

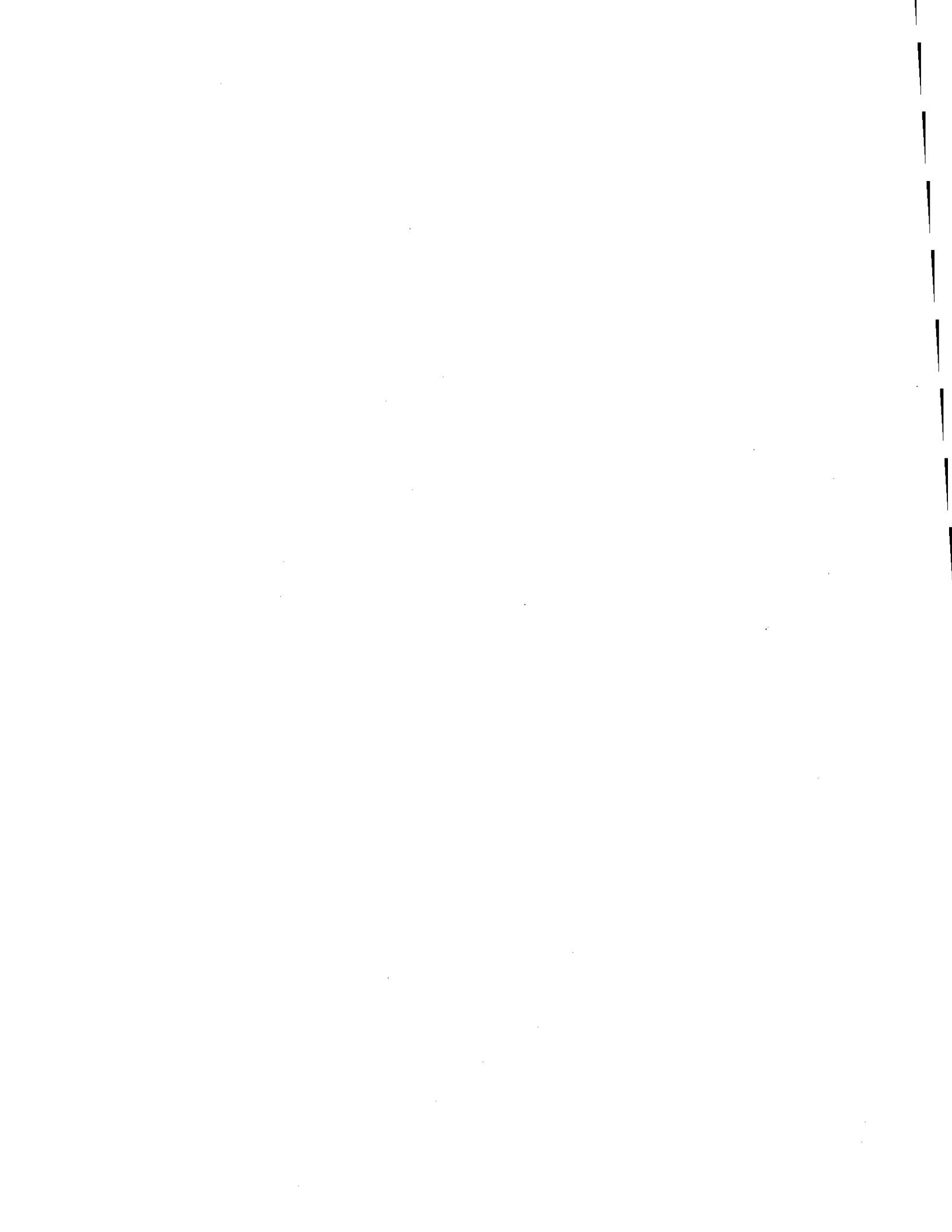


**US Army Corps  
of Engineers®**  
Galveston District

MATAGORDA SHIP CHANNEL, TEXAS

SITE MANAGEMENT PLAN  
FOR THE MAINTENANCE DREDGING  
OCEAN DREDGED MATERIAL DISPOSAL SITE

AS REQUIRED BY  
SECTION 102 OF THE  
MARINE PROTECTION, RESEARCH AND SANCTUARIES ACT



## SITE MANAGEMENT PLAN

### MATAGORDA SHIP CHANNEL, TEXAS OCEAN DREDGED MATERIAL DISPOSAL SITE

#### I. General

The Marine Protection, Research and Sanctuaries Act (MPRSA) of 1972 (33 U.S.C. Section 1401, et seq.) is the legislative authority regulating the disposal of dredged material into ocean waters, including the territorial sea. The transportation of dredged material for the purpose of placement into ocean waters is permitted by the Corps of Engineers or, in the case of Federal projects, authorized for disposal under MPRSA Section 103(e), applying environmental criteria established by the Environmental Protection Agency in the Ocean Dumping Regulations (40 CFR Parts 220-229).

Section 102(c) of the MPRSA and 40 CFR 228.4(e)(1) authorize the Environmental Protection Agency (EPA) to designate ocean dredged material disposal sites (ODMDSs) in accordance with requirements at 40 CFR 228.5 and 228.6. Section 103(b) of MPRSA requires that the Corps of Engineers (USACE) use dredged material sites designated by EPA to the maximum extent feasible. Where use of an EPA-designated site is not feasible, the USACE may, with concurrence of EPA, select an alternative site in accordance with MPRSA 103(b).

Section 228.3 of the Ocean Dumping Regulations established disposal site management responsibilities; however, the Water Resources Development Act of 1992 (WRDA 92; Public Law 102-580) included a number of amendments to the MPRSA specific to ODMDS management. Section 102(c) of MPRSA as amended by Section 506 of WRDA 92 provides that:

1. Site management plans shall be developed for each ODMDS designated pursuant to Section 102(c) of MPRSA.
2. After January 1, 1995, no ODMDS shall receive a final designation unless a site management plan has been developed.
3. For ODMDSs that received a final designation prior to January 1, 1995, site management plans shall be developed as expeditiously as practicable, but no later than January 1, 1997, giving priority to sites with the greatest potential impact on the environment.

4. Beginning on January 1, 1997, no permit or authorization for dumping shall be issued for a site unless it has received a final designation pursuant to Section 102(c) MPRSA or it is an alternate site selected by the USACE under Section 103(b) of MPRSA.

