

## Circular 2018-01: USA VGP Annual Report

### US EPA Vessel General Permit (VGP)

The VGP is a USA Clean Water Act, NPDES permit that authorizes discharges incidental to the normal operation of vessels greater than 79 feet in length. The 2013 Vessel General Permit that replaced the 2008 Vessel General Permit, has incorporated a new requirements for a submission of an electronically annual report **by February 28<sup>th</sup>** covering activities conducted from January 1<sup>st</sup>, till December 31, of previous year.

### VGP Annual Report Requirements

The Reporting Requirements under the VGP are outlined as follows:

#	Annual Report Question / Requirement	Applicability	Action/Data
1	Does your vessel have a <b>ballast</b> water treatment system?	BWTS equipped vessels	Ballast Addendum
2	Does your vessel have an <b>exhaust gas scrubber</b> ?	EGS fitted vessels	EGS Addendum
3	Does your vessel have an <b>oily water separator</b> (OWS)?	VsIs discharged bilges within 3 NM	Bilge water Addendum
4	Did you discharge treated or untreated <b>graywater</b> in U.S. waters?	New builds subj to 2.2.15, Large & Medium Cruise Ships subj to 5.1, or 5.2	Graywater Addendum
5	Did your vessel store any discharges incidental to the normal operation of vessels on board for <b>onshore disposal</b> ?	All vessels	Provide list and disposal method
6	Did your vessel use <b>environmentally acceptable lubricants</b> for oil to sea interfaces?	All vessels	Name Brands, If not, why?
7	Did you have to claim a <b>safety exemption</b> for any discharge category, and were therefore unable to meet effluent limits of the VGP?	All vessels	List discharge types and reason(s) for safety exemptions claimed
8	Did you receive any citations or <b>warnings from EPA</b> or the U.S. Coast Guard for any violations of environmental laws?	All vessels	If yes, please scan and attach. Explain and provide details
9	Did you have any instances of <b>non compliance</b> this year (e.g., discharging untreated bilgewater, exceeding numeric effluent limits)?	All vessels	Provide Details (table) with Date, VGP ref, NCO description, cause & corrective action etc.

### Actions required

Ship Managers with vessels covered under the 2013 VGP are required to submit the annual report by February 28<sup>th</sup> 2018 (for activities conducted from January 1<sup>st</sup> 2017 till December 31<sup>st</sup> 2017).

### How we may help

Ship Managers with vessels covered under the 2013 VGP are required to submit the annual report by **February 28, 2018**. **SQE MARINE having a world class expertise on VGP requirements and implementation may assist in the preparation and review of the above annual report prior electronic submission and/or co-ordinate accordingly.**

To learn more please contact our client Service Department

### Further information

- EPA VGP: [VGP Monitoring and Reporting](#)
- [SQEMARINE: USA Vessel General Permit \(VGP\) Manual](#)