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Memorandum

To: Doug Hotchkiss, Jason Jordan, and Tim King; Port of Seattle

From: Dennis Hanzlick and Bryan Patterson; Anchor Environmental, L.L.C.

CC: Tom Wang; Anchor Environmental, L.L.C.

Date: May 30, 2008

Re: Sediment Characterization Chemical Results Summary and Recommendations for Construction at Port of Seattle Terminal 115

Background

In conjunction with sediment characterization prior to maintenance dredging, the Port of Seattle (Port) collected sediment samples from Terminal 115 (T-115) on March 14, 2008. The target depth was -19 feet mean lower low water (MLLW), which comprised a design depth of -15 feet MLLW, 1 foot of allowable overdepth, and 3 feet for the collection of three 1-foot-increment Z-layer samples. Figure 2 shows the proposed and actual coring locations.

Two Dredged Material Management Units (DMMUs) represented the dredge footprint, and sediment from two coring locations in each DMMU provided material for the respective composite samples. The two composite samples from the two DMMUs and the four upper Z-samples from the four cores were submitted for analysis for the 2007 Dredged Material Management Program (DMMP) analyte list plus dioxin/furan congeners.

Chemical analytical results for the composite samples yielded concentrations of total polychlorinated biphenyls (PCBs) that exceeded the DMMP screening criterion, concentrations of polycyclic aromatic hydrocarbons (PAHs) that exceeded one or more of their respective criteria, and dioxin/furan Toxic Equivalents Quotient (TEQ) values that exceeded those at the proposed open-water disposal site in Elliott Bay. Similarly, concentrations of these compounds were also elevated in the four Z-samples.

Because of these chemical analytical results, the Port, in accordance with the Sampling and Analysis Plan (SAP), and in coordination with the DMMP, submitted the remaining Z-samples for the same suite of analyses as the initial round. The purpose was to evaluate chemical concentrations in the 2 feet of sediment underlying the upper Z-layer samples.

These results are summarized further in the following section, and a proposal for a modified dredging approach is presented in the last section.

Summary of Chemical Analysis Results

Table 1 summarizes the results for both composite samples and all collected Z-samples. The upper, middle, and lower Z-samples were identified as "ZA", "ZB", and "ZC" samples, respectively. Only the ZA-sample could be collected at core location S1-01; ZA and ZB samples were obtained at core location S1-02, and all three Z-samples were collected at both locations S2-01 and S2-02.

Table 1 shows that high-molecular-weight polycyclic aromatic hydrocarbon (HPAH) concentrations remain elevated in some of the Z-samples from both DMMUs. While total PCB concentrations in the Z-samples from DMMU S1 are less than the concentration in the composite sample (141 micrograms per kilogram dry weight [$\mu\text{g}/\text{kg DW}$]), they are still elevated, showing the presence of PCBs in the subsurface material. PCB concentrations in the composite sample and all Z-samples from DMMU S2 all exceed the screening level criterion, and indicate no decrease with depth in the Z-samples. Dioxin/furan TEQ values range from 14.3 to 54.1, and similar to total PCB concentrations, are also elevated in the Z-samples. For comparison, the maximum of the three TEQ values measured in surface sediments at the Elliott Bay open-water disposal site is 17.0; one value is between 1 and 5, and the third is between 5 and 10.

Because of the apparent presence of PCBs and dioxin/furan congeners in the 3 feet of Z-material beneath the dredge prism, there is some concern for the sediment quality of the surface that would be exposed after dredging. The following section describes the Port's proposed dredging approach in light of the chemical analytical results.

Recommendations for Dredging at T-115

Based on the recent analysis of the Z-samples, a change to the proposed dredge design is recommended. Currently, the design calls for dredging to -15 feet MLLW with 1 foot of allowable overdepth. The recommended dredging approach would be to lower the required dredge elevation from -15 feet MLLW to -16 feet MLLW (Figure 1). This would allow for the removal of an additional 1 foot of contaminated material in the dredge prism. It is also recommended that the overdepth allowance be increased from 1 foot to 2 feet. The U.S. Army Corps of Engineers (USACE) allows up to 2 feet of allowable overdepth in coastal regions and in inland navigation channels (USACE 1996). The increased overdepth allowance could potentially result in more contaminated sediment being removed and also provide for the greatest flexibility for the contractor to reach the required dredge elevations.