This Site Management Plan, for the Matagorda Ship Channel, TX Ocean Dredged Material Disposal Site, was developed jointly by the U.S. Environmental Protection Agency, Region 6 (EPA, Region 6) and the U.S. Army Corps of Engineers, Galveston District (USACE-SWG). In accordance with Section 102(c)(3) of the MPRSA, as amended by WRDA 92, the plan includes the following:

1. A baseline assessment of conditions at the site;
2. A program for monitoring the site;
3. Special management conditions or practices to be implemented at the site that are necessary for protection of the environment;
4. Consideration of the quantity of dredged material to be discharged at the site, and the presence, nature, and bioavailability of the contaminants in the material;
5. Consideration of the anticipated use of the site over the long term, including the anticipated closure date for the site, if applicable, and any need for management of the site after the closure;
6. A schedule for review and revision of the plan.

## **II. Site Management Objectives**

The purpose of ODMDS management is to ensure that placement activities do not unreasonably degrade the marine environment or interfere with other beneficial uses (e.g., navigation) of the ocean. The specific objectives of management of the Matagorda Ship Channel, TX Ocean Dredged Material Disposal Site for maintenance material are as follows:

1. Ocean discharge of only that dredged material that satisfies the criteria set forth in 40 CFR Part 227 Subparts B, C, D, E, and G and Part 228.4(e) and is suitable for unrestricted placement at the ODMDS;

2. Avoidance of excessive mounding either within the site boundaries or in areas adjacent to the site, as a direct result of placement operations.

These objectives will be achieved through the following measures:

1. Regulation and administration of ocean dumping permits;
2. Development and maintenance of a site monitoring program;
3. Evaluation of permit compliance and monitoring results.

### **III. Roles and Responsibilities**

In accordance with Section 102 (c) of the MPRSA and with the Regional MOU between USACE-SWG and EPA, Region 6 on Management of ODMDSs signed August 13, 1993, EPA is responsible for designation of ODMDSs. Where use of an EPA-designated site is not feasible, the USACE-SWG may, with concurrence with EPA, Region 6 select an alternative site in accordance with Section 103(b) of the MPRSA as amended by Section 506 of WRDA 1992.

