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Discharging Vessel Wash Water Into The Mississippi River

Recently there have been several meetings and numerous discussions regarding vessels discharging wash water into the Mississippi River.

For decades vessels have cleaned cargo holds and discharged wash water into the Mississippi River provided that wash water was considered clean, not having oily residue or leaving a sheen on the water when discharged.

Last month in April, 2003 the State of Louisiana Department of Environmental Quality issued a statement advising that:

- a) Discharge of ship and barge wash waters and waste-waters is an activity that is subject to Louisiana Pollutant Discharge Elimination System permitting,
- b) Discharging wash water and waste-water to the waters of the state without a permit is an enforceable concern,
- c) Although LAC 33:IX.2315.A.1 allows discharges incidental to the operation of a vessel without the need for a permit, ship and barge cleaning related discharges are not considered normal vessel operations and require a permit from the LDEQ. The LDEQ letter further states that they will be closely scrutinizing these types of activities for compliance with state and federal laws and regulations in corroboration with the USCG.

Although cargo is spilled into the Miss.River at numerous transfer locations, the Louisiana Dept of Environmental Quality considers the distinction that transfer facilities have specific LDEQ permits that allow for spillage of specific cargoes and that spilling of cargo during transfer operations is accidental as opposed to vessels cleaning cargo holds whereby wash water is intentionally discharged into the river.

Dialog between the Mississippi River River Maritime Association, Steamship Association of Louisiana and LDEQ is presently ongoing; however we are advising all vessels handled by Blue Water of the following: quote As per Louisiana and USCG regulations, only clean water is allowed to be pumped overboard into State Waters. If necessary, wash water should be stored in holding tank/s until it can be pumped out at sea in accordance with International regulations. If you have to pump wash water overboard into the river, please coordinate with us so that we can arrange for sampling, testing, and monitoring of wash water to be discharged under LDEQ permit. end quote

All major Mississippi River Cleaning Companies currently have LDEQ permits to sample, monitor, and discharge vessel wash water into the Mississippi River. Discharging of wash water within 1 mile upstream of any of the 34 fresh water intakes between Southwest Pass and Baton Rouge is prohibited.

The following Mississippi River Anchorages are located within 1 mile upstream of Fresh Water intakes; therefore discharge of wash water at these anchorage locations is prohibited.

- Lower & Middle Grandview Anchorage
- New Orleans General Anchorage
- Point Celest Anchorage (actually the lower part of Point Celest south of mile point 50.2)

There are also numerous facilities and city front berths which are located within 1 mile upstream of Fresh Water intakes.

When cleaning holds after discharge of most bulk cargoes (except coal or coke) the following procedure must be complied with for discharge of wash water under LDEQ permit: a PH test using a calibrated meter confirming that wash water is between ph 6 and 9, certify vessels GPS location, ensure no visible foam / floating solids / or sheen is present, and that vessels location is not within 1 mile upstream of a fresh water intake. This test can be done within a hour once the representative is onboard.

When cleaning from coal or coke, in addition to the above testing procedures, a COD (Chemical Oxygen Demand) test is also required. This test requires a two hour digestion process at 150 degrees C followed by analysis. This test canalso be done on board but requires about 3 hours from the time that samples are taken.

Cost for discharge of wash water under permit is negotiated with the bid when a cleaning crew will be utilized for hold cleaning. Cost is quoted to be \$1600 per vessel (one voyage / one location) if holds are to be cleaned by vessels crew.

We expect that testing rates will become more competitive in the near future.