Following dredging, a nominal clean sand layer would be placed over the dredged surface. Taking into account the 2-foot allowable overdepth, the newly exposed surface could vary between elevation -16 feet and -18 feet MLLW. However, the nominal sand layer would have a target thickness of 6 inches that would provide a clean substrate in the dredge prism without exceeding the original maintenance dredging elevation of -15 feet MLLW.

All other elements of the originally proposed design remain unchanged including the transloading and disposal of contaminated sediments. The contractor will likely transport the dredged material by barge to an offloading facility where it will be loaded onto trucks or rail cars. From the offloading facility, the material will be transported to an approved subtitle D disposal facility.

Reference

U.S. Army Corps of Engineers (USACE). 1996. Project operations: Navigation and dredging operations and maintenance policies. Engineering regulation 1130-2-520.

TABLES

Table 1
Summary of Chemical Analytical Results for DIMMU Composite Samples and Z-Samples Collected at Port of Seattle Terminal 115

Location Sample	Dredged Material Management Program Criteria	Screening		S1 T115-S1- 01-ZA-0803 3/14/08	S1 T115-S1- 02-ZB-0803 3/14/08	S1 T115-S1- 03-ZC-0803 3/14/08	S2 T115-S2- 01-ZA-0803 3/14/08	S2 T115-S2- 01-ZB-0803 3/14/08	S2 T115-S2- 01-ZC-0803 3/14/08	S2 T115-S2- 02-ZB-0803 3/14/08	S2 T115-S2- 02-ZC-0803 3/14/08
		Level	Trigger								
Conventional (mg/kg)											
Sulfide				196	1800	2390	2460				
Conventional (mg-N/kg)											
Ammonia				37.6	53.7	32.6	51.7				
Conventional (pct)											
Total organic carbon				1.98	1.84	2.23	1.89	5.25	1.6	61.4	3.53
Total Solids				55.1	53.5	69.1	78.5	78.4	61.4	60.1	68.9
Total solids (preserved)				53	62.9	61.3			57.5		
Total volatile solids				7.34	6.87	7.63	4.6				
Grain Size (pct)											
Gravel				4.3	28.6	66.6	41	10.6	63.2	41	3.7
Sand				13.9	22.7	19.8	25	21.8	38	31.6	22.7
Silt				61.8	36.6	10	62.9	48.6	9.7	15.6	43.9
Clay				19.8	12	3.7	25.3	15.8	5.4	14.1	9.1
Fines (Silt + Clay)				81.6	48.6	13.7	88.1	64.4	12	64.7	33.3
Metals (mg/kg)											
Antimony				7 U	9 U	7 U	20 U	20 U	20 U	8 U	7 U
Arsenic				8	14	14	20	20	20	13	12
Cadmium				0.3	0.6	0.4	0.9	0.8	0.5 U	0.7	0.5
Chromium				28.8	36	25.4	33.4	51	32	32.1	38.5
Copper				42.1	79.5	72.8	71.9	78.8	77.2	64.1	56.4
Lead				16	60	46	27	53	71	58	76
Mercury				0.13	0.21	0.11	0.21	0.17	0.1	0.17	0.1
Nickel				23	30	29	26	31	32	29	32
Selenium				0.3 U	0.4	0.4	0.3 U	0.3 U	0.2 U	0.3 U	0.3 U
Silver				0.4 U	0.6 U	0.4 U	0.5 U	1 U	0.9 U	0.5 U	0.4 U
Zinc				88	155	96	188	266	213	172	195
Organometallic Compounds (µg/L)											
Tributyltin (ion)				0.019 U	0.03	0.019 U	0.19	0.024		0.019 U	
LPAHs (µg/kg)											
Total LPAH ^(h)				873	2339	37	715	284	212	488	863 J
Naphthalene				20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U
Acenaphthylene				85 J	330	19 U	62 J	38	24	110 J	58
Fluorene				28 J	79	19 U	28 J	20 U	35	36 J	81
Phenanthrene				40 J	220	19 U	55 J	17 J	39	55 J	130
Anthracene				500 J	510	26	320 J	99	280	390 J	430
2-Methylnaphthalene				220 J	1200	11 J	250 J	130	110	280 J	300
HPAHs (µg/kg)											
Total HPAH				19485 J	122960	588	10710	5278	2969	5478	11540 J
Fluoranthene				7400 J	47000	120	2400	650	330	730	1200
Pyrene				5500 J	15000	140 J	2900	1600	1100	1600	8500
Benzo(a)anthracene				1200 J	6800	37	800 J	400	370	570 J	740
Chrysene				2600 J	16000	63	1300	550	600	1600 J	1300
Total Benzofluoranthenes (b, j, k) ^(c)				590 J	9900	134	1890 J	760	1390	2500 J	2100
Benzo(e)pyrene				560 J	3400	49	720 J	420	520	940	1000
Indeno(1,2,3-cd)pyrene				190 J	730	19 J	280 J	92	120	330 J	200
Dibenz(a,h)anthracene				85 J	300	19 U	130 J	47	48	150 J	110

