



CONTINGENCY PLAN SAN DIEGO SHIPYARD SEDIMENT SITE – SOUTH SHIPYARD

Prepared for

San Diego Bay Environmental Restoration Fund – South

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1 INTRODUCTION

1.1 Purpose

This Contingency Plan (Plan) was prepared by Anchor QEA, L.P., on behalf of the San Diego Bay Environmental Restoration Fund – South (South Trust) and has been reviewed and adopted by the Contractor to maintain Cleanup and Abatement Order (CAO) schedules. This Plan satisfies the conditions of CAO No. R9-2012-0024 (Water Board 2012a) and Mitigation Measure 4.3.3 of the Mitigation Monitoring and Reporting Program (MMRP; Water Board 2012b) for the South Shipyard portion of the San Diego Shipyard Sediment Site (Site).

Specifically, this Plan addresses equipment and operation failures that could occur during dredging activities and establishes measures to prevent, respond to, and report spills or releases to the environment. It also addresses contingency measures pertaining to encountered munitions or ordnance. The Contractor will be responsible for implementation of the Plan. This Plan will be provided to the Regional Water Quality Control Board (Water Board) for verification during construction. An updated copy of the Plan will be kept on site at all times throughout construction.

1.2 Background

Discharges of metals and other pollutant wastes to San Diego Bay over the years have resulted in the accumulation of pollutants in marine sediments along the eastern shore of central San Diego Bay in San Diego, California. This accumulation resulted in conditions identified by the Water Board as adversely impacting beneficial uses (aquatic life, aquatic-dependent wildlife, and human health).

The Water Board identified the affected areas as including waters adjacent to two adjoining, active shipyard facilities in San Diego Bay—the North Shipyard and the South Shipyard, together termed the Site. In March 2012, the Water Board issued CAO No. R9-2012-0024 for the remediation of marine sediments containing elevated chemical concentrations at the Site.

An upland Sediment Management Area (SMA) is available for dredged material and debris offloading, dewatering, sediment management, haul truck loading, water management, and other staging activities.

1.3 Project Personnel

Prior to the start of construction operations at the Site, the Contractor will designate the person, or persons, responsible for managing, implementing, and maintaining this Plan. Contact information for these responsible parties shall be provided to all personnel and those parties shall be available for response 24 hours per day. Anchor QEA will review and comment on the Contractor's designations to ensure consistency with project communications.

2 SPILL NOTIFICATION AND RESPONSE

2.1 General

This section applies to fueling operations or equipment failures that may release waste (e.g., gasoline, oil, and transmission fluid) into the environment. The Contractor shall have spill response equipment (including surface booms, oil-absorbent pads, and similar materials) on site at all times to be deployed in the event that any sheen may occur on the surface of the water during work. Further discussion regarding spill response equipment can be found in Section 3.4. All response actions shall comply with the site-specific Health and Safety Plan (HASP).

Though not anticipated, any hazardous materials that may be encountered during dredging activities will be handled in accordance with the Dredging Management Plan (Anchor QEA 2013).

2.2 Emergency Notifications

In the event of a spill in excess of a reportable quantity as defined by the U.S. Environmental Protection Agency (USEPA) (40 CFR Part 302), the Contractor shall assess the spill to determine if the Contractor has the appropriately trained personnel and on-site resources to safely and effectively respond to the spill. If the Contractor does not have the appropriate personnel and resources to respond to the spill, then the area will be evacuated and the following parties will be notified:

- Fire Department, 911
- NASSCO Security, (618) 544-8401
- U.S. Environmental Protection Agency (USEPA) National Response Center, (800) 424-8802
- California Hazmat and Oil Emergency Response Team, (800) 852-7550
- U.S. Coast Guard (USCG) Sector San Diego, (619) 278-7031

NASSCO Security at (619) 544-8401 shall be notified to perform a hazardous materials spill assessment in the event of any hazardous materials spill regardless of spill quantity.

