

EPA Vessel General Permit (VGP) - USCG Job Aid

This enclosure is intended to be used as a Job Aid by Coast Guard Marine Inspectors (MI) and Port State Control (PSC) Officers during inspections of U.S. flag vessels and during PSC examinations to assist in verifying that a vessel is in compliance with the December 2013 EPA VGP. This Job Aid contains a list of minimum items that MI and PSC Officers should examine. The depth and scope of the examination must be determined by the MI and PSC Officers based on the condition of the vessel, operation of its systems, and the competency of the vessel's crew.

The EPA VGP addresses many of the same water pollution prevention items that the Coast Guard currently examines during vessel compliance examinations. This Job Aid addresses the key or "first tier" inspection items currently not covered by Coast Guard vessel inspection regulations or policy. Coast Guard personnel will perform these checks in addition to the current pollution prevention inspections/examinations covered in the applicable CG-840 books.

All deficiencies, even if corrected while onboard, shall be documented within MISLE as discussed in Section 6 of the cover letter to this policy. MISLE documentation will then be sent to the EPA via generated CGBI Cube reports.

Note: - Citations to the VGP sections are given as references for the specific requirements and legal authorities.

Record Keeping

<u>VGP Requirement</u>	<u>Cite</u>	<u>Finding</u>	<u>Action</u>	<u>Comment</u>
<p>If the vessel is greater than or equal to 300 gross tons or has the capacity to hold or discharge 8 cubic meters (2113 gallons) of ballast water, has the vessel submitted a Notice of Intent (NOI)?</p> <p>Note: Existing vessels which successfully filed a NOI under the 2008 VGP must re-file an NOI under the 2013 VGP.</p>	<p>VGP Part 1.5.1.1; Appendix E –Notice of Intent (NOI)</p>	Yes	No action required.	
		No	<p>Advise the master/crew they must submit an NOI electronically through EPA’s NOI system. .</p> <p>Provide the master/crew with a copy of the EPA VGP 1-page Fact Sheet.</p>	<p>The EPA has posted all vessel NOIs submitted by vessel owners and operators. You can use this public EPA web page to search, sort, and view these NOIs: http://ofmpub.epa.gov/apex/vgpenoi/f?p=vgp:Search</p> <p>Vessel owners and operators must prepare and submit their NOIs using EPA’s Electronic Notice of Intent (eNOI) system unless a waiver is granted by EPA.</p> <p>The eNOI system can be accessed at: www.epa.gov/npdes/vessels/eNOI/.</p>
<p>If the vessel less 300 gross tons or does not have the capacity to hold or discharge more than 8 cubic meters (2113 gallons) of ballast water, has the vessel completed a Permit Authorization and Record of Inspection (PARI) form?</p> <p>Note: Checks for PARI completion should be limited to inspected vessels only.</p>	<p>VGP Part 1.5.1.2; Appendix K – Permit Authorization and Record of Inspection (PARI) form</p>	Yes	No action required.	
		No	<p>Advise the master/crew they must fill out a PARI form and retain it onboard their vessel</p> <p>Provide the master/crew with a copy of the EPA VGP 1-page Fact Sheet</p>	

<u>VGP Requirement</u>	<u>Cite</u>	<u>Finding</u>	<u>Action</u>	<u>Comment</u>
Record of routine visual inspections	VGP Parts 4.1.1, 4.1.1.1, and 4.2.	Yes	No action required.	
Record of comprehensive annual vessel inspections ¹ ,	VGP Parts 4.1.3 and 4.2.	No	Advise the master/crew they must complete visual inspections at least once per week or per voyage, whichever is more frequent; unless they engage in multiple voyages per day, in which case a daily inspection is required. They must also have a comprehensive inspection annually and record all results in the vessel's recordkeeping documentation.	The VGP section on recordkeeping is about 1 page and may be appended / inserted within routine vessel logbooks. If records are not on the vessel, advise that they must be on the vessel or accessible by the vessel (unalterable electronic records from a central exchange).
Documentation of Corrective Action Assessments: does the vessel maintain records of completed actions ² ?	VGP Parts 3, 4.2 para. 3,	Yes	No action required.	
		No	Advise the master/crew they must conduct a corrective action assessment including a description of identified deficiencies, an explanation of the cause and the corrective action to be taken and a schedule to complete such action.	If records are not on the vessel advise that they must be on the vessel.

¹ If new vessel (less than one year old or, for foreign vessel, within one year of first visit to the U.S.) lack of comprehensive annual exam is not a deficiency.

² If new vessel (less than one year old or, for foreign vessel, within one year of first visit to the U.S.) lack of completed actions may not be a deficiency.