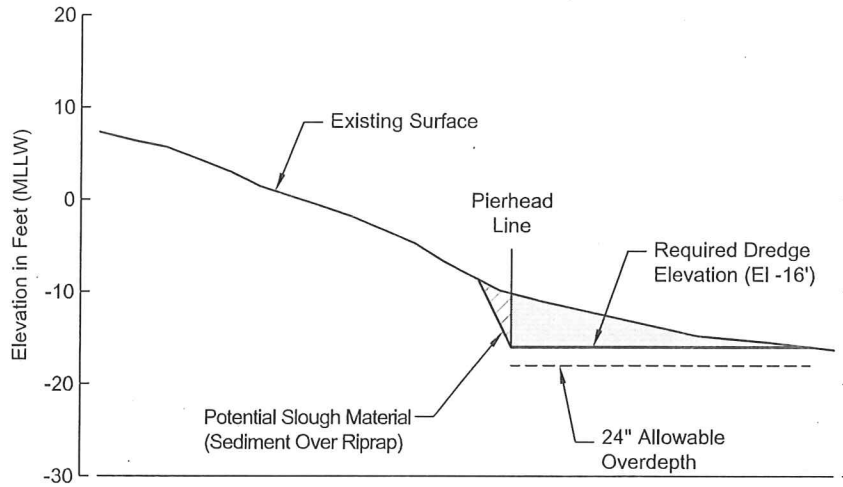
Table 1
Summary of Chemical Analytical Results for DIMMU Composite Samples and Z-Samples Collected at Port of Seattle Terminal 115

Location Sample	Dredged Material Management Program Criteria	Screening Level		S1	S1	S1	S1	S2	S2	S2	S2	S2	S2	S2	S2	S2
		Level	Maximum Level													
gamma-BHC (Lindane)		10		1.9 U	4.1	6.4	4.1	9.3	13.3	14	3.4	11.4	5 U	5 U	18.1 to -19.1 ft	1115-S2-02-ZC-0803 3/14/08
Total PCB			38	5.4	4.1	6.4	4.1	9.3	13.3	14	3.4	11.4	5 U	5 U	-17.1 to -18.1 ft	1115-S2-02-ZB-0803 3/14/08
Total PCB		130		141	86	126	78	172	297	264	177	182	20 U	20 U	324	234
Aroclor 1016				20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U
Aroclor 1221				20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U
Aroclor 1232				20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U
Aroclor 1242				20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U
Aroclor 1248				35	20 U	33	20 U	41	53	34	20 U	42	20 U	20 U	74	54
Aroclor 1254				63	48	55	44	77	94	90	67	68	100	100	100	90
Aroclor 1260				43	40	38	34	54	150	140	72	72	150 J	150 J	150 J	90
Aroclor 1262				20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U
Aroclor 1268				20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U
Dioxin/Furans (TEQ)				23.2	14.3	17.9	54.1	29.9	38.6	33.3	28.3	31.2	31.2	31.2	41.5	31.2
ITEF TEQ (ND = 0; EMPC = 0)																
Dioxin/Furans (pg/g)				615	349	532	2040	845 J	1110	1010	865	816	816	816	1130	938
1,2,3,4,6,7,8-HpCDD				73.9	46.3	44.9	60.3	91.4	99.4	82.6	74.1	85.7	85.7	85.7	90.8	66.4
1,2,3,4,6,7,8-HpCDF				6.23	3.77	3.62	3.96	7.46	7.52	5.73	6.12	7.18	7.18	8.34	6.07	6.07
1,2,3,4,7,8,9-HpCDF				4.53	2.88	3.08	5.02	5.07	7.47	5.72	5.1	5.37	5.37	4.91	4.29	4.29
1,2,3,4,7,8-HxCDD				9.72	5.87	5.57	8.2	10.3	10.4	7.74	7.76	9.95	9.95	8.96	6.67	6.67
1,2,3,4,7,8-HxCDF				20.6	13.9	13.4	46.8	22.1	35.9	33.7	22.3	22.1	22.3	22.3	18.4	18.4
1,2,3,6,7,8-HxCDD				3.59	2.4 J	2.06 J	3.1	3.71	5.06	4.38	4.39	4.04	4.04	3.66	2.78	2.78
1,2,3,7,8,9-HxCDD				10.6	8.51	6.46	8.27	10.9	17.8	14.1	10.9	11.9	11.9	10.8	8.59	8.59
1,2,3,7,8,9-HxCDF				2.05 J	1.37 J	1.36 J	4.16	2.23	2.75	2.57	2.2 J	2.38 J	2.38 J	2.11 J	1.59 J	1.59 J
1,2,3,7,8-PeCDD				2.51	2.11 J	1.47 J	1.22 J	2.53	4.14	3.24	2.61	2.61	2.61	2.44 J	1.95 J	1.95 J
1,2,3,7,8-PeCDF				1.54 J	0.944 J	0.977 J	2.3 J	1.57 J	2.16 J	1.95 J	1.49 J	1.6 J	1.6 J	1.52 J	1.25 J	1.25 J
2,3,4,6,7,8-HxCDF				5.08	3.43	3.09	5.31	5.48	7.39	7.08	6.59	5.73	5.73	5.81	4.13	4.13
2,3,4,7,8-PeCDF				4.57	2.91	3.13	5.32	5.14	5.91	5.29	4.54	5.1	5.1	4.54	3.58	3.58
2,3,7,8-TCDD				0.724	0.605	0.486 J	0.443 J	0.614	0.894	0.649	0.485	0.659	0.659	0.619	0.456 J	0.456 J
2,3,7,8-TCDF				1.61	1.03	1.16	1.25	1.9	2.01	1.77	1.35	1.92	1.92	1.71	1.46	1.46
OCDD				5850	3110	5470	20900 J	9430 J	11200 J	9340 J	8400	10800 J	10800 J	18600 J	12700 J	12700 J
OCDF				242	134	157	127	363	302	234	241	313	313	444	299	299

