## Document Log Item

| Addressing | | | |
|---|---|---|---|
| **From** | | **To** | |
| "Steve Costa" <slcatgdc@earthlink.net> | | Carl Goldstein/R9/USEPA/US@EPA | |
| **CC** | | **BCC** | |
| "Jim Cox" <jcox@cosintl.com> | | | |
| **Description** | | | Form Used: Memo |
| **Subject** | | **Date/Time** | |
| Re: COS Samoa Packing Permit Issues | | 08/17/2009 11:11 AM | |
| **# of Attachments** | **Total Bytes** | **NPM** | **Contributor** |
| 0 | 14,214 | | Marcela VonVacano |
| **Processing** | | | |
| **Comments** | | | |
| | | | |
| | | | |

Body

## Document Body

Carl,

That would be great. We will be there from Sept 11 to Sept 20.

Steve

----- Original Message -----
From: <Goldstein.Carl@epa.gov>
To: "Steve Costa" <slcatgdc@earthlink.net>
Cc: "Jim Cox" <jcox@cosintl.com>
Sent: Monday, August 17, 2009 10:50 AM
Subject: Re: COS Samoa Packing Permit Issues

> Steve,
>
> If we indeed overlap in Sept. , and you would like to, we can both go
> together to see what we are talking about at COS, thereby getting EPA's
> on-site evaluation /inpsection if desired.
>
> -Carl
>
>
>
> "Steve Costa"
> <slcatgdc@earthl
> ink.net> To
> "Jim Cox" <jcox@cosintl.com>,
> 08/17/2009 10:42 Carl Goldstein/R9/USEPA/US@EPA
> AM cc
>
> Subject
> Re: COS Samoa Packing Permit
> Issues
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>
> Thanks for the clarification, Carl.
>
> Jim, can you provide a drawing of the active surface area that will be

> involved in the buying operation. If not I can probably put
something
> together from the hydraulics report we did some years ago.
>
> Steve
>
>
> ----- Original Message -----
> From: <Goldstein.Carl@epa.gov>
> To: "Jim Cox" <jcox@cosintl.com>
> Cc: "Steve Costa" <slcatgdc@earthlink.net>
> Sent: Monday, August 17, 2009 10:07 AM
> Subject: RE: COS Samoa Packing Permit Issues
>
>
>> With regard to the storm water permit, as I recall, it also
included
> how
>> clean the area is that would collect the storm water and then
> discharge.
>> The canning plant across the road had a very small area that
did
> collect
>> and discharge, but it was very, very clean. Naturally, when we
read
> the
>> rules, it will be clear.
>>
>>
>>
>> "Jim Cox"
>> <jcox@cosintl.co
>> m> To
>> "Steve Costa"
>> 08/16/2009 11:43 <slcatgdc@earthlink.net>
>> AM cc
>> Carl Goldstein/R9/USEPA/US@EPA
>> Subject

>> RE: COS Samoa Packing Permit
>> Issues
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>> Steve,
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>> Thanks for your help in obtaining Carl’s input. Our intent
will be to
>> continue to keep the permits active and we will follow what
course is
>> needed there. Regarding item 3 below, I would request that you
help
> us
>> to fill out the exemption application and help us sheppard it
through.
>>
>> Regards,
>>
>> Jim
>>
>>
>>
>>
>> From: Steve Costa [mailto:slcatgdc@earthlink.net]
>> Sent: Sunday, August 16, 2009 11:27 AM
>> To: Jim Cox; Goldstein.Carl@epa.gov
>> Subject: COS Samoa Packing Permit Issues
>>
>> Carl,
>>

>> Please review and make sure I am correctly interpreting our
>> conversation.
>> ----------
>>
>> Jim,
>>
>> I have had a couple of phone conversations with Carl. The
following
>> represent his evaluation at this time, but keep in mind that
he has
>> submitted the letter to the permitting folks for a more
"official"
>> evaluation. This could take some time.
>>
>> As suspected when you stop production at the cannery there are
two
>> courses of action you can take:
>>
>> [1] Simply notify EPA that you are no longer in business and
wish to
>> terminate (abandon your permits - NPDES and Ocean Dumping
[OD]).
> There
>> will be no further requirements. If someone buys the facility
and
> wants
>> to start production they would have to apply for a new
permit(s). My
>> feeling is that this might be problematic until the nitrogen
and
>> phosphorus water quality standards issues are settled. A new
OD
> permit
>> could be very difficult.
>>
>> [2] If you wish to maintain the permit for a possible sale of
the
> plant,

>> then all permit required monitoring will be required. As for the DMRs
>> and OD reports, you would file those and simply check the "No
> Discharge"
>> box or indicate no discharge in the appropriate places. All other
>> requirements would remain in effect - however, I believe that if there
>> is no processing then any internal plant monitoring would be in
>> suspension until production starts -up. It is unclear to me at this
>> time how EPA would view the routine Harbor and Ocean monitoring or how
>> you would coordinate with StarKist since they will still be obligated
> to
>> do that monitoring. I suspect EPA would accept the monitoring as in
>> compliance for both permits - but I am not sure how that gets worked
> out
>> between COS and StarKist. StarKist may object to submitting a
>> monitoring report with COS as a co-submitter if they are paying for
> the
>> whole thing. Obviously, I do not want to get conflicted between the
> two
>> operations - so COS, StarKist, and EPA would need to work that out.
>>
>> [3] As for the storm water from the buying and storage operation, Carl
>> has indicated that you can apply for an exemption/exclusion from a
>> stormwater permit since there would be no identifiable point source

>> discharge of pollutants. Evidently that is the existing situation for
>> the can plant. There should be an application for that available
> online
>> at the EPA web site. If not I believe a letter to EPA (through Carl)
>> would suffice. I am not sure if this is the same thing as permitting
>> under the EPA-Region 9 general storm water permit. I believe your
> best
>> course of action is to fill a request for an exemption and continue
> with
>> your planned operation as the details get worked out. Carl sees no
>> downside to this approach at this time.
>>
>> Let me know if you would like gdc to follow up on item [3]
>>
>> Steve
>>
>>
>
>