After the appropriate authorities have been notified and the situation becomes a non-emergency, the Contractor shall immediately notify the Anchor QEA Construction Management representative, who shall notify the General Dynamics National Steel and Shipbuilding Company Shipyard Facility (NASSCO) Security at (618) 544-8401. A flow chart illustrating the proper chain-of-command for environmental spill notification is shown on Figure 1. Other important contact numbers for the Contractor to use include:

- Harbor Police, (619) 686-6585
- San Diego Unified Port District (Port), (619) 686-6200
- U.S. Navy Port Operations, (619) 556-1433
- USCG Marine Safety Office, (619) 683-6470
- San Diego Emergency Services, (619) 974-9891
- 24-Hour U.S. Navy Regional Duty Office, (619) 524-2314

If the spill can be safely and effectively responded to by the Contractor (using the methods described in Section 2.3), then immediate response action will begin and the Anchor QEA Construction Management Team and the South Trust will be notified. After reported, the appropriate personnel within NASSCO will be notified and will conduct the appropriate follow up and investigation.

2.2.1 Public Notifications

After immediate spill response actions have been taken for any situations that arise outside the Site (e.g., within Barrio Logan) and the appropriate authorities have been notified (see Section 2.2), public notifications will be made as appropriate based on possible danger to the public. These notifications will be provided at www.sdcleanbay.com. Notifications shall be made in accordance with the developed Community Relations Plan.

2.3 Spill Response Actions

Following determination that the spill can be safely and effectively managed, the Contractor shall immediately administer response actions to contain and clean the spill, as follows:

- The area of the spill shall be immediately isolated, and all non-essential cleanup personnel shall be kept away.

- Any combustible materials shall be moved from the vicinity of the spill.
- The Contractor shall report the spill to NASSCO Security at (619) 544-8401. NASSCO Fire will respond for awareness but will not conduct cleanup operations.
- Proper materials and Personal Protective Equipment (PPE) necessary to address the spill shall be secured.
- The source of the spill shall be located and stopped by containing, shutting valves, or powering down equipment and pumps.
- Appropriate spill response materials (sand, fill, booms, pads, etc.) shall be deployed as necessary to address the spill.
- The affected area and equipment that contacted the spilled material shall be decontaminated.
- Spill response materials shall be collected and disposed of appropriately.
- Recovered waste, contaminated soil or surface water, or any other material that results from the incident or its control shall be treated and stored.
- No waste that is incompatible with released material shall be treated or stored in the facility until cleanup procedures are completed.
- The National Response Center (1-800-424-8802) and appropriate local agencies shall be notified (if spill is in reportable quantities) and given the following information:
 - Name and telephone number
 - Name and address of facility
 - Time and type of incident
 - Name and quantity of materials involved, if known
 - Extent of injuries
 - Possible hazards to human health or the environment outside of the facility

As soon as the incident is controlled, the Contractor shall conduct the emergency notification procedures discussed in Section 2.2. In the event of any emergency (such as fire, earthquake, and worker injury), the Contractor shall follow site-specific contingency measures to ensure the rapid communication of an emergency situation to project members to enact a swift and safe evacuation of the Site until the emergency has subsided. Refer to the site-specific HASP developed by the Contractor for more information.

In the event of a medical emergency, immediate action will be taken by the first person to recognize the event following the appropriate protocols set forth by the Contractor. Refer to the site-specific HASP developed by the Contractor for more information.

2.3.1 Spill Report

Following completion of a hazardous materials spill cleanup, the Contractor shall prepare and submit a Spill Report to the Construction Management Team, who will submit the report to the South Trust. The Spill Report shall include the following, at a minimum:

- Material released
- Source of release
- Volume of material released
- Time of release
- Response actions taken to contain and cleanup release
- Parties contacted and corresponding times
- Volume of material captured during cleanup
- Decontamination procedures
- Final disposal of cleaned up material details
- Lessons learned to avoid future incidents
- Cause of incident

3 RELEASE PREVENTION

3.1 Material Acceptance

The Contractor must notify the Construction Management Team and NASSCO and provide the appropriate Material Data Safety Sheets (MSDS) prior to any product being brought on site. Subsequently, the Construction Management Team will notify the South Trust. Approval must be gained from the South Trust prior to any materials being transported on site. These materials include, but are not limited to, all fuel, oil, industrial solvents, or other manufactured chemicals delivered to the Site. The Contractor is required to keep MSDSs for all materials on site in a location known by all workers. This location must be accessible at all times, included in site orientation, and reviewed in morning tailgate meetings.

