Lake Carriers' Association

The Greatest Ships on the Great Lakes

JAMES H. I. WEAKLEY, PRESIDENT
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May 1, 2008

Via E-Mail: maryjean.fenske@pca.state.mn.us
(Original Mailed)

Ms. Mary Jean Fenske
Minnesota Pollution Control Agency
Industrial Division
520 Lafayette Road North
St. Paul, MN 55155-4194

Dear Ms. Fenske:

MINNESOTA VESSEL DISCHARGE GENERAL PERMIT
CURRENT WORKING DRAFT LANGUAGE

Lake Carriers' Association would like to add an additional point to its submission of April 29, 2008.

Any requirement to install ballast treatment systems on our members' vessels would increase the electrical load on the vessel. At a minimum, this would result in increased fuel consumption to power the existing generator(s). On some vessels, the increased need for power would result in installation of an additional generator. The generator could cost $250,000; installation could be as much as an additional $150,000.

We would further note that unused space is a rare commodity in engine rooms, so simply finding the room for an additional generator could be challenging.

Sincerely,

James H. I. Weakley
President

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cc: Members – LCA Board of Directors
Members – LCA Fleet Engineers Committee
Members – LCA Navigation Committee