

Dear Sir or Madam:

I am the Cargo Operations Manager for Sause Bros., a tug and barge company located on the west coast. We currently have a fleet of 13 ocean going tugs and 20 ocean going barges that operate throughout the Pacific. Specifically, we are now operating six barges and three tugs between the Pacific Northwest and Hawaii while the remainder of the vessels operate along the coast between Canada and Mexico.

Sause Bros is very concerned with the referenced proposed rulemaking (NPRM) to make the voluntary ballast water management program mandatory and applying to all vessels. We are members of the American Waterways Operators and heartily endorse their position on this issue.

Sause Bros.' barges will not be able to follow the guidelines as written. Our barges are all equipped with stern ballast tanks which must be utilized during the loading and unloading process. This process of loading and discharge takes place at coastal lumber mills, port docks along the Columbia River, and alongside public docks in Hawaii. The guidelines request that ballasting not take place over coral reefs, areas near sewage outfalls, areas near dredging operations, areas where tidal flushing is known to be poor, in darkness, or where propellers may stir up the sediment. These areas are precisely where our barges load and discharge.

In addition, the NPRM requests that all vessels employ at least one of the following ballast management practices.

1. Exchange ballast water 200 miles from shore. This is unrealistic and not possible to do (safely) on our unmanned barges.

2. Retain the ballast water. When our barges are empty, all ballast (stern tanks) must be removed so that the barge does not pound on the return trip damaging the bow of the vessel. New barges could be built to hold the ballast...but the present fleet does not have the capability.

3. Use an environmentally sound method of ballast water management approved by the USCG. We are not aware of any such alternatives.

4. Discharge ballast water to an approved reception facility. There are none...or few. Also, if there were any facilities, it would be a great expense to truck the water to the facility....since the deballasting for our barges must take place at the discharge location...not at the approved reception facility.

As you can see, our company will have a difficult time trying to comply with the NPRM....and, indeed, may find that some of the guidelines are impossible to follow.

We also have concerns with the ballast reporting form. The form is specific for one vessel. The tug and barge industry operates in clusters of two or more vessels. Could the form be specific to a tow which might include one tug and two barges? This would reduce the paperwork involved while presenting the same information. Also, the form could be more tug and barge "friendly" using terms and measurements that are common to the industry.

In summary, our concerns are that the NPRM, as written, seems to be based on deep sea vessels (ships) coming into US waters. For that purpose it may be acceptable. However, the tug and barge industry utilizing unmanned, un-powered vessels operating in shallow, tidal waters is unique and does not fit well into the guidelines.

Thank you for the opportunity to comment on this NPRM. We hope the Coast Guard and AWO can work together in "fine tuning" the rules on ballast water management before they become law.