3.2 Physical Barriers and Signage

Any fuel, oil, transmission fluid, hazardous materials, and waste storage areas shall be secured and fenced within the SMA. The entire SMA is paved with asphalt. All hazardous materials storage locations shall be clearly marked as “Hazardous” and indicate the exact nature of the material.

3.3 Repair Location

All repairs on equipment shall be conducted on land within the confines of the designated SMA to the extent possible. No repair work shall be conducted in-water unless impractical by other methods and approved by the South Trust prior to the start of repair.

3.4 Spill Containment Equipment

The Contractor shall keep the following equipment on site at all times throughout construction operations:

- Sand or clean fill
- Absorbent booms
- Absorbent pads
- Chemical disinfectant cleaners
- Shovels
- Water pumps of adequate size to manage potential spills

- Water hoses and valves
- Decontamination water and pressure washing equipment

These materials shall be strategically staged throughout the Site in spill response kits to effectively address any potential spills as they may occur.

4 WATER QUALITY CONTINGENCY MEASURES

Water quality monitoring will be performed in accordance with the Remediation Monitoring Plan (an appendix to the RAP; Anchor QEA 2012) and the project technical specifications.

4.1 Water Quality Exceedance

If conventional parameters (turbidity, dissolved oxygen, and/or pH) are exceeded during construction activities, then the following contingency actions will be implemented:

1. Evaluate the concurrent measurements at background and compliance monitoring stations and supporting visual evidence to determine whether the exceedance is caused by construction operations or by other ambient conditions in the bay (e.g., wind waves, boat wakes, barge/ship traffic, and storm inflow).
2. Immediately re-take measurements at background and compliance stations.
3. If the exceedance is confirmed, immediately notify the Contractor and the Construction Management Team. The Contractor will be directed to immediately modify operations or implement additional best management practices (BMPs) to mitigate the exceedance.
4. Re-evaluate field measurements at all relevant stations 30 minutes after additional BMPs or operational modifications are implemented.
5. Take actions to mitigate the exceedance. If the water quality exceedance continues to persist, even with additional BMPs or operational modifications, a path forward will be discussed with the Construction Management Team. The path forward could include some or all of the following:
 - Implement more aggressive BMPs or operational modifications.
 - If additional measures are not successful at controlling the water quality exceedance, stop work to further assess the source of the exceedance, identify effective mitigation measures, and allow the water column to recover.

4.2 Operational Modifications

In addition to standard BMPs listed in the Quality Assurance Project Plan (an appendix to the RAP; Anchor QEA 2012), the following operational modifications can be implemented

individually or in combination as part of the response to a confirmed water quality exceedance:

- Adjust the sequence and/or speed of dredging and disposal activities.
- Reposition dredging activities to ensure future exceedances do not occur.
- Fix, maintain, and/or upgrade floating silt curtains.

4.3 Silt Curtain Breach Procedures

All in-water operations shall be immediately stopped until the silt curtain can be properly repaired and inspected in the event that a silt curtain breach or similar opening in the continuous curtain is observed at the Site. Following the immediate stoppage of all in-water work, the Contractor shall notify the Construction Management Team, who will notify the South Trust of the silt curtain breach or opening, and then begin immediate response actions to repair the breach. An appropriate length of replacement silt curtain will be staged at or near the Site in the event that repairs are necessary. The Contractor shall remove the damaged silt curtain as necessary and patch or replace the curtain with the same material. In-water operations may resume following completion of repair work and inspection of the curtain.

