CA Regional Water Quality Control Board San Diego Region

PUBLIC WORKSHOP:

TENTATIVE CLEANUP AND ABATEMENT ORDER (CAO) NO. R9-2005-0126

June 29, 2005

EVALUATION OF CLEANUP TO BACKGROUND SEDIMENT QUALITY CONDITIONS

- Technological feasibility
- Economic feasibility

BACKGROUND SEDIMENT QUALITY CONDITIONS

Finding 31 Background Sediment Quality

Based on Finding 15 – Baseline Sediment Quality Conditions

"Technological feasibility is determined by assessing available technologies, which have been show to be effective under similar hydrogeologic conditions in reducing the concentration of the constituents of concern."

SWRCB Resolution 92-49

Categories of Remedial Response

- Natural Recovery
- Capping
- Sediment Removal via Dredging

Conditions Conducive to Dredging

- Proximity to shore and infrastructure
- Water depth
- Underlain by clean material
- High concentrations in discrete areas

Potential Limitations to Dredging

- Complexity and cost
- Presence of piers, bulkheads, pilings
- Site operations

Technological Feasibility Conclusion

It is technologically feasible to cleanup to background

"Economic feasibility is the objective balancing of the incremental benefit of attaining further reductions in the concentrations as compared with the incremental cost of achieving those reductions."

SWRCB Resolution 92-49

- Evaluated 7 alternative cleanup levels
 - Natural recovery
 - Lower Adverse Effects Threshold (LAET)
 - Four other levels higher than background
 - ◆ Background

Volume

Cost

Natural Recovery	0	\$900,000
LAET (Shipyard)	75,000	\$15,000,000
20x Background	252,000	\$33,000,000
15x Background	295,000	37,000,000
10x Background	502,000	\$58,000,000
5x Background	886,000	\$96,000,000
Background	1,200,000	\$122,000,000



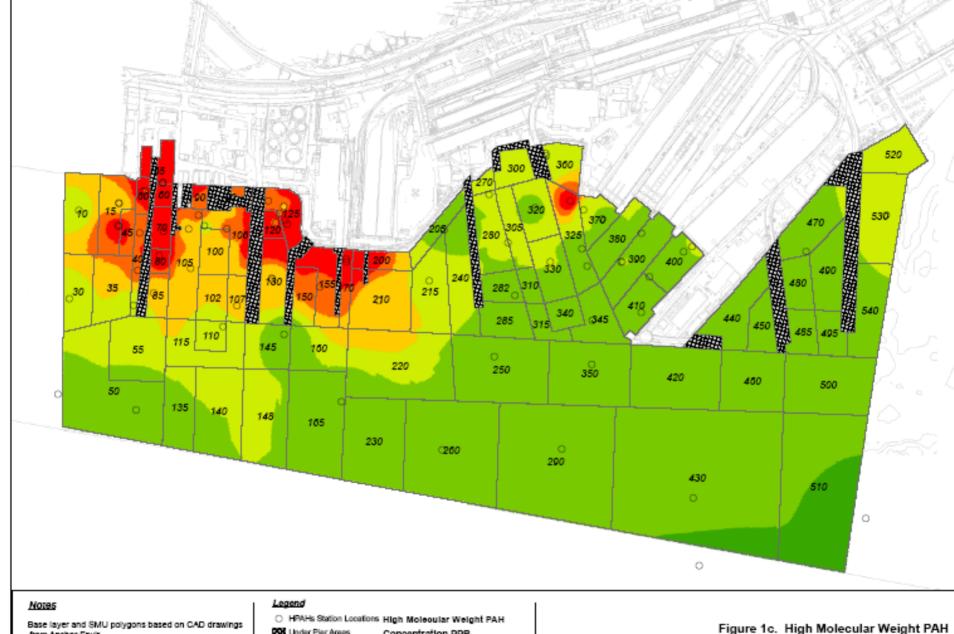


Base layer and SMU polygons based on CAD drawings from Anchor Envir. 555 Under Pier Areas Concentration PPB SMU Polygons 12 - 22 Core Locations/Depths and Contaminant Data Numeric Designation 23 - 110 from Query Manager Database (NOAA CPRD) — CAD Base: Anchor 111 - 220 Contaminant Surface: IDW Power 3 Neighbor 8 221 - 330 331 - 440 Coordinate System: UTM Zone 11 NAD83 Meters 441 - 3,700

