

- ★ Project Location
- County Boundary
- Highway
- Road
- Railroad

Datum: NAD83 UTM 15N

Source: ESRI World Street Map

Accutrans Inc.

Prepared By: 

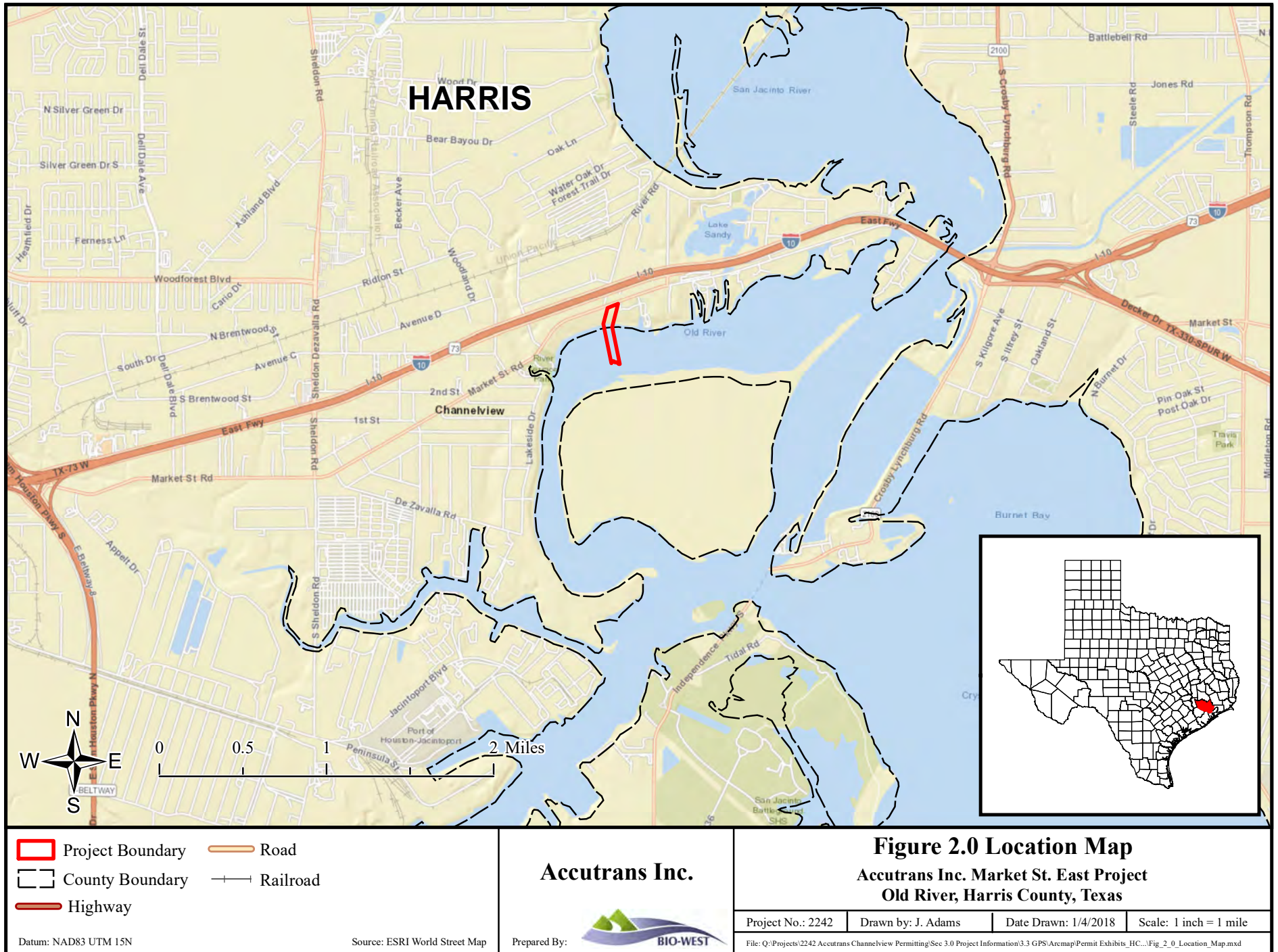
## Figure 1.0 Vicinity Map

Accutrans Inc. Market St. East Project  
Old River, Harris County, Texas

Project No.: 2242	Drawn by: J. Adams	Date Drawn: 1/4/2018	Scale: 1 inch = 5 miles
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- Project Boundary
- Upland Data Point
- Mean High Tide Line

