

8. Installation

- a. Installation of the device and its piping should allow ease of servicing and replenishment of the disinfecting agent.
- b. The device shall be adequately secured independently of any connecting piping.
- c. All piping shall be sufficiently strong and durable to withstand any pressure that might be imposed upon it by normal operation of the device.
- d. Materials of the connecting piping shall meet the requirements of Paragraph 6.
- e. Subject to the foregoing, it is recommended that:
 - (1) Boat designers and manufacturers, in planning toilet installations, provide a space of not less than 24 inches in length, 14 inches in width, and 17 inches in height for the installation of a device.
 - (2) Overall dimension of toilet and device should not exceed 4 feet and the length of hose connecting toilet to intake of device must not exceed 3 feet.

CONCLUSIONS AND RECOMMENDATIONS

Mr. CHOATE. I have spent time giving you this background because the NAEBM has serious concern over the passage of any new legislation that further expands the number of agencies, Federal or State, having the power to regulate recreational boating or which seems to depart from the regulatory approach set up in existing Federal boating laws. This concern leads us to suggest two possible courses of action.

1. We believe that there is a need to grant time to the independent organizations and the various State agencies mentioned to see if they can perform adequately to accomplish the objectives;

2. We believe that appropriate amendments to the 1958 Boating Act could resolve any administrative or enforcement problems to insure uniformity without the need for completely new legislation or the expenditure of extensive Federal funds on a new direction or approach. Gentlemen, we have the same goal—clean water—and we believe that the desire and the mechanisms to reach that solution, at least in the area of pleasure boats, are already in existence.

One of the chief problems concerned with water pollution today is the need for well-defined, carefully considered water quality standards that can be uniformly accepted. While we assume that such standards are being developed by Federal and State health agencies, we still do not know what water criteria we, the industry, will be expected to meet with antipollution devices.

In some quarters, there seems to be the belief that holding tanks might be the only acceptable device for small craft. The industry disputes that as unduly restrictive and as a real roadblock to continuing technological progress. It will also be expensive since a whole new system of shore facilities will be required.

It is reported that Ontario, Canada, made a survey of 282 marinas to find out how many were interested in establishing pumping facilities. Two marinas were willing to put in the equipment. Twenty marinas said they would allow discharge systems to be set up on their property providing the Province of Ontario paid for the installation and manned the facility. The remaining 220 marina operators stated they would not allow sewage handling equipment on their premises. That's why Ontario is now taking another look at their act.

Also, holding devices require considerable space aboard, so much so that boats under 19 or 20 feet in length would be hard put to find