranking under Tier I or IIa is generally suitable for unconfined or confined aquatic disposal. Potential issue: need for additional evaluation at specific disposal sites – may be resolved with establishment of new protocols regarding application of exclusion ranking.
- Add note that material meeting exclusion ranking under Tier I or IIa may still be considered solid waste in Oregon if placed upland and may require associated solid waste permitting. Suggested changes based on some work I am doing with DSL to clarify this issue.
- Expand Tiered testing flow chart and discussion of transition to subsequent tiers to more specifically identify other dredge material management options and associated evaluation frameworks – refer to appendix.

Chapter 6 – Sampling and Analysis Plan

- Identify aspects of the SAP that may differ depending on the disposal option. This could include: sampling intensity, analytes, analytical techniques.
- Include example of a SAP for upland disposal in appendix.

Chapter 7 – Sampling Protocols

- Include sampling approach that would assess other disposal options concurrent with the assessment of unconfined aquatic disposal.
- Include discussion of additional sample collection/handling procedures and criteria pertinent to confined disposal options or upland disposal options (e.g., leachate tests).

Chapter 8 – Tier II Physical and Chemical Testing

- At some point may want to include screening levels for unconfined upland disposal. At this time, in Oregon, upland disposal may still require a SW determination. Screening levels in WA and ID may be available.
- At some point may want to include screening levels or dredge material characteristics that would make the material unsuitable for confined in-water disposal (CAD, CDF).
- At some point may want to include screening levels or testing protocols that would indicate the material is hazardous waste.

Chapter 9 – Tier III Biological Testing

- May want to add a note that this testing does not apply to disposal other than

unconfined in-water (or beach nourishment?).

Chapter 9.5? – Tier III Testing for Disposal Options Other than Unconfined In-Water

- One option – to have a focused section on the testing protocols for upland or confined in-water disposal options – primarily would reference other guidance but an overview of likely evaluation might be nice.

Chapter 10 – Tier IV Evaluations

- Expand to include discussion of the scenarios where this might be warranted for upland or confined in-water disposal options and the likely testing and evaluations that would be conducted.

Chapter 11 – Submittal of Sampling and Testing Data

- Include requirement that proposed disposal site be described.

Chapter 12 – Disposal Site Identification

- Add a chapter that describes the process for establishing a dredge material disposal site.
- Include sections on flow lane disposal, ocean disposal, confined aquatic, upland sites, and beach nourishment sites.
- For confined disposal sites would include identifying appropriate cap characteristics and long term management and monitoring protocols. Agencies in each state with regulatory authority for these sites would be identified.
- Reference appendix that identifies existing sites and shows locations on map.

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