



March 18, 2020

CSI Notice to Clients 02-2020

SUBJECT: VGP Analytical Monitoring

For vessels calling the United States, the requirement to conduct analytical monitoring for greywater, ballast water, bilge water, and exhaust gas scrubbers may be required. Under the U.S. Environmental Protection Agency (EPA) Vessel General Permit (VGP) 2013 Final Rule, analytical monitoring is applicable for vessels that discharge greywater (vessels built after December 19, 2013), operate the Ballast Water Treatment System (BWTS), the Oil Water Separator (OWS) or the Exhaust Gas Scrubber (EGS) within three miles from shore or other jurisdictional limits as stipulated in the 2013 VGP Final Rule. The analytical monitoring is NOT required if the vessel retained greywater on board, and there was no operation of the BWTS, OWS or EGS while operating with the three-mile limit.

We are aware of one service provider that has stated they can meet the demand. We are very curious and appreciate your feedback on your personal experiences you are having with companies who provide sampling services. As a reminder, any analytical sampling and equipment calibration should be included in your VGP Annual Report.

For most of our client vessels, greywater is normally stored onboard in holding tanks while in port limits and the OWS is usually operated well away from shore. For vessels using the EGS within the three-mile limit, the equipment must comply with the North American Emission Control Area (NA-ECA) standards of 0.1% Sulphur. For most vessels, the analytical monitoring will likely be for the BWTS.

Vessel Required to Collect and Analyze Samples under the 2013 VGP:

Greywater:

- Any vessel discharging bilge water to waters subject to the VGP constructed on or after December 19, 2013 and greater than 400 gross tons (see Part 2.2.2 of the VGP)
- Any large cruise ship discharging graywater to waters subject to the VGP within 3 nautical miles of shore (see Part 5.1 of the VGP)
- Any medium cruise ship discharging graywater to waters subject to the VGP within 1 nautical mile of shore (see Part 5.2 of the VGP)
- Any vessel constructed on or after December 19, 2013, having a maximum crew capacity of at least 15 crew, and providing overnight accommodation to those crew, and discharging greywater to waters subject to the VGP (see Part 2.2.15 of the VGP)



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Exhaust Gas Scrubber (EGS):

- Any vessel discharging exhaust gas scrubber wash water to waters subject to the VGP (see Part 2.2.26 of the VGP)

Ballast Water Treatment System (BWTS):

Requirements for sampling and testing of ballast water treated through a BWTS are contained in Section 2.2.3.5.1.1 of the VGP. Sub-section 2.2.3.5.1.1.6 requires records of sampling and testing results be retained onboard for a period of three years in the vessel's recordkeeping documentation. Vessels must also submit the testing results to EPA as part of the VGP annual report. The crew should be fully aware of the operation, maintenance (including analysis and calibration) of the BWTS. Records of monitoring information shall include:

- The ballast water treatment system used, any type approval certificate, and records of whether the system meets the high-quality data criteria as stated in part 2.2.3.5.1.1.4 (a) or (b);
- The individual(s) who performed the sampling, measurements, and/or inspections;
- The date(s) analyses and/or inspections were performed;
- Any sensor or other control equipment calibration and functional tests conducted during the inspection as applicable;
- The techniques or methods used for any sensor or other control equipment calibration and functional tests as applicable;
- The date and time of all monitoring results (monitoring in Parts 2.2.3.5.1.1.2, 2.2.3.5.1.1.4, and 2.2.3.5.1.1.5, as applicable);
- The analytical techniques or methods used as applicable, and
- The results of such analyses.

The 2013 VGP Final Rule that outlines these requirements can be located at:

<https://www.epa.gov/npdes/vessels-vgp>.

In the near future, the U.S. Coast Guard will issue the new or modified VGP requirements under the Vessel Incidental Discharge Act (VIDA). It's likely the three-mile limit will be extended out to twelve miles and there may be changes to the analytical monitoring.

Should you have any questions regarding analytical monitoring, please do not hesitate to contact our office at csi@compliancesystemsinc.com or +1 (912) 233-8181.