

From: [Chet Myers](#)
To: [Catri, Cindy](#)
Cc: [Lederer, Dave](#); [Jay Borkland](#)
Subject: Additional CAD Cell #3 Information
Date: Tuesday, May 14, 2013 3:17:39 PM
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)

Hi Cindy,

The following information is submitted in order to clarify information previously submitted by the Commonwealth in association with the re-design of CAD Cell #3.

When preparing a draft design of CAD Cell #3 in June of 2012, the Commonwealth did not believe that CAD Cell #3 would include any of the following: the Federal Channel dredge area, the proposed increase in width of the channel by 50 feet, or the increase in length of the deep-draft dredge area by 200 feet. The size of CAD Cell #3 in June of 2012 was 6.3 acres.

In order to present EPA with an idea of the potential size increase of CAD Cell #3 if certain optional items were included within the disposal volume, the Commonwealth stated the following within its November 8, 2012 Response to USEPA Questions:

“the proposed implementation of (CAD Cell #3) expansions will have the following effect on CAD Cell #3:

- If Federal Channel dredging is included, the Commonwealth anticipates that the size of the CAD Cell will increase from 6.3 acres to 8.54 acres.
- If both the Federal Channel dredging and the increase in the width of the channel are included, the CAD Cell will increase from 6.3 acres to 8.69 acres.
- If EPA includes all of the proposed expansions (Federal Channel, increase in width and extensions of the deep draft dredge area), the CAD Cell will increase from 6.3 acres to 8.76 acres.”

USEPA indicated within its Final Determination that the Federal Channel dredging was authorized and could be disposed of within CAD Cell #3. The Commonwealth conducted a re-design of CAD Cell #3 prior to issuing its plans and specifications for bid on December 5, 2012. During the course of re-designing CAD Cell #3, the Commonwealth determined that the area (and environmental impact) of CAD Cell #3 could be reduced if the depth of the CAD Cell were increased. As a result, the Commonwealth altered the design to include a maximum depth of -60 MLLW, and reduced the area of CAD Cell #3 to 8.29 acres.

In March of 2013, USEPA indicated that it may alter the Final Determination to allow the increased width and increased deep draft length (second and third bullet points outlined within the Commonwealth’s November 8, 2012 response). In addition, USEPA requested more information on the CAD Cell #3 design change, and whether an additional redesign of CAD #3 was necessary.

The Commonwealth stated the following within its March 20, 2013 Response to USEPA Questions:

“No expansion of CAD #3 is requested by the Commonwealth at this time. It is currently anticipated that the material volumes to be generated while dredging the deep-draft expansion of 200 feet to the north and the increased 50 foot width of the channel may be disposed of within CAD Cell #3 without further expansion of the CAD Cell #3 shown within the Commonwealth’s December 5, 2012 design drawings. The added capacity is anticipated to be generated by self-compression of sediments within CAD Cell #3. This self-compression was not previously accounted for, and served as a “factor of safety” should additional volumes be generated during construction.

However, as USEPA has noted in prior communications, the Commonwealth increased the dredge depth of CAD Cell #3 during the re-design conducted by the Commonwealth prior to its issuance of its December 5, 2012 design drawings from -45 MLLW to -60 MLLW. Although a CAD Cell #3 depth of -60 MLLW was not explicitly approved within EPA’s Final Determination, page 29 of the Final Determination states “the clean glacial sand will be dredged down to 45 feet below the existing harbor floor”. As the existing harbor floor in the area of construction of CAD Cell #3 ranges from -6 MLLW to -15 MLLW, “45 feet below the existing harbor floor” is an elevation that ranges from -51 MLLW to -60 MLLW.

The intent of this depth change was to keep the areal impact of CAD Cell #3 to a minimum during the re-design. As a result, the design size of CAD Cell #3 is 8.29 acres, which is significantly less than the 8.76 acres permitted within the Final Determination. Although the Commonwealth believes that the redesign of CAD Cell #3 was consistent with the text of the Final Determination as noted above, if EPA believes that a change to the Final Determination is required to accommodate the deeper depth of CAD Cell #3, the Commonwealth requests that EPA approve a change in the depth of CAD Cell #3 to -60 MLLW.

Although the Commonwealth does not anticipate any further increase in the area of CAD Cell #3 at this time; the Commonwealth requests that the maximum area of CAD Cell #3 remain at 8.76 acres, in case any future adjustments are required during the construction process.”

In fact, the Commonwealth erroneously stated that the 8.29 acre redesign should be compared to the larger 8.76 acre area, when the 8.54 acre area was what was approved by EPA within its Final Determination. Please remove the references to “8.76 acres” in the March 20, 2013 response and replace those references with “8.54 acres”.

The re-designed CAD Cell could have been 8.54 acres in size, with a maximum depth of -45 MLLW. However, the re-design to 8.29 acres with a maximum depth of -60 MLLW was intended to reduce the overall impact from CAD Cell #3, and also had the benefit of

reducing the quantity of contaminated sediment that would need to be disposed within CAD Cell #2 as well as maximizing the use of space within the DMMP area within which CAD Cells are built (which increases the future flexibility of the CAD Cell program). The added capacity generated by self-compression of sediments within CAD Cell #3 would have added capacity to either design of CAD Cell #3.

If EPA requires it, CAD Cell #3 could be re-designed to the previously mentioned 8.54 acre size with a maximum depth of -45 MLLW, however, the reduced-size CAD Cell is less impactful, and makes most efficient use of existing resources. It is requested that EPA modify the Final Determination to allow the re-design of CAD Cell #3 with the deeper dredge depth and smaller size.

Thanks,

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