

“Bullets” on the Recently Implemented Clean Water Act Permit Requirements for Vessels

- Process applies to any vessel over 300 GRT or having a ballast water capacity greater than 8 cubic meters (2,113 gallons) – probably applies to the entire “UNOLS fleet.”
- All of the UNOLS vessels should qualify under the “Vessel General Permit.” In order to qualify under the permit the only action the operator will need to take is to file a “Notice of Intent” by 19 September 2009 (but after 19 June 2009). This is an easy, 3 page form that can be filled out on an EPA web site and submitted.
- The permit only limits activities in “waters of the United States” (extending to the outer reach of the 3 mile territorial sea”).
- The permit does not “affect, supersede, or relieve ... any otherwise applicable requirements or prohibitions under other provisions of Federal law or regulations. Specifically:
 - A Ballast Water Management Plan,
 - Garbage disposal (33 CFR Part 151, Subpart A)
 - Oil (MARPOL, etc.)
- The permit will limit, within the 3 mile territorial sea (in addition to all the existing limits like oil, garbage, etc.):
 - Deck Washdown and Runoff and Above Water Line Hull Cleaning “to minimize the introduction of on-deck debris, garbage, residue and spill,” “presence of floating solids, visible foam, halogenated phenol compounds, and dispersants, or surfactants,” “rust (and other corrosion by-products), cleaning compounds, paint chips, non-skid material fragments, and other materials associated with exterior topside surface preservations.” “If deck washdowns or above water line hull cleaning will result in a discharge, they must be conducted with non-toxic and phosphate cleaners and detergents.”
 - Chain Locker Effluent.
 - Firemain System discharges are allowed but limited to those where “the intake comes directly from the surrounding waters or potable water supplies and there are no additions to the discharge.”
 - Graywater. “All vessel must minimize the discharge of grawater while in port,” the introduction of kitchen oils must be minimized to the graywater system,” Vessel owner/operators must use phosphate free and non-toxic soaps and detergents for any purpose if they will be discharged into waters subject to this permit.”
 - Boat Engine Wet Exhaust. “Vessels generating wet exhaust must be maintained in good order ... to decrease pollutant contributions to wet exhaust ... use low sulfur or alternative fuels ... to reduce the concentration of pollutants,” “consider four stroke versus two stroke engines.”
 - Sonar Dome Discharge. “The water inside the sonar dome shall not be discharged within waters subject to this permit for maintenance purposes.”
 - Underwater Ship Husbandry Discharges. Bringing in the team of divers with power brushes is no longer acceptable – hull cleaning should be done in drydock with adequate controls on the runoff water.