From: Tristen Gardner
To: Jonathan Freedman
Cc: Richard Franklin
Subject: Re: LST 1166 list
Date: 04/23/2010 11:37 AM

So a couple of comments to this email as we discussed:

a) we cannot 'say' that paint and wiring can be left in place. According to our TSCA guidance **everything** that contains PCBs would have to removed. However if the risk assessor the Coast Guard hires believes that the paint and wiring can be left on the ship then our program can do a Risk Based Disposal thing to allow the ship to be disposed as such.

b) To that end, in my opinion we shouldn't even mention the wiring in the letter at all, because since the letter is a advisement on what they can do untill the risk assessor gets there, and we don't know if they will need to remove the wiring, we should just leave it out

c) we dont need to have section 5 on PCBs becasue it is covered in the paint section

I think this is all, I will look over it again to make sure.

-Tristen

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Tristen S. Gardner
Pesticides and Toxics Unit
US EPA, Region 10, OCE-084
1200 6th Ave, Suite 900
Seattle, WA 98101
Phone: 206.553.6240
Fax: 206.553.0151

PCB Website:
http://yosemite.epa.gov/r10/owcm.nsf/pcb/pcb

▼ Jonathan Freedman---04/22/2010 06:00:52 PM---Richard and Tristen: The last two weeks have been an unanticipated drill that we just finished yest

From: Jonathan Freedman/R10/USEPA/US
To: Tristen Gardner/R10/USEPA/US@EPA, Richard Franklin/R10/USEPA/US@EPA
Date: 04/22/2010 06:00 PM
Subject: LST 1166 list

Richard and Tristen: The last two weeks have been an unanticipated drill that we just finished yesterday at 5:00 pm. Here is a draft list for your review. I could not locate the photos after I looked at them a week ago. Tristen, I must have downloaded them to a temp file and lost them.
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I still don't know what we tell the USCG about the PCBs. Tristen, I thought you said wiring and intact paint could be left in place. That would satisfy the general permit. Please advise.

[attachment "LST 1166 cleanup list.doc" deleted by Tristen Gardner/R10/USEPA/US]

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