From: Jones, Matthew LT
Sent By: Matthew.N.Jones@uscg.mil
To: Mary Queitzsch
Subject: FW: Draft Action List for the LST 1166
Date: 05/17/2010 11:15 AM

Mary,

As I mentioned in my voicemail, here are the main issues, as per Sector Portland, with trying to take the LST to another port.

V/R,
Matt

A) The vessel is unable to obtain a loadline permit, therefore if it leaves the river it will be unable to reenter any port in the world, including another US port. U. S. Vessel Inspections has already stated the vessel will not receive one without essentially replacing the entire hull.

B) As Mr. Boes stated, the hull is extremely deteriorated, with 136 holes patched during cleanup operations in the Summer and Fall of 2008. Either new holes formed or some of the temporary patches failed in the Winter of 2009 that caused the vessel to again fill with water up to the main tank deck (2 decks and bilge flooded).

C) 2 options were examined by T & T Bisso involving moving the vessel. Both were cost prohibitive and had regulation waivers required. One involved towing the vessel to British Columbia, Canada but that requires a PCB waiver from U. S. EPA and Environment Canada. The second option involved bringing a barge and barging the vessel to Texas to be dismantled. The problem with the second option is no U. S. barges are large enough thus requiring a foreign barge and a Jones Act waiver.

I hope this answers the questions posed.

v/r

MSTC James "Pat" Griggs
Sector Portland
Phone: 503-240-2562
Fax: 503-240-9308

-----Original Message-----
From: Boes, Richard R
Sent: Wednesday, May 12, 2010 3:04 PM
To: Jones, Matthew LT; Smith, David CDR
Cc: Zlomek, Marc LCDR; Lodge, Michael CAPT; Buie, Gregory; Knutson, Scott; Myer, Frederick CAPT; Edwards, Shaun LT; Griggs, James MSTC; Eastman, Timothy
Subject: RE: Draft Action List for the LST 1166

Matt,

The hull is in such a deteriorated condition that it probably wouldn't make it half way down to California waters. That's not necessarily a bad thing but our fine friends in the EPA's Ocean Dumping Permit branch would have a cow.

Richard Boes
Case Officer
202-494-3557 (Work Cell)
251-445-3140 (NPFC @ Mobile ICP)
540-455-7672 (Personal Cell)

-----Original Message-----
From: Jones, Matthew LT
Sent: Wednesday, May 12, 2010 5:44 PM
To: Smith, David CDR
Cc: Zlomek, Marc LCDR; Lodge, Michael CAPT; Buie, Gregory; Knutson, Scott; Myer, Frederick CAPT; Edwards, Shaun LT; Griggs, James MSTC; Boes, Richard R; Eastman, Timothy
Subject: RE: Draft Action List for the LST 1166

CDR,

I just talked with the EPA Attorney for the Ocean Dumping Section at Region 10. It sounds like everyone is back to a stand still on this project due to the PCB issue.

I understand the action list does not address the PCBs on board as we expected it to. Since it appears that no answer on that issue is forthcoming and assuming we think the action items on the list are doable, I'm thinking we should go forward with the PCB Risk Assessment (Action Item #2) based on what would be left after the actions on the list are taken and seek PCB bulk waste risk-based disposal approval. I don't think the risks will be different if some of the PCB is removed anyway.

As noted below, Chris Field and Richard Franklin agreed to task their START contractor to identify a contractor that could do the risk assessment. You would then have to ask the SILC to issue the vendor a contract for the RA (funded by the CPN).

Also, I still need some information/documentation on why the Texas and B.C. land disposal options really aren't feasible i.e. specifics on why transport to those locations wouldn't work, etc.

Let me know what you think.

LT Matthew N. Jones
Staff Attorney
Thirteenth Coast Guard District
E-mail: Matthew.N.Jones@uscg.mil
Office: 206-220-7155
Cellular: 206-321-7696
Fax: 206-220-7119

-----Original Message-----
From: Buie, Gregory
Sent: Wednesday, March 17, 2010 8:46 AM
To: Jones, Matthew LT; Myer, Frederick CAPT; Smith, David CDR; Edwards, Shaun LT; Griggs, James MSTC; Knutson, Scott; Boes, Richard R; Eastman, Timothy
Cc: Zlomek, Marc LCDR; Lodge, Michael CAPT
Subject: RE: Draft Action List for the LST 1166

Matt et al,

This pretty much follows my notes and recollections from the meeting.

