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Illinois Department of Natural Resources

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George H. Ryan, Governor • Brent Manning, Director

May 3, 2002

Dr. Richard Everett
Project Manager
Office of Operating and Environmental Standards
US Department of Transportation
400 Seventh Street SW
Washington, DC 20590

USCG-2001-10486-32

Dear Dr. Everett:

This letter is in response to the request for comments on the development of a ballast water treatment goal, and an interim ballast water treatment standard [USCG-2001-10486]. This effort is being conducted for expansion of the Nonindigenous Aquatic Nuisance Prevention and Control Act of 1990 and the National Invasive Species Act of 1996.

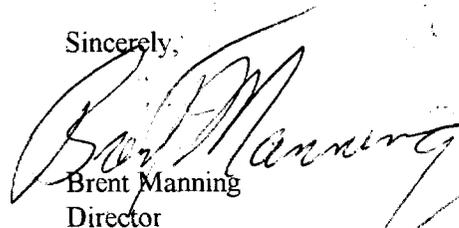
Of the various goals offered, goals G1 and G2 provide for "no discharge" of zooplankton and for treatment for living organisms to the level of drinking water respectively. These goals are both impractical for ship-scale treatments. Goal G3 provides for ballast water treatment (BWT) technologies which are considered a viable short-term solution. While more durable technologies will need development, these provide the best opportunity for uniform agreement among the interested parties, and the most expedient implementation schedule.

Several standards are also mentioned in this document which vary greatly in their scope. Standard S1 calls for achieving 95% removal, kill, or inactivation of species representatives. Although this may not be the best optimum goal for a standard, it is currently authorized by NISA, and should therefore be considered. Standards S2 - S4 require removal of organisms based on size, or location of uptake. This will be extremely difficult for enforcement and for analyzation because of sediment in the tanks, pumpage volumes, and other factors. Although these may be good long-term goals, they are not viable under current practices.

Finally, question #6 addresses the concerns of nuisance organisms as well as potential disease threats they would carry with them. One oversight of concern is the residual effects of the treatment being employed when released overboard during deballasting. Many of the chemicals used can have environmental impacts if not properly neutralized or removed before disposal.

Thank you for the opportunity to comment on this proposed rulemaking. Please feel free to contact Mike Conlin of my staff at 217/782-6424 if you need further information.

Sincerely,



Brent Manning
Director

BM:SJS