Development of site management plans for ODMDSs within the Galveston District is the joint responsibility of EPA, Region 6 and the USACE-SWG. Both agencies are responsible for assuring that all components of the site management plans are implementable, practical, and applicable to site management decision-making.

### **IV. Funding**

Physical, chemical, and biological effects-based testing shall be undertaken on sediments to be deposited at the ODMDS. This testing will be conducted at least every five years, or as necessary to address contaminant concerns due to unanticipated events, and will be funded by the permittee if the project is permitted or USACE-SWG for Federal projects. The permittee or USACE-SWG, as appropriate, shall also be responsible for costs associated with placement site hydrographic monitoring. Should monitoring indicate that additional studies and/or tests are needed at the ODMDS, the cost for such work would be shared by the permittee or USACE-SWG and EPA, Region 6. Physical, chemical, and biological effects-based testing at the ODMDS, or in the site environs after discharge, that is not required as a result of hydrographic monitoring, shall be funded by EPA, Region 6. Federal funding of all aspects of this Site Management Plan is contingent on availability of appropriated funds.

## V. Baseline Assessment

*A. Site Characterization.* The Matagorda Ship Channel Maintenance ODMDS is located approximately two miles offshore, and about 1,000 feet southwest of the edge of the Entrance Channel. The site is approximately rectangular in shape with corner coordinates located at:

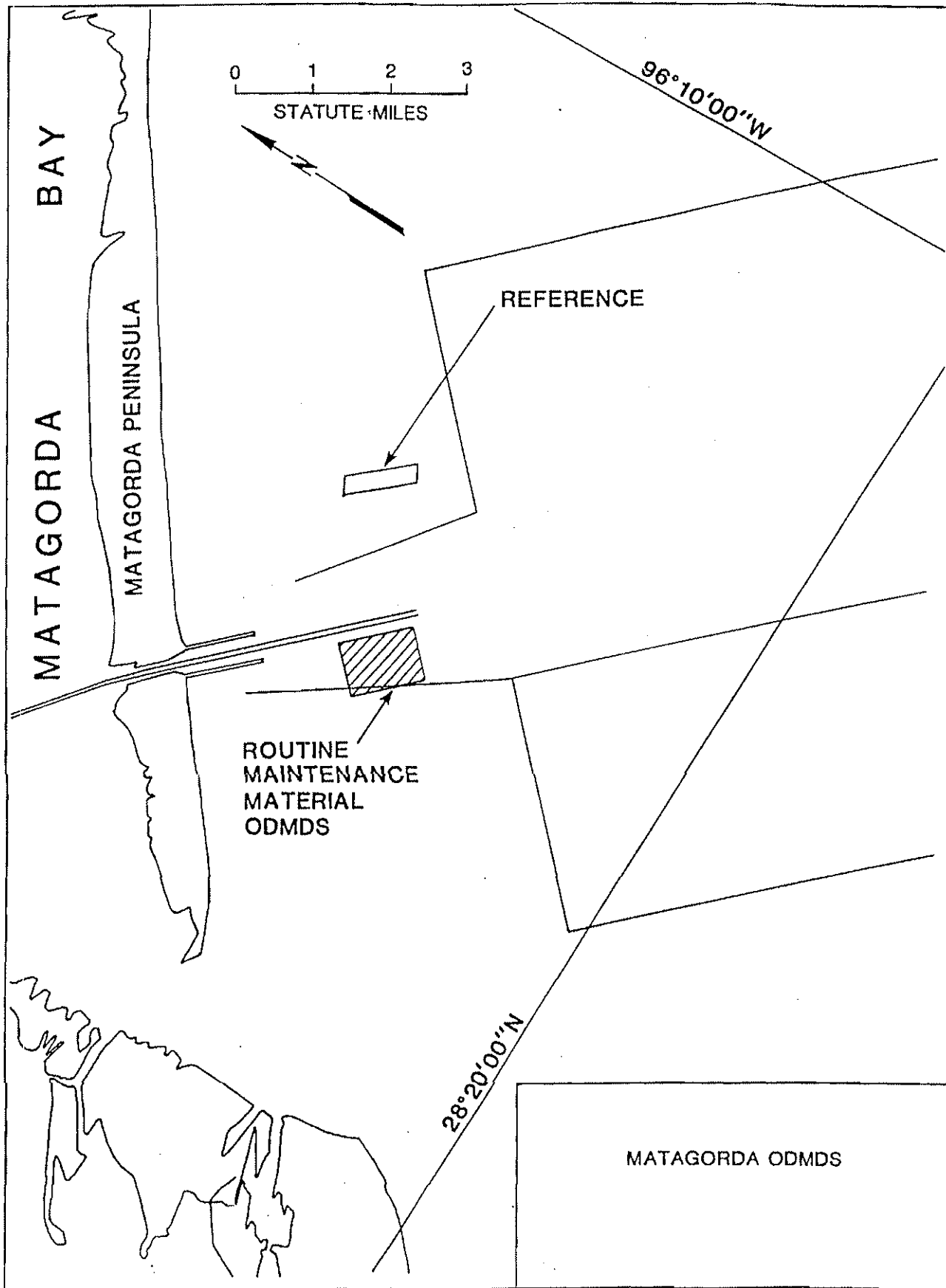
28°23'48"N, 96°18'00"W;  
28°23'21"N, 96°18'31"W;  
28°22'43"N, 96°17'52"W;  
28°23'11"N, 96°17'22"W.

