



COLONIAL COMPLIANCE SYSTEMS, INC.
MARITIME REGULATORY CONSULTANTS

January 1, 2018
NTC 01-2018

CSI Notice to Clients 01-2018

**SUBJECT: VESSEL GENERAL PERMIT (VGP) - 2017 ANNUAL INSPECTION
& ANNUAL REPORT**

Every vessel with an active VGP Notice of Intent (NOI) letter is required to conduct a VGP Annual Inspection and the owner/operator of the vessel must also complete the VGP Annual Report. VGP Section 4.1.3 requires an onboard comprehensive annual vessel inspection be conducted at least once every 12 months. The inspection must be completed by a qualified person, defined as the Master, vessel superintendent, Class surveyor, or appropriately trained marine or environmental engineer or technician acting on behalf of the owner/operator.

The annual inspection must cover all areas of the vessel affected by the requirements in the 2013 VGP Final Rule. Such areas that inspectors must examine include, but are not limited to:

1. The vessel hull, including niche areas, for fouling organisms, flaking anti-foulant paint, exposed TBT or other organotin surfaces;
2. Ballast water tanks, as applicable;
3. Bilges, pumps, and oily water separator (OWS) sensors, as applicable;
4. Oil discharge monitoring system and electronic valve switching function, as applicable;
5. Protective seals for lubrication and hydraulic oil;
6. Oil and chemical storage areas, cargo areas, and waste storage areas; and
7. All visible pollution control measures to ensure that they are functioning properly.

For areas not accessible during the annual inspection, the vessel owner/operator must document the areas of the vessel that were not examined.

Should the annual inspection identify any non-conformities, which could result in a VGP violation, we recommend the vessel document the deficiency in accordance with the company's Safety Management System (SMS) and establish a corrective action plan.

The 2013 VGP Final Rule Section 4.4.1 requires the owner/operator of a vessel with an active VGP NOI to submit an Annual Report each year. This is required even if the vessel did not call the United States during the year. The 2017 Annual Report must be completed online and submitted to the EPA, no later than February 20, 2018. All analytical monitoring results, details pertaining to the ballast water treatment systems, Environmentally Acceptable Lubricants (EAL's) and VGP related non-conformities must be included in the Annual Report.



The following is a list of EPA websites relating to the above Advisory:
2013 VGP Final Rule:

<https://www.regulations.gov/document?D=EPA-HQ-OW-2011-0141-0949>

EPA Account (to establish or update your EPA account):

<https://cdx.epa.gov/>

EPA VGP Access (to generate, update, delete, vessel NOI's or conduct annual reports):

[https://ofmpub.epa.gov/apex/vgpenoi/f?p=141:101::::](https://ofmpub.epa.gov/apex/vgpenoi/f?p=141:101:::)

The 2013 VGP Final Rule will expire on December 19, 2018. We will update you with the details of the 2018 VGP Final Rule when it is available. Should you require additional information or assistance, please contact our office at

csi@compliancesystemsinc.com