



August 22, 2014

Electronic submittal: [vincent.mcgowan@ecy.wa.gov](mailto:vincent.mcgowan@ecy.wa.gov)

Mr. Vincent McGowan  
Water Quality Program  
Washington State Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504-7600

Subject: Response to DRAFT Vessel Deconstruction General Permit

Dear Mr. McGowan:

Please accept these comments from the Washington State Department of Natural Resources (DNR) regarding the *DRAFT Vessel Deconstruction General Permit* (Permit). DNR is the manager of over three million acres of state trust lands comprised of forest, range, commercial and agricultural lands and 2.6 million acres of state-owned aquatic lands. DNR is committed to sustainably managing the state's resources, relying on sound science, and making transparent decisions in the public's interest throughout the environmental review process. It is the ultimate goal of DNR to protect state-owned lands for future use by Washington state citizens.

DNR understands the need and value that this Permit will provide in order to have proper deconstruction of vessels that cannot be moved to a shipyard for various reasons. Like Ecology, generally DNR would prefer for vessel deconstruction to occur in properly permitted and maintained shipyards to ensure the implementation of pollution preventing Best Management Practices (BMPs) but we appreciate the opportunity for increasing the potential for temporary facilities for increased vessel disposal.

DNR would like to provide the following comments and questions regarding the Permit:

- S1.B.1a Will this Permit apply to the deconstruction and removal of wooden vessels for example removal of sunken and deteriorated wrecks that have to be removed via clamshell.
- S2.B. – The estimated vessel deconstruction project length should be included in the Public Notice information. This is valued information that will provide an understanding of how long a project will be occurring over water.
- S4.B – Drydock discharge analysis should also include copper, zinc, and lead. The drydock may still have remnants of previous materials and activities that could cause a discharge of pollutants.



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- G9b. How far in advance of the transfer date do the parties need to provide the Transfer of Coverage form to the Director? How long does the Director have to notify the parties that he/she is revoking the permit? What information does the Transferor/Transferee need to provide to ensure that they will be able to execute the plan? There should be enough time and information provided to keep someone who is being marginally successful at their deconstruction project from transferring it mid project to someone who will be less successful.

Thank you for allowing DNR the opportunity to comment on the DRAFT Vessel Deconstruction General Permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Kyle C. Murphy", written over a horizontal line.

Kyle Murphy, Assistant Division Manager  
Aquatic Resources Division