Maintenance Dredging at a Superfund Site Challenges for Navigation in Portland Harbor

Dr. Laura McWilliams

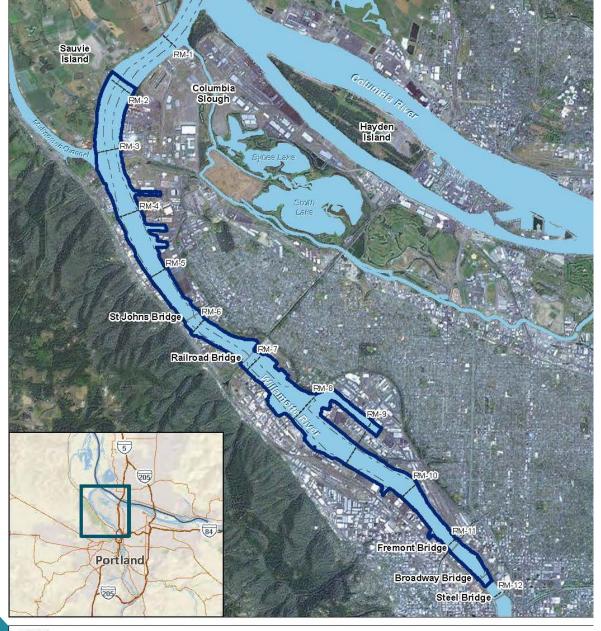
CMANC Winter Meeting January 18, 2017



Outline

- Lower Willamette River/ Portland Harbor Overview
- 2 Impediments to Dredging
- Case Study Maintenance Dredging as Part of an Early Remedial Action
- Case Study Challenges Remaining after Record of Decision





Portland Harbor Superfund Site

LEGEND

Portland Harbor Study Area

---- River miles

[___ Navigation Channel







Regulatory History

1999 - Sediment contamination documented in Willamette River

2000 – Site added to the National Priorities List

2001 – Nine member Lower Willamette Group (LWG) agreed to complete the remedial investigation/feasibility study (RI/FS)

2002 – US EPA, Oregon DEQ, USACE Share Responsibilities:

EPA: In-water investigation, remediation

DEQ: Upland remediation and source control

USACE: Dredging permits; maintenance dredging

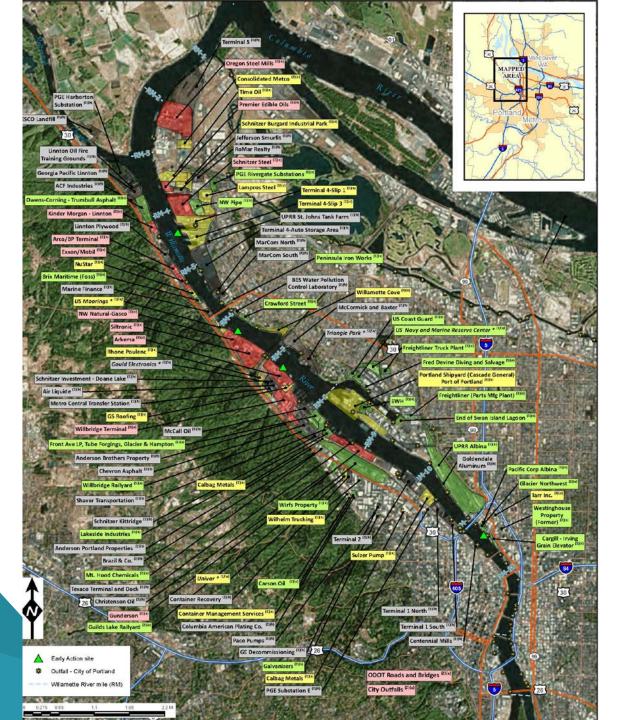
2011 – Draft RI Report submitted by LWG

2012 – Draft FS Report submitted by LWG

2016 – EPA prepares final RI and FS reports

2017 – Record of Decision (ROD) signed in January





- Nine miles of river
- 100s of chemicals of potential concern
- Dozens of major potentially responsible parties (PRPs)
- Over 200 minor PRPs
- >\$1 Billion spent on investigation
- Over 15 years to complete the remedial investigation (2001-2016)







Obstacles to **Dredging**

Letter of Agreement

Between the
U.S. Environmental Protection Agency, Region 10, the
Oregon Department of Environmental Quality and
the U.S. Army Corps of Engineers, Portland District
Concerning the