Datum: NAD83 UTM 15N

Source: ESRI World Imagery

**Accutrans Inc.**

Prepared By:



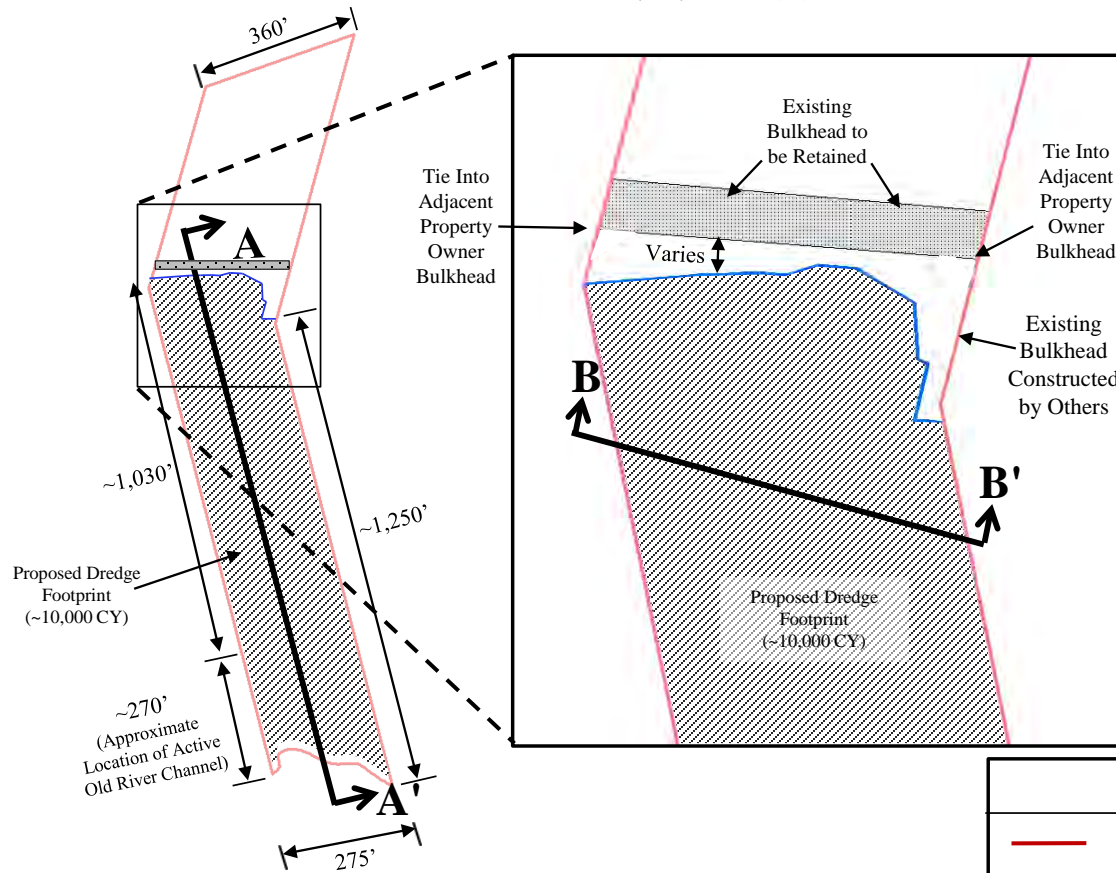
## Figure 8.0 Wetlands Map

**Accutrans Inc. Market St. East Project  
Old River, Harris County, Texas**

Project No.: 2242	Drawn by: J. Adams	Date Drawn: 1/4/2018	Scale: 1 inch = 275 feet
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# PLAN VIEW



## Notes:

- Mooring and Dolphins Locations are To Be Determined based on on-going POHA Coordination
- MHW and MLLW Reference NOAA Sta. 8770613, Morgans Pt, NAVD88

## LEGEND

- Project Site
- Mean High Tide (MHT)

\*FOR ILLUSTRATION PURPOSES ONLY - NOT TO SCALE

Prepared by:



Date: 10/27/2020

## PROJECT OVERVIEW

**Accutrans Fleeting Services, LLC. Market Street East Project  
Old River, Harris County, Texas**

Prepared for:

