

CLARIFICATION**MODIFICATIONS TO SAMPLING REQUIREMENTS FOR DEEP NATIVE SEDIMENTS**

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INTRODUCTION

PSDDA provides guidelines for calculating the number of field samples and laboratory analyses which must be used in the characterization of proposed dredged material. These guidelines are based on the project area ranking and volumes of surface (0-4 feet) and subsurface (>4 feet) material to be dredged.

PROBLEM IDENTIFICATION

Under current PSDDA guidelines, the entire volume of material to be dredged is included in calculating the number of field samples and laboratory analyses required. This includes deep sediments in native soils. The problem is that sampling costs for deep sediments may be appreciably higher than those associated with shallower sediments. In the case of deep native sediments, the potential for chemicals of concern to be present is very low and the additional cost associated with sampling deep sediments seems unjustified. Unnecessary costs associated with PSDDA testing must be controlled to maintain the purpose and viability of the PSDDA process.

PROPOSED CLARIFICATION

At the second PSDDA annual review meeting it was determined that, for native materials, best professional judgment should be applied in determining the number of samples and analyses to be required. When the existence of large volumes of native material could be substantiated through exploratory testing or from site-specific historical dredging records, then testing requirements could be relaxed.

It is proposed that on a case-by-case basis, where deep native sediments exist and can be similarly substantiated, the requirement to sample to the maximum depth of the dredging prism may be relaxed by a collective decision of the PSDDA agencies after applying and documenting best professional judgment considerations.