

Meeting Record: Bradford Island

Subject: **Technical Advisory Group Meeting**

Date of Meeting: 2/22/2006

Location of Meeting: Grand Ronde Room, URS (111 SW Columbia, Portland, OR)

1. Participants:

Corps and Consultants to Corps (URS):

Mark Dasso, USACE	Mike Gross, USACE	Carolyn Schneider, USACE
John Wakeman, USACE	Jeff Hurt, USACE	Kathryn Carpenter, USACE
Kitia Howard, USACE	Ken Duncan, USACE	Jeff Wallace, URS
Chris Moody, URS	Chi-wah Wong, URS (by phone)	Dominic Giandrone, URS (by phone)
Heather Loso (by phone)		

Agency/Tribal Members:

Bob Schwarz, ODEQ	Christy Fellas, NOAA	Jennifer Peterson, ODEQ
Patti Howard, CRITFC	Jeremy Buck, US FWS	Paul Seidel, ODEQ
Rose Longoria, Yakama Tribe		

2. Introductions and Today's Goals. (*Mark Dasso, USACE Project Manager*).

Mark introduced himself to the TAG as the returning project manager. He introduced the discussion of the In-water Non-time Critical Removal Action's Engineering and Economic Cost Analysis (EE/CA). He said that the closing date for comments is 3 March 2006; this TAG meeting offers an opportunity to discuss both the members' comments on the EE/CA and to gain further inputs for the RI/FS Work Plan.

3. Old Business

A. Distribution of Minutes of Prior Meetings; Web Publication (*John Wakeman*)

John passed out hardcopies of the promised minutes from all TAG meetings, including a recent (31 Jan 2006)risk assessor break-out session). John said that the plan is to post these minutes on the Bradford Island website, so that other groups such as the Mid-Columbia River Toxics Reduction Strategy group may follow the proceedings.

B. Status of Fish Sampling Efforts (*Kitia Howard*)

Kitia reported that the USGS-contracted Fish Advisory sampling program was frustrated first by very cold weather, then flooding and debris causing poor visibility and floating hazards, and recently by poor fish response to the angling techniques used. None of the target species have been caught (sturgeon with set lines, smallmouth and walleye by guided angling). USGS added some traps that they placed near Bradford Island. A few

crayfish and sculpin were recovered there. USGS informed USACE that smallmouth are more likely to be collected from June-August, walleye from April to September, and sturgeon in spring months. (Some sturgeon were being taken downstream of the dam in the same time frame that they were not biting or not present upstream of the dam.) A significant constraint for sampling occurs within the Forebay boat-restricted zone that begins at the eastern tip of Bradford Island between April 1 and August, when spilling occurs for fish passage. A few days may be possible during April, since spill starts intermittently. During the spill, boats may be present in the Forebay but only under special conditions including an additional boat to assure that the boat is not swept into the dam.

Mark Dasso said that this fulfills the Corps' commitment to try to sample for the Fish Advisory. Rose Longoria of the Yakama Nation said she didn't think that a "good faith effort" was sufficient to protect the tribes' cultural fish resource. John Wakeman said that this sampling is still important to complete, and this might be done in context of the Remedial Investigation/Feasibility Study. The RI/FS Work Plan will be available for TAG review in June.

TAG members suggested a Section 10 ESA permit for electrofishing to be used in the fall of 2006. Others asked if USACE could hire private fishermen. USACE checked with Oregon and Washington fisheries managers—private non-tribal fishermen may not be paid for the catch, which would violate their licenses. They may provide the fish for free. Also, tribal fishers might be hired. It was also suggested that, failing to get the target fish, sculpin or other species which might be trapped in the near-island environment might be tried. Sculpin are foraging fish with high site fidelity.

4. EE/CA and Non-time Critical Action Update

A. Public Meeting Summary (*Jeff Hurt*)

Jeff summarized the meeting: a very sparse turn-out occurred, with only a few members of the interested public attending. Future meetings and workshops will be held, and Jones and Stokes, USACE contractor, will be conducting community interviews.

B. EE/CA Response to Comments -- Action Memorandum (*Mike Gross*)

Mike stated that, at the time of the meeting when all comments are not in hand, it is not USACE's intent to re-draft the EE/CA, but instead to answer comments via the decision document (called an Action Memorandum), which has a responsiveness summary.

C. Selected Topics for TAG

1) Documentation of *TrophicTrace* model (*John Wakeman*)

John said that Jennifer Peterson and Paul Seidel had requested this documentation, and they received both the key to the code about 8 weeks before and a written documentation

of the model about a week before this TAG meeting. (This was provided the TAG members.) Jennifer said she had not read the latter yet. Paul has been able to view the Visual Basic code statements in the model.

