

# INGRAM BARGE COMPANY

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February 7, 2014

Department of Public Health  
Attn: Environmental Permitting and Inspections  
333 South State Street, Room 200  
Chicago, IL 60604

Re: Comments regarding Petcoke's proposed regulations concerning bulk material piles

To Whom It May Concern:

Ingram is a leading inland marine transportation company with a fleet of over 150 towboats and nearly 5,000 barges. Ingram is an active member of the American Waterways Operators. We support the comments that have been submitted to your attention by AWO, and we would like to additionally note that:

- The haste of these proposed rules fail to take into consideration the impact on barge transportation and the effect it may have on the many Illinois residents employed by the Industry.
- The proposal, as it exists today, creates ambiguity by using terms related to the different modes of transportation interchangeably – barge, rail and truck. These ambiguities will create difficulties in interpretation and application of the rules to barge operations in Illinois waters.
- The proposal to use tarps on barges is not practical. Furthermore, tarps have never been used by inland river transporters. Lastly, tarps would raise the risk of environmental and safety hazards.
- Tarps are not used in the marine industry for good reason. First, the use of tarps creates safety concerns for the vessels and their crews, and the general public. Tarps could obstruct the clear view of the vessel by captains and pilots, which could lead to significant risks. Secondly, tarps may cause harm to the general public should one blow off a barge.

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As one of the largest transporters of bulk commodities across the America's river highways, we feel strongly that the proposed rule, regardless of how well intended, would increase operational cost that will ultimately impact citizens of Illinois.

Ingram Barge, working in conjunction with AWO, intends to play a role in these conversations moving forward. Again, thank you for the opportunity to comment on this important topic.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Mecklenborg". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Dan Mecklenborg