From: Jonathan Freedman
To: Dave Bartus
Cc: Clifford Villa; Mary Queitzsch
Subject: Re: Existing documentation of LST-1166 alternatives analysis
Date: 08/05/2010 01:59 PM

Dave - I have no idea. We certainly weren't informed about this. My only suggestion would be to contact Ecology and try to find out what standards they held the facility to.

Jonathan Freedman (206) 553-0266
USEPA, Region 10
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1200 Sixth Avenue, Suite 900
ETPA - 083
Seattle WA 98101
freedman.jonathan@epa.gov
FAX: (206) 553-1775

▼ Dave Bartus---08/05/2010 01:57:19 PM---I'm curious about the statement that the LST would need to be cleaned to EPA standards. Does this

From: Dave Bartus/R10/USEPA/US
To: Jonathan Freedman/R10/USEPA/US@EPA
Cc: Clifford Villa/R10/USEPA/US@EPA, Mary Queitzsch/R10/USEPA/US@EPA
Date: 08/05/2010 01:57 PM
Subject: Re: Existing documentation of LST-1166 alternatives analysis

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I'm curious about the statement that the LST would need to be cleaned to EPA standards. Does this imply that the two ships recently scrapped in Tacoma were in fact cleaned to EPA standards? If so, is there any documentation of same, including cost estimates that we could look at as a point of comparison?

▼ Jonathan Freedman---08/05/2010 11:25:23 AM---Mary: In the message text below, there is some communication between LT Edwards and Rick Chianelli o

From: Jonathan Freedman/R10/USEPA/US
To: Mary Queitzsch/R10/USEPA/US@EPA
Cc: Clifford Villa/R10/USEPA/US@EPA, Dave Bartus/R10/USEPA/US@EPA
Date: 08/05/2010 11:25 AM
Subject: Existing documentation of LST-1166 alternatives analysis

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Mary: In the message text below, there is some communication between LT Edwards and Rick Chianelli of T&T Bisso LLC. Matt told me yesterday this was the contractor they hired to do the alternatives analysis. The only documentation we have of this work is the Excel document (at bottom), conversation between the CG and T&T, and what I am pasting in just below in bold text.

(yesterday - I think Matt meant "neither")
Mr. Freedman,

I just talked with Sector Portland. They contacted Schnitzer and Cascade General in 2009 and either were interested in taking the LST.

V/R,
LT Jones

LT Matthew N. Jones
Staff Attorney
Thirteenth Coast Guard District
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Johnathan- the statement concerning AMIX is no longer completely accurate. They cooled on the idea and but stated that the LST would have to be cleaned to EPA standards. There is also the issue of exporting hazarous materials to another country.

Sent from my GoodLink synchronized handheld (www.good.com)

-----Original Message-----
From: Freedman.Jonathan@epamail.epa.gov [mailto:Freedman.Jonathan@epamail.epa.gov]
Sent: Thursday, April 15, 2010 06:25 PM Pacific Standard Time
To: Edwards, Shaun LT
Subject: Re: FW: LST1166 IGE

Shaun - I was forwarded a message yesterday by our regional counsel Mary Queitzsch sent by your counsel Matthew Jones. His discussion raises questions as to whether the two recycling options remain viable at this time. Collectively we are going to need to address the issues he has raised, and determine that these three options exhaust all possibilities before we can figure out whether practicable options to ocean disposal exist.

I have also reviewed the cost estimate spreadsheet. The three options (Ocean Disposal, Recycle Vancouver, and Transport and Recycle US) you have here appear to be roughly equal in cost. There are some cost assumptions being made here that may need refining. For example, foam removal is a line item in all three estimates. This may not be necessary with all scenarios. It also appears the abatement and disposal costs may be very general estimates under all options, and may not be accurate. More explanation of approximate costs for these two most costly line items would give me more confidence that comparing the costs of the three options is meaningful.

On Wednesday, I received the photos from our other two inspectors. I am reviewing them and discussing our observations of the vessel to make sure our cleanup list is complete. We hope to have that for you next week.

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From: Freedman.Jonathan@epamail.epa.gov
[mailto:Freedman.Jonathan@epamail.epa.gov]
Sent: Monday, April 05, 2010 1:09 PM
To: Edwards, Shaun LT
Subject: Re: FW: LST1166 IGE

Shaun: I will review these numbers, but I think we will need a narrative comparison and discussion to justify ocean disposal as the only practicable option. We're breaking new ground with this project, none before have been this complicated. I don't see this as a long document, maybe just a few pages. We can discuss. We are still working on the cleanup list for you.

