VESSEL DISPOSAL AT SEA PERMIT REQUEST FOR P/V WILD ALASKAN

City of Kodiak

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Introduction

The City of Kodiak is seeking an EPA General Permit for the disposal at sea of the 124ft. / 500 ton former passenger vessel WILD ALASKAN. WILD ALASKAN has been in the custody of the City of Kodiak since it was determined to be a "port risk" and was impounded on December 21, 2017.

Background

The WILD ALASKAN was impounded by the City of Kodiak on December 21, 2017. Prior to impoundment, the vessel was moored illegally in St. Herman Harbor and ordered to leave it's berth. The vessel was issued thirteen citations for trespassing and failure to comply but these did not compel the owner to remove the vessel as ordered. During several patrols by Harbor staff, observations of portable fuel tanks on deck and portable generators caused the Harbor staff to suspect the vessel may have mechanical issues. During the course of an investigation to determine if the vessel had mechanical issues, a diver was hired by the City of Kodiak to check the condition of the vessel under the waterline and it was discovered that the vessel had no installed zincs to protect the hull from electrolysis and there was severe electrolysis damage to the rudder, rudder shoe, and hull. The diver also noted that he had been hired seven years prior by the vessel owner and he noted that it had no zincs at that time either. Due to deficiencies with the structural and mechanical components of the vessel, a "Port Risk" survey was completed by Alaska Marine Surveyors in February 2018. Additionally, in December 2018 the USCG issued a letter listing multiple safety issues that must be repaired prior to the USCG allowing the vessel back into the water for operations.

Need for Vessel Disposal

The City of Kodiak scheduled two public auctions in an attempt to sell the vessel; the first in the summer of 2018 and the second in early 2019 both with negative results. After the public auctions produced no bids for the vessel, the City started evaluating alternative options for the vessel disposal which included scrapping the vessel and disposal at the Kodiak Island Borough Landfill. The local salvage yard was contacted and they offered to take the steel at a cost of $240/ton but they would not except any other material from the vessel. That quote in addition to landfill estimates for the remaining pieces of the vessel would cost the City a total of approximately $220,000 which is not economically feasible for the City. In addition the Kodiak Island Borough Landfill provided a disposal estimate of $330/ton for metal and steel and $355/ton for other materials which would cost taxpayers approximately $250,000. Both of these estimates were determined using City personnel as labor and would increase significantly if City personnel could not be utilized due to other operational needs. Additionally, the City considered requesting assistance from the US Navy to dispose of the vessel under their

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existing EPA Permit. However, this method was determined to be unviable because the existing Navy EPA permit only applies to US Navy owned vessels.

Due to Kodiak's remote location, lack of available facilities equipped to dispose of or handle the disposal of a vessel this size, and estimates for alternate disposal methods it was determined that disposal at sea was the City's most cost effective and economically viable option. For disposal at sea, the City of Kodiak estimates a cost of $12,000 - $28,000 for towing fees, approximately $20,000 for disposal of materials and approximately $10,000 for divers. This is nearly 1/3 of the price of the other alternative. In preparation for the possible approval of the EPA General Permit, the Kodiak Harbormaster has been in close contact with the US Coast Guard Marine Safety Detachment Kodiak to get a detailed summary of the requirements that the USCG would need done to the vessel for disposal above and beyond those already required by the EPA for permit approval.

In continued preparation for utilizing an EPA General Permit for disposal at sea; the City of Kodiak has worked with an experienced salvage diver to come up with the most efficient and safest scuttle plan possible, a plan tailored specifically to the WILD ALASKAN.

Vessel Description

Name: Wild Alaskan Ex: Alaska Leader Ex. Shaman
Official No: 558637 (Federal)
IMO No: 7609582
Call Sign: WYR2524
Year Built: 1974
Lenth Overall: 124'
Width: 29'
Weight: 198 tons
Type: Commercial Pasenger Vessel Ex. Fishing Vessel
Construction: Welded Steel

The Wild Alaskan is a typically configured, all-steel, single diesel, shaft driven, forecastle house forward, previous uninspected fishing vessel under the previous names of Alaska Leader and Shaman. The vessel was most recently utilized as a passenger vessel/pleasure craft. The vessel has a raked V-entry non-bulbous bow stem to fully displaced hard chine bottom, to straight sides and square stern.