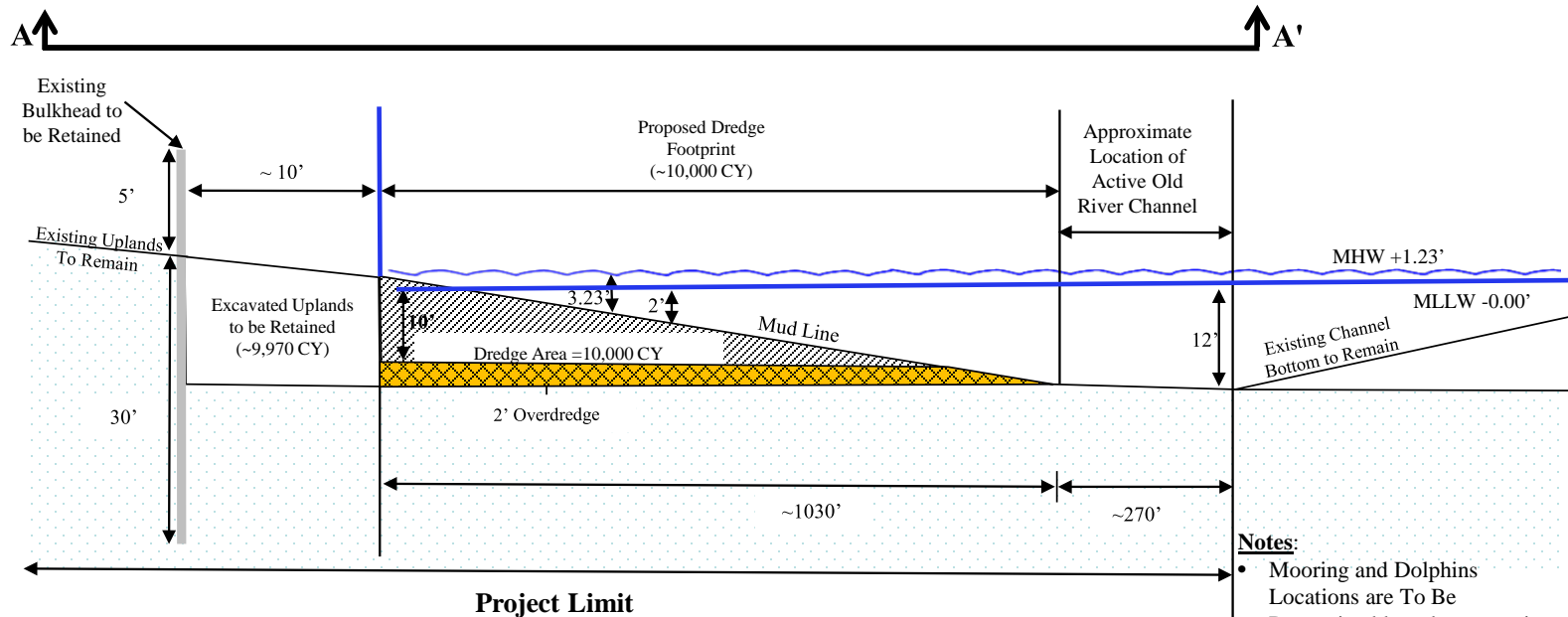
**Accutrans Fleeting  
Services, LLC.**

Project No: 2242

Drawn By: M. Chastain | File: 2242 Permit Drawings

# PROFILE VIEW

## CROSS SECTION A – A'



### Notes:

- Mooring and Dolphins Locations are To Be Determined based on on-going POHA Coordination
- MHW and MLLW Reference NOAA Sta. 8770613, Morgans Pt, NAVD88

\*FOR ILLUSTRATION PURPOSES ONLY - NOT TO SCALE

Prepared by:



Date: 10/27/2020

## CROSS SECTION A – A'

Accutrans Fleeting Services, LLC. Market Street East Project  
Old River, Harris County, Texas

Prepared for:

