



## U.S. Coast Guard Sector Baltimore

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### MARITIME SAFETY & SECURITY BULLETIN 08-11

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#### USCG & EPA Sign Memorandum of Understanding for Vessel General Permit Compliance

On February 11, 2011, the Coast Guard and the Environmental Protection Agency (EPA) signed a Memorandum of Understanding (MOU) authorizing the Coast Guard to evaluate compliance with the EPA's Vessel General Permit (VGP) program. Beginning March 13, 2011, the Coast Guard will begin evaluating compliance with the VGP during routine vessel inspections and Port State Control Examinations.

The EPA initially issued the VGP on December 18, 2008, in order to regulate discharges under the Clean Water Act (CWA). This prohibits the discharge of any pollutant into U.S. waters from any point source without a National Pollutant Discharge Elimination System (NPDES) permit. The VGP applies to discharges incidental to the normal operation of all non-recreational vessels of 79 feet or greater in length. In addition, the ballast water discharge provisions also apply to any non-recreational vessel of less than 79 feet or commercial fishing vessel of any size discharging ballast water.

The VGP covers 26 different types of discharges, many of which have not previously been covered by U.S. regulations. There are also additional requirements for eight vessel types such as large and medium-sized cruise vessels and oil tankers. Under the CWA, discharges of pollutants from vessels that are not covered by the VGP are unlawful unless they are separately covered under another CWA permit or are exempt from permitting requirements (for example sewage from vessels, incidental discharges from a vessel of the armed forces, or discharges in compliance with the instructions of a federal on-scene coordinator). The VGP requires vessel owners/operators to perform training, inspections, monitoring, and reporting, and take assessments and corrective actions as necessary. It also requires vessel owners or operators to submit a Notice of Intent (NOI) to receive permit coverage and submit a one-time permit report between 30 and 36 months after obtaining permit coverage.

The USCG/EPA VGP MOU, and additional information pertaining to the VGP including links to the EPA's VGP web page is available on the Coast Guard's VGP information page on Homeport at <http://homeport.uscg.mil> by selecting the following tabs: Missions>Domestic Vessels>Domestic Vessels General> EPA Vessel General Permit (VGP). Additionally, EPA has posted electronic copies of the VGP and other related information, including VGP Fact Sheets, on the EPA's NPDES-Vessel Discharges webpage at [www.epa.gov/npdes/vessels](http://www.epa.gov/npdes/vessels).

A handwritten signature in blue ink, appearing to read "Kelly M. Post".

**KELLY M. POST**  
**COMMANDER, U.S. COAST GUARD**  
**USCG SECTOR BALTIMORE**