

Appendix O
DCR Control Measure Effectiveness

2
3 **DCR Control Measure Effectiveness**

PREPARED FOR: U.S. Coast Guard
 PREPARED BY: CH2M HILL
 DATE: November 26, 2007

4 **Introduction**

5 Because operator capability and equipment capability, either on board cargo ships or at
 6 loading ports, determines in part the amount of dry cargo residue (DCR) produced during
 7 operations, a review of historical DCR data was conducted to determine if patterns exist that
 8 would indicate certain ships and, therefore, loading and unloading equipment on those
 9 ships, could be the cause of noticeably higher DCR quantities. Similarly, a review of ports
 10 was conducted to determine if equipment and loading practices at certain ports may be
 11 contributing to higher DCR discharges than other ports. If a pattern is determined, this may
 12 assist in determining which types of equipment or practices are more effective in reducing
 13 DCR quantities. The analysis relied on historical data and did not include an inspection of
 14 individual loading processes at ports or on ships. Results for ships are presented first,
 15 followed by results for ports.

16 **Ships**

17 The offloading equipment and best management practices
 18 (BMPs) on each ship may be partially responsible for the
 19 amount of DCR that is spilled during bulk cargo vessels
 20 offloading operations and then later swept or discharged
 21 from the ship.

22 Table 1 lists 10 ships that were built under Title XI of the
 23 Merchant Marine Act of 1970, which allowed U.S. shipping
 24 companies to construct new vessels or to modernize their
 25 existing fleet by government-guaranteed financing and tax-
 26 deferred benefits. The total cost of these 10 ships was more
 27 than \$250 million. Ships constructed following passage of the
 28 Act have some of the lowest DCR discharges.

29 DCR discharge data (U.S. Coast Guard, 2005) for ships were
 30 used to determine the mass of DCR discharged per
 31 washdown for each ship. The data are from ship logs and
 32 document location, material type, and quantity estimate of
 33 DCR events. The DCR quantities given are estimates, and
 34 therefore there is some uncertainty associated with the
 35 reported amount.

36 The five ships with the least DCR per discharge and the five ships with the most DCR per
 37 discharge are shown in Table 2 as pounds of discharge per washdown. Table 3 shows the

TABLE 1
 Ships Constructed Following
 Passage of the Merchant Marine Act
 of 1970

Ship	Year Built
<i>Roger Keyes</i>	1973
<i>Charles E. Wilson</i>	1973
<i>H. Lee White</i>	1974
<i>Sam Laud</i>	1975
<i>St. Clair</i>	1976
<i>Belle River</i>	1977
<i>Buffalo</i>	1978
<i>Indiana Harbor</i>	1979
<i>American Mariner</i>	1980
<i>American Republic</i>	1981

38 five highest- and five lowest-discharging ships in terms of DCR discharge as a ratio of total
 39 cargo hauled. Both tables indicate that newer ships (built in the 1970s) perform better (in
 40 terms of DCR spillage) than the older ships (built in the 1950s). More information on the
 41 equipment and practices on each of these ships would be required to determine why older
 42 ships seem to produce more DCR than newer ships.

TABLE 2
 Highest and Lowest DCR-Discharging Ships per Washdown

Ship (Company)	Year Built	Washdowns Recorded in Database	Mass DCR per Washdown Event (lbs)	Material as Percent of Total DCR		
				Coal	Stone	Iron
Five Lowest-Discharging Ships						
<i>Buffalo</i> (ASC) ^a	1978	94	69	19	33	13
<i>Paul R. Tregurtha</i> (ISC)	1981	110	128	99	0	0
<i>John J. Boland</i> (ASC)	1973	63	136	23	13	61
<i>Adam E. Cornelius</i> (ASC) ^a	1973	80	137	24	57	15
<i>Walter J. McCarthy</i> (ASC) ^a	1977	46	143	75	0	25
Five Highest-Discharging Ships						
<i>John G. Munson</i> (GLF)	1952	69	849	36	51	8
<i>Reserve</i> (ON)	1953	121	378	3	13	82
<i>Charles M. Beeghly</i> (ISC)	1959	121	355	18	1	49
<i>Buckeye</i> (ON)	1952	27	345	0	9	82
<i>Armco</i> (ON)	1953	66	338	0	6	68

^aBuilt as a result of the 1970 Merchant Marine Act, which provided subsidies to build and operate ships to revitalize the American shipping industry.

43

TABLE 3
 Lowest and Highest DCR-Discharging Ships as Ratio of Total Cargo Hauled

Ship (Company)	Year Built	DCR Discharge per 1,000 Tons of Cargo Hauled (lbs)
Five Lowest-Discharging Ships		
<i>Walter J. McCarthy</i> (ASC) ^a	1977	1.1
<i>Paul R. Tregurtha</i> (ISC)	1981	1.6
<i>Buffalo</i> (ASC) ^a	1978	1.7
<i>John J. Boland</i> (ASC)	1973	2.0
<i>American Mariner</i> (ASC) ^a	1979	2.1

TABLE 3
Lowest and Highest DCR-Discharging Ships as Ratio of Total Cargo Hauled

Ship (Company)	Year Built	DCR Discharge per 1,000 Tons of Cargo Hauled (lbs)
Five Highest-Discharging Ships		
<i>Reserve</i> (ON)	1953	17.4
<i>Buckeye</i> (ON)	1952	14.0
<i>John G. Munson</i> (GLF)	1952	13.9
<i>E.W. Oglebay</i> (ON)	1973	9.9
<i>Charles M. Beeghly</i> (ISC)	1959	9.3

^aBuilt as a result of the 1970 Merchant Marine Act, which provided subsidies to build and operate ships to revitalize the American shipping industry.

44 Ports

45 Loading ports may be partially responsible for the amount of DCR that is discharged from
46 bulk cargo vessels on the Great Lakes because some of the cargo material is spilled during
47 loading operations.

48 The U.S. Coast Guard (2005) data provide loading port information for each haul segment
49 and DCR discharge. However, it is difficult to link loading ports to the proper DCR
50 discharge data because some ships wash down only after several haul segments; therefore,
51 the mass of DCR discharged may have been deposited during a loading operation at a
52 previous port and not the loading port that is indicated in the data. For example, the *Arthur*
53 *M. Anderson* hauled a load of coal on August 24, 2004, from Sandusky, Ohio, to Green Bay,
54 Wis. During this haul, the ship discharged 50 lbs of limestone DCR, indicating that the DCR
55 was not caused by the Sandusky loading operation but had been deposited by a previous
56 loading operation at a different port. Therefore, it is difficult to determine which loading
57 ports are responsible for which DCR discharges; and thus it is difficult to determine which
58 loading ports have the best loading operations in terms of minimizing DCR. As a result,
59 using the U.S. Coast Guard database is not conducive to analyzing individual port
60 performance.

61 References

- 62 U.S. Coast Guard. 2002. A Study of Dry Cargo Residue Discharges in the Great Lakes.
- 63 U.S. Coast Guard. 2005. Interim Check Draft Environmental Assessment of Incidental Dry
64 Cargo Residue Discharges in the Great Lakes. U.S. Coast Guard. October.