

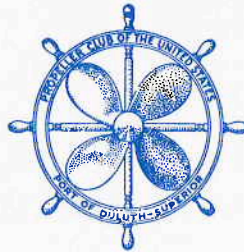
# THE PROPELLER CLUB OF THE UNITED STATES

PORT OF DULUTH-SUPERIOR  
Port No. 29 Chartered October 6, 1933

faxed 2:25pm  
9/28/09

To Promote, Further and Support an  
American Merchant Marine.

To Aid the Development of Great Lakes,  
River and Harbor Improvements.



September 28, 2009

Air and Radiation Docket and Information Center  
U.S. Environmental Protection Agency  
Mailcode 6102T  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

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[a-and-r-docket@epa.gov](mailto:a-and-r-docket@epa.gov)

Docket ID: EPA-HQ-OAR-2007-0121; FRL-8926-5  
Re: Notice of Proposed Rulemaking, Federal Register, August 28, 2009,  
40 CFR Parts 80, 85, 86, et al; Control of emissions from new marine  
compression-ignition engines at or above 30 liters per cylinder

On behalf of the Port of Duluth-Superior Propeller Club, I am writing to voice our concerns about the EPA proposed rule to include the inland waters of the Great Lakes navigation system in a continental Emissions Control Area (ECA) that would force a switch to distillate fuels at levels far more stringent than IMO standards and within a timeframe that could potentially cripple the shipping capacity and the entire maritime industry along the Great Lakes St. Lawrence Seaway (GLSLS).

Including the inland waters of the Great Lakes navigation system in this ECA and enacting an almost immediate ban on the use of residual and heavy blended fuels will dramatically impact every port and port community along this *bi-national* waterway. The Port of Duluth-Superior has a vested interest in the outcome of these proceedings. We are the largest tonnage port on the Great Lakes, handling an average of 46 million short tons of bulk cargo every year. The EPA's proposed emissions rule would effectively doom an entire class of vessels that serve our port and jeopardize the useful lives of another 20 bulk cargo carriers currently in operation on these waters. Losing those vessels and having to pay upwards of \$20 million apiece to replace engines in the remaining U.S. and Canadian-flag fleets – could severely diminish domestic trade opportunities; increase fuel and freight costs; and eliminate jobs in the maritime, mining, manufacturing and energy industries.

Pulling vessels out of service would dramatically reduce shipping capacity on the Great Lakes navigation system. Reduced capacity and increased fuel costs will increase freight rates, causing a *modal shift* to landside transport. Ironically, a modal shift to truck and rail will actually *increase* landside congestion and *increase* emissions, which is exactly what the EPA (Clean Air Act) is trying to avoid.

In addition, this proposed rule will further impact *international* trade. Oceangoing ships will *not* burn high-priced, low-sulfur fuel for *2,300+ miles* from the Atlantic Ocean to the Port of Duluth-Superior. Cargo destined for Midwestern states will be dumped at already congested East Coast ports to be moved by rail and truck to the heartland. Midwestern farmers and manufacturers will lose a low-cost competitive transportation route for sale and export.

The marine mode of transportation stands alone as the safest and most efficient way to move huge quantities of raw materials and finished goods long distances at relatively low cost. To ensure our industry's sustainability, we ask that the EPA suspend application of ECA rules to the Great Lakes navigation system...that the EPA establish a separate regulatory action to focus on appropriate and workable emissions regulations for vessel operators on these inland waters. We ask that the EPA take time to fully assess the situation and analyze the long-term impacts of requiring such radical changes on the GLSLS – the impact of emissions from Great Lakes vessels on regional air quality, plus the technical challenges unique to those vessels, potential modal shifts and employment impacts in this region. We urge EPA to work cooperatively with Great Lakes vessel operators to determine if there are alternative options available, such as exhaust emission control technologies that could be adopted. In any event, we ask that you extend the timetable for compliance – to equivalent IMO standards – to keep the Great Lakes marine transportation system operating effectively and competitively.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gerald Walls", written in a cursive style.

Gerald Walls, President