4.4 Barge Overfill Procedures

The Contractor shall immediately stop barge filling operations if a barge overfill is observed. The barge overfill will be reported to the Construction Management Team, who will notify the South Trust and response action procedures will be immediately initiated. Water pumps will be used to transfer free water from the material barge to shoreline water storage tanks. The barge will be transported from the overfill location once enough water has been transferred from the barge to water storage tanks to enable safe transport of the barge to the SMA for offloading. In-water operations shall not restart until turbidity measurements have been taken at the pre-determined monitoring locations and determined to be within acceptable limits.

4.5 Project Generated Water Discharge

Effluent to the City of San Diego's sewer system will be monitored by the Construction Management Team to ensure all applicable discharge requirements are met. If at any time discharge requirements are not met, the discharge will be immediately ceased. The Contractor shall be responsible for the management of all project-generated waters.

5 ENCOUNTERED MUNITIONS OR ORDNANCE

During dredging operations, unexpected munitions or ordnance may be recovered along with dredged material. Munitions present a serious danger to the vessel and its crew. If these materials are encountered, the Contractor shall follow the three Rs of explosive safety: Recognize, Retreat, and Report. The three Rs are explained in detail below.

5.1 Recognize

The military has conducted training and combat operations at sea for centuries. Sea disposal of munitions and ordnances occurred prior to 1970s and is now only allowed in case of emergency. Munitions that may be encountered include mines, torpedoes, depth charges, high explosives, or chemical agents. Munitions that have been in water for long periods may be more sensitive and may be referred to as “duds” or “UXO” (unexploded ordnance) and such munitions can explode when handled. Munitions submerged in sea may look new and easily identifiable or be heavily encrusted in sea growth and difficult to identify.

5.1.1 Chemical Agents

Chemical agents are designed to kill, seriously injure, or incapacitate an enemy. In the past, the United States and other countries sea-dumped munitions filled with chemical agents as well as agents in bulk (such as 55-gallon drums filled with chemical agents). Vessel crew should be alert for the following conditions that may indicate the presence of chemical agents:

- Unusual smells to the dredged material or equipment
- A stinging or burning sensation in the eyes or skin
- Corroded containers or suspicious clay-like lumps

5.2 Retreat

The specific response to identified munitions will depend on the circumstance. If possible, munitions or suspect munitions should not be brought on board. If munitions are observed in the dredge bucket or dredged material barge, the crew shall immediately stop all operations. Dredging shall be secured. All crew shall evacuate the area of the suspected munitions if possible.

5.3 Report

Careful observation is necessary prior to reporting for proper instructions and assistance to be provided. After the munitions has been secured and isolated and the area evacuated (if the munitions was not brought on board the vessel), the Contractor shall notify Naval Facilities Engineering Command (NAVFAC) Southwest Division at (866) 793-8226 and the Site Safety Manager to report the encounter. Immediately following notification of NAVFAC, the Contractor shall notify the Construction Management Team, who will then notify the South Trust. The Contractor should be prepared to provide the following information:

- The vessel's position
- The activity being conducted when the suspected munitions was encountered
- A general description of the suspected munitions key features and condition, such as size, shape, fins, prop markings (do not try to clean, open, or tamper with the munitions for identification purposes)
- Action taken and current location of the suspected munitions
- Any unusual odors, if noticed

The recovery and disposal of munitions and/or ordnance items found will become the responsibility of NAVFAC Southwest Division. The Contractor shall make no attempt to recover or disposal of located munitions and/or ordnance. All operations conducted by the Contractor shall be performed in accordance with the site-specific HASP.

6 REFERENCES

Anchor QEA, L.P., 2012. *Remedial Action Plan*. San Diego Shipyard Sediment Site. October 2012.

Anchor QEA, 2013. *Dredging Management Plan*. San Diego Shipyard Sediment Site – South Shipyard. August 2013.

Water Board (San Diego Regional Water Quality Control Board), 2012a. Cleanup and Abatement Order R9-2012-0024 for the Shipyard Sediment Site. March 14, 2012.

Water Board, 2012b. *Technical Report for Cleanup and Abatement Order No. R9-2012-0024 for the Shipyard Sediment Site*. March 14, 2012.

FIGURE