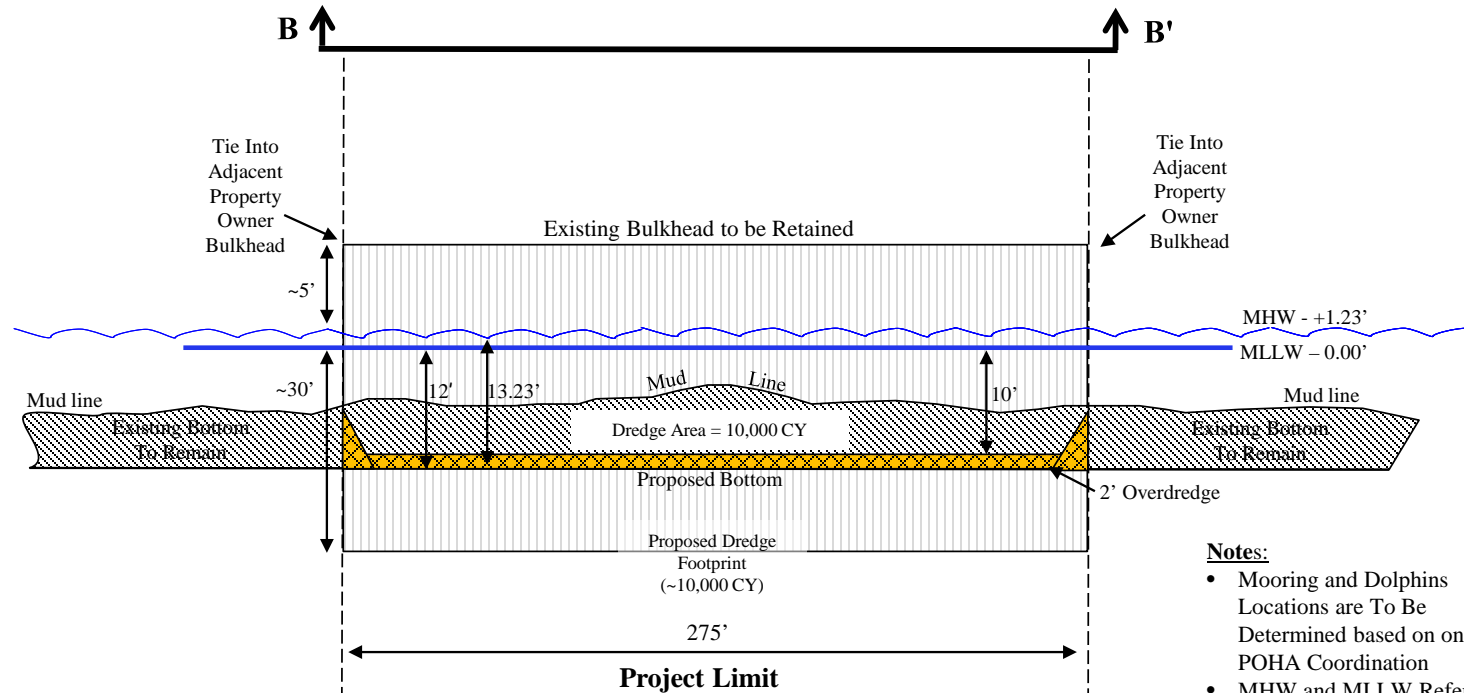
**Accutrans Fleeting  
Services, LLC.**

Project No: 2242

Drawn By: M. Chastain File: 2242 Permit Drawings

# PROFILE VIEW

## CROSS SECTION B – B'



### Notes:

- Mooring and Dolphins Locations are To Be Determined based on on-going POHA Coordination
- MHW and MLLW Reference NOAA Sta. 8770613, Morgans Pt, NAVD88

\*FOR ILLUSTRATION PURPOSES ONLY - NOT TO SCALE

Prepared by:



Date: 10/27/2020

## CROSS SECTION B – B'

Accutrans Fleeting Services, LLC. Market Street East Project  
Old River, Harris County, Texas

Prepared for:

**Accutrans Fleeting  
Services, LLC.**

Project No: 2242

Drawn By: M. Chastain File: 2242 Permit Drawings

October 27, 2020

Mr. Broc Adams  
U.S. Army Corps of Engineers – Galveston District  
Regulatory Branch  
P.O. Box 1229  
Galveston, Texas 77553-1229

**RE: Dredge Material Management Plan (DMMP)**  
**Permit No. SWG-2017-00654**  
**Accutrans Fleetings Services, LLC**  
**Channelview, Harris County, Texas**

Dear Mr. Adams:

On behalf of Accutrans Fleetings Services, LLC, herein referred to as “the applicant,” please find attached a Dredge Material Management Plan (DMMP) for a proposed barge terminal in southeast Harris County, Texas. The applicant is currently constructing a barge terminal on an undeveloped 11.18-acre (ac) property located near the intersection of River Road and Market Street in Channelview, Texas. The project would potentially impact 7.18 ac of jurisdictional waters of the United States (U.S.) through mechanical dredging activities, which would be subject to regulation under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act. No other special aquatic sites are proposed to be impacted by project activities.

