

US EPA ARCHIVE DOCUMENT

April 9, 2014

**VIA FIRST CLASS U.S. MAIL AND E-MAIL**  
**Attachments Contain Confidential Business Information**



Chief, Environmental Enforcement Section  
Environment and Natural Resources Division  
U.S. Department of Justice  
P.O. Box 7611, Ben Franklin Station  
Washington, D.C. 20044-7611

Director, Water Enforcement Division  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
Mail Code 2243A  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

Director, Water Division  
U.S. Environmental Protection Agency, Region 5  
77 W. Jackson Blvd. (W-15J)  
Chicago, IL 60604

Re: *United States v. Lake Michigan Trans-Lake Shortcut, Inc., d/b/a Lake Michigan Carferry Service and S.S. Badger*, No. 1:13-cv-317, DOJ Case No. 90-5-1-1-10771 (W.D. Mich.)

Dear Sir or Madam:

Pursuant to the notification requirement in Paragraph 30 of the Consent Decree in *United States v. Lake Michigan Trans-Lake Shortcut, Inc., d/b/a Lake Michigan Carferry Service and S.S. Badger*, Civil Action No. 13-00317 (W.D. Mich. entered into Oct. 10, 2013), attached please find a copy of the application submitted on behalf of Lake Michigan Carferry ("LMC") to the American Bureau of Shipping seeking review of compressed air system designs as part of LMC's installation of combustion control technology on the Badger. Combustion control technology is being designed and installed on the Badger in order to meet the interim effluent limits set forth in Appendix A to the Consent Decree. LMC anticipates engineering and installation of the new combustion control technology to be completed before the start of the 2014 Operating Season.



Additionally, pursuant to Paragraph 43B of the Amendment to the Consent Decree, attached please find the lab analysis of coal purchased to be used on the S.S. Badger during the 2014 Operating Season. The lab analysis reports the ash, mercury, and sulfur content of the coal purchased. If additional coal is purchased for use during the 2014 Operating Season, LMC will provide additional analyses. With this submission, LMC has fulfilled the requirements set forth in Paragraph 43B of the Amendment to the Consent Decree.

Please do not hesitate to contact me if you have questions or require additional information.

Very truly yours,

Charles R. Leonard  
Vice-President, Navigation  
Lake Michigan Carferry Service

Attachments

**From:** Marine Shop [mailto: [REDACTED]]  
**Sent:** Friday, April 04, 2014 2:03 PM  
**To:** [EShtaygrud@eagle.org](mailto:EShtaygrud@eagle.org)  
**Cc:** [cleonard@pmship.com](mailto:cleonard@pmship.com)  
**Subject:** Badger 5300348

Good afternoon Mr. Shtaygrud,

In an effort to address several issues with the compressed air system aboard our vessel S.S. Badger (ABS no. 5300348) we have been directed to you by Mr. Mohammad Ahmed.

This vessel has an existing original compressed air system utilizing a single 7.5 Hp electrically driven compressor to deliver air at 175psig and 25 CFM. Additionally there are two steam reciprocating air compressors used as needed to deliver additional volume. Over the course of time the original black iron piping has degraded and the system has been modified by the crew to the extent that a renovation was thought to be the best course. This coupled with an increased demand for compressed air over time and a pending need for even more volume in the next operating season prompted us to undertake an up-grade at this time.

We have researched our needs and what we propose to do is replace the 7.5 Hp 25CFM electrically driven compressor with a 15HP 35 CFM machine, relocate the compressor from the automobile deck into the engine room for a better environment and replace the piping with stainless steel. We will retain the steam driven compressors to provide the large volume low-pressure air needed periodically in our boiler room.

We propose to use a Quincy brand air compressor and Victaulic's Vic-Press piping system utilizing 316 stainless steel fittings and piping, valves will be manufactured in stainless steel by Jomar.

We have had a naval architect, [REDACTED], generate a set of drawings for us and would like to get them to your attention so that we may proceed with this project. We would like to complete installation by mid-May.

Your comments and guidance will be appreciated, and I can be contacted at any time at the numbers below.

Regards,

Charles Cart



Cell – [REDACTED]



Analysis Report

October 21, 2013

Page 1 of 1

Client Sample ID: East Pile-North Section
Date Sampled: Oct 8, 2013
Date Received: Oct 9, 2013
Product Description: COAL

Sample ID By:
Sample Taken At:
Sample Taken By:
Sample ID: US/0097444
P. O. #: AU04350

SGS Minerals Sample ID: 491-1374432-002

Table with 5 columns: Parameter, Method, As Received, Dry, DAF. Rows include Moisture, Total %, Ash %, Sulfur %, Gross Calorific Value Btu/lb, Chlorine, CL %, Fluorine, F µg/g, and Mercury, Hg µg/g.

Tests

TRACE ELEMENTS - DRY BASIS

Lead, Pb Result Unit Method 5 µg/g ASTM D3683

Handwritten signature of James P. Nelson

James P. Nelson
Great Lakes Operations Manager

SGS North America Inc. Minerals Services Division
16130 Van Drunen Road South Holland IL 60473 t (708) 331-2800 f (708) 333-3090 www.sgs.com/minerals

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US EPA ARCHIVE DOCUMENT



Analysis Report

October 21, 2013

Page 1 of 1

Client Sample ID:	East Pile-South Section	Sample ID By:	
Date Sampled:	Oct 8, 2013	Sample Taken At:	
Date Received:	Oct 9, 2013	Sample Taken By:	
Product Description:	COAL	Sample ID:	091809AAD
		P. O. #:	AU04350

SGS Minerals Sample ID: 491-1374432-001

	<u>Method</u>	<u>As Received</u>	<u>Dry</u>	<u>DAF</u>
Moisture, Total %	ASTM D3302	4.53		
Ash %	ASTM D3174/D7582	5.81	6.09	
Sulfur %	ASTM D4239 (A)	0.68	0.72	
Gross Calorific Value Btu/lb	ASTM D5865	13765	14418	15353
Chlorine, CL %	ASTM D4208	0.23	0.25	
Fluorine, F µg/g	ASTM D3761		26.9	
Mercury, Hg µg/g	ASTM D6722	0.04	0.05	

Tests

**TRACE ELEMENTS - DRY BASIS**

Lead, Pb	<u>Result</u>	<u>Unit</u>	<u>Method</u>
	5	µg/g	ASTM D3683

James P. Nelson  
Great Lakes Operations Manager

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