To: SCHMIDT, LINDIE (DNR)[LINDIE.SCHMIDT@dnr.wa.gov]
Cc: Pruit, Terry (ATG)[TerryP@ATG.WA.GOV]; Callow, Ted (ATG)[TedC@ATG.WA.GOV]; RECHNER, MICHAL (DNR)[MICHAL.RECHNER@dnr.wa.gov]
From: COTHERN, SHAYNE (DNR)
Sent: Wed 8/1/2012 9:54:27 PM
Subject: FW: Thompson Float removal JARPA
IC-127694-1.pdf

Lindie,
Thank you for swinging by and providing full picture of what we are dealing with here. We need to be cautious avoiding opening ourselves to liability for contractor's operations at this site. I want to see pontoons removed but not at an unnecessary cost to the environment.

We should first and foremost ensure that contractor has provided proof that he has exhausted every option to avoid demolition on site. If cost is a factor then he needs to bring forth cost estimates showing what work needs to be conducted and explain why these costs are prohibitive. If they are not prohibitive then we should seek agreement to proceed in this manner.

If we are to consider demo on site, not saying we will allow, but hypothetically to provide recommendations to regulating agencies considering this matter here are a few key recommendations. First we should ensure Ecology's Water Quality Program Manager is aware of request-I did not see this recommendation in WDFWs letter. On-site demo was an issue new to water quality managers for Davy Crockett DV removal and I am sure a similar challenge for permit writers in this area. In speaking with Environmental Unit Leader for Davy Crockett my first recommendation is to ensure that requirements listed in Ecology General Boatyard Permit conditions S1.B and S3.C-J as well as all pertinent BMPs (starting on page 18) are listed in Individual NPDES Permit. In addition to these BMPs I would also recommend the following:

1) Apply best available technology (BAT) to ensure that debris (including waste tips from cutting rods) do not enter State Waters and do not remain on SOAL.
    a. Count cutting and/or welding rods used to ensure tips are retained for proper disposal
    b. Employ use of a magnet to pick up scraps that may fall away from pontoon during operations
    c. Ensure that all cutting and welding is conducted in such a way as to ensure slag falls into vessel where it may be collected and properly disposed of before coming in contact with State waters-this would most likely require vacuuming of bottom of pontoon daily at end of operations.
    d. Secure pontoon so it cannot roll over and fill with water while partially cut
    e. Ensure no cutting is allowed that will deliver slag or other debris to State Waters (limit to low tide operations once down to a certain level).
2) Marc Pacifico is a good contact familiar with these types of operations whose name should be passed to water quality permit writers.
3) I am seeking input from EPA contact to see whether metals are part of cleanup consideration and how this operation might jeopardize investigation and/or affect level of liability at this site. I will see if they would even consider this proposal at this time and if so whether they have any further recommendations for BMPs. Will let you know when I hear back from them.

That is all I have right now. Call if any questions.

Shayne Cothern, Environmental Specialist
Dept. of Natural Resources
(360) 902-1064

From: SCHMIDT, LINDIE (DNR)

Sent: Tuesday, July 31, 2012 1:37 PM
To: COTHERN, SHAYNE (DNR); Pruit, Terry (ATG)
Subject: RE: Thompson Float removal JARPA

Hello Shayne,

At this time, no permits have been issued. See the attached letter from WDFW.

Lindie Schmidt
Natural Resource Specialist II
Shoreline District; Aquatics Program
Washington State Department of Natural Resources (DNR)
(206) 949-1740 (cell)
Lindie.Schmidt@dnr.wa.gov
www.dnr.wa.gov

From: COTHERN, SHAYNE (DNR)
Sent: Tuesday, July 31, 2012 11:02 AM
To: SCHMIDT, LINDIE (DNR); Pruit, Terry (ATG)
Subject: RE: Thompson Float removal JARPA

Sorry for absence of response but just returning from vacation.

First and foremost it appears this JARPA is not current. After reviewing limited information provided it seems first action should be to seek a copy of approved HPA or one pending our approval. I am assuming we are issuing a ROE for this action so we should acquire copies of all permits needed for this action to proceed. I would definitely prefer to see scrapping occur on private land away from SOAL but if this cannot be accomplished it should be stated why and what will be done (in greater detail) to ensure metal contamination within an active cleanup site does not occur. I also want to confirm ownership-Thompson lists itself as owner but I am assuming they are working for Seskos-please clarify.

The Davy Crocket vessel removal on the Columbia has taught us that scrapping in place can lead to sediment contamination from metals and byproducts of cutting rods. There most likely are BMPs that could be employed to reduce impacts beyond that of spreading plywood to catch slag. I will review notes from Davy Crockett tomorrow upon my return to see what else we should recommend (collecting remnant cutting rods and ensuring least toxic rod use comes to mind...).

Due to the fact that this is a cleanup site we need to ensure that we keep site managers informed of planned actions and seek input. This site is currently transferring from "Emergency Action" management under the EPA to a long-term CERCLA cleanup site entering the RI/FS stage with significant sampling already accomplished. Upon return to office I will review past sampling records, speak with my contact at EPA, Kathy Parker, and seek recommendations on next steps forward.
In meantime Lindie if you could request an updated HPA, Shoreline Permit or other more detailed document that includes a salvage plan please forward so I may share with EPA.

Will get back to you when I have a response from EPA.

Shayne Cothern
DNR-Aquatics Program
Environmental Specialist
360-902-1064
Shayne.Cothern@dnr.wa.gov

From: SCHMIDT, LINDIE (DNR)
Sent: Fri 7/27/2012 1:38 PM
To: Pruit, Terry (ATG)
Cc: COTHERN, SHAYNE (DNR)
Subject: RE: Thompson Float removal JARPA

Redacted

From: Pruit, Terry (ATG)
Sent: Fri 7/27/2012 1:29 PM
To: SCHMIDT, LINDIE (DNR)
Cc: COTHERN, SHAYNE (DNR)
Subject: RE: Thompson Float removal JARPA

Redacted

Terry Pruit
Assistant Attorney General
Natural Resources Division
(360) 586-0642
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From: SCHMIDT, LINDIE (DNR)
Sent: Friday, July 27, 2012 10:49 AM
To: COTHERN, SHAYNE (DNR); Pruit, Terry (ATG)
Subject: FW: Thompson Float removal JARPA

Hello Gentlemen,

Attached is a JARPA for removal of the Sesko pontoons. The contractor (Thompson Drilling) is now proposing to cut the pontoons up and place the scrap on a barge. WDFW wanted to know if DNR had any concerns with this proposal.

Redacted

Lindie Schmidt
206-949-1740

From: Waldbillig, Chris M (DFW)
Sent: Fri 7/27/2012 10:16 AM
To: SCHMIDT, LINDIE (DNR)
Subject: FW: Thompson Float removal JARPA

Lindie,

Attached is the JARPA that Paul submitted. I'm wondering if it would not be better to cut the scrap in place, capturing the debris of course, then remove the pieces in ¼'s on a barge.

Let me know what you think, thanks.

Chris Waldbillig
WDFW Marine Area Habitat Biologist
360-874-7258 Office
360-480-8128 Cell

From: Waldbillig, Chris M (DFW)
Sent: Tuesday, July 24, 2012 11:37 AM
To: 'jweaver@cityofportorchard.us'
Subject: Thompson Float removal JARPA

Attached, thanks James.

Chris Waldbillig
WDFW Marine Area Habitat Biologist
360-874-7258 Office
360-480-8128 Cell