

**From:** [Aaron Harrington](#)  
**To:** [McGowan, Vincent \(ECY\)](#)  
**Subject:** Vessel Deconstruction General Permit Comments  
**Date:** Friday, August 22, 2014 3:30:52 PM  
**Attachments:** [image001.png](#)

---

Vince,

The ultimate goal of the work associated with the “in water” demolition of vessels is to mitigate the problem and eliminate the ongoing threat of pollution and detriment to the environment.

Including the following implementations and clarifications in the permit requirements and conditions would help ensure projects are successful:

- 1) Who and what qualifications does the plan reviewer of plans submitted for operations and hazardous materials assessment and handling associated with the project have?
- 2) Will oversight or visits to the permit site occur confirming the plans are being implemented?
- 3) Will this permit be required for wooden vessels that cannot be lifted with “clamshelling” being the only possible removal method?
- 4) Require proof of marine and pollution insurances for permit holder. Typical for contractors engaging in this type of work.
- 5) When referencing “qualified marine professional” what defines these individuals? I would encourage you to require the permit holder have membership in the American Salvage Association and Association of Diving Contractors signifying an understanding of the dynamic situations surrounding vessel removal operations as well as underwater work.

Thank you for your time and please call with any questions or concerns.

Regards,



**Aaron Harrington**  
*PNW General Manager*

Global Diving & Salvage, Inc.  
3840 W Marginal Way SW  
Seattle, WA 98106  
206.623.0621 Office  
206.932.9036 Fax  
206.730.9362 Mobile  
800.441.3483 24hr Line  
[aharrington@gdiving.com](mailto:aharrington@gdiving.com) | [www.gdiving.com](http://www.gdiving.com)

*This message contains confidential and privileged information. If it has been sent to you in error, please reply to inform the sender of the error and then delete this message.*