Proposed Disposal Plan

The City of Kodiak has disposed of two vessels in the past under the EPA's MPRSA general permit, the F/V La Poncena and the F/V Sisu. These vessels were taken off shore to approximate positions 56°30.0N 152°30.0W in the vicinity of Albatross Banks which is now prime fishing area for longlining halibut. The operator of the tug

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Brian T also notified the City of another vessel he was contracted to tow out for disposal, the F/V Provision which was disposed of in approximate position 57°57.0N 151°55.0W. The position where F/V Provision was disposed of is outside state waters and approximately 12 nautical miles NNE of Kodiak in Marmot Bay and is not an active fishing ground. With a depth of water over 100 fathoms, this is the area we request to dispose of the WILD ALASKAN as it meets the requirements outlined by the EPA General Permit dumping guidelines and is a much more cost effective option for the City due to its proximity to Kodiak.

In preparation for approval, the city will be working with local contractors to empty and flush all fuel lines and tanks, and remove other pollutants and readily detachable material capable of creating debris or contributing to chemical pollution. This includes removing any florescent lighting, removing all antifreeze and flushing engine coolers, remove and flush all lube oil, remove and flush all hydraulic oil, remove batteries, loose plastics, trash, spray cans, and any other hazardous materials found. In preparation for scuttling all holes in the hull will be patched, once cleaned all tanks will be filled with water, all sea chest valves and deck hatches/doors will be tested for proper operation.

Prior to execution, a practice exercise will be table topped where all exit routes will discussed, which sea chest valves will be opened and in what order, which internal doors and hatches will be left open and a review of the entire evolution will occur.

Evolution:
1: Sea state less than 3 feet during daylight hours
2: Establish lookout for vessels and marine mammals in addtion to broadcasting security calls.
3: Verify the 3 person scuttle team has life jackets and dry/wet suits for all entry personnel.
4: Entry team will board via pre-placed Jacobs ladder with quick release attachments for removal on exit.
5: Open designated hatches and open designated doors.
6: One member of the entry team will enter the engine room and open sea chest valves to a flow rate of approximately fifteen gallons per minute to provide egress time.
7: Once all sea chest valves are open in the engine room, the entry team will exit to the main deck together and use the skiff which brought them there to get them back to the tug.
8: As the vessel begins sinking, the tow line will be cut to ensure it sinks on station yet ensure the tug is in no danger.
9: If needed, the tug can energize water cannons to expedite the sinking after the tow line is cut.
10: Tug remains on scene until the vessel sinks to record coordinates of disposal location.

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Environmental Impact

It is the City of Kodiak's intent to minimize the impact of this disposal on the environment. We will utilize the procedures explained in the disposal plan to remove all materials, to the maximum extent practical, that may degrade the marine environment. We will utilize the EPA's and U.S. Maritime Administration's 'National Guidance: Best Management Practices for Preparing Vessels Intended to Create Artificial Reefs' document to do our best to prepare the vessel. This will include emptying all fuel lines and fuel tanks to the lowest point practicable, flushing them with water, and again emptying them to the lowest point practicable so that they are essentially free of petroleum. Examples of materials the City of Kodiak will work on removing are:

- Fuel, lubricants, hydraulic fluid, anti-freeze, and waste oil, including oily bilge water
- PCBs (solid and liquid forms)
- Batteries
- Containers of paint, thinner, chemicals, tar, acids, cleaning products, etc
- Lights containing mercury
- Electronics
- Pressurized cylinders (extinguishers, acetylene tanks, oxygen cylinder, propane tanks)
- Fishing nets and related gear, lines, and rigging that are readily detachable
- Plastic tarps, bags, cushions, empty containers, plastid totes, foul weather gear, rags, and anything else that may possibly float
- Ammuntion, explosives, flares
- Life jackets, rings, rafts, survival suits, and EPIRBS that could be found and reported to the Coast Guard
- Asbestos pipe insulation that is loose
- Loose paint and paint chips

The City will work closely with regional EPA and USCG representatives to ensure the vessel meets all stakeholder needs regarding "how clean is clean". We will set up a joint inspection with EPA or Coast Guard no less than 10 days before disposal to ensure all elements of the permit have been met. Additionally, we are working closely with the USCG Sector Anchorage to ensure our disposal location creates the minimum impact to the environment.

Conclusion

Examining all methods of disposal for the Wild Alaskan, utilizing the EPA General Permit under the Marine Protection, Research and Sanctuaries Act is the City of Kodiak's most viable and fiscally responsible way of disposing of the vessel. Disposal in both the landfill and/or salvage yard would be highly cost prohibitive and very taxing on the

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island's only two land based disposal areas which have limited space and are operating near full capacity to accommodate the normal level of waste produced on island. The EPA's General permit has been used successfully in the past to dispose of several vessels around Kodiak Island. With close cooperation between the City of Kodiak, the Environmental Protection Agency, and the US Coast Guard throughout the EPA General Permit process, we believe this can be another successful endeavor for all involved.

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