

January 9, 2020

Prepared by:

Dredged Material Management Office
Seattle District, U.S. Army Corps of Engineers

MEMORANDUM FOR: RECORD

SUBJECT: SUPPLEMENT TO THE ANTIDegradation DETERMINATION FOR DUNLAP TOWING, OLYMPIA, WASHINGTON (NWS-2018-1153).

1. **Introduction.** This memorandum supplements the DMMP antidegradation determination, dated May 4, 2016, and reflects the consensus determination of the Dredged Material Management Program (DMMP) agencies (U.S. Army Corps of Engineers, Washington State Department of Ecology, Washington State Department of Natural Resources, and the Environmental Protection Agency) regarding the suitability of the exposed sediment surface after maintenance dredging at Dunlap Towing, Olympia, WA.
2. **Background.** The original antidegradation determination determined that ALL wood waste, including wood waste below the proposed project depth of -3 ft MLLW, must be dredged and disposed at an approved upland disposal facility in order for the project to comply with Washington State's antidegradation policy.

The original determination erroneously included a recency expiration date of March 2018, three years from the sampling date. Recency expiration dates apply to projects with material approved for open-water disposal. No sediments from Dunlap Towing are approved for open-water disposal, therefore the recency expiration date does not apply.

3. **Supplemental Determination.** This memorandum documents the supplemental evaluation of the antidegradation compliance of the Dunlap Towing project. Due to the elevated dioxin concentrations and high fraction of wood waste at the site, the DMMP agencies' original determination that ALL wood waste, including wood waste below the project depth of -3 ft MLLW, must be removed and disposed at an approved upland facility is maintained. No additional testing is necessary to meet DMMP requirements and a recency expiration date is not applicable to this project.

A determination regarding the suitability of the material for upland disposal must be coordinated with the local Health Department.

A pre-dredge meeting with DNR, Ecology and the Corps of Engineers is required at least 7 days prior to dredging. A dredging quality control plan and transloading plan must be developed and submitted to the Regulatory Branch of the Seattle District Corps of Engineers at least 7 days prior to the pre-dredge meeting.

11. **Agency Signatures.**

The signed copy is on file in the Dredged Material Management Office.

Concur:

Date Kelsey van der Elst - Seattle District Corps of Engineers

Date Erika Hoffman - Environmental Protection Agency

Date Laura Inouye, Ph.D. - Washington Department of Ecology

Date Shannon Soto - Washington Department of Natural Resources

Copies furnished:

DMMP signatories

Brandon Clinton, USACE Regulatory PM

Shawn Hinz, Gravity Marine

Jeff Wilson, Gravity Marine

Mike Harlan, Dunlap Towing