### **Proposed Dredging Activities**

Access to safe, efficient, and open waterborne transportation lanes is critical to the feasibility of continued operations at the Accutrans terminal. In determining future needs, the applicant developed a site plan that avoids impacts to jurisdictional wetlands, seagrass beds, oyster beds, and other special aquatic sites, while still achieving an economically viable project. The project site is located along a historically developed and regularly dredged portion of the Old River Channel and is adjacent to the Houston Ship Channel, providing access to transportation corridors.

The applicant proposes to mechanically dredge an approximately 7.8-ac portion of the Old River Channel to conduct operations at a newly constructed barge terminal. This terminal footprint would be dredged to a depth of 12 feet (ft) below MLLW (10ft dredge with 2ft overdredge) in a manner similar to adjacent property owners. Approximately 10,000 cubic yards (CY) of material would be excavated over four stages for this effort. The applicant proposes to use utilize either barge-mounted or land-based, long-armed trackhoes (i.e. mechanical dredging) for all portions of this project. No hydraulic dredging is proposed.

The track-hoe or similar equipment would reach into the dredge footprint, remove a bucket full of material to the water’s surface, allow any surficial water to drain, and then evenly distribute the material across a 1.65-ac (~72,000 square foot [sq. ft]) confined upland placement area on the applicant’s property. When necessary, the applicant would utilize dump trucks to transport the material a short distance (less than 100m) from the current bulkhead to various area on their property. During dredging operations, no over the road transport of dredged material is proposed. A figure depicting the confined upland placement on Accutrans’ property is included in Appendix A.

Appropriate best management practices (BMPs) would be utilized during dredging activities to alleviate sedimentation issues within Old River Channel, including but not limited to establishing a dredge schedule,



installing silt or bubble curtains as field conditions require, and adjusting track-hoe rotation speed and tilt during dredging to minimize resuspension and residual deposition. The proposed final dredging depth (-12 feet MLLW) includes a two-foot overdredge would match the existing bottom elevations of the Old River Channel, allow bulk material barges access to the dock area of the project site, alleviate traffic safety concerns from currently congested storage yards, and match the barge terminal depth with surrounding berths and the Old River Channel.

Decant water runoff from the upland confined placement area would be contained behind properly installed silt fences, hay bales, and/or earthen levee, and captured in sediment/retention basins to prevent to their discharge into receiving waters.

Upland confined placement area figures are attached to this response letter for reference. They include the approximate location of proposed BMPs in the upland portions of the applicant site based on current conditions. The applicant reserves the right to alter this layout as necessary, based on changing site conditions, input from the dredging contractor and project engineer, and project schedules. Additionally, as referenced below, the applicant would utilize a dredging schedule to prevent an overload of decant water and suspended solids from escaping the upland confined placement area.

### **Dredging Schedule and Material Handling**

Using the techniques described above, the applicant proposes to stage dredging activities to allow all dredged material from each dredge event to thoroughly dry through intense workover and sediment amendment activities, as necessary. The applicant proposes up to four (4) dredge events of between 2,000 and 2,500 CY each over the course of one year to dredge the total 10,000 CY of material from the project area. When 2,250 CY (60,750 cubic feet) is evenly distributed across the 1.65-ac (72,000 sq. ft) confined upland placement area, the resulting layer would be approximately 10 inches thick. The applicant would utilize a standard dump truck load of 20CY or similar method to measure and record the amount of dredge per dredge event.

For the purposes of this application, the applicant proposes to utilize the industry standard term of percent solids (% solid) to assist in documenting the running CY total per dredge event and to aid in placement and drying of the material. Defined by the U.S. Environmental Project Agency (2005) and USACE (2008) as the ratio of weight of dry solids to total weight of the dredged material as removed, % solids for mechanical dredging is a function of the in-situ % solids and the effective bucket fill and is expressed as a percentage of the bucket capacity filled by in-situ sediment as opposed to free water. According

According to the USACE (2008), mechanical dredges can remove sediment with less entrainment of water if a full cut is possible, compared to hydraulic dredging activities. A common rule of thumb for navigational mechanical dredging is the addition of 10 percent water by volume, reflecting a condition equivalent to the bucket filled to 90 percent of its volume with in situ sediment and 10 percent with overlying water (USACE, 2008). However, according to Table 1: Environmental dredging equipment operational characteristics of USACE Report ERDC/EL TR-08-29, that percentage can range from ~80% to 90%, depending on the type of mechanical dredge used.