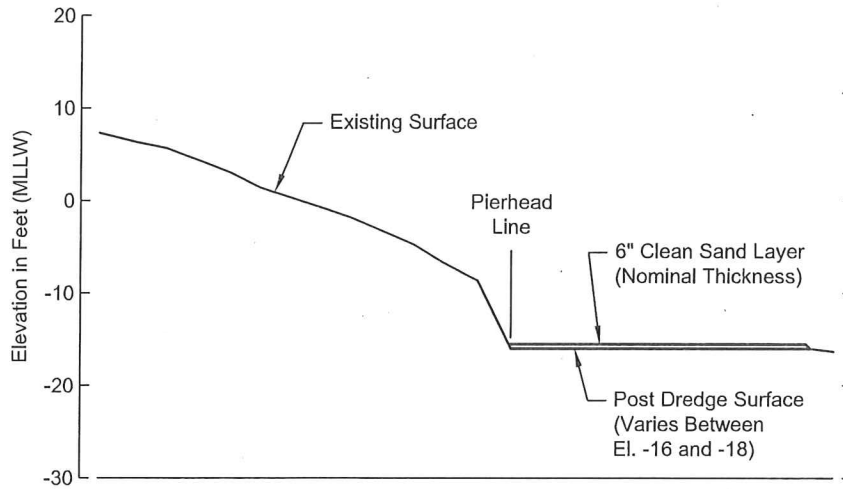
Notes:
 Detected concentration is greater than the DMMP SL criterion
 Detected concentration is greater than the DMMP BT criterion
 Detected concentration is greater than the DMMP ML criterion
 Non-detected concentration is greater than one or more of the DMMP criteria
 --- No criteria
Bold = Detected result
 J = Estimated value
 U = Compound analyzed, but not detected above detection limit
 UJ = Compound analyzed, but not detected above estimated detection limit

FIGURES

May 30, 2008 9:52am dholmer K:\Jobs\080003-T115\080003-02\08000302-001 (MEMO).dwg FIGURE 1



