

## Ohio comments on MN ballast water permit -

**Page 1** – Have you developed a special DMR for this permit? Or have you been able to work out specific reporting codes for ballast water performance standards?

**Page 3** – Does the Armed Forces exclusion apply to the Canadian military, as well?

For Exclusion 5 b., can you give me an example of what this covers?

For Exclusion 5 c., does this apply to ocean vessels that may take on ballast in Duluth, then discharge it in the harbor? I can see how this provision would work for lakers, but for ocean vessels this may still introduce critters. I'm not sure whether the issue is the definition of "originated"? Food for thought.

**Page 5/6** – What are the costs associated with the performance standards monitoring? Twice per year doesn't sound like much monitoring, especially considering that the tests on Page 6 are not expensive. Or is there a BMP that would address treatment system operation between tests?

I would recommend including the TRO/bromine conditions from the start. Substitution of bromine for chlorine is not that difficult. I think it would save modifying the permit within a short time period.

**Page 7** – Are you planning to use a permit-specific NOI for this? If so, can you send me a copy?

**Page 12** – Are the duration-based chlorine limits set on WQS for short-term discharges? If so, shouldn't the language refer to discharge durations less than 2 or 6 hours, rather than chlorination less than 2 or 6 hours? As written, the permit would allow extended discharges at high concentrations of chlorine/bromine, especially if the ship treated just before discharge (which is what I would do).

Is there a provision for approving or disapproving new biocides?

**Page 13** – In the MDL language, is there a need to refer to 40 CFR 136, Appendix B?