APPENDIX 4
CIDOE Abatement of PCB standards letter

Department of Environment
PO Box 486
580 North Sound Road
Grand Cayman KY1-1106
Cayman Islands

12 March 2008

Mr. Matt Hale
Director, Office of Solid Waste
MC-5301P
US EPA
1200 Pennsylvania Avenue, NW
Washington DC 20460

RE: Removal of PCB's from Vessel ex-Kittiwake

Dear Mr. Hale:

The Cayman Islands Tourism Association (CITA) has applied to the US Maritime Authority for the transfer of a decommissioned US naval auxiliary vessel, the ex-Kittiwake, from the James River Reserve Fleet to be used as a recreational diving tourist attraction in the Cayman Islands. The Cayman Islands Dept. of Environment (CI DOE), as the agency responsible for the prevention of marine pollution, has been requested to provide clarifications to your agency regarding our standards for abatement of PCB's from the Kittiwake.

The cleaning standards stipulated by the Cayman Islands Department of Environment for the removal of PCB's from the Kittiwake are as follows.

1. Generally, CI DOE employs the standards stated in the US Code of Federal Regulations 40 section 761.97 and the document *National Guidance: Best Management Practices for Preparing Vessels Intended to Create Artificial Reefs*, May 2006.
2. All materials aboard the vessel with the potential of containing PCB's are assumed to contain PCB's and will be disposed of accordingly.
3. An exception is made for paint which will be tested for PCB's. Any paint containing levels equal to or greater than 50 ppm will be removed.

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4. All hazardous materials abatement, including PCB's, will be completed before the vessel will be allowed to enter Cayman Islands waters. Compliance with abatement standards will be confirmed through inspections by CI DOE and a qualified 3-party inspector before the vessel arrives in the Cayman Islands.

Please let me know if further information is required.

Sincerely,

Scott Slaybaugh
Asst. Director - Operations
Cayman Islands Department of Environment
For Director - DOE

CC:
Chief Officer – Ministry of Tourism, Environment, Investment and Commerce
Director – Dept. of Environment
Kittiwake Project Manager - CITA

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