This site occupies an area of approximately 0.56 square nautical miles, with depths ranging from 25 to 40 feet. The sediment reference area is located northeast of the channel with vertices at the following coordinates:

28°24'27"N, 96°16'04"W;  
28°24'33"N, 96°15'52"W;  
28°25'10"N, 96°16'30"W;  
28°25'04"N, 96°16'42"W.

Baseline conditions at the Matagorda Ship Channel Maintenance ODMDS were assessed during the site designation process. Details of baseline conditions, including descriptions of the marine environment in the site vicinity and the physical, chemical and biological characteristics of the sediments and the water column at the site, are contained in the "Final Environmental Impact Statement (EIS), Matagorda Ship Channel, Ocean Dredged Material Disposal Site Designation" prepared by EPA, Region 6, in July 1990. In 1995, EPA collected and characterized sediment and biological samples at the Matagorda Ship Channel ODMDS. This information updates the EIS baseline conditions at the disposal site.

*B. Historical Use of the Site.* The Matagorda Ship Channel maintenance ODMDS received final designation on December 8, 1993 (58 FR 234). The location of this ODMDS was revised from the initial final designation of September 10, 1990 (55 FR 175). This revision was necessary because most of the previously-designated site had water depths too shallow to accommodate deep-draft hopper dredges. Large class hopper dredges require about 30-foot water depths, whereas, the predominant depth at the site was about 25 feet. In order to accommodate deep-draft hopper dredges, the site was relocated 3,000 feet seaward into deeper water, where the predominant depth is 30 feet or more. Historical dredging of the Entrance Channel since 1966 is







depicted in the following table: Historically, the dredging frequency for this navigation project is approximately 1.6 years, with an average of about 682,067 cubic yards (CY) of material excavated per dredging contract. Descriptions of dredged volumes from 1966 through 2006 are depicted in the following table:

#### Maintenance Dredging History

STARTED	COMPLETED	QUANTITY DREDGED (CUBIC YARDS)
March 15, 1966	April 17, 1966	536,212
July 2, 1966	December 24, 1966	728,300
March 13, 1967	April 9, 1967	381,500
July 17, 1967	October 31, 1967	985,464
January 29, 1968	March 25, 1968	661,100
July 29, 1968	October 6, 1968	683,664
February 10, 1969	April 13, 1969	711,000
October 3, 1969	November 30, 1969	1,003,000
April 20, 1970	May 17, 1970	492,087
October 11, 1970	November 29, 1970	906,785
July 25, 1971	August 8, 1971	229,040
March 20, 1972	April 16, 1972	484,560
March 26, 1973	April 29, 1973	547,000
December 28, 1974	May 6, 1975	1,463,473
January 21, 1976	February 17, 1976	943,112
December 22, 1977	January 29, 1978	290,000
August 2, 1979	August 31, 1979	624,727
August 28, 1980	December 22, 1980	1,716,288
January 26, 1984	March 7, 1984	908,933
January 30, 1989	February 20, 1989	498,040
August 11, 1993	September 7, 1993	964,186
October 3, 1996	October 21, 1996	488,383
July 16, 1999	August 3, 1999	499,341
October 21, 2001	October 29, 2001	285,594
January 18, 2004	February 6, 2004	365,226
July 31, 2006	August 10, 2006	336,720
Total		17,733,735
Average		682,067

