

Congress of the United States

Washington, DC 20515

August 3, 2016

Admiral Paul Zukunft
Commandant, United States Coast Guard
2703 Martin Luther King Jr. Avenue, SE
Washington, DC 20593

Dear Admiral Zukunft:

We are contacting you to express our concern regarding the U.S. Coast Guard's (USCG) delayed enforcement of its Ballast Water Management Regulations. The actions taken thus far by the Coast Guard have yielded deleterious impacts on both the environment and the economy.

Despite issuing a final rule on Ballast Water Discharge Standards in 2012, the USCG has yet to approve a single Ballast Water Management System (BWMS). The lack of USCG type-approved technology has resulted in the extension of regulatory compliance deadlines for more than 8,500 vessels. These delays allow for the continued, unnecessary discharge of untreated ballast water into U.S. waters.

Specifically, we are concerned by a recent USCG preliminary decision to reject the most probable number as an equivalent method for testing the efficacy of BWMS that use ultraviolet (UV) light to render organisms unable to reproduce. This will likely place artificial constraints on the market for BWMS by preventing vessel operators from installing UV-based BWMS and could further delay the installation of this important technology on vessels operating in U.S. waters.

In 2015, a major U.S. manufacturer of BWMS technology, headquartered in Pennsylvania, expected to grow its workforce by 300 new employees and triple the size of its manufacturing facilities to meet the demand for its International Maritime Organization certified UV BWMS technology. Instead, as a direct result of USCG action, this manufacturer has reduced its workforce associated with the manufacturing of UV BWMS and has not expanded its manufacturing facilities. The manufacturing job losses and adverse economic impacts are not limited to Pennsylvania as the effects of the USCG inaction are felt throughout the UV BWMS supply chain.

Therefore, we urge your cooperation and request to work together with you to address these important issues. If you have any additional questions, please contact Scott Dziengelski with Rep. Murphy at (202) 225-2301 and Chris Bowman with Rep. Doyle at (202) 225-2135. Thank you in advance for your attention to this matter.

Sincerely,



Tim Murphy
Member of Congress



Mike Doyle
Member of Congress

Bob Casey, Jr.

Robert P. Casey Jr.
United States Senator

Keith J Rothfus

Keith Rothfus
Member of Congress

Glenn GT Thompson

Glenn "GT" Thompson
Member of Congress

Mike Kelly

Mike Kelly
Member of Congress