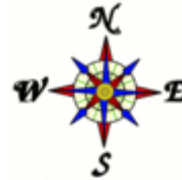


CSAW  
Campaign to Safeguard America's Waters



Earth Island Institute



*Responsible Cruising in Alaska*

7/07/08

Commissioner Larry Hartig  
Alaska Department of Environmental Conservation  
410 Willoughby Ave, Juneau, AK 99801

Re: Cruise Ship Source Reduction Evaluation Submissions

Dear Commissioner Hartig,

The Alaska General Permit 2007DB0002 for large passenger vessels (GP) under Section 1.9.3 requires any ship wishing to qualify for the interim effluent limits listed in Table 1 of the permit for zinc, nickel, copper, or ammonia submit: (1) proof the long term effluent limits for these parameters have been exceeded, and (2) a Source Reduction Evaluation (SRE) within 60 days of the request for approval to operate under the interim effluent limits. According to Section 1.9.5 the SRE must identify the likely on-board sources of the pollutants of concern, a plan to reduce those concentrations to authorized levels, and an implementation schedule for this action.

The GP specifically requires in Section 1.9.7 that the implementation schedule include a list of specific practices, any equipment changes, and the timeline the vessel operator will undertake to reduce pollutant loading. Since most if not all of the large passenger vessels visiting Alaska this cruise season have already visited the State, and presumably applied for their discharge permits in April or early May of this year, the department should have a complete record of the SREs submitted by the fleet.

CSAW and RCA hereby request a copy of those documents at your staff's earliest convenience. Copies may be mailed to CSAW, c/o Gershon Cohen Ph.D., Box 956, Haines, Alaska 99827. Thank you for your prompt attention to this matter.

Sincerely,

*Gershon Cohen Ph.D.*

Gershon Cohen Ph.D.  
Project Director  
CSAW, Earth Island Institute

Theodore Thoma  
President  
Responsible Cruising in Alaska

Cc: Mr. Talis Colberg, Alaska Attorney General,  
Mr. Joseph Geldhof, RCA Counsel