The material is dredged from the Matagorda Ship Channel Entrance Channel, and transported to the ODMDS by hopper dredge or scow. The dredge, either a conventional bottom opening hopper or a split-hulled hopper, travels from the dredging site with its doors closed. Upon reaching the designated ODMDS, the hoppers are opened and the material is released as the dredge travels through the site. The hoppers are closed before the dredge leaves the site. The disposal operations occur 24 hours a day, seven days a week until the dredging is completed.

Prior to designation of the maintenance site, another placement site located closer to shore was used for dredged material discharge. As explained in the Final EIS, this historically-used site was not selected as the final site because it was located within a buffer zone adjacent to a biologically sensitive area.

## VI. Quantity of Material and Level of Contamination

A. *Summary of information used to determine size of the site.* Historically, since 1966, the dredging frequency for this navigation project is approximately 1.6 years, with an average of about 682,067 CY of material excavated per dredging contract. Since the final designation of the maintenance ODMDS in 1993, however, the average quantity of material dredged and deposited offshore decreased to approximately 395,053 CY, while the dredging interval increased to about 2.6 years. The excavated channel sediments can be characterized as predominantly sand with some silt and clay. But, the ODMDS contains a higher percentage of sand than do the channel and reference area. Overall grain size characteristics of the sediment are indicated by the  $D_{50}$ , which represents the median particle size. The sediment in the channel is characterized as very fine sand, while the ODMDS is fine sand, and the Reference Area is coarse silt. Average particle size distribution is described in the table below.

<b>Particle Size Distribution</b>				
AVERAGE COMPOSITION (%)				
LOCATION	SAND	SILT	CLAY	$D_{50}$ (mm)
Channel	51.1	25.3	23.6	0.093
ODMDS	89.1	9.9	1.0	0.206
Reference Area	46.9	24.2	28.9	0.061

As described in the site designation EIS, the size of the ODMDS was determined by simulations run on a computer model. These simulations assumed an average shoaling rate of about 795,000 CY per year, with a yearly dredging frequency. This quantity is more than double the current average of approximately 395,053 CY dredged per cycle, although the current rate is based

on a 2.6-year frequency. Therefore, a smaller average quantity of material is deposited less often than the previous rate. The site can be described as dispersive; therefore the dredged material deposited there is expected to erode and dissipate. Primary considerations for selecting this site were as follows:

1. The vicinity of the Site has received material dredged from the Matagorda Ship Channel Project since the 1960s. Past studies have not determined any significant adverse impacts from disposal in the vicinity.
2. Past studies have determined that this is a high-energy erosional zone and can generally accept large volumes of dredged material with little apparent net change to the bottom.
3. The site is within the inlet zone and is adjacent to the channel, providing easy access for dredged material placement operations, and reduce costs.
4. Studies have shown that there are no unique fisheries in the area.

**B. Summary of testing requirements per Regional Implementation Agreement (RIA) and summary of past dredged material evaluations.** On September 24, 1992, a RIA was executed between EPA Region 6, and the Galveston District. This RIA was updated on November 3, 2003 (U.S. EPA and USACE, 2003), and describes protocols for evaluating the quality of the dredged material and implementation of the "GREEN BOOK" (U.S. EPA and USACE, 1991). These protocols describe chemical parameters to be analyzed, as well as required detection limits. It also specifies how toxicity testing and bioaccumulation assessments are to be conducted, as well as organisms to be utilized. Since that time, all sediment evaluations have been conducted in accordance with the RIA. Since the mid-1970s, before development of the RIA, dredged material from the Matagorda Ship Channel Project had been evaluated numerous times to determine suitability for offshore placement. This testing was performed to determine levels of metals and organic constituents, as well as toxicity and bioaccumulation assessments. Testing performed for this project is summarized in the following table:

