From: Richard Parkin
To: Mary Queitzsch; Clifford Villa; Dan Opalski; Jonathan Freedman; Christine Reichgott
Subject: Fw: Derelict vessel
Date: 04/22/2010 03:31 PM

Thanks Dan... It appears that Ocean Disposal is the option to concentrate on. Jonathan inspected the vessel and provided a list of cleaning steps that needed to be taken by the Coast Guard. Have we heard from the Coast Guard about the doability of that work? Have we heard from the TSCA folks about the bulk waste exemption? I am prepared to allow disposal under the MPRSA GP when the peeling paint is removed an other work on Jonathan's list is completed. If we need to elevate for a final decision I can help with that as well. Is it still possible to meet the towing window at this point?

Rick Parkin
U.S. EPA, Region 10
(206) 553-8574

----- Forwarded by Richard Parkin/R10/USEPA/US on 04/22/2010 03:23 PM -----

From: Dan Opalski/R10/USEPA/US
To: "Richard Parkin" <parkin.richard@epa.gov>
Date: 04/21/2010 09:23 PM
Subject: Fw: Derelict vessel

----- Original Message -----
From: Dan Opalski
Sent: 04/22/2010 12:23 AM EDT
To: "Richard Parkin" <parkin.richard@epa.gov>
Subject: Fw: Derelict vessel

Dan - Below is what I've found out vis a vis the derelict vessel.

1) USCG approached NAVSEA PMS-333 about a year ago regarding this vessel. At that time USCG was considering sinking it as an artificial reef which NAVSEA did not think was possible because contains regulated solid PCBs onboard. NAVSEA recommended that USCG find a scrapping facility in the area and solicit the vessel for scrapping. At that time USCG was concerned as to the seaworthiness of the vessel and did not think it could be towed very far.

2) CG would be responsible for all costs required to environmentally remediate the vessel and make other SINKEX preparations. Without knowing the particulars of its current condition, a rough estimate to environmentally prepare the hulk for SINKEX is $800/$900K. NAVSEA would not be willing to accomplish the work given the remote location, material condition, etc. NAVSEA would not be willing to assume custody of the vessel, and as such CG would be responsible for accomplishing the work in accordance with SINKEX requirements. All that said, if the USCG did complete the necessary preparations Navy could inspect the vessel and certify that work was properly accomplished in accordance with SINKEX standards. CG would have to fund Navy travel to support the inspections, but this would most likely be done by the Bremerton, WA inactive ships facility which is within driving distance.

3) The cost to prepare the hulk aside, the key stumbling block appears to be the seaworthiness of the hulk. Regulations require that a SINKEX be

conducted at least 50 nautical miles from land and in water at least 6000 feet deep. There are serious concerns whether the hull is seaworthy enough to get towed out that far.

4) Finally, we really don't have a requirement for a target. Neither CPF nor C3F have identified the need for a SINKEX in PACNORWEST. Without the training need and the ordanance to conduct this operation, justifying this would be difficult.

Given all the factors discussed above, I'm not sure the Navy wants it. If you'd like, we can set up a meeting with NAVSEA to dicuss this further. Hope this helps.

Pat

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