As far as funding for these activities goes, I would expect the CERCLA project to pay for much of this work (risk assessment and any PCB-related activities from "Mr. Freedman's List"). As the list of activities is turned into contractor task orders, we (NPFC and Sector PDX) can have further discussions as to what fund will pay for each task.

After the meeting I talked with Chris Field and Richard Franklin. They agreed to task their START contractor to identify a contractor that could do the risk assessment. Sector PDX would then have to ask the SILC to issue the vendor a contract for the RA (funded by the CPN).

Also note that we are still committed to using the OSLTF project to fund the actual towing and sinking evolution if/when we get there.

Greg

Ps. Can I get a copy of the sign-in sheet that Mary sent you?

-----Original Message-----
From: Jones, Matthew LT
Sent: Wednesday, March 17, 2010 11:14 AM
To: Myer, Frederick CAPT; Smith, David CDR; Edwards, Shaun LT; Griggs, James MSTC; Buie, Gregory; Knutson, Scott
Cc: Zlomek, Marc LCDR; Lodge, Michael CAPT
Subject: FW: Draft Action List for the LST 1166

ALCON,

Please take a look at the below action list from the EPA. As far as I can tell it comports with what we agreed to at the meeting last week. If you think there needs to be any changes let me know and we can discuss.

I am going to confirm that the EPA will be pursing the option of offering it up to the Navy as a SINKEX.

V/R,
LT Jones

LT Matthew N. Jones
Staff Attorney
Thirteenth Coast Guard District
E-mail: Matthew.N.Jones@uscg.mil
Office: 206-220-7155
Cellular: 206-321-7696
Fax: 206-220-7119

-----Original Message-----
From: Queitzsch.Mary@epamail.epa.gov [mailto:Queitzsch.Mary@epamail.epa.gov]
Sent: Tuesday, March 16, 2010 10:27 AM
To: Jones, Matthew LT
Subject: Draft Action List for the LST 1166

Good morning, Lt. Jones.

Below is the draft action list I promised to send. I've also attached the sign-in sheet from our meeting. The list is my best understanding of action items based on our meeting Friday, March 12, 2010. Please take a look and let me know if you would like to see any changes made. Our program offices have asked that this draft list be shared with Captain Myers and other USCG attendees at our Friday meeting.

DRAFT ACTION LIST

1. EPA Ocean Dumping Coordinator, Mr. Jonathan Freedman, and EPA OSC Mr. Richard Franklin, will visit the LST-1166 with Cmdr. Griggs on or before March 26, 2010. Based on this visit, Mr. Freedman, in consultation with Mr. Franklin, will develop a list of what still needs to be cleaned, removed from the vessel or secured to the vessel. The list will be shared with the USCG on or before March 31, 2010.

2. The USCG will conduct a Risk Assessment, the focus of which will be PCBs aboard the vessel, based on what would be left on the vessel after cleaning, removing or securing the items on the list prepared by Mr. Freedman. Mr. Cliff Villa will provide samples of Risk Assessments to Lt. Jones.

3. If, based on the Risk Assessment, it appears that ocean dumping would be possible when the items on Mr. Freedman's list were completed, the USCG will seek a PCB bulk waste risk-based disposal approval from Region 10 and proceed to clean, remove or secure the items on Mr. Freedman's list. Mr. Freedman and Mr. Franklin will coordinate with the USCG on these actions.

4. If the Region approves the risk-based disposal, the USCG will coordinate with Mr. Freedman for remaining steps to be taken to use the EPA general permit at 40 CFR 229.3 to transport and dispose of the vessel in ocean waters. Ocean disposal will be conducted by the USCG.

Ocean disposal would be targeted to take place on or before August 31, 2010. This date is representative of the end of the safety window based on sea and weather conditions at the Columbia bar.

5. If, based on the Risk Assessment, it appears that ocean dumping would not be possible even if the items on Mr. Freedman's list were complete, the USCG will discuss next steps with EPA. These next steps would most likely involve limited or no participation by the USCG in the disposal of the LST-1166.

Please feel free to call or email me. Thank you.

Regards,
Mary S. Queitzsch

Mary Stroh Queitzsch
Office of Regional Counsel
U.S. EPA, Region 10
1200 Sixth Avenue, Suite 900, ORC-158
Seattle, Washington 98101-3140
phone (206) 553-0145
fax (206) 553-0163

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