

EPA's Vessel General Permit (VGP)

Continuing Compliance, FAQs and Important Updates

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VGP Issuance

- Final VGP effective December 19, 2008 covers:
 - All discharges incidental to normal operation of non-recreational, non-military vessels 79 feet or longer, except commercial fishing vessels
 - Ballast water discharges for all non-recreational vessels (including commercial fishing vessels and vessels less than 79 feet)
- Regulated community required coverage as of February 6, 2009
- Expires December 19, 2013

Obtaining Coverage

- Certain vessels must submit NOIs:
 - Greater than or equal to 300 gross tons; or
 - Have a ballast water capacity of at least 8 cubic meters
 - NOIs were required by September 19th 2009
- All other vessels were granted coverage without submitting an NOI

<http://cfpub.epa.gov/npdes/vessels/vesselsenoi.cfm>



<http://earthsys.ag.chic-state.edu/decision/ballast/ballast1.htm>

VGP Structure

- Part 1 – Coverage under the Permit
 - (General Information and Standard Requirements)
- Part 2 – Effluent Limits and Related Requirements
- Part 3 – Corrective Actions
- Part 4 – Inspections, Monitoring, Reporting, and Recordkeeping
- Part 5 – Vessel Class-Specific Requirements
- Part 6 – State 401 Certification Conditions
- Appendices

Vessel Discharges Eligible for Coverage

- 26 Incidental Vessel Discharges/ Technology-based effluent limits



Photo by Christian Reinauer

Corrective Actions

- Permittee must take corrective action when it becomes aware of a violation:
 - Minor changes: within two weeks
 - Major changes (requiring new parts): within three months
 - Major renovations: before relaunching from the next drydocking (typically a 5 year cycle)

Inspections and Monitoring

- Routine visual inspections
 - Once per voyage (and minimum once per week)
- Annual inspections
 - Must focus on areas likely to generate pollution; drydocking is not required
- Drydock inspections
 - Only required in coordination with drydocking (does not mandate additional drydocking)
- Analytical monitoring
 - For select cruise ships and vessels with experimental ballast water treatment systems

Reporting

- One-time report for all vessels (June – December 2011)
- Annual noncompliance reports
 - The reports must be made to the EPA regional office in whose waters the most events occurred, or if similar, to the regional office in whose waters the vessel operated the most

Parts 5 and 6 of the VGP

- Vessel Class-Specific Requirements
 - E.g. cruise ships, ferries, barges, vessels with experimental ballast water treatment systems
- 401 Certification– Additional State Requirements



FAQs & Updates

- NY 401 certification requirements effective January 1, 2012:
 - Ballast water treatment systems – extended until August 1, 2012
 - Prohibition of treated and untreated bilgewater into NY waters
 - Prohibition of treated and untreated graywater into NY waters

MOU between USCG and EPA signed 2/11/2011 – coordination between agencies to ensure compliance with the VGP



U.S. Coast Guard Photo by Chief Petty Officer Don Wagner

Other Resources

- EPA's Homepage for Vessel Discharges (Permit, Fact Sheet, Regional Contacts, eNOI filing, Program Development):

www.epa.gov/npdes/vessels

- E-mail questions to EPA headquarters:

commercialvesselpermit@epa.gov

- EPA Region 2 Contact Information:

EPA Region 2

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Questions?

Thank you!