

## Suggested Peer Review Questions

### A. Resuspension Standard

1. The Resuspension Standard includes a primary standard that requires a temporary shut-down of the project, and three “actions levels” at which engineering evaluations and/or controls are required to ensure that the primary standard is not exceeded.
  - a. Is this four-tiered structure appropriate and effective to serve the purpose of the standard? If not, what improvements can be made? Are there ways to simplify this structure while ensuring that its goals are satisfied?
  - b. Are the constituents to be measured and the concentrations specified for each level appropriate for the purpose of that level? If not, what improvements can be made?
2. The monitoring and sampling program is key to the implementation of the Resuspension Standard.
  - a. Has the monitoring and sampling program associated with this standard been optimized to determine whether the standard is met? If not, how can the program be improved? In addressing these questions, please consider both (i) the routine monitoring program and (ii) the contingency monitoring that would be required if the various action levels are exceeded.
  - b. Is the monitoring and sampling program associated with this standard feasible and practical to carry out? Is it cost-effective? Are all elements in the program necessary to determine compliance with the standard? Conversely, have any appropriate elements been omitted? In light of the answer to these questions, what improvements, if any, can be made?

In addressing these questions, please consider: (i) the requirements for near-field suspended solids sampling; (ii) the utility and timing of replacing the suspended solids sampling with turbidity monitoring; (iii) the utility of discrete PCB monitoring vs. continuous or compositing PCB monitoring; (iv) the requirement for separate monitoring for dissolved- and particulate-phase PCBs; and (v) any other aspects of the draft monitoring and sampling program identified by the panel members.
3. How can and should the data collected in Phase 1 be used to improve this standard for Phase 2?

### B. Residuals Standard

1. The Residuals Standard requires collection of surface sediment samples after EPA has confirmed that the dredging cut-lines have been achieved. It then establishes a set of action levels (based on both average and discrete Tri+ PCB concentrations) at which various responses (e.g., re-dredging, capping, backfilling) would be required. It also requires

sampling of the backfill to ensure achievement of an average Tri+ PCB concentration of 0.25 ppm in the post-backfill surface sediments, as specified in the ROD.

- a. Are these requirements appropriate and effective to ensure removal of the PCB mass targeted for removal and to achieve an average Tri+ PCB concentration of 0.25 ppm in the post-backfill surface sediments? Are there alternative approaches to achieve these objectives that are more flexible, simpler, or more efficient, and/or would promote faster and more efficient implementation of the project while ensuring that the goals of this standard are satisfied?
  - b. Are the specific responses required at the various action levels necessary, effective, and efficient to achieve the goals of the standard? If not, what improvements can be made? In addressing these questions, please consider the requirements for re-dredging, including the requirement for a maximum of two re-dredging passes if the residuals criteria are not achieved in the pre-backfill surface, as well as the requirements for capping and backfilling. Also, please consider the extent to which and circumstances in which field personnel should have flexibility to determine the appropriate response (e.g., backfilling/capping vs. re-dredging) based on local conditions.
2. Is the sampling program for the Residuals Standard optimized? Is it feasible and practical to carry out? What specific improvements can be made to that program?
  3. How can and should the data collected in Phase 1 be used to improve this standard for Phase 2?

#### **C. Production Rate Standard**

1. The standard proposes that 240,000 cubic yards of sediment be dredged during Phase 1. Is the proposed volume for Phase 1 appropriate to provide a fair and vigorous test of the three engineering performance standards? If not, how should it be changed?
2. Does the performance standards document demonstrate that the production rate standard can be achieved? Have all the components of the project been adequately considered? Have the uncertainties been adequately expressed?
3. How can and should the information from Phase 1 be used to improve this standard for Phase 2?

#### **D. Interaction Among the Standards**

1. Does the performance standards document adequately explain the interaction and trade-offs of achieving all three standards? If not, how could this be improved?
2. Has the uncertainty in the ability to achieve these standards, separately and in combination, been adequately addressed and expressed?
3. Has the role of Phase 1 as a test of the ability to achieve the standards been adequately defined?

4. Does the review of case studies capture what is known about the issues affecting achievement of the performance standards in the real world? If not, what more should be done?