



**COLONIAL COMPLIANCE SYSTEMS, INC.**  
MARITIME REGULATORY CONSULTANTS

December 10, 2018  
NTC 12-2018

**CSI Notice to Clients 12-2018**

**SUBJECT: NEW Vessel General Permit (VGP) - Vessel Incidental Discharge Act of 2018**

On December 4, 2018, President Trump signed into law the Vessel Incidental Discharge Act (VIDA) of 2018 which establishes a framework management of discharges incidental to the normal operation of a vessel. The full details of this new regulation, which will align with the current U.S. EPA National Pollutant Discharge Elimination System (NPDES) Vessel General Permit, will be developed into regulations over the next few years by the EPA and Coast Guard.

Until the new regulations are implemented, vessel owners and operators are to continue procedures established under the 2013 VGP, even though the 2013 VGP is set to expire on December 19, 2018. As per our client advisory 10-18 sent out this past October, the EPA indicated the new VGP Final Rule would be delayed and they recommended operators submit any Notices of Intent (NOIs) for coverage under that permit prior to December 19th. However, with the new VIDA law, NOIs can be generated and submitted after December 18, 2018, consistent with the existing 2013 VGP requirements.

Under the VIDA regulations, the EPA will be responsible for establishing the NPDES standards and the Coast Guard will be responsible for prescribing, administering, and enforcing the regulations. It's our view that the process for generating and maintaining VGP NOIs may change once the new regulation is implemented; however, the VGP effluent list, recordkeeping, training, and reporting requirements will more than likely remain unchanged.

Should you have any questions regarding the VGP, please do not hesitate to contact our office at [csi@compliancesystemsinc.com](mailto:csi@compliancesystemsinc.com).