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## REDACTED

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**From:** Young, Hunter <Young.Hunter@epa.gov>

**Sent:** Friday, April 14, 2023 11:00 AM

**To:** Nik Bacher <nbacher@anchorqea.com>; Peterson, Lance <peteronle@cdmsmith.com>

**Cc:** Bob Wyatt <rjw@nwnatural.com>; Patricia Dost <pdost@pearllegalgroup.com>; Ryan Barth <rbarth@anchorqea.com>; Jen Mott <jmott@anchorqea.com>; Joe Smith <jsmith@anchorqea.com>

**Subject:** RE: Gasco Sediments Site Additional Depth of Contamination Investigation: Contractor provided dive safety plan for review

Bob, Ryan, Nik,

EPA has reviewed the dive safety plan prepared by Calypso Diving LLC for the use of divers to attempt the retrieval of the drill casing associated with the vibracore at location PDI-210. Note that EPA does not approve health and safety plans, or dive safety plans, but reviews for completeness. We would appreciate consideration of the following comments in a resubmitted document. Providing a response-to-comment description of the changes or reline/strikeout text would facilitate EPA's review.

1. Revise the text to specify the route to the nearest hospital (refer to EPA 2022, Appendix M).
2. Revise subsection 2.3 *Surface Supplied Diving Equipment* to indicate whether the umbilicals have been tested within the last year to 1.5 times their working pressure (consistent with OSHA 29 CFR 1910.430).
3. Revise subsection 5.1, *Protection Level* to replace "fresh water" with "potable water." The revisions should be made to the second bullet in the *Decontamination Procedures* on page 24 and in the first row, first column of the table on page 25. Potable water decontamination should be used at a minimum after each dive for dives with low to moderate contamination.
4. Include a description in the dive plan on how the diver(s) will work around energized equipment when connecting the core flight/drill string to avoid diver injury (consistent with OSHA 29 CFR 1910.147).
5. The certifications should be resubmitted to address the following:

Jacob Langdon is missing OSHA HAZWOPER certifications. Also, it is not possible to ascertain when the last CPR, AED and first aid course was taken (e.g., poorly legible photo of previous certification card without dates).

Jed Hoffman is missing OSHA HAZWOPER certifications.

Simon Cleasby had presented an expired first aid certification.

Certifications for Derek Nelson and Simon Cleasby contain confidential medical information (first 9 pages for Nelson and 11 pages starting on the 5<sup>th</sup> page for Cleasby). This information should be removed from the revised dive safety plan.

**GASCO0049986**

Reference:

EPA, 2022. Diving Safety Manual (Revision 2.0). Office of Administrative and Resource Management, Safety and Sustainability Division, Washington, D.C. May 7. 2022.

Let me know if you have any questions. Thank you,

Hunter Young  
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Region 10 - Oregon Operations Office  
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**From:** Nik Bacher <[nbacher@anchorqea.com](mailto:nbacher@anchorqea.com)>  
**Sent:** Thursday, April 13, 2023 12:03 PM  
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[jmott@anchorqea.com](mailto:jmott@anchorqea.com); Joe Smith <[jsmith@anchorqea.com](mailto:jsmith@anchorqea.com)>  
**Subject:** Gasco Sediments Site Additional Depth of Contamination Investigation: Contractor provided dive safety plan for review

Hunter,

Attached for your review is the dive safety plan from our subcontractor for using divers to attempt the retrieval the drill casing stuck in the bottom at location PDI-210.

Let us know if you have any questions during your review.

**Niklas Bacher, L.G., P.G.**

Director of Field Services  
Senior Managing Geologist

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