Since the primary goal of this project is barge navigation and the applicant is proposing to use a fixed-arm mechanical excavator or similar equipment, the applicant assumes that the % solid will be approximately 80%, resulting in an additional 20% volume to the overall dredge CY. Therefore, the applicant estimates up to 12 inches of total dredged material (solids and liquids) will be distributed across the 1.65-ac the confined upland placement area during each dredge event.



During and immediately following each placement, the applicant will utilize bulldozers and other appropriate equipment to move and turn-over the dredged material over the course of several days, exposing the material to sun and wind, allowing the material to dry quickly and efficiently. Once dried to a manageable consistency and determined to be appropriate for transport in unsealed trucks over the road per current transportation agency guidelines, the applicant proposes one of two potential options:

- Leave the material in place on the applicant's property, outside of the 100-year floodplain for future use
- To load and transport the material to one of two locations: Adloy Disposal Area or the Baytown Landfill. A figure depicting these locations in relation to the confined upland placement area and project site is included in Appendix A. Prior to loading, the applicant will ensure that the dredged material has sufficiently dried (i.e. no leaking or discharging from the dump trucks), have a moderately firm to firm consistency (USACE, 2015), and can be re-classified as soil/overburden. Additionally, the applicant will coordinate with the disposal area for any necessary regulatory requirements.

During each drying and loading process, the applicant will properly maintain and service all on-site containment BMPs to ensure decant water, suspended soils, slurry, or dredged material does not reach the dredge area or any portion of the Old River Channel.

### **Placement Area Alternatives Analysis**

In determining that onsite confined upland placement area was the only viable option, the applicant considered several factors including cost (both transport and tipping), dredging profiles and depths, and site location within the San Jacinto Waste Pits Area of Concern (AOC). Tipping fees charged by the USACE, the Port of Houston, and third-party entities were evaluated and determined to be an added, unnecessary cost compared the preferred option. The applicant also would not have to pay transportation/barging fees if the material was placed on upland property they currently own. Since the project site is located within the AOC, additional surcharges would also apply to disposal to sediments, even if contamination levels were within normal ranges per the current Environmental Protection Agency (EPA) AOC Public Announcement dated October 21, 2009.

Finally, short or long-haul maritime transport of potentially contaminated sediment introduces an environmental risk to the Houston Ship Channel that doesn't exist if the applicant uses upland property they own immediately adjacent to the project site. Therefore, onsite confined upland placement, drying, and retention of decanted/dried dredged material on the applicant's own property is the preferred option. During the course of the project, the applicant will abide by all local, state, and federal regulations for upland dredged material placement during the life of the current, developed site.

It should be noted for the project file that alternatives analyses generally apply to the Purpose and Need of the project. As no guidance, regulation, or requirements exist from the USACE Galveston District related to the use of the generic "established offsite dredge material placement areas" compared to private land and property owned and operated by the applicant, no alternative analysis for placement areas was initially conducted. Additionally, the USACE cannot force the use of dredged material placement areas (DMPAs) owned and operated by the federal government when other alternatives exist, as this would constitute a conflict of interest.

Please review the enclosed information and contact me as the applicant's agent at (832) 595-9064 or [mchastain@BIO-WEST.com](mailto:mchastain@BIO-WEST.com) if you have any comments, questions, or concerns.

Sincerely,



Matthew Chastain, PWS  
Senior Project Manager

**Enclosed:** Appendix A: Dredged Material Management Plan Figures – October 2020

**CC:** Mr. Leonard Brusatori, Accutrans Fleeting Services, LLC  
Mr. Robert Steelhammer

#### References/Citations

U.S. Environmental Protection Agency (USEPA). 2005a. Contaminated Sediment Remediation Guidance for Hazardous Waste Sites. U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, Washington, DC, OSWER 9355.0-85.

<http://www.epa.gov/superfund/health/conmedia/sediment/guidance.htm>.

