

From: James H. I. Weakley [REDACTED]
Sent: Wednesday, July 06, 2016 11:02 AM
To: Elizabeth Brackett
Cc: [REDACTED]
Subject: FW: Ballast Water

Elizabeth,

I appreciated your piece on non-native species and thank you for reaching out to us on the story. I would like to make a few follow-up comments for clarification:

1. In your exchange with Dr. Willink all 180 aquatic non-native species currently resident in the Great Lakes basin were attributed to ballast water introduction by international vessels. To clarify, of the 180 species currently tracked by USGS, U.S. EPA and NOAA, 74 species have been identified as possibly linked to ballast: 12 were from the 19th Century and came in solid ballast, such as stone, before the universal switch from wooden hulled vessels to steel; and two are only potentially linked to ballast water but not confirmed. So 60 or 62 is what is commonly used.
2. Ms. Riley stated that the Coast Guard is not expert in regulating technology on vessels, which is not correct. They have been writing and enforcing environmental regulations for over 40 years. The Coast Guard regulates such complicated environmental technology as marine sanitation devices which are designed to receive, retain, treat, or discharge wastewater and oily water separators - devices and technologies used to capture and separate oil from water to as little as 2 parts per million. Additionally, Coast Guard is in-charge of the testing, certification, and approval of any and all ballast water treatment systems that will be installed on any vessel, domestic or foreign, visiting U.S. ports. They not only lead this effort but the entire US delegation at the International Maritime Organization. Their standards are held very high and in fact have proven that many treatment systems approved in other countries will not, do not meet the rigorous technological and discharge standards to meet U.S. law. Much to the chagrin of the rest of the world, the US Coast Guard is setting the highest standard for the testing and type approval of ballast water treatment systems. The standards the USCG are using are based on the EPA's ETV testing protocol. The two agencies work well together and as you pointed out in the interview with me, both have adopted the same numerical discharges standard, which is impossible to be a "national standard" under the Clean Water Act. I think to challenge the CG's credibility are competence as a regulator and enforcer of environmental standards is both inaccurate and unfair. The EPA has been regulating ships since 2009 and that is only because a court ruled they should not because the CG was doing an inadequate job.