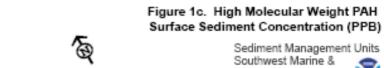


Sediment Management Units
Southwest Marine &
NASSCO Shipyards

1,000 Feet



CON Under Pier Areas from Anchor Envir. Concentration PPB SMU Polygons 264 - 673 Core Locations/Depths and Contaminant Data Numeric Designation 674 - 3.365 from Query Manager Database (NOAA CPRD) CAD Base: Anchor 3,366 - 6,730 Contaminant Surface: IDW Power 3 Neighbor 8 6,731 - 10,095 10,096 - 13,460 Coordinate System: UTM Zone 11 NAD83 Meters



1,000 Feet

500

NASSCO Shipyards DRAFT NOAA CPRD

13,461 - 58,200

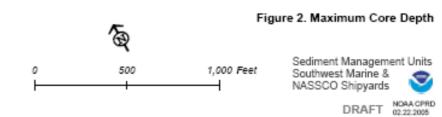


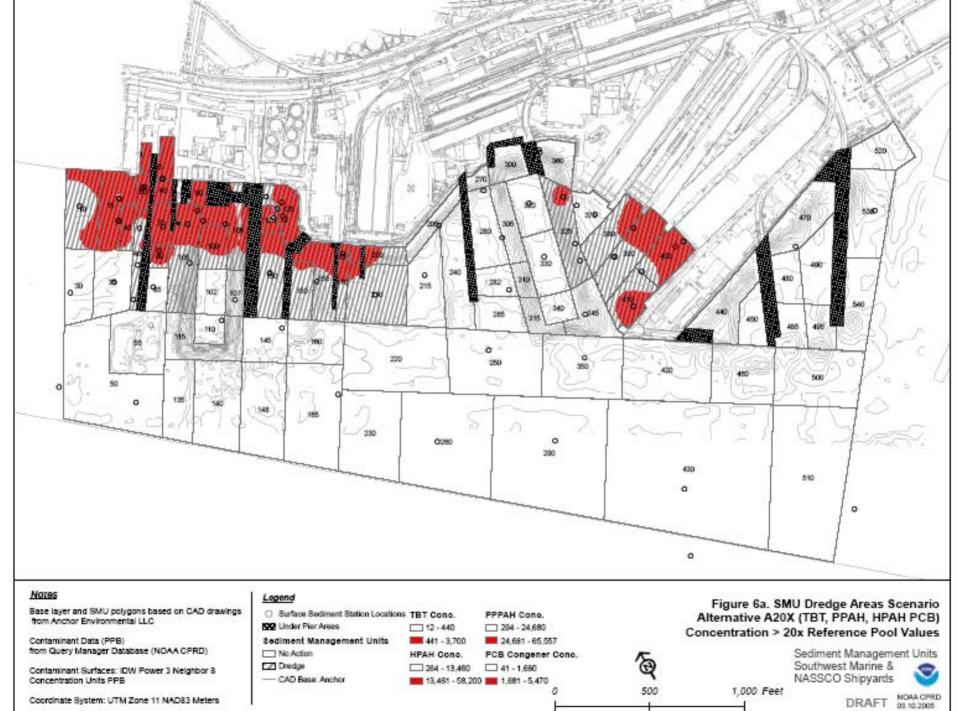
Base layer and SMU polygons based on CAD drawings from Anchor Environmental LLC

Maximum Core Depth (Feet) from Query Manager Database (NOAA CPRD)

