

○ SUMMER 2011

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NPDES Vessels Program *Quarterly*

NAVIGATING THE EPA REGULATED VESSELS UNIVERSE

UPDATE ON THE ONE- TIME REPORT

The VGP requires that vessel owner/operators submit a one-time report between 30-36 months after obtaining permit coverage to ensure that permittees are complying with the provisions of the permit, learn how owner/operators are implementing the permit, and gain a better understanding about the universe of permittees. Release of the electronic system for submitting one-time reports remains delayed due to unexpected technical difficulties. EPA believes the final remaining glitches will be resolved soon, and the system will then be made available to the public. EPA strongly recommends that vessel owner/operators wait for the electronic system to submit their one-time reports. Once available, the system will be accessible at <http://www.epa.gov/npdes/vessels/vesselsreporting.cfm>.

Owner/operators have the option to complete a paper one time report. A fillable PDF of the report is available on the one-time report website located at: <http://www.epa.gov/npdes/vessels/vesselsreporting.cfm>. This website also contains answers to frequently asked questions (FAQs) and contact information.



One-Time Report FAQs

FAQs on the one time report are available on the VGP one-time report website. For your convenience, EPA has posted three commonly asked questions in this newsletter. To see the full list of FAQs, please visit: <http://www.epa.gov/npdes/vessels/vesselsreporting.cfm>.

Who must file a one-time report?

All owner/operators with vessels covered by the VGP are required to submit one-time reports, regardless of whether or not Notices of Intent (NOIs) were required to be submitted to EPA.

The one-time report for the vessel must be submitted by a party with operational control over the vessel. If the vessel owner meets the definition of “operator” in Part 7 of the VGP, the vessel owner may submit the one-time report.

If a vessel became covered under the VGP between February 6 and September 19, 2009 (the date by which owner/operators were required to submit an NOI for those vessels that were delivered to the owner or operator on or before September 19, 2009), when will the one-time reports be due for these vessels?

For any vessel owner/operator who submitted a NOI on or before September 19, 2009, the vessel had permit coverage starting February 6, 2009. The one-time report will be due for these vessels by February 6, 2012.

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To learn more about the NPDES vessels program, please visit <http://www.epa.gov/npdes/vessels>. For questions or concerns about the VGP, please e-mail CommercialVesselPermit@epa.gov.

ONE TIME REPORT FAQs (CONTINUED)

Continued from page 1

If a vessel's one-time report were to be due after the next VGP becomes effective, would the owner/operator still be required to complete a one-time report?

No. As stated in Part 4.4.4 of the VGP, vessel owner/operators are required to submit a one-time report for each vessel between 30 months and 36 months after obtaining permit coverage. If the 30-36 month timeframe occurs outside the current permit's term, then a one-time report is not required from that vessel.

Final NAS and SAB Reports Now Available

The National Academy of Sciences (NAS) National Research Council report titled Assessing the Relationship Between Propagule Pressure and Invasion Risk in Ballast Water was released on June 2, 2011. The report recommends that a "benchmark discharge standard should be established that clearly reduces concentrations of coastal organisms below current levels resulting from ballast water exchange (such as the IMO D-2 standard)". In the report, the NAS also identified the strengths and weaknesses of existing approaches in evaluating risk from ballast water discharges and made recommendations on how to improve our future scientific understanding of analyzing this risk.

On July 12, 2011, the chartered EPA Science Advisory Board (SAB) committee released a final report titled Efficacy of Ballast Water Treatment Systems: a Report by the EPA Science Advisory Board. The SAB found that systems currently exist to meet the International Maritime Organization (IMO) standard, and some of those systems may achieve a limit 10 times the IMO standard. However, due to the detection limitations of current

monitoring technology and approaches, the SAB could not definitively determine whether systems could meet this more stringent limit. The SAB also found it unlikely that treatment systems, which attain a limit of 100 times or 1000 times more stringent than IMO standards, exist today.

EPA will consider information from the NAS and SAB reports in developing appropriate ballast water limits in the next Vessel General Permit (VGP).

EPA and the U.S. Coast Guard requested the National Academy of Sciences National Research Council study to inform their efforts to derive environmentally protective numeric ballast water discharge limits under their respective regulatory programs. To view a copy of the report, please visit the NAS website at:

http://www.nap.edu/catalog.php?record_id=13184.

EPA requested SAB review of technical documents and available data on the efficacy of ballast water treatment systems and advice on improving the performance of such systems. To view a copy of the final report, please visit:

[http://yosemite.epa.gov/sab/sabproduct.nsf/fe6d9c8c-66f1bfb6f4e09fd852578cb006e0149/\\$File/EPA-SAB-11-009-unsigned.pdf](http://yosemite.epa.gov/sab/sabproduct.nsf/fe6d9c8c-66f1bfb6f4e09fd852578cb006e0149/$File/EPA-SAB-11-009-unsigned.pdf).

VESSELS ENOI WEBPAGES UPDATED

The vessels eNOI home page and public search page have been updated. The vessels eNOI home page now contains information on how to transfer ownership of a NOI vessel and provides answers to frequently asked questions.

To visit the vessel eNOI home page, please visit <http://www.epa.gov/npdes/vessels/eNOI>.

To visit the vessels eNOI search, please visit: <http://cfpub.epa.gov/npdes/vessels/vesselsnoisearch.cfm>.

UPDATE ON EPA AND US COAST GUARD MOU



After signing a Memorandum of Understanding (MOU) with EPA on February 11, 2011, to better coordinate efforts to implement and enforce VGP requirements for vessels, the U.S. Coast Guard (USCG) is actively inspecting vessels for compliance with EPA's VGP as part of its routine Port State Control (PSC) and domestic vessel inspections. To assist USCG PSC and domestic inspectors with VGP compliance, the USCG developed the job aid found in CG 543 Policy Letter 11 01, which can be seen at <https://homeport.uscg.mil>. As part of the MOU, results of USCG VGP compliance inspections have been and will continue to be shared with EPA for evaluation and possible enforcement actions. Additionally, EPA has participated in joint boardings of foreign flagged and domestic vessels with the USCG. EPA appreciates USCG's efforts to ensure vessels' compliance with the VGP and looks forward to future collaborative efforts.