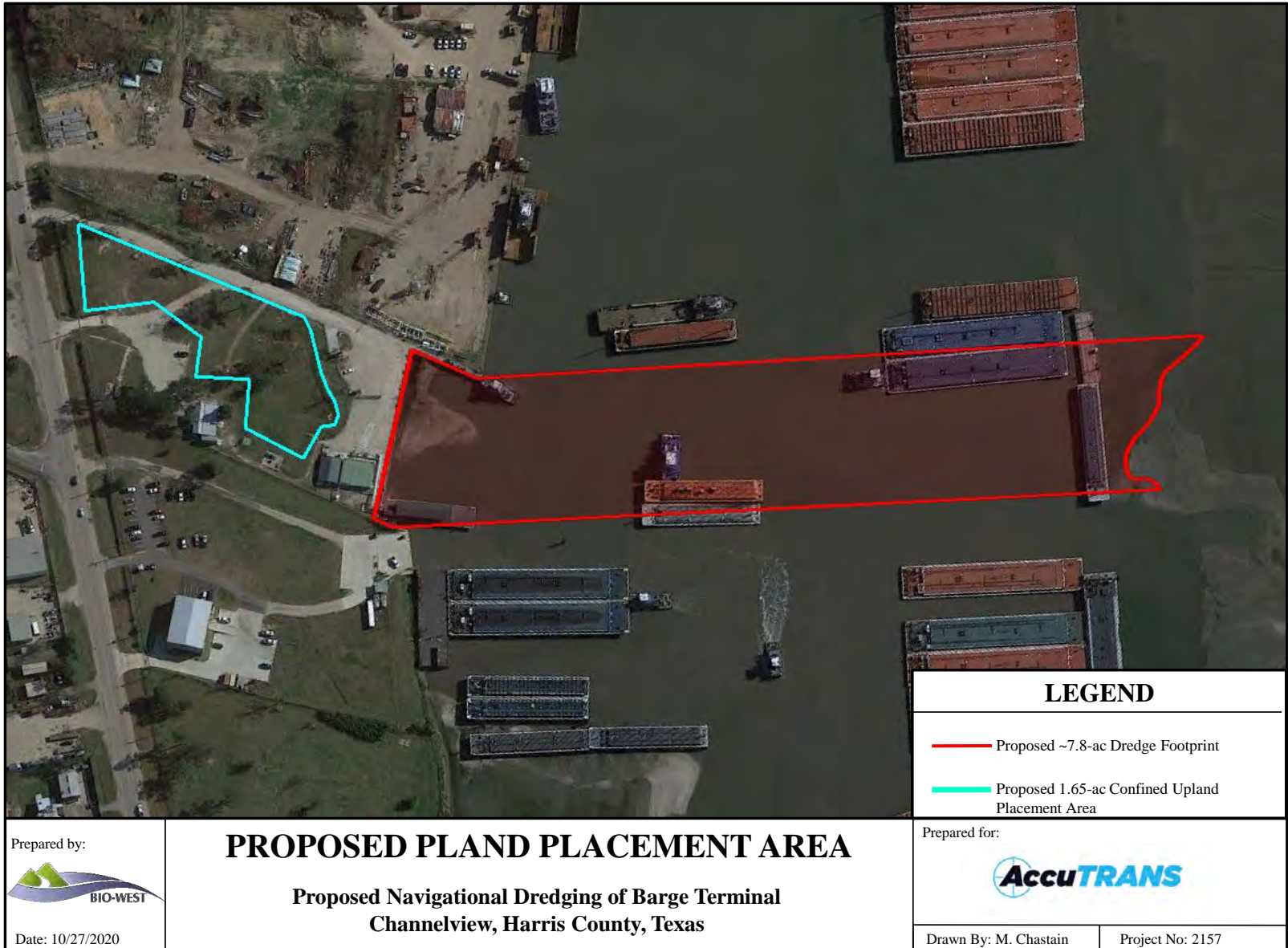
United States Army Corps of Engineers (USACE). 2008. Technical Guidelines for Environmental Dredging of Contaminated Sediments. ERDC/EL TR-08-29. <http://el.erdc.usace.army.mil/elpubs/pdf/trel08-29.pdf>