Coordinate System: UTM Zone 11 NAD83 Meters

Legand Core Locations (Max Depth) Core Locations (Max Depth) Core Locations (Max Depth) Core Programs Core (Numeric Designation) CAD Base: Anchor









Contaminant Data (PPB) from Query Manager Database (NOAA CPRD)

Contaminant Surfaces: IDW Power 3 Neighbor 8 Concentration Units PPB

12 - 220 294 - 12,340 Sediment Management Units 12,341 - 65,557 221 - 3,700 No Action HPAH Cono. PCB Congener Cone. Dredge 264 - 6,730 41 - 840 - CAD Base: Anchor 6,731 - 58,200 841 - 5,470

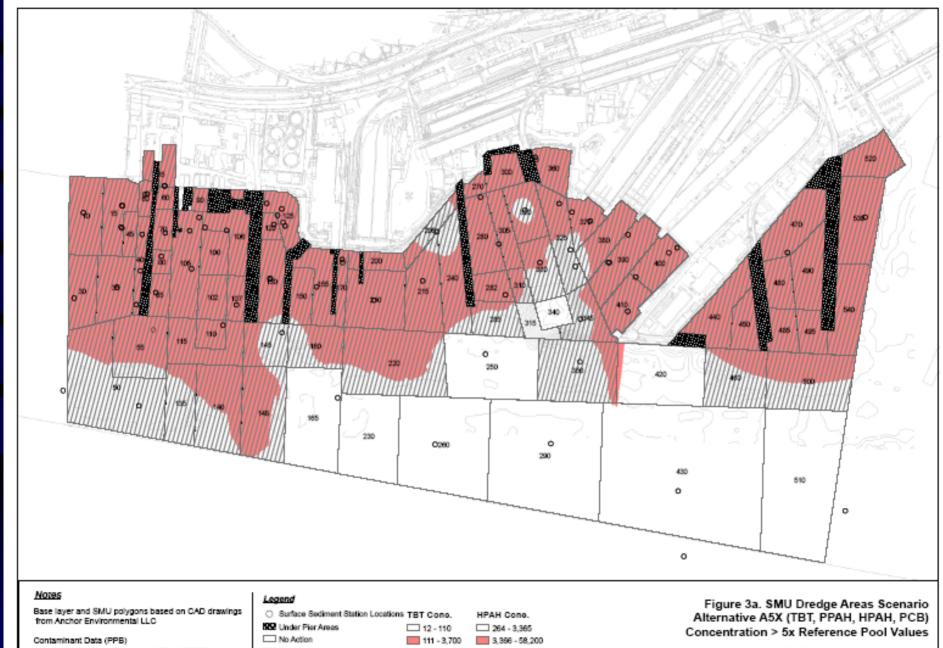
Concentration > 10x Reference Pool Values



500

Sediment Management Units Southwest Marine & NASSCO Shipyards

1,000 Feet



from Query Manager Database (NOAA CPRD)

Contaminant Surfaces: IDW Power 3 Neighbor 8 Concentration Units PPB

Coordinate System: UTM Zone 11 NAD83 Meters

Sediment Management Units Z₂ Dredge PPPAH Conc. PCB Congener Cono. Southwest Marine & - CAD Base: Anchor 294 - 6,170 41 - 420 NASSCO Shipyards 6,171 - 65,560 421 - 5,470

500

1,000 Feet

DRAFT NOAA CPRD 02:22:2005

Other Criteria

- Short-term and long term effects on aquatic life, wildlife, and human health
- ◆ Effects on shipyards and economic activities
- Effects on local businesses and neighborhoods
- ◆ Effects on aquatic resources

Criterion scale relative to current conditions

- Not economically feasible to cleanup to background
 Compared to 5x background, costs increase 27%
- Incremental cost outweighs incremental benefit

	Volume	Cost
5x Background	885,580	\$96,000,000
Background	1,200,000	\$122,000,000