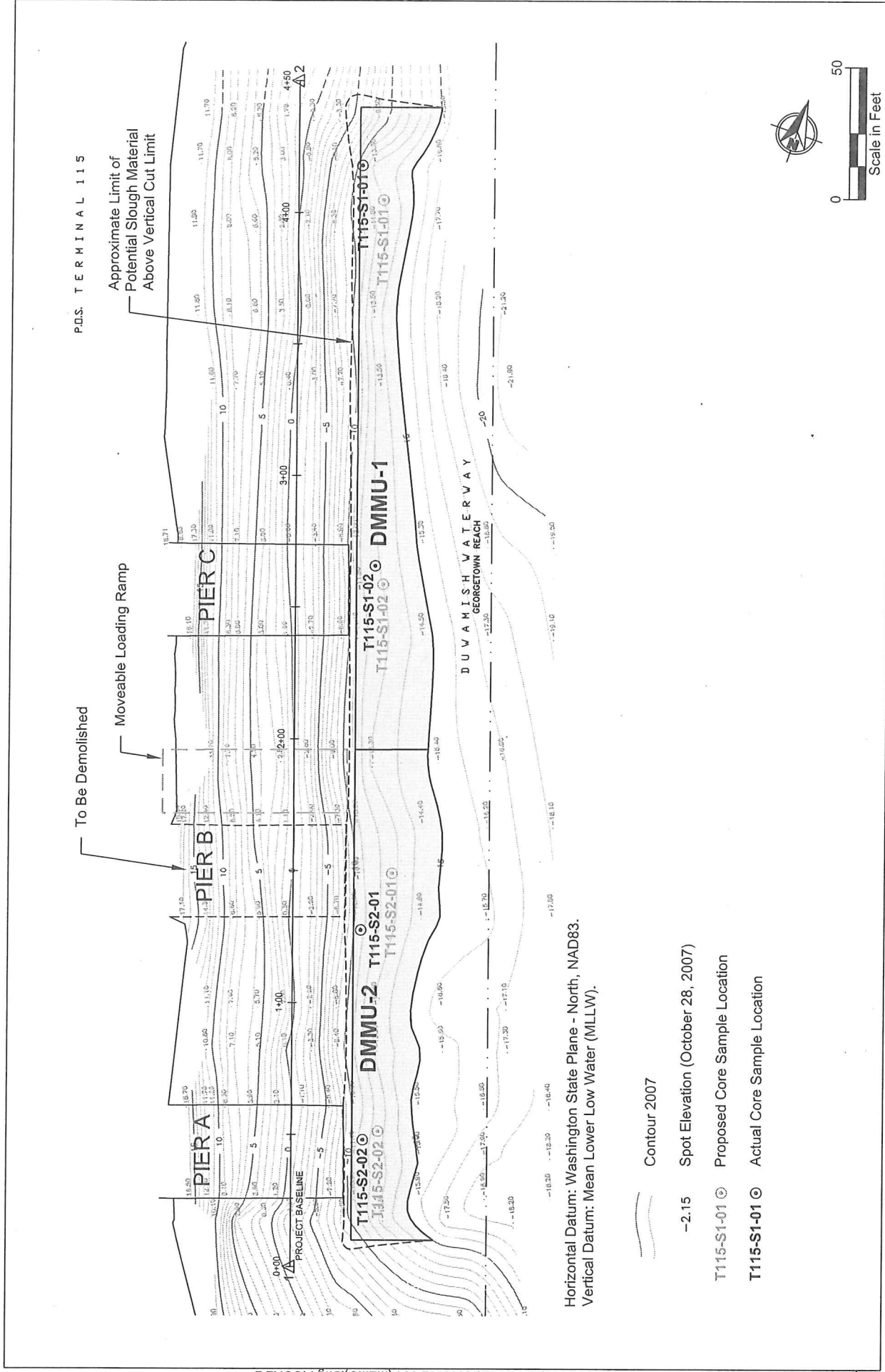
TYPICAL DREDGE SECTION
SCALE: 1" = 20'



TYPICAL CAP SECTION
SCALE: 1" = 20'

Horizontal Datum: Washington State Plane North, NAD83.
Vertical Datum: Mean Lower Low Water (MLLW).





P.O.S. TERMINAL 115

Approximate Limit of Potential Slough Material Above Vertical Cut Limit

To Be Demolished

Moveable Loading Ramp

Horizontal Datum: Washington State Plane - North, NAD83.
Vertical Datum: Mean Lower Low Water (MLLW).

- Contour 2007
- 2.15 Spot Elevation (October 28, 2007)
- T115-S1-01 Proposed Core Sample Location
- T115-S1-01 Actual Core Sample Location

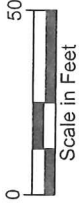


Figure 2
Core Sample Locations
Port of Seattle
Terminal 115