TRANSMITTAL 30

Scanlon, Debbie

From: Otera, Steven
Sent: Thursday, December 09, 2010 8:44 AM
To: Scanlon, Debbie
Subject: FW: Comments on "Open Cell System Benefits and Case Studies"

Steve Otera
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From: Larry Simon [mailto:lsimon@coastal.ca.gov]
Sent: Monday, December 06, 2010 2:18 PM
To: Otera, Steven
Subject: RE: Comments on "Open Cell System Benefits and Case Studies"

Steve,

My September 2, 2010, comments (below) on the "Open Cell System Benefits and Case Studies" document remain valid. During the subsequent months I have not received any additional information from Gambol or its representatives regarding my comments or on the suitability of the proposed open cell containment system for use at Berths 243-245 in the POLA.

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From: Larry Simon
Sent: Wednesday, October 20, 2010 10:50 AM
To: Otera, Steven
Subject: FW: Comments on "Open Cell System Benefits and Case Studies"

Steve,

My September 2, 2010, comments (below) on the "Open Cell System Benefits and Case Studies" document remain valid. I have not received any additional information from Gambol or its representatives regarding my comments or on the suitability of the proposed open cell containment system for use at Berths 243-245 in the POLA.

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From: Larry Simon
Sent: Thursday, September 02, 2010 3:38 PM
To: 'kehrlich@jmbm.com'
Cc: 'Mathewson, David'; Fields, James A SPL
Subject: Comments on "Open Cell System Benefits and Case Studies"

Ken,

I completed my review of the above document and provide the following comments.

The cover memo to the document provides analysis of the steel sheet pile Open Cell technology proposed for POLA Berths 243-245 and briefly describes four examples where conventional steel sheet pile structures were incorporated into CDFs for contaminated sediments. It is unclear if the four cited cases are located in marine environments similar to Berths 243-245 or if they are located in upland or river environments. However, neither of the four examples used the Open Cell technology. The two-page list of constructed or under-construction projects using the Open Cell technology which follows the cover memo does not indicate which, if any, of these projects were designed to contain and isolate contaminated dredged materials/sediments. As a result of the information in the cover memo, it still appears that there are no examples that can be cited, and that the Commission staff can investigate further, where the Open Cell technology has been successfully used to contain contaminated sediments.

The document next provides a September 2005 technical note from the Corps of Engineers on design guidance for lateral seepage control in CDFs. While it includes analysis of sheet pile walls as a type of barrier and of a method to seal joints to reduce permeability and increase integrity of the barrier, there is no discussion of its use in isolating contaminated sediments or of the Open Cell technology.

The document next provides an August 2000 technical note from the Corps of Engineers which summarizes field experiences with the application of containment features to improve the effectiveness of CDFs in retaining

contaminants in CDFs. The note describes containment approaches and eighteen case studies of CDFs. Of the eighteen, it appears that three (Tresse Island, Venice, Italy; Minamata Bay, Japan; Waukegan Harbor, Illinois) involved the use of sheet pile walls. The first was constructed on an island and not in open coastal waters similar to the Berths 243-245 site. The second was constructed within a coastal embayment. The third was constructed in a boatslip and other nearshore areas along the shoreline of Lake Michigan. No information was provided for the latter two in-water projects regarding the length of time the projects have been in place or any monitoring results that document the effectiveness of the projects in containing the contaminated sediments. None of these three projects used the Open Cell technology.

The document next provides a paper on the proposed use of Open Cell technology as a component in a sediment remediation project on the Lower Fox River upstream of Green Bay on Lake Michigan. Contaminated sediment would be placed behind an Open Cell bulkhead. However, the bulkhead element of the project was cancelled due to a lack of processed sand from the larger dredging project.

The document lastly provides additional technical information on Open Cell technology projects, apparently none of which incorporates the containment of contaminated sediments.

In conclusion, the submitted document does not provide evidence that the Open Cell technology has been used to successfully and permanently isolate and contain contaminated sediments in the marine environment. Five projects using sheet pile walls to contain contaminated sediments were referenced but insufficient information was provided to undertake a substantive evaluation of those projects, their success, or their similarities to the POLA Berths 243-245 project site (Minamata Bay, Japan; Waukegan Harbor, IL; Everett, MA; Cleveland, OH; Brown County, WI), or if conclusions could be drawn that could be applicable to the Open Cell technology.

I will be out of the office starting September 3 and will return on September 13. Please contact me on or after the 13th to discuss this matter further.

Regards,

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