

MEMORANDUM FOR RECORD

January 11, 2018

**SUBJECT: DMMP RECENCY EXTENSION FOR DREDGING AT THE PORT OF SEATTLE
TERMINAL 5 (USACE PERMIT NWS-2015-269-WRD)**

1. **Introduction.** This memorandum supplements the 21 April 2015 Suitability Determination Memorandum (DMMP, 2015) and reflects the consensus determination of the Dredged Material Management Program (DMMP) agencies (U.S. Army Corps of Engineers, Washington Departments of Ecology and Natural Resources, and the Environmental Protection Agency) regarding the application of the DMMP recency guidelines to proposed dredging of the Port of Seattle Terminal 5 (T5) project for disposal at the Elliott Bay nondispersive open-water site.

2. **Background.** The April 2015 Suitability Determination approved the placement of all 51,000 CY of proposed dredged material from the Port of Seattle Terminal 5 project for open-water disposal at the Elliott Bay non-dispersive disposal site. The project was ranked high, and the recency period for high-ranked projects is two years from the date of sampling. The previous Suitability Determination for the T5 project expires in December 2017, three years from the December 2014 sampling.

The Port requested an extension to the recency period in a memo to the DMMP dated 27 November 2017, citing construction delays. The Port anticipates dredging to occur within the next two years. No changes to the proposed dredge footprint or volume were proposed on the basis that sedimentation rates in the West Waterway are minimal (~1 cm/year).

3. **Recency Evaluation.** Since the April 2015 suitability determination, no revisions to the DMMP chemical screening criteria have occurred. Furthermore, no cleanup activities have been conducted at nearby sites that might affect the sediments at the project area.

Therefore, there is no reason to believe that the condition of sediments at the site have changed from what was originally documented in the suitability determination.

A review of the Washington State Department of Ecology's Spills Database found one spill reported adjacent to the project area since the April 2015 suitability determination. The spill, reported on February 27, 2017, released 1,340 gallons of diesel; all but 25 gallons were recovered. The escaped diesel was likely transported downstream on the water surface and therefore is unlikely to impact the sediments.

4. **Recency Determination.** On the basis of the existing information, the DMMP agencies are in agreement that a recency extension through February 15, 2019 for the Port of Seattle Terminal 5 project is acceptable as long as no significant changed conditions occur which may affect the suitability of the material. An example of such a condition would be the commencement of cleanup work at the adjacent Lockheed Martin Superfund site, which has known contaminated sediments on-site. If cleanup activities start before the planned dredging at the T-5 project site, additional sediment sampling and testing (coordinated with the DMMP) may be needed to confirm that surface sediments are still suitable for disposal at the Elliott Bay site.

5. **Debris Management.** The DMMP agencies implemented a debris screening requirement following the 2015 SMARM in order to prevent the disposal of solid waste and anthropogenic debris at open-water disposal sites in Puget Sound (DMMP, 2015). The April 2015 Suitability Determination did not evaluate the Port of Seattle Terminal 5 project for debris management concerns. As such, debris management was evaluated as part of this recency extension.

Port of Seattle employee George Blomberg provided information to evaluate debris management practices and the likelihood of encountering debris during dredging. The project is located in an area that was formerly shallow sub-tidal and inter-tidal with deepest areas at approximately -8 ft MLLW. Over the course of more than nine decades, the project area was gradually deepened, with the most recent deepening (to 45 to 50 ft below MLLW) occurring in 2000. Maintenance dredging occurred between 2011 and 2014 to maintain the project depth to 45 to 50 ft below MLLW. The current project proposes to deepen the project area to depths (up to 56 ft below MLLW) that most likely consists of primarily native, bedded sediment material.

Terminal 5 has been used for marine cargo operations since 1954. The bulk of the cargo handled at the site consists of pre-loaded containers, with smaller amounts of break-bulk shipments interspersed over the years. Potential types of debris present at the site most likely include cargo handling equipment and rock armoring and other debris that has migrated down from under the adjacent pier. During the 2011 to 2014 dredging, some debris was encountered, including rock spillage from nearby armoring, a few pilings, and other discarded cargo handling materials.

Based on this information from the Port, the DMMP agencies concur that potential exists for greater than 1-ft square-sized debris associated with nearby rock armoring and cargo handling activities; therefore, a debris screening grid is required for this project. In October 2016, the USACE Regulatory issued a permit for this project that includes a Special Condition that requires that dredged material be filtered through a debris grid with a maximum opening size of 12 inches by 12 inches. The Port has confirmed via email that the use of the screening grid is planned as required by the permit.

As required in the USACE permit, the Port must submit a dredging and disposal quality control plan (QCP) to the USACE Regulatory Project Manager at least 7 days prior to the scheduled pre-dredge meeting. This plan must include, among other items, a debris management plan for any debris encountered during dredging. The pre-dredge meeting will be held at least 7 days prior to the dredging and disposal activities.

1. **References:**

DMMP, 2015. Determination Regarding the Suitability of Proposed Dredged Material from the Port of Seattle T-5 Berth Deepening, Seattle, Washington, for Open-Water Disposal at the Elliott Bay Nondispersive Site. April 21, 2015.

DMMP, 2015. *Debris Screening Requirements for Dredged Material Disposed at Open-Water Sites.* Final DMMP Clarification Paper. October 02, 2015.

Ecology, 1995. Sediment Management Standards – Chapter 173-204 WAC. Washington State

Department of Ecology, December 1995.

USACE Regulatory, 2017. Department of the Army Permit, NWS-2015-269-WRD. Signed October 16, 2017.

2. Agency Signatures:

Concur:

signed copy on file in DMMO - Seattle District office

Date Heather Whitney Fourie – U.S. Army Corps of Engineers, Seattle District

Date Erika Hoffman - Environmental Protection Agency

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

Date Celia Barton - Washington Department of Natural Resources

Copies furnished:

DMMP signatories
Seattle District Regulatory
Paul Meyer, Port of Seattle