

“Waukegan Harbor Sediment Remediation”
Preliminary Comments from
the Great Lakes Legacy Act Technical Review Committee
February 21, 2007

1. Which disposal option is preferred? Why?
2. What is the current navigation use, what are the project benefits to navigation?
3. Why is the marina being demolished? Why should the marina demolition and reconstruction costs be included as part of the GLLA project?
4. Why should bulkhead repair costs be included as part of the GLLA project?
5. How is the "free" navigation dredging source of cover material (i.e., sand from the approach channel) being charged to the GLLA portion of the project?
6. The justification for action needs to be beefed up if it is meant to be risk-driven vs. re-development. The risk is relatively low, as the mean game fish concentrations are low. The bottom fish are elevated, but carp and suckers are not species typically sought after by recreational fishers and could be controlled more easily through fish consumption advisories.
7. Since game fish levels are relatively low already, uncertain how much of an additional decrease will be observed. Since little baseline data were reported on the existing fish sampling, is not clear how, or if, one could distinguish statistically significant decreases post-remediation. May need more focused baseline fish tissue data; e.g., just one or two species and lipid normalized, collected during design as well as more monitoring data post remediation.
8. More explanation is needed on why areas not needing dredging for navigational purposes can not be capped using sand layers or with an engineered cap. More info on the extent and location of debris needs to be collected during final design.
9. More data needs to be presented on the current conditions at the nearby beach that was not included in the boundary, and if there are any currents that might take re-suspended sediments and released PCBs in that direction.
10. Since the harbor will be open to ship traffic after the remedy, the residual sand cap is not likely to stay in place. If this was considered, and the sand cap is just a simple dilution mechanism, then it is unclear how the low SWAC of 0.20 will be achieved and maintained. If the purpose of the sand cover is to also isolate the PCBs, then it is important to place it in two lifts.
11. Clarify if the PCB discharge limit is 250 ppt (p. 2-9) or 10 ppt (Appendix D).

12. Since the cleanup level for OMC was quite high, e.g. 50 ppm, and PCBs had existed at levels up to 500,000 ppm, and only 37,000 yd³ were dredged, why are the baseline levels now so much lower? Where have the PCBs gone? The site conditions and processes impacting this should be understood.
13. There are so many weaknesses in the data and approach used to back calculate an acceptable fish tissue levels (e.g. did not lipid normalize or use OC, combined fish species and fish of different ages) from the sediment concentrations, that the protective fish goals should not be used or included in the report as the main basis for the final SWAC.
14. Because PCBs are relatively low, need to minimize deep dredging in areas where it is not needed for navigational purposes, are there areas that could be capped using sand or an engineered cap?
15. Provide additional clarification to the typical cross-section for the seawall cover / capping proposal. Specifically: (1) The cross-section drawing appears to suggest that there is a dredge cut-line at the seawall, when in reality, the proposed dredging would start at 10 ft from the shore. It would be better to show an uneven slope from 0-10ft, (2) A 3 inch stone cap may not be appropriate for a number of reasons. First, if the cap is to be protective of the environment, it would likely be necessary to lay down a layer of fine grained sand to create a barrier to the existing contaminants. A layer of coarser material, such as gravel or stone, could be placed on top of the sand. However, if the property owner wanted to drive new sheet pile at a later date, it would be difficult to do so through a layer of 3 inch stone. It would be possible to clear the 3-inch stone along the drive line before the sheet pile installation, but this would have to be done incrementally. To avoid this issue, a layer of 1 inch stone might be a better option.
16. Placement of a cap/cover system in the federal navigation channel that prevents future dredging of the full width and extent of the authorized federal navigation channel may not be a viable option. The project proposal needs to consider the congressional authorization of the navigation channel in presenting the preliminary design or conceptual proposal. Fed agencies may not be able to sanction activities that would result in a de facto modification of a congressional authorization (e.g., placement of a cap/cover material that prevents future dredging within the authorized channel). What this means for Waukegan is that capping w/in the navigation channel may not an option unless the uppermost surface of the cap is below the bottom of the authorized channel depth, or the authorized channel depth is modified by Congressional action. This would include those areas on the sides of the central channel that have been discussed in recent conference calls/meetings.