

ATTACHMENT

Overview of the Proposed VGP

- Permit coverage for discharges incidental to the normal operation of a vessel
- The permit covers vessels greater than 79 feet in length that are being used as a means of transportation in inland waters and within the 3 nautical mile territorial sea

- **Notice of Intent (NOI) Requirements**
 - At time of permit issuance, permittees will be granted coverage without submission of an NOI
 - After 9 months, submission of an NOI is required for vessels greater or equal to 300 gross tons or if the vessel has a ballast water capacity of at least 8 cubic meters

- **Technology-Based Effluent Limits and Related Requirements**
 - Tech-Based Limits Applicable to All Vessels
 - Material Storage
 - Toxic and Hazardous Materials
 - Fuel Spills/Overflows
 - Discharges of Oil Including Oily Mixtures
 - Compliance with other statutes and regulations

 - Tech-Based Limits for Specific Discharge Categories (see page 2 for complete list)
 - 28 discharge categories identified, with at least one BMP associated with each discharge
 - Examples:
 - Ballast Water: Incorporate Coast Guard mandatory management and exchange requirements, additional requirements for vessels engaged in Pacific nearshore voyages and for NOBOB vessels
 - For bilge water and graywater, additional BMPs for vessels discharging within waters federally protected for conservation purposes

- **Water Quality-Based Effluent Limits**
 - Each permittee must control discharge as necessary to meet water quality standards
 - Anticipate receiving additional state-specific requirements through the 401 certification process

- **Corrective Actions**
 - Exceedance of an effluent limit is a permit violation
 - The permit requires the permittee to take corrective action when they become aware of a violation

- **Self-Inspections, Recordkeeping and Reporting**
 - Routine and annual self-inspections
 - Recordkeeping will include, for example, owner and voyage information and inspection results

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- Reporting required for ballast water release (to the Coast Guard), spills that endanger health or welfare, and spills of oily materials (all based on existing regulation)
 - **Vessel Class-Specific Requirements**
 - Supplemental requirements for cruise ships, barges, oil tankers, ferries, research vessels, rescue boats, vessels employing experimental ballast water treatment systems
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Specific Discharge Categories:

1. Deck Washdown and Runoff
2. Bilgewater
3. Discharges of Ballast Water
4. Anti-Fouling Hull Coatings
5. Aqueous Film Forming Foam (AFFF)
6. Boiler/Economizer Blowdown
7. Cathodic Protection
8. Chain Locker Effluent
9. Controllable Pitch Propeller Hydraulic Fluid
10. Distillation and Reverse Osmosis Brine
11. Elevator Pit Effluent
12. Firemain Systems
13. Freshwater Layup
14. Gas Turbine Wash Water
15. Graywater
16. Motor Gasoline and Compensating Discharge
17. Non-Oily Machinery Wastewater
18. Refrigeration and Air Condensate Discharge
19. Rudder Bearing Lubrication Discharge
20. Seawater Cooling Overboard Discharge (including non-contact engine cooling water; hydraulic system cooling water, refrigeration cooling water)
21. Seawater Piping Biofouling Prevention
22. Small Boat Engine Wet Exhaust
23. Sonar Dome Discharge
24. Stern Tube Oily Discharge
25. Underwater Ship Husbandry Discharges
26. Welldeck Discharges
27. Graywater Mixed with Sewage from Vessels
28. Exhaust Gas Scrubber Washwater Discharge