#### Sediment Quality Assessment History

DATE	TYPE OF TESTING
June 4, 1979	Pre-dredging Bulk Analyses
May 1980	Toxicity and Bioaccumulation Assessment
October 27, 1983	Pre-dredging Bulk Analyses

DATE	TYPE OF TESTING
November 1985	Toxicity and Bioaccumulation Assessment
December 18, 1988	Pre-dredging Bulk Analyses
December 1996	Toxicity and Bioaccumulation Assessment
July 9, 1998	Pre-dredging Bulk Analyses
September 2001	Toxicity and Bioaccumulation Assessment
March 2006	Toxicity and Bioaccumulation Assessment

The above testing indicated that the material was suitable for offshore placement without special management conditions.

#### **VII. Anticipated Site Use**

As previously discussed, the dredging frequency for this project is approximately 1.6 years, with an average of approximately 682,067 CY of material excavated per dredging contract. It is anticipated that the channel will continue to shoal at a similar rate. Presently, the ODMDS only receives dredged material from the Federally-maintained Matagorda Ship Channel Project. Material from other sources is not presently placed at this site, and none is expected in the foreseeable future.

Currently, no beneficial use of material dredged from Matagorda Ship Channel is practiced. It is the policy of the Galveston District to implement beneficial uses of dredged material, wherever practicable. The high sand content of the channel sediments suggests that there are potential beneficial uses of this material. These will be investigated, in coordination with other State and Federal agencies.

#### **VIII. Special Management Conditions or Practices**

Currently, no special management conditions or practices related to placement of dredged material into the designated ODMDS have been required. As previously discussed, evaluations of sediment quality have indicated that the material from the channel is suitable for offshore placement without such requirements. However, all operations shall be conducted such that the dredged material remains within the bounds of the ODMDS immediately following descent to the ocean floor.

A seasonal restriction has been recommended by the National Marine Fisheries Service, during formal consultation undertaken pursuant to the Endangered Species Act (NMFS, 2007). This

restriction was based on potential impacts of hopper dredging operations on several species of threatened and endangered sea turtles. The recommendation is to restrict hopper dredging to the period from December 1 through March 31, during which turtle abundance is at a minimum. This recommendation pertains, however, only to actual dredging operations, and not placement of the material into the ODMDS. While it may not be practical to observe this restriction for all dredging cycles, it will be practiced when feasible.

## **IX. Monitoring Program**

The primary purpose of the Site Monitoring Program is to evaluate the impact of the placement of dredged material on the marine environment. The evaluations will be used for making decisions, preventing unacceptable adverse effects beyond the site boundary, and ensuring regulatory compliance over the life of the ODMDS. Emphasis will be placed on determining physical impacts, since, to date, dredged material from the Matagorda Ship Channel Project has been determined to be acceptable for ocean placement, without special conditions; however, consideration of contaminants will also be included. Testing of dredged material is conducted based on "Greenbook" and RIA procedures, however it is necessary to verify the decisions made regarding the suitability of the dredged material are correct and that the material is not having an adverse impact to the environment. In the event that the dredged material persists in the ODMDS, there may be potential for long-term contaminant effects on the benthos.

The size and location of the Matagorda Ship Channel Project ODMDS were determined pursuant to the General Criteria as listed in 40 CFR 228.5, and the Specific Criteria at 40 CFR 228.6(a). There are no significant environmental resources delineated within or immediately outside of the designated ODMDS. Since this site is dispersive in nature, the primary concern of the use of the site is the potential short-term build up of dredged material, such that a hazard to navigation is presented. Another concern is whether there is significant short-term movement of the dredged material beyond the ODMDS boundaries; specifically, the benthic community can be impacted if significant rapid movement of material off the site occurs, resulting in burial of benthic populations outside the site. Studies have shown that benthic organisms can burrow through 6-9 inches of dredged material without significant impacts on the community (Maurer, et al., 1978).

The Site Monitoring Program is designed as a tiered program. If initial tier results fail predetermined limits, then a more complex set of tests is invoked at the next tier to determine the extent of impact. The tiers are used to facilitate rapid, accurate and economical collection of information for use by the EPA, Region 6, and the USACE-SWG. The tiered testing for these factors is described below.