Lower Willamette River

Issuance of permits by USACE. For any permit issuance or permit application processed by USACE for any facility or area located between the confluence of the Willamette and Columbia Rivers and the Willamette Falls, USACE will coordinate with EPA regarding consistency of permit activities with CERCLA and the NCP and will ensure that any certifications required under the CWA are obtained from ODEQ. EPA will review permits and permit applications and make recommendations to USACE, which may include permit conditions, modifications, or work st

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Federal Channel Maintenance Dredging Responsibilities. Prior to any Federal Navigation Channel dredging activities, including in-water disposal, performed pursuant to the Dredged Material Management Plan (DMMP) between the confluence of the Willamette and Columbia Rivers and the Willamette Falls, USACE will coordinate with EPA and obtain from ODEQ any certifications required under the CWA EPA will ensure that the impact of USACE's Federal

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Rivers and the Willamette Falls, USACE will coordinate with EPA and obtain from ODEQ any certifications required under the CWA. EPA will ensure that the impact of USACE's Federal channel maintenance dredging responsibilities on the RI/FS are evaluated. EPA will coordinate



US Army Corps of Engineers – Willamette River Navigation Channel Maintenance

- Historically, dredged 500,000 to 750,000 cubic yards of sediment every three to five years
- Last significant maintenance dredging in 1997
- In 2007 and 2008, the USACE worked on a Dredged Material Management Plan (DMMP) for the 40-ft deep Navigation Channel
- September 2008, the USACE suspended work on the DMMP pending the outcome of the Superfund investigation and cleanup
- Only work has been the removal of about 50,000 cubic yards of material from a hazardous shoal at Post Office Bar in Fall 2011 (next slide)
- Records of Decision signed in January 2017; to date USACE has not resumed work on the DMMP



Willamette R. FNC Post Office Bar

DETAILS

Location: Willamette River, RM 2.1-2.4

Volume: 52,300 cy

 Depth: Dredged to -40 feet CRD (plus 2 feet advanced maintenance)

Disposal: Upland, West Hayden Is.
 Placement Site

• Project completed in Sept./Oct.

2011



USACE Presentation

Port of Portland Terminal 4 - Maintenance Dredging Combined with Early Remedial Action



- 1995 35,000 cubic yards of contaminated sediment removed
- 2003 Early Action agreement signed with US EPA
- 2008 Removed 13,000 cubic yards and capped 8,000 square feet

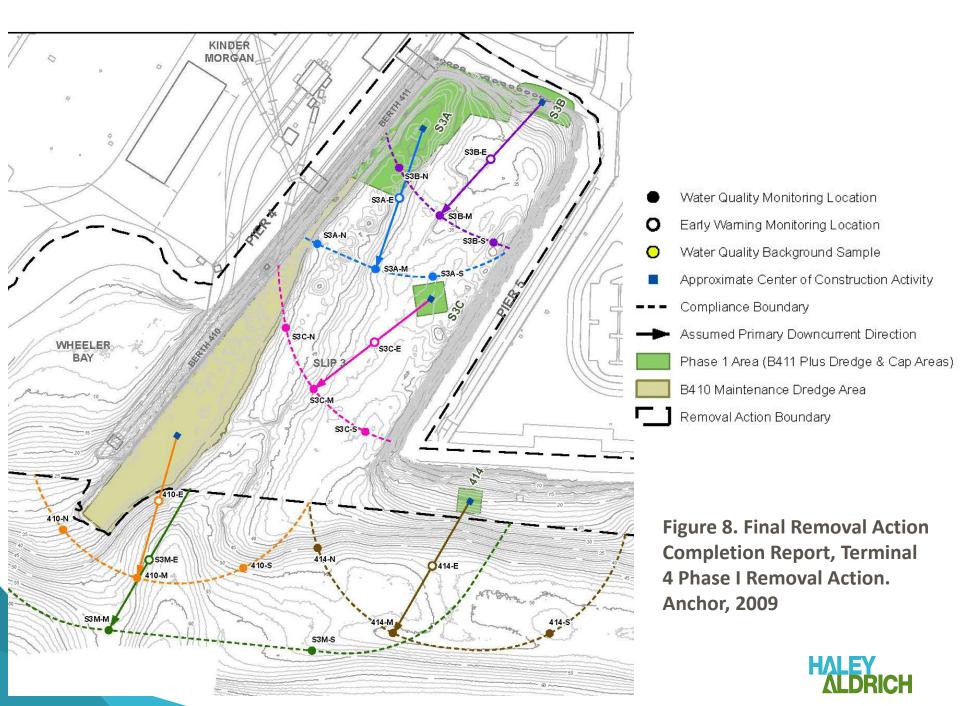








Figure 2. Final
Removal Action
Work Plan, Terminal
4 Phase I Removal
Action.
Anchor, 2008