2) Documentation of Spatial Statistical Summaries of Sediment PCB Contamination (URS)

Chi-wah Wong and Dominic Giardrone of URS described how they had developed a weighting ratio to account for the spatial data. Approximately 25% of the area (the most contaminated) had 78 samples and 75% of the area had 26 samples. These samples were not collected in an equally spaced manner. Had they been so done, there should have been $26 \times (25\%/75\%)$, or about 9 samples taken in the more concentrated area. Therefore, the concentrated sampling area was “down-weighted” by $9/78$, or 0.12. That was the basis for the calculations in the EE/CA.

Discussion. USACE will address USFWS’ comments in the Responsiveness Summary appendix to the Action Memorandum. The comment is embodied in the following discussion. Jeremy Buck said he does not like a singular adjustment such as described above. He recommended a geostatistical approach. Chi-wah said that he thinks the geospatial correlation is weak; that would make such an interpretation difficult or uninformative. Jeremy said that USFWS would like to see it done anyway, to see if it concludes differently from the existing analysis. He and Jennifer Peterson emphasized that they want to see reduction to a risk based number, not one associated with uncertain residual concentrations. However, Bob Schwarz said that we can argue small vs. large area of removal, but sooner for the very contaminated sediment is better. .

3) Biological Opinion Discussion (Carolyn Schneider)

Christy Fellas of NOAA said that the BO takes a *minimum* of 135 days. She said that she doesn’t like the barge dewatering option. She would prefer to see upland settling.

Discussion. This is clearly critical path for the construction. USACE will want to start consultation as soon as possible in the development of the Removal Design; at Conceptual Design, we will meet with NMFS and present the Biological Assessment. Jeremy and Christy said that a good Monitoring Plan will be a critical component of the BO. This may be included in the assessment or design documents presented to the Services, who can consider them as “conservation measures” that might mitigate impacts to Threatened and Endangered Species. Christy mentioned the following names: Greg Smith and Jim Meador of the NMFS Science Center. Jim reviews monitoring and sediment analysis plans. It may be a good idea to find out what Jim’s expectation is for this plan in advance.

4) Summary of Meeting with DEQ and Approach to Water Quality Documentation (URS)

This was briefly described. A memorandum of the meeting is provided as Appendix A to this meeting record.

5. RI/FS Work Plan Milestones and Schedule (*Kathryn Carpenter*)

Kathryn briefly recapped the schedule for the Work Plan: mid-June a draft will be provided for review by the TAG, and there will be a 30-day comment period. Kathryn also said that the next related item is the Pre-Removal Sampling Program, which will address sediment, tissue and fish collection before the Removal Action.

Kathryn said that resources have become constrained by removal of \$500,000 from this year's budget by the Operating Project, which had need for these funds for critical uses. Jeremy commented that it is critical to acquire samples of sediment and tissue for benthos before the Removal Action.

6 Risk Related Topics for RI (*John Wakeman*)

A Summary of Risk Breakout Session (1/31/2006)

John summarized the discussions and noted that everyone has a copy of the minutes of this meeting. (This is included elsewhere on the Bradford Website at TAG Meeting of 1/31/2006.)

B. Exposure-Unit Based Approach to Sampling Sediment & Tissue

John presented information he had found that suggested that about 5 acres is the minimum plausible exposure unit size for smallmouth bass, and that more commonly it is 20 acres or more. Smallmouth have had the highest concentrations of PCB in the Lower Willamette RI. Jeremy suggested that characterization of sediments should be a unit as small as 1 acre. Jeremy also recommended looking up tag studies done in the Willamette River on the DFW website. John found the following:

“Radio-tagged northern pikeminnow and smallmouth bass *Micropterus dolomieu* were commonly relocated within 1.6 km of release sites, although smallmouth bass were more sedentary than other species. Recoveries of radio-tagged smallmouth bass and northern pikeminnow were disproportionately high near piling structures allowing light.”)

In light of this information (which is 500 acres if taken as a circle and may be somewhat less as an ellipse), and because there are no structures in the area to concentrate fish, one-tenth of this, or 50 acres may be representative. This is suggested for the lowest-end of exposure of a smallmouth in proximity to Bradford Island. (Smaller areas may be proposed for sampling in the Work Plan, however.)

Jeremy also suggested that sculpin have very high site fidelity, and may be used for near-island studies if other species are not found.

