

mayor of Chicago announced a year ago that they had a resolution, or had adopted an ordinance that would be enforceable this season, and that was that you had to have holding tanks on every boat.

That sounded good at the time, but what they are proposing is that it is a fail-safe. They will not give approval to any specific treatment device, whether chlorinated or recycling activated sludge type unit. Very frankly, for the size of the tanks that they call for for the small boats, it is impossible. If it were to be enforced, the regatta this year, from Chicago, would have to be canceled because the holding tank is bigger than the boat.

Canada came up with something along the same line and this year they have announced a postponement until they can come up with some practical applications.

I would offer some suggestions to you. The first is that the law as set, present Federal law, requires a water quality, not effluent standard. In other words, to come up with the requirement by the Secretary that you cannot have any discharge would be in violation of your Federal law. Those witnesses this morning were correct. It is water quality you are trying to achieve.

What we do have is some difficulty in trying to maintain these facilities and harbors; and to protect the harbor you are going to come up with control that you would apply out in the lake. The boat just will not work it that way. What should be, I think, is a request to the Secretary to provide you with a report on the possibilities, along with a report from the Department of Transportation, or have him get it from the Department of Transportation, on the possibilities of redesign of the larger ships; and at times, schedule for conversion of ships, rather than leaving it up to a regulation that would be nebulous and in an area that we know now there are no specifics, and ask them to come forth with something that you could then review as a basis for setting the requirements for the future. And also to recognize that the requirement is to protect the water rather than to force the people to walk around with a satchel.

PLANT OPERATION

The next area would be the chemical treatment, Mr. Dingell's bill, H.R. 16044. The philosophy behind that bill is excellent. I do not agree with the content that suggests the Federal Government should assume 25 percent of the operating cost. They are having difficulty now honoring the requirement for the funds for construction. Simply what it means is that the State of Michigan, rather than wait for the ultimate in technology to be developed, has cooperated with the Dow Chemical Co. to come up with a procedure whereby the addition of two types of chemical coagulants, either one of which alone does not work, but the combination of the two of them has converted primary treatment plants over to the equivalent of what you would call a tertiary treatment plant.

The possibility of using primary treatment plants and converting them by such chemical conditions deserves attention. If this committee were to suggest that a specific amount of the funds proposed for such research were to go into demonstration projects in different parts of the country, to see whether or not this same approach would