Challenges Remaining After the Record of Decision



Figure 30. Sediment Management Areas, Selected Remedy



0 1,000 2,000 3,000 4,000

Record of Decision (Jan 2017): Specified Less Conservative Remedial Action Levels (RALs) within the Federal Navigation Channel than Along the Shorelines

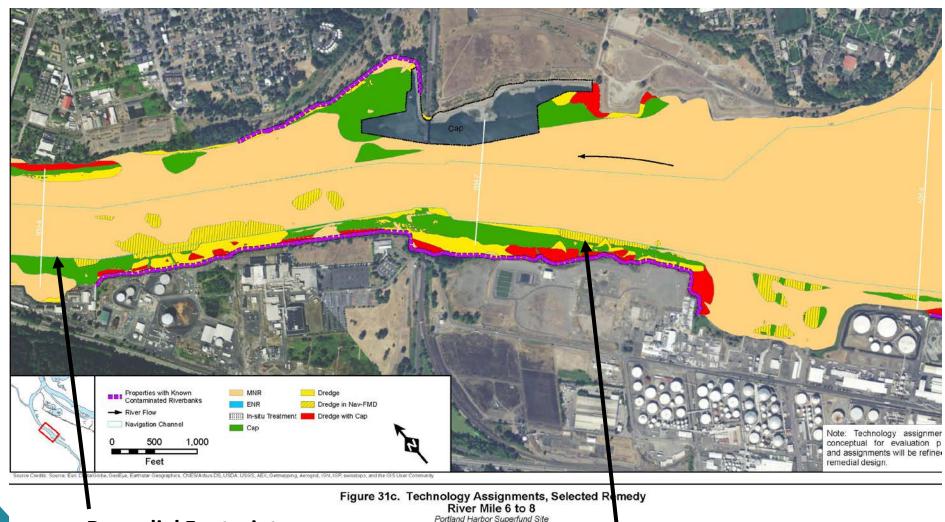
Within the Navigation Channel

Focused COC	RAL (μg/kg)				
	PTW	Alt B +PTW	Alt D	Alt E	Alt F
PCBs	200	200	500	200	75
Total PAHs	870,000	170,000	69,000	35,000	13,000
2,3,7,8-TCDD	0.01	0.002	0.002	0.0006	0.0006
1,2,3,7,8-PeCDD	0.01	0.003	0.0008	0.0008	0.0008
2,3,4,7,8-PeCDF	0.2	0.2	1	0.2	0.2
DDx	7,050	650	450	300	160

Everywhere Else



Remedial Goals Change Abruptly at the Edge of the Navigation Channel



Remedial Footprints
Abruptly Stop

Maintenance Dredge for Facility Access Subject to More Stringent Standards



Hypothetical Example of Difficulty Faced for Maintenance Dredging

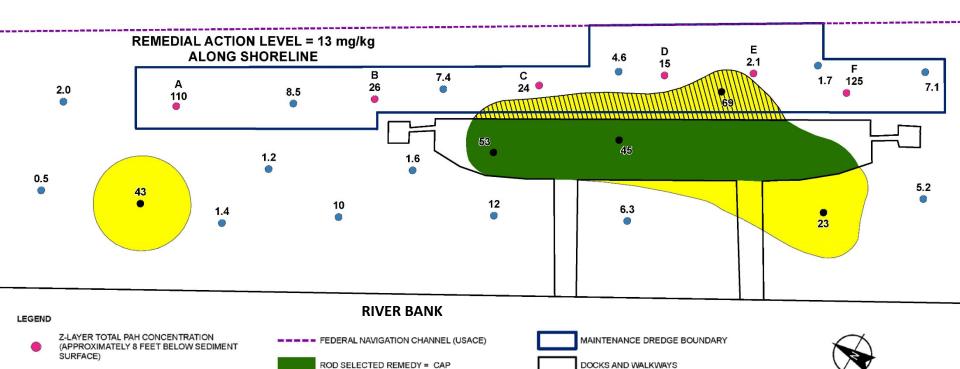
ROD SELECTED REMEDY = DREDGE

ROD SELECTED REMEDY = DREDGE IN

Surface Sediment Concentrations are Below Nearshore RAL.

Z-layer Concentrations are Below Navigation Channel RAL, but Above Nearshore RAL

REMEDIAL ACTION LEVEL = 170 mg/kg
WITHIN NAVIGATION CHANNEL



ROD = RECORD OF DECISION.

SCALE IN FEET

SURFACE SEDIMENT TOTAL PAH CONCENTRATION < 13 mg/kg

SURFACE SEDIMENT TOTAL PAH

CONCENTRATION > 13 mg/kg

