From: David Allnutt
To: Dave Bartus
Cc: Duncan.Daniel@epamail.epa.gov; Jonathan Freedman; Rick Albright; Scott Downey; Tristen Gardner; Richard Mednick; Mary Queitzsch; Clifford Villa
Subject: Re: Fw: Re: Deep-water vessel disposal (FYI)
Date: 04/26/2010 04:04 PM

Thanks, Dave. I know that there are some open questions about the presence or absence of PCB liquids on the ship that it would be helpful to get your input on in the near term.

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R. David Allnutt, Acting Regional Counsel
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▼ Dave Bartus---04/26/2010 08:09:58 AM---As you note, I've been involved in at least some aspects of this project, and would be more than hap

From: Dave Bartus/R10/USEPA/US
To: Scott Downey/R10/USEPA/US@EPA
Cc: David Allnutt/R10/USEPA/US@EPA, Duncan.Daniel@epamail.epa.gov, Jonathan Freedman/R10/USEPA/US@EPA, Tristen Gardner/R10/USEPA/US@EPA, Rick Albright/R10/USEPA/US@EPA
Date: 04/26/2010 08:09 AM
Subject: Re: Fw: Re: Deep-water vessel disposal (FYI)

As you note, I've been involved in at least some aspects of this project, and would be more than happy to participate further, whether its in the discussion of the path forward, or more specifics of a PCB risk-based assessment.

▼ Scott Downey---04/24/2010 01:40:15 PM---Dave - I was asked by David Allnut the other day whether you should be involved in the LST-1166 ass

From: Scott Downey/R10/USEPA/US
To: Dave Bartus/R10/USEPA/US@EPA
Cc: David Allnutt/R10/USEPA/US@EPA, Tristen Gardner/R10/USEPA/US@EPA, Duncan.Daniel@epamail.epa.gov, Jonathan Freedman/R10/USEPA/US@EPA
Date: 04/24/2010 01:40 PM
Subject: Re: Fw: Re: Deep-water vessel disposal (FYI)

Dave - I was asked by David Allnut the other day whether you should

be involved in the LST-1166 assessment due to your vast vessel expertise and I agreed that would be a good idea. I don't think any decision has been made as to whether this will be an ocean-disposal, but if that's the case, we'll need help on a TSCA risk-based assessment. I see you have some awareness of this, but I'm not sure the extent you've been involved lately. If you could help us out, please let me and Tristen know and he can bring you up to speed. HQ has also said they could help.

▼ Daniel Duncan---03/17/2010 09:35:54 AM---Scott:

From: Daniel Duncan/R10/USEPA/US
To: Scott Downey/R10/USEPA/US@EPA
Cc: Tristen Gardner/R10/USEPA/US@EPA, Jonathan Freedman/R10/USEPA/US@EPA
Date: 03/17/2010 09:35 AM
Subject: Fw: Re: Deep-water vessel disposal (FYI)

Scott:

The following is a summary of the interface between OWOW and OPPTS/ORCR. If the vessel is sunk under SINKEX the PCB program review is not required.

If the vessel not sunk under SINKEX then PCB Program review is required under a risk-based disposal at 40 CFR 761.62(c).

-----Forwarded by Daniel Duncan/R10/USEPA/US on 03/17/2010 09:33AM -----

To: Dave Bartus/R10/USEPA/US@EPA, Laura-S Johnson/DC/USEPA/US@EPA
From: Laura Casey/DC/USEPA/US
Date: 03/17/2010 04:49AM
Cc: Clifford Villa/R10/USEPA/US@EPA, Frank Mcalister/DC/USEPA/US, Daniel Duncan/R10/USEPA/US@EPA
Subject: Re: Deep-water vessel disposal

Good morning

I am including Laura Johnson from the Office of Water as her office has responsibility for the SINKEX and deep water sinkings. Her office also has responsibility for PCBs under the SINKEX and MPRSA.

In 1999, OPPT transferred authority for the disposal of PCBs on SINKEX ships to the Office of Water under Section 9(b) of TSCA. A finding was made that the MPRSA was as protective or more protective

as TSCA and the Administrator approved the transfer. Laura Johnson can fill you in on the SINKEX and vessel disposal programs and their requirements. No disposal approval from the PCB program should be needed.

If this was a shallow water sinking for creating and artificial reef, then we need to talk as reefing is a PCB program issue and either all known or suspected PCB-containing materials must be removed or a risk-based PCB disposal approval is needed and it would be a 62(c) as the materials onboard are Bulk Product Waste not Remediation Waste.

For now I am turning this over to Laura Johnson.

I hope this helps or at least gets you started. Feel free to contact me w/ any questions.

Laura Casey

Dave Bartus---03/16/2010 04:25:19 PM---Laura - Greetings. I just spoke to John Smith with a question, and he immediately referred me

From: Dave Bartus/R10/USEPA/US
To: Laura Casey/DC/USEPA/US@EPA
Cc: Clifford Villa/R10/USEPA/US@EPA
Date: 03/16/2010 04:25 PM
Subject: Deep-water vessel disposal

Laura - Greetings. I just spoke to John Smith with a question, and he immediately referred me to you hased on your experience with the SINKEX program, and risk evaluations of deep-water vessel disposal.

We're looking at a landing ship with significant PCB (paint, electrical cable, etc.) and asbestos contamination. The coast guard is evaluating options for decon, but also is considering deep water disposal of the vessel, with some or all of the PCBs remaining (I'm not entirely clear on the details of the proposal, but I think you can get the gist of it). We're assisting the Coast Guard in evaluating the format/content of a 761.61(c) risk-based disposal approval that likely would be needed to authorize final disposal (if it warrants disposal at all), as well as what we should be looking at in terms of a risk evaluation of PCBs in a deep-water marine environment. In particular, I understand that you were involved with a PCB risk evaluation associated with the SINKEX program.

Our ears are open - with many thanks in advance for your input.

Dave