C. Identification of, and Procedure for Evaluation of, “Others” Columbia R. Sediment and Tissue Data

Both the Mid-Columbia and the Lower Columbia Toxics Reduction Strategy Work Groups are compiling existing Columbia River data, and some of these data may be useful for the Remedial Investigation. Similar to the Lower Willamette River investigation, a process for reviewing these data for usability will be developed in the RI/FS Work Plan.

D. Data Needs Regarding Tribal Resource Utilization

(This topic was not discussed due to time.)

6. Future Meetings and Likely Topics (*Mike Gross*)

The next meetings were decided to be \

- March 6 (10-2) for a risk breakout (however, later, this meeting was cancelled).
- May 16 (9-3) to discuss the RI Work Plan and In-water Design

Appendix A.

Memorandum for Record: Bradford Water Quality Meeting, 2/9/2006

From: John Wakeman, CENWS-EC-TB-ET, and Dominic Giandrone, URS.

Participants:

Corps: Mark Dasso (convenor), Carolyn Schneider, John Wakeman

URS: Wendy Oresik, Chris Moody, Dominic Giandrone

Oregon Department of Environmental Quality: Bob Schwarz, Alex Cyril, Tom Melville

1. Mark Dasso stated the purpose of understanding what USACE will need to do to assure conformance with water quality requirements. Mark also introduced the project, giving relevant history to date, including 2002 Time Critical Removal of the equipment, and the current project path via RI/FS and a concurrent Non Time Critical Removal Action.
2. John Wakeman said that, under CERCLA, substantive requirements and not permits appear to be required for the Removal Action. Tom Melville said that apparently the state will need to give a letter of consent, or review and approval. The question of who does the documentation of CWA 401 requirements was discussed – Tom suggested that EPA write the 401 certification, but ODEQ would prepare it if EPA requested.¹ However, it was pointed out that USACE previously wrote a 401 documentation package for Tongue Point.
3. We discussed the environmental metrics that we would address in the documentation package.
 - a. Non-toxics. Tom said that the State uses dissolved oxygen and turbidity as surrogates for insoluble toxicants (that is in place of total suspended solids). Alex Cyril said that there is an evolving standard for turbidity (5 NTU increment or 15% of background above 30 NTU) under the “Essential Dredging” clauses of OAR 340-041-0025. Carolyn Schneider pointed out that this clause is not promulgated yet, and that USACE has prepared a rebuttal. Generally, however, it is assumed that if there is no increased turbidity, there is no release of suspended solids.
 - b. PCB and copper. Tom indicated that ODEQ has required testing for PCBs at the point of discharge (e.g., in scuppers of barges). He said he anticipates that we should do this during our Removal Action at the barge or whatever place we select to dewater. We discussed whether to accomplish a before-the-fact Modified Elutriate Test to estimate the potential for release. Tom indicated that he didn’t think we could properly represent this potential with an empirical test. We will be looking at the existing data, however, to ascertain if a MET would be useful to the 401 documentation. The

¹ **Action Item.** We need to find out what EPA believes should be done here. This item converges with the need to get a letter from EPA on its passing its authority to DEQ.

representativeness question may be minor. (Existing data showed very low detected values of PCB near the point of sediment disturbance.)

4. Dewatering Concerns and Suggestions

- Tom did not think that hay bales would be sufficient to reduce the particulates in runoff; however, he did acknowledge that hay bales can be effective when used in combination with filter fabric. He said that we should not rely upon 24-hour a day discharges either.
- Tom indicated that ODEQ would prefer dewatering in an upland location instead of using a barge or multiple barges. We discussed the space limitations on the island and concluded that there are no suitable areas apart from the parking lot in the administrative area. He indicated that Baker © tanks might be used. We also discussed other practicality issues and limitations associated with upland dewatering (e.g., pumping distance limitations, potential for additional downtime, and additional engineering complexity).
- Tom also suggested that a Baker © tank could be used for asked if a barge would be used, if the slurry could be kept in a tank. We responded that this creates a serious problem for overturning barges based on experienced elsewhere.

5. Alex Cyril indicated that we would be granted a compliance zone for the project, but that ODEQ would also like to see end-of-pipe effluent monitoring. We discussed that real-time monitoring for PCBs is not realistic. ODEQ also indicated that discharge requirements would be identical for upland or in-water dewatering (i.e., that it would not change whether or how a zone of compliance was granted).

6. Other permits. Because we had talked of possible runoff from the Sand Blast Area and other sites, Alex Cyril asked if the project has existing 1200Z (industrial NPDES surface water discharge permits).

See

<http://www.deq.state.or.us/wq/wqpermit/GenPermits/NPDES1200Z/NPDES1200ZPermitDraft.pdf>.