MAINTENANCE MATERIAL

## TIER M1

Physical and chemical evaluations of the ODMDS material shall be conducted to characterize possible effects from the placement of dredged material occurring at the site. Physical analyses of the sediment can assist in assessing the impact of disposal practices on the benthic environment at the disposal site and determine if dredged material is migrating offsite. Chemical analyses of the sediment shall be conducted to establish whether contaminants of concern are suspected to be affecting the benthic environment at the disposal site.

Bathymetric Surveys

The ODMDS is located outside of the safety fairway for large vessel traffic, therefore, the mounding will be considered in regard to shallow-draft vessels, only. Considering the grain-size characteristics of typical maintenance dredged material from this channel, significant mounding is not expected subsequent to discharge operations. The threshold elevation for mounding of dredged material within the ODMDS will be ten (10) feet above the existing bottom elevation.

Since the site is dispersive, movement of material from the site is expected to occur after disposal operations cease. In order to detect if short-term movement of the material out of the designated ODMDS is occurring at a significant rate, hydrographic surveys of the ODMDS shall be obtained before the start of disposal operations, and soon after completion of disposal operations. An accumulation of one (1) foot of sedimentation along the ODMDS boundary will be considered the threshold level for movement of material outside of the designated ODMDS. This determination shall be based on a comparison of the results of these before and after surveys.

Hydrographic surveys shall be conducted along transects within the ODMDS. These transects shall be oriented perpendicular to the channel in the direction of sediment transport (i.e., southwest). Transect intervals shall be every 1,000 feet extending 1,000 feet outside each boundary. In addition, a depth profile shall be obtained along each boundary.

Surveys shall be obtained using a USACE, or contract survey vessel equipped with electronic surveying capabilities. The vessel must be equipped with positioning equipment with a horizontal precision of one (1) foot. The fathometer, which shall display real-time depth on real-time location, must have a precision of 0.5 feet. All data shall be collected using methodology described in Engineer Manual EM 1110-2-1003, dated January 1, 2002.

### Data Analysis

- ◆ If deposited dredged material is not mounding to elevations greater than the threshold elevation above the existing bottom elevation, and there is no short-term movement of material beyond the limits of the ODMDS, then the management objectives are met. No further post-disposal monitoring will be required.
- ◆ If mounding to elevations greater than the threshold elevation, and/or movement of material out of the ODMDS has occurred, as determined by the post-dredging survey, then the monitoring program shall proceed to Tier M2.

### Sediment Chemistry

Sediment chemistry analyses shall be conducted in conjunction with the dredged material evaluations from samples collected in the navigation channel. Collecting samples from both the navigation channel and ODMDS during the same sampling event has been determined to be the most efficient use of resources. Because most ODMDSs lie directly adjacent to the navigation channels, there are relatively short distances between the two areas. As described in the RIA, sediment testing in the navigation channels generally occurs on a five-year cycle. Sediment chemistry results from the ODMDS should be compared to the results collected from the navigation channel. Significantly elevated sediment concentrations are defined as concentrations above the range of contaminant levels in dredged sediments that the Regional Administrator and the District Engineer found to be suitable for disposal at the ODMDS.

### Data Analysis

- ◆ If contaminant concentrations are not significantly different than navigation channel concentrations then no further testing is needed.
- ◆ If significant increases in levels of contaminants are observed at the ODMDS, then a determination will be made whether a bioassay/bioaccumulation study is warranted to determine effects on the benthic community. The studies are described below as Biological Testing under Tier M2.

## TIER M2

Bathymetric Surveys

If transport of material from the site is occurring, hydrographic surveys shall be expanded to include the impacted area and shall be performed on a semi-annual basis to determine the changes in dispersion of the material until the impacts are no longer observed. An accumulation of more than one (1) foot of sedimentation along the ODMDS boundary will be considered the threshold level for significant movement of material outside of the designated ODMDS.

