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Sent: Thursday, May 03, 2012 1:47 PM

To: Pendowski, Jim (ECY); Hankins, Martha (ECY); Asher, Chance (ECY)

Cc: Teresa Michelsen; Inouye, Laura (ECY); Briner, Wendy K NWP; McMillan, James M NWP

Subject: Support for FW SQSV

Importance: High

Jim et al.

After 34 years with the Corps today is my last day as a Federal employee. I am therefore desperately trying to wrap up some loose ends. One of those is to express support for the adoption and implementation of the proposed new freshwater sediment screening levels. I had planned to draft a formal letter on Corps letterhead but have run out of time to do so.

I have worked with sediment quality screening values (SQSV) since 1988. My predecessor here in the Portland District in 1985 developed the first tiered testing approach which utilized SQSVs. At that time the values used were gleaned from a literature search of values in use around the United States at that time. These values were in use until 1998 when we published the Lower Columbia River Management Area Dredged Material Evaluation Framework. The manual notes the following:

"Within the Pacific Northwest, scientists and regulatory personnel have developed sediment quality values to predict potential adverse biological effects based on demonstrated toxicity in bioassay tests (not bioaccumulation) involving appropriately sensitive benthic organisms and a decision model for their use. The use of sediment quality values as regulatory screens has proven to be environmentally protective as well as economically efficient. Both Washington and Oregon have used the approach as the basis for developing water quality standards for sediments. EPA Region 10 has used the approach and specific values for sediment management decisions throughout the Pacific Northwest, including the lower Columbia and Willamette Rivers for the past several years.

These screening values were developed for the marine environment. Freshwater values are under development. In the interim, the marine/estuarine values are useful as indicators of the need for effects-based testing. A comparison with the draft Washington Department of Ecology freshwater AETs show the screening levels contained in Table 8-1 to be conservative for a freshwater environment."

It is now closing on 14 years later and we are finally going to realize this commitment to producing and accepting freshwater values. Like the marine values which have been in use now for several decades the freshwater values are derived from Pacific NW sediment and test organisms. Unlike many other touted values the proposed values are effects based derived from data generated

from NW waters.

Having been involved in their development I know firsthand the work, thought and dedication Teresa, Laura, and many others committed to the effort to produce the freshwater sediment screening values. To see them implemented at long last gives me a good feeling that that work was all worth it.

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We must deliver reliable marine transportation using a risk-informed life-cycle asset management business model in order to maintain and operate our coastal and inland navigation program assets.