

# **Testing for Upland Confined Disposal**

Tab U1

Dr. Paul R. Schroeder

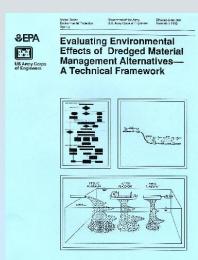
Keywords: CDFs, Contaminant Pathways, Testing



#### **USACE/ EPA Technical Framework**



- Alternative Screening Based on Environmental Suitability
- Open Water
- Confined (diked)
- Beneficial Uses
- Umbrella for OTM, ITM, UTM, etc.
- Applicable to Full Range of Materials





# **The High Points**

- UTM provides a tiered approach for contaminant pathways evaluations for CDFs
- Technically sound testing/ evaluation procedures are available for all pathways
- Pathway controls are available

#### UTM - What does it do?

- Provides approach and methods to evaluate potential CDF contaminant effects
- Determines the need for management actions or controls for placement of material in a CDF

Material suitability is not an issue for CDFs



**Purpose:** Technical guidance for evaluation of potential CDF contaminant migration pathways.

Applicability: Upland, Nearshore, Island CDFs.

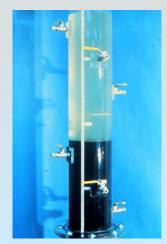
Does **not** apply to capping or beneficial uses but may be applicable for common exposure pathways.

### **Regulatory Considerations**

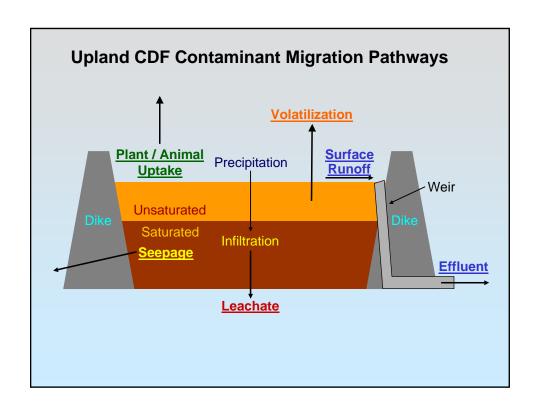
- CDF Effluent is regulated as a CWA Section 404 discharge to waters of the US
- NEPA requires consideration for all pathways
- RCRA is not applicable when the dredged material that is subject to the requirements of a permit that has been issued under the Clean Water Act or section 103 of the Marine Protection, Research, and Sanctuaries Act is not a hazardous waste.
- UTM is NOT regulatory; only technical guidance.

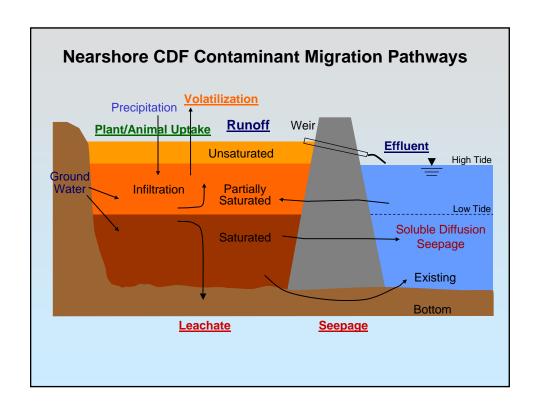
#### CDF Engineering Design - EM 1110-2-5027

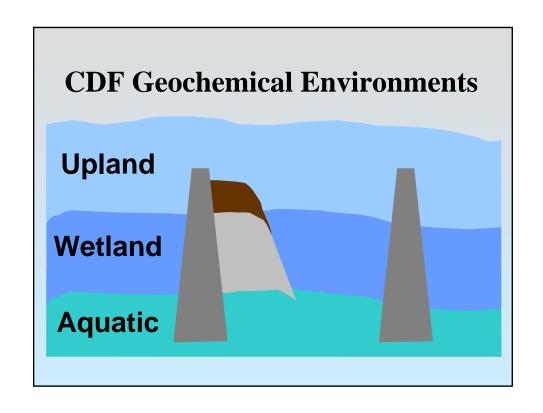




**UTM** assumes sound engineering design







Tier I	<b>Existing Info</b>			
Tier II	Screening Evaluations	Complexity	t Required	Cost
Tier III	Effects-Based Testing and Evaluations	Com Data/Effor	Data/Effort Required	
Tier IV	Case Specific Studies/ Risk Assessment			

#### **CDF Pathway End Points**

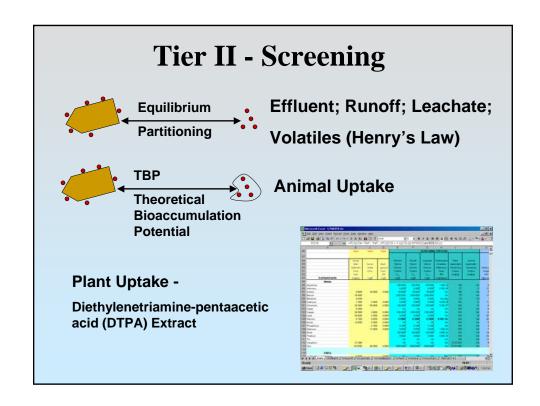
- Effluent and Runoff
  - WQ Standards and/ or WC Toxicity after Mixing
- Leachate
  - Applicable GW Standards after Attenuation
- Volatiles
  - OSHA Human Exposure Standards after Dispersion
- Plant and Animal Uptake
  - Comparison of uptake to Reference Soil

#### **Initial Evaluations (Tier I)**

- Need for Pathway Evaluations
  - "reason to believe"
  - sand/gravel; clean material; new work
- Identify Relevant Pathways
- Identify Contaminants of Concern
- Compile Existing Information

Evaluate all relevant pathways.

Test only as needed.



#### Tier III

- Effects Based Testing and Evaluations
- Chemical and Biological Tests
- Models for Mixing, Attenuation, Dispersion
- Results of all Tier III tests can be used in Risk Assessments

#### Tier IV

- Case or Site Specific Studies
  - Demonstrations
  - Pilot studies
- Operation Specific Testing
- Risk Assessments

#### Guidance Documents for CDFs

- http://el.erdc.usace.army.mil/dots/guidance.html
- USACE/EPA Technical Framework
  - http://www.epa.gov/OWOW/oceans/framework/
- Engineer Manual 1110-2-5027 Confined Disposal of Dredged Material
  - http://www.usace.army.mil/inet/usace-docs/eng-manuals/em1110-2-5027/toc.htm
- Upland Testing Manual
  - $-\ http://el.erdc.usace.army.mil/dots/pdfs/trel03-1.pdf$
- DOTS Website
  - http://el.erdc.usace.army.mil/dots/

## **The High Points**

- CDFs are containment options
- Contaminant pathways must be appropriately evaluated
- UTM provides a tiered approach for evaluations
- Testing/ evaluation procedures are available for all pathways
- Pathway controls are available



# ERDC Dredging Operations Technical Support/



Center for Contaminated Sediments

Website:

http://el.erdc.usace.army.mil/dots

Email:

Paul.R.Schroeder@erdc.usace.army.mil