Data Analysis

- ◆ If deposited dredged material is mounding to elevations above the threshold value, but less than fifteen (15) feet above the existing bottom elevation and there is no significant short-term transport of material beyond the limits of the ODMDS, then semi-annual post-disposal monitoring shall occur as described.
- ◆ If at six months after disposal, deposited dredged material remains mounded to elevations greater than half the post-disposal elevations, then bathymetric surveys shall be continued.
- ◆ If deposited dredged material is mounding to elevations greater than fifteen (15) feet, and/or significant movement of material out of the ODMDS has occurred, the Galveston District together with EPA Region 6 will consider various management options to rectify the situation. Such options could include, but are not limited to expansion of the ODMDS; or relocation of the ODMDS within the zone of siting feasibility described in the designation EIS.

Biological Testing

If the results of the Tier M1 sediment chemistry evaluation suggest the need for additional testing, then solid-phase bioassay and bioaccumulation testing shall be conducted in accordance with the procedures described in the RIA. If the sediment can be attributable to recent dredging, funding for testing under this Tier will be provided by USACE-SWG or the permittee, as appropriate; otherwise funding will be provided by EPA, Region 6. Any such testing is contingent on availability of appropriated funds.



Data Analysis

- ◆ If toxicity is not indicated, then no further testing is needed and disposal activities can continue at the ODMDS.
- ◆ If toxicity is indicated at the ODMDS, the Galveston District together with EPA Region 6 will consider various management options to rectify the situation. Because the ODMDS is a dispersive site, potential sources of toxicity other than dredged material must also be considered. If planned use of the ODMDS is imminent, a decision must also be made whether to allow continued use of this site.

**X. References**

Maurer, D.L., R.T. Keck, J.C. Tinsman, W.A. Leathem, C.A. Wethe, M. Huntzinger, C. Lord, and T.M. Church. 1978. Vertical Migration of Benthos in Simulated Dredged Material Overburdens, Vol. 1: Marine Benthos. Technical Report D-78-35. U.S. Army Engineer Waterways Experiment Station, Vicksburg, MS.

NMFS (National Marine Fisheries Service), 2007. Revision 2 to the November 19, 2003 Biological Opinion concerning Dredging of Gulf of Mexico Navigation Channels and Sand Mining ("Borrow") Areas Using Hopper Dredges by COE Galveston, New Orleans, Mobile, and Jacksonville Districts (Consultation Number F/SER/2000/01287).

U.S. EPA and USACE. 1991. *Evaluation of Dredged Material Proposed for Ocean Disposal - Testing Manual*. EPA-503/8-91/001. U.S. Environmental Protection Agency and U.S. Army Corps of Engineers, Washington, D.C.

U.S. EPA and USACE. 2003. *Regional Implementation Agreement for Testing and Reporting Requirements for Ocean Disposal of Dredged Material off the Louisiana and Texas Coasts Under Section 103 of The Marine Protection, Research and Sanctuaries Act*. U.S. Environmental Protection Agency, Region 6 and U.S. Army Corps of Engineers, Galveston and New Orleans Districts.

## XI. Site Management Plan Review and Revision

Pursuant to Section 102(c) of the MPRSA, as amended by WRDA 1992, the Site Management Plan for the Matagorda Ship Channel ODMDS will be reviewed and revised, if necessary, not less frequently than 10 years after adoption and every 10 years, thereafter.

Modifications or updates to the Site Management Plan may be necessary, based on specific needs identified for specific authorized projects. Modifications or updates to the Site Management Plan may be proposed by either the USACE-SWG or EPA Region 6. Following a thirty (30) day review period of the changes(s), the modifications may be incorporated into the plan by mutual consent of both agencies.

This Site Management Plan complies with Section 102(c)(3) of the Marine Protection, Research and Sanctuaries Act of 1972 (33 U.S.C. Sections 1401, et seq.) as amended by Section 506 of the Water Resources Development Act of 1992 (WRDA 92; Public Law 102-580), and has been approved by the following officials of Region 6 of the U.S. Environmental Protection Agency, and Galveston District of the U.S. Army Corps of Engineers. This plan goes into effect upon the date of the last signature:



Richard E. Greene  
Regional Administrator  
Region 6  
U.S. Environmental Protection Agency

NOV 25 2008

Date



David C. Weston  
Colonel, Corps of Engineers  
District Engineer  
Galveston District  
U.S. Army Corps of Engineers

15 DEC 2008

Date



