From: Jonathan Freedman
To: Mary Queitzsch
Subject: Re: Draft Action List for the LST 1166
Date: 03/16/2010 01:01 PM

This works, the concepts and order are right. I am concerned about being able to get the necessary training in time and to get Tristan aboard in time. He's done PCB inspections on an aircraft carrier and other large military vessels.

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▼ Mary Queitzsch---03/16/2010 11:12:09 AM---Good morning, Lt. Jones. Below is the draft action list I promised to send. I've also attached the s

From: Mary Queitzsch/R10/USEPA/US
To: matthew.n.jones@uscg.mil
Date: 03/16/2010 11:12 AM
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

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