



October 12, 2020

CSI Client Advisory 12-2020

SUBJECT: Pre-publication notice for EPA changes to the Vessel Incident Discharge Act (VIDA)

On October 5, 2020, the United States Environmental Protection Agency (EPA) Administrator signed the [proposed rule](#) for new standards for incidental discharges from commercial vessels under Vessel Incident Discharge Act (VIDA), presently referred to as the Vessel General Permit (VGP), into the waters of the United States or the waters of the contiguous zone (24 nautical miles from the U.S. baseline). The proposed standards will apply to all vessel incidental discharges, and organized into three categories:

- (1) General Operation and Maintenance,
- (2) Biofouling Management, and
- (3) Oil Management.

The general discharge standards of performance are preventative in nature and require best management practices (BMPs) to minimize the introduction of pollutants into the discharges, as well as the volume of discharges.

There are 20 different types of vessel equipment and systems, to include: ballast tanks, bilges, boilers, cathodic protection, chain lockers, decks, desalination and purification systems, elevator pits, exhaust gas emission control systems, fire protection equipment, gas turbines, graywater systems, hulls and associated niche areas, inert gas systems, motor gasoline and compensating systems, non-oily machinery, pools and spas, refrigeration and air conditioning, seawater piping, and sonar domes.

As required in VIDA, the proposed discharge standards are technology-based and in the form of numeric effluent limits and best management practices; distinguish among classes, types, and sizes of vessels, and between new and existing vessels; and are at least as stringent as the 2013 Vessel General Permit (VGP), with limited exceptions.

This pre-notification, <https://www.epa.gov/vessels-marinas-and-ports/pre-publication-proposed-rule-vessel-incident-discharge-national> is not the final rule for purposes of public notice and comment, but instead, provided as a means for you to have time to review and prepare for the upcoming changes to the requirements, which we now refer to as the VGP.

In the near future, the U.S. Government will publish the final rule. We will keep you updated, and work with you to ensure your vessels remain compliant.

This Client Advisory, along with previously issued CSI Advisories, can be retrieved from our website, www.compliancesystemsinc.com. Should you have any questions regarding this advisory, please do not hesitate to contact our office at csi@compliancesystemsinc.com or +1-912-233-8181.