<u>VGP Requirement</u>	<u>Cite</u>	<u>Finding</u>	<u>Action</u>	<u>Comment</u>
Ballast Water Plan and Records Compliance	33 CFR Part 151	Yes	No action required	Plans and records shall be in accordance with 33 CFR Part 151. Violation of 33 CFR Part 151 Ballast Water requirements is also a violation of the VGP.
		No	Advise the master/crew update or implement their plan and to maintain records of ballast water information and operations, as appropriate.	
Bilgewater Discharges: If the vessel measures 150 GT or more (tank vessels) or measures 400 GT or more (other vessels), is it maintaining records of its bilge water discharges? If the vessel measures 150 GT or more (tank vessels) or measures 400 GT or more (other vessels), and regularly sails outside the territorial sea, is it not discharging within 1 nm of shore or within National Parks, Marine Sanctuaries, etc., listed in Appendix G of the VGP?	VGP Part 2.2.2; 4.2.		No action required	Violation of VGP is also violation of Coast Guard Oil Pollution Prevention requirements found in 33 CFR 151 Subpart A.
		Yes	Advise the master/crew to begin maintaining records.	
		No records	Advise the master/crew that if technologically feasible or if not necessary to maintain the safety and stability of the ship, to hold bilgewater onboard or discharge to a shore side facility.	
		No, discharging within 1 nm of shore or within waters listed in Appendix G.		

Deck/Topside Walk

<u>VGP Requirement</u>	<u>Cite</u>	<u>Finding</u>	<u>Action</u>	<u>Comment</u>
Is the state of deck and work areas housekeeping adequate? Deck is free of clutter, garbage, fuel/oil spills? Are spill rails and drip pans in place and utilized?	VGP Parts 2.1 and 2.2.1	Yes	No action required.	
		No	Advise the master/crew that they must maintain proper housekeeping onboard the vessel - contain garbage, secure containers in proper storage, prevent oil and fuel spills, and use containers or rails to contain oil.	Evidence of poor housekeeping can trigger need to look for other areas of lack of good practice.

Large and Medium Cruise Vessels

“Large Cruise Ships” are that provide overnight accommodations (has onboard sleeping facilities) to passengers authorized to carry 500 people or more for hire. VGP 5.1. “Medium Cruise Ships” are vessels that provide overnight accommodations (have onboard sleeping facilities) to passengers authorized to carry between 100-499 people for hire. VGP 5.2

<u>VGP Requirement</u>	<u>Cite</u>	<u>Finding</u>	<u>Action</u>	<u>Comment</u>
For untreated graywater:	VGP Parts 5.1.2.1 and	Yes	No action required.	

<u>VGP Requirement</u>	<u>Cite</u>	<u>Finding</u>	<u>Action</u>	<u>Comment</u>
Does the vessel have records estimating discharges of untreated graywater including date location and volume, speed of vessel?	5.2.2.1	No	Advise the master/crew that they must maintain records of estimating discharges of untreated graywater including date, location, volume, and vessel speed.	
For untreated graywater: For large cruise vessels, was graywater only discharged outside 3 nm and not in nutrient impaired waters such as the Chesapeake Bay? For medium cruise vessels which sail more than 1 nm from shore and were constructed after December 19, 2008, was graywater only discharged outside 3 nm and not in nutrient impaired waters such as the Chesapeake Bay?	VGP Parts 5.1.1.1.1 and 5.2.1.1.1	Yes	No action required.	
		No	Advise the master/crew that they must hold their untreated graywater while operating in waters covered by the VGP.	

<u>VGP Requirement</u>	<u>Cite</u>	<u>Finding</u>	<u>Action</u>	<u>Comment</u>
		No	Advise the master/crew that graywater must be treated or discharged consistent with Parts 5.1 and 5.2 of the VGP.	
For treated graywater: For large and medium cruise vessels, did the vessel maintain records of date, location and volume of treated graywater discharged? Did the vessel conduct monitoring and assure that graywater discharged is below limits in Part 5.1.1.1.2 or 5.2.1.1.2 of the VGP, as applicable?	VGP Parts Large cruise vessels: 5.1.2.2. Medium cruise vessels: 5.2.2.2	Yes No	No action needed. Advise the master/crew that they must maintain records of date, location and volume of treated graywater. If they are discharging treated graywater in waters of the US; remind them they must conduct monitoring. Monitoring records must also include who did the analysis, date and results. The vessel must maintain one sample per quarter (four per year) and records of the sampling and testing results must be retained onboard for a period of 3 years in the vessel's recordkeeping documentation	