****

(3-30-10 - following vessel inspection)--
Jonathan- I don't think we have an actual NEPA analysis that has been done for the LST. Chief Griggs was referring to the different alternatives for disposal and was thinking those were the NEPA. Is that what you are wanting? I think the NEPA is dealing with the environmental impact, if so then we don't have one done.

LT Shaun Edwards
Chief, Incident Mgmt Division
Sector Portland
PH: 503-240-2566
FAX: 503-240-9308

----- Forwarded by Jonathan Freedman/R10/USEPA/US on 08/05/2010 10:19 AM -----

From: "Edwards, Shaun LT" <Shaun.L.Edwards@uscg.mil>
To: Jonathan Freedman/R10/USEPA/US@EPA
Date: 04/05/2010 08:55 AM
Subject: FW: LST1166 IGE
Sent by: Shaun.L.Edwards@uscg.mil

Jonathan- attached is the spreadsheet that lists the three alternatives for disposal of the LST.

LT Shaun Edwards
PH: 503-240-9566

-----Original Message-----
From: rickc@tandtbisso.com [mailto:rickc@tandtbisso.com]
Sent: Friday, February 19, 2010 3:01 PM
To: Edwards, Shaun LT
Subject: RE: LST1166 IGE

Thanks & understood Shaun,

I hadn't heard back from so I called Shaun Ritchie on his cell. They have been waiting on a local drydocking quote so they could give us a solid number. Their plan is to tow it their facility and then, via the drydock, load LST1166 on their 400x100 semi-sub barge they scrap out barges on.
Bottom line is AMIX can scrap the vessel and AMIX does want to scrap the vessel.

I've amended and attached IGE spreadsheet accordingly. towing costs and a guess at the drydock. Barring any major changes in cleaning standards or prolonged, as in years, delays I still believe the numbers represent a worst case scenario.
Best regards,
Rick

Rick L. Chianelli
T&T Bisso, LLC
11311 Neeshaw Drive
Houston, TX 77065
713 534-0700 24 Hour Phone
262 707-5200 Cell
rc@ttbisso.com Email
www.ttbisso.com Web Site

-----Original Message-----
From: Shaun.L.Edwards@uscg.mil [mailto:Shaun.L.Edwards@uscg.mil]
Sent: Friday, February 19, 2010 3:36 PM
To: rickc@tandtbisso.com
Subject: RE: LST1166 IGE

Rick- just to let you know, we got word today that the EPA is sticking with its 50ppm requirement for PCBs.

LT Edwards
503-240-2566

-----Original Message-----
From: rickc@tandtbisso.com [mailto:rickc@tandtbisso.com]
Sent: Monday, January 25, 2010 8:50 AM
To: Edwards, Shaun LT
Subject: RE: LST1166 IGE

Good day Shaun,

I reviewed my notes and the est. cost for remediation of the wiring with PCB's in the insulation as well as any surprise, ballasts, transformers etc.is covered in the second line item (added $2M). I included added "surprise" days for the below deck prep as well. I amended the "abatement" costs explanation to clarify what was included. Sorry for the confusion.
Best regards,
Rick

Rick L. Chianelli
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11311 Neeshaw Drive
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713 534-0700 24 Hour Phone
262 707-5200 Cell
rc@ttbisso.com Email
www.ttbisso.com Web Site

-----Original Message-----
From: Shaun.L.Edwards@uscg.mil [mailto:Shaun.L.Edwards@uscg.mil]
Sent: Friday, January 22, 2010 5:17 PM
To: rickc@tandtbisso.com
Subject: RE: LST1166 IGE

Rich- does the "below deck preparation" estimate include the removal of all the wiring in the overheads? There were some areas that contain high levels of PCBs that would have to be removed also.

LT Edwards
503-240-2566

-----Original Message-----
From: rickc@tandtbisso.com [mailto:rickc@tandtbisso.com]
Sent: Friday, January 22, 2010 7:00 AM
To: Edwards, Shaun LT; Griggs, James MSTC
Subject: LST1166 IGE

Good day Gentlemen,

Rather than wait for the quotes from AMIX I'm sending you what I've had prepared since before Christmas. If AMIX is able to recycle the vessel then, cost wise, we may have a reasonable alternative. Either way it is a simple adjustment to the IGE.

Assuming you are satisfied with my efforts and once we have the AMIX reply I will forward a 5136 showing one day's cost and some consumables i.e. third party coping of the LST 1166 plans you loaned us and postage to return them to you.

Best regards,

Rick

Rick L. Chianelli

T&T Bisso, LLC

Salvage & Response Manager

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262 707-5200 Cell

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[attachment "Phase I IGE.xlsx" deleted by Dave Bartus/R10/USEPA/US]