

Beyond the Headlines: Cleveland Harbor

Headline: “Cleveland to Corps: Dump open-lake dump in Lake Erie: editorial” (Cleveland Plain Dealer editorial on March 11, 2014)

The photo in the article without a date or location, along with the title, negatively represents the U.S. Army Corps of Engineers (USACE) dredging operation in Cleveland, OH. Never has the USACE, Buffalo District’s dredging operations, in any of the Great Lakes harbors, ever resulted in what was depicted in the article’s photo.



CLEVELAND, OH -- Dewatered sediment dredged from the Cuyahoga River channel that has been placed in CDF 10b. Material dredged from the upper Cuyahoga River Channel is sediment which has migrated down from the upstream reach of the river.

Statement: “U.S. Army Corps offers Cleveland chocolate water fresh from Lake Erie dredge dump (Caption to the editorial’s photo).”

Response: Terms such as "chocolate water" (or "crud" and "toxic sludge" used in other articles) are a mischaracterization of the material and are misleading. Material dredged from the upper Cuyahoga River Channel is sediment which has migrated down from the upstream reach of the river. Much of it originally comes from land erosion in the upstream watershed. These newly deposited sediments are dredged typically twice a year. These sediments have been determined to be non-toxic and very similar to the sediments already out in Lake Erie. These sediments are routinely sampled, tested, and thoroughly evaluated against strict Federal requirements to determine if they are either *suitable* or *not suitable* for open lake placement.

Statement: "...U.S. Army Corps of Engineers' application to dispose of toxic sludge in Lake Erie near the intake valves that supply drinking water to hundreds of thousands of Northeast Ohio residents."

Response: Four potable water intakes (PWIs) for public water supplies are located in Lake Erie just offshore of Cleveland, including the Crown, Morgan, Baldwin, and Nottingham structures. The USACE is currently proposing to use two open lake placement areas (designated as Cleveland Lake Area CLA-1 and CLA-4). The closest distance between either proposed placement areas is three miles and the nearest PWI, between the center of CLA-4 and the Morgan PWI. Once placed at these areas, the dredged sediment rapidly settles and stays in-place. It is also similar in quality to the lake bottom sediments in general. Therefore, there is no potential for open lake placement at these areas to have any significant influence on the quality of water at any of these PWIs.

Statement: "the Corps' apparent cluelessness about why the intake valves for municipal water treatment plants had been moved away from the river and into the lake."

Response: The locations of water intakes were taken into account in the selection of the proposed open lake placement areas, which was also coordinated in advance in early 2012 with the U.S. Fish and Wildlife Service, Ohio Environmental Protection Agency, and Ohio Department of Natural Resources. Initially, four potential open lake areas were investigated. Two areas were eliminated from consideration when field sampling revealed a potentially high relative value of aquatic habitat due to bedrock, coarse sands, and gravel substrates. The two remaining sites are Cleveland Lake Area-1 (CLA-1), which is located nine miles from the Cleveland Harbor entrance, and Cleveland Lake Area-4 (CLA-4), which is located five miles from the harbor entrance. Both of these locations have bottom substrates with physical characteristics similar to the material to be dredged from the upper Cuyahoga River channel.

The four potable water intakes (PWIs) for public water supplies located in Lake Erie just offshore of Cleveland include the Crown, Morgan, Baldwin and Nottingham structures. The center of CLA-1 is located approximately 11.8 miles from the Crown PWI, 6.9 miles from the Morgan PWI, 6.7 miles from the Baldwin PWI, and 5.8 miles from the Nottingham PWI. The center of CLA-4 is located approximately 3.8 miles from the Crown PWI, 3 miles from the Morgan PWI, 3.7 miles from the Baldwin PWI, and 11.5 miles from the Nottingham PWI.

Extensive sampling, analysis and modeling efforts were undertaken to determine whether the placement of dredged sediment at either CLA-1 or CLA-4 would have the potential to adversely affect the quality of public water supply sources. These efforts indicate that no meaningful contribution of suspended solids, dissolved constituents, or contaminants from dredged sediment placement operations at CLA-1 and CLA-4 would be expected at any PWI, and there is no potential to compromise water quality standards.

Statement: "An environmental engineer questioned the methodology, as did a professor of geosciences, who noted that the Corps intended to dredge sediment in depths of feet, but the sampling was conducted only to a depth of inches."

Response: Per Federal Clean Water Act guidance, sediment deposits that are a foot or two in thickness, have accumulated rapidly, or have existing information suggesting that they are

vertically homogenous, can usually be sampled using grab sampling equipment. Sediment from the upper Cuyahoga River Channel is dredged at least annually and the sediment to be removed has accumulated since the last dredging operation. Therefore, the sediments are reasonably assumed to be homogenous and surface grab samples are an acceptable and representative means of evaluating the river bottom sediments per the Federal Clean Water Act guidance.

Statement: “In a letter last October, the Ohio EPA lambasted the Corps, stating that the presence of contaminants posed “an unacceptable risk of toxicity to aquatic organisms and to human, wildlife, and avian consumers of fish.”

The USACE provided a comprehensive response specific to these OEPA comments in a letter dated December 20, 2013. This response is publically available at: <http://1.usa.gov/1gq6aT0>, Enclosure 8 (pg. 283). The USACE does not agree with OEPA on this point because state-of-the-science testing and evaluation of the dredged sediment demonstrated that it would not be harmful to aquatic life, fish-eating birds, or humans.

Statement: “Cleveland City Council joined the chorus March 3, when it unanimously passed an emergency resolution that urged the state to deny the application and admonished the Corps “to continue the current practice of using confined disposal facilities — or [work] with the Cleveland-Cuyahoga County Port Authority on an environmentally sound alternative.”

Response: The dredged sediment of the upper Cuyahoga River channel meets Federal Clean Water Act guidelines for open lake placement. Further, placement of the sediment in the open lake complies with applicable, numeric Ohio water quality standards for the protection of aquatic life and human health, as well as applicable Safe Drinking Water Act standards. This is why the USACE, Buffalo District’s Section 401 State Water Quality Certification application requests to place *suitable* dredged sediment at the open lake placement areas, while dredged sediment that is *not suitable* for open lake placement would continue to be placed in a confined disposal facility.