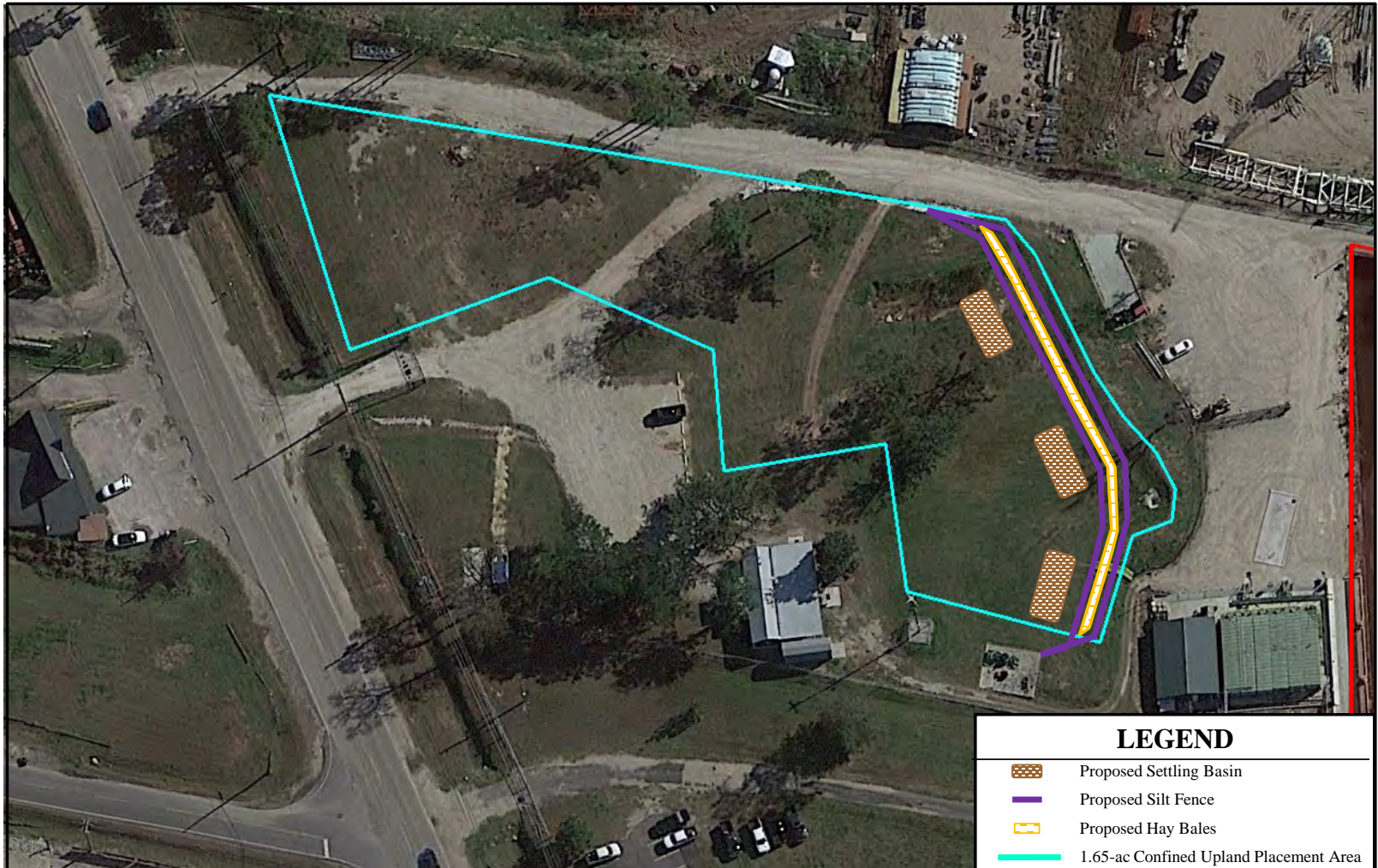
USACE, 2015. Engineer Manual: Dredging and Dredged Material Management. EM 1110-2-5025; Online: [https://www.publications.usace.army.mil/portals/76/publications/engineermanuals/em\\_1110-2-5025.pdf](https://www.publications.usace.army.mil/portals/76/publications/engineermanuals/em_1110-2-5025.pdf) Online. Oct. 2020

# **Appendix A**





## **Dredged Material Management Plan Maps October 2020**







### LEGEND

-  Proposed Settling Basin
-  Proposed Silt Fence
-  Proposed Hay Bales
-  1.65-ac Confined Upland Placement Area

Prepared by:



Date: 10/27/2020

## PROPOSED PLACEMENT AREA LAYOUT

Proposed Navigational Dredging of Barge Terminal  
Channelview, Harris County, Texas

Prepared for:



Drawn By: M. Chastain

Project No: 2157



