



**COMPLIANCE WITH EPA VESSEL GENERAL PERMIT (VGP) REQUIREMENTS**

VGP	The current VGP came into effect on December 19, 2013 and has a duration of 5 years. It requires the implementation of minimum best management practices for 27 types of discharges incidental to the normal operations of a vessel when operating in US waters (0-3 nm).		
APPLICABILITY	If a vessel meets any one or more of the following criteria it is eligible for coverage and must enroll in the VGP:		
	• Is it a commercial vessel 79 feet in length or greater?		<input type="checkbox"/>
	• Is it a commercial vessel over 300 GT?		<input type="checkbox"/>
	• Is it a commercial vessel with a ballast water capacity of 8m ³ or more?		<input type="checkbox"/>
RECREATIONAL VESSELS	Recreational vessels, those NOT carrying paying passengers for hire, as defined in section 502(25) of the Clean Water Act are NOT eligible for VGP coverage.		
COMMERCIAL FISHING VESSELS	Commercial fishing vessels have had their exemption extended for an additional three (3) years until December 2017 with the exception of ballast water discharges.		
eNOI	Applicable vessels must have an active Notice of Intent (NOI) for the 2013 VGP. The purpose of this document is to certify your intent to comply with the applicable minimum best management practices required by the VGP.		
1	Enroll and certify vessels for VGP coverage using the EPA's online eNOI System at least (7) days prior to operating in US waters. 2013 VGP eNOI System: https://cdx.epa.gov/		<input type="checkbox"/>
<i>This only has to be done one time, NOT prior to every voyage to the US and will remain valid for the duration of the current VGP (5 years) or until it is terminated.</i>			
2	Maintain a copy of your active Notice of Intent (NOI) on board which is a certification statement that a vessel has implemented appropriate measures to comply with the VGP.		<input type="checkbox"/>
3	If your vessel name, IMO number, USCG vessel identification number, vessel call sign, flag state, or port of registry changes, the eNOI must be updated, re-certified and an updated copy provided to the vessel. Updates should also be made to correct any mistakes to the original submission.		<input type="checkbox"/>
4	When a vessel is transferred out of management or will no longer call US waters a Notice of Termination (NOT) should be submitted using the EPA eNOI System.		<input type="checkbox"/>
NOTE	<p>Vessels that operate in US waters (0-3 nm) prior to VGP coverage becoming active (within the 7-day window) increase the <u>risk of liability</u> for discharges incidental to the normal operation of a vessel from non-governmental (environmental) groups.</p> <p>For a transfer of ownerships, if the vessel was covered under the previous owner activation of the new eNOI will be immediate and is not subject to the 7-day window. Please note, and new eNOI still needs to be submitted for the new owner or operator.</p> <p><i>Note: neither the EPA nor the USCG will restrict operations for not having a valid NOI. However, you may receive a notice of violation and monetary penalty for not having coverage in place before arriving in the US.</i></p>		
For more detailed information on accessing and using the EPA eNOI System please see the			
<ul style="list-style-type: none"> EPA eNOI Home Page: https://www.epa.gov/npdes/vessels-vgp#enoi O'Brien's Compliance Guide: Enclosure 2 – Electronic Reporting 			
For assistance in submitting, updating or terminating an eNOI contact your contact your Client Specialist.			
VESSEL ENOI SEARCH	Use the public link below to search and download a copy of the eNOI for your vessel(s): http://ofmpub.epa.gov/apex/vgpenoi/f?p=vgp:Search		

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SUMMARY OF SIGNIFICANT 2013 VGP CHANGES	<p>It is recommended that companies conduct a comprehensive review each of the discharge types in Section 2 of the VGP. The EPA has updated the descriptions, definitions, and minimum best management practices for many of the 27 discharge types.</p> <p><i>Below is a brief summary of some of the significant changes:</i></p>
<ul style="list-style-type: none"> When deck wash-downs or above water line hull cleaning will result in a discharge, it must be conducted with "<i>minimally toxic</i>" and "<i>phosphate-free</i>" cleaners and detergents, as defined in Appendix A of the VGP. 	<input type="checkbox"/>
<ul style="list-style-type: none"> Vessels greater than 400gt that regularly sail outside of the territorial sea shall <i>not</i> discharge treated bilgewater within 1nm of shore if technologically feasible. 	<input type="checkbox"/>
<ul style="list-style-type: none"> "New Build" vessels built after December 19, 2013, greater than 400gt that discharge bilgewater between 0-3nm must monitor and report their effluent at least once a year. 	<input type="checkbox"/>
<ul style="list-style-type: none"> Ballast water requirements remain consistent with current U.S. Coast Guard (USCG) regulations, which were released in 2012. The schedule for implementing ballast water treatment systems (BWTS) are aligned with the International Maritime Organization (IMO) schedule and requirements for exchange and flushing remain in place. 	<input type="checkbox"/>
<ul style="list-style-type: none"> Vessels <i>must</i> use environmentally acceptable lubricants (EAL) in all <i>oil to sea interfaces</i> (i.e., mechanical equipment subject to immersion), <i>unless technically infeasible</i>. The terms "environmentally acceptable lubricants," "technically infeasible," "biodegradable," "minimally toxic," and "not bioaccumulative" are defined in Appendix A of the VGP. 	<input type="checkbox"/>
<ul style="list-style-type: none"> For graywater, vessels must use phosphate-free and minimally-toxic soaps and detergents, as defined in Appendix A of the permit. Additional best management practices to minimize the production of graywater while in port or not underway are described. All vessels with sufficient graywater storage capacity must not discharge within 1nm of shore or dispose of graywater onshore if there are appropriate facilities available and it is economically practicable and achievable. 	<input type="checkbox"/>
<ul style="list-style-type: none"> There are semi-annual graywater monitoring requirements for new build vessels that have a maximum crew capacity of 15 or more and that discharge graywater between 0-3nm. The information collected is to be included in the Annual Report. 	<input type="checkbox"/>
<ul style="list-style-type: none"> Vessels with exhaust gas cleaning systems that result in washwater discharges between 0-3nm must meet the numeric effluent limits found in Section 2.2.26.1 and the monitoring and reporting requirements found in Section 2.2.26.2 of the permit. <i>(This does NOT include Inert Gas Scrubber discharges).</i> 	<input type="checkbox"/>
<ul style="list-style-type: none"> A new discharge category has been added: Fish Hold Effluent (2.2.27) – Reasonable steps must be taken to prevent discharge of excess fish hold water and ice while a vessel is stationary at the pier. Large fish pieces may not be discharged unless a physical separation method is used. These solid fish wastes must be disposed of shoreside or at sea (outside harbors or other protected and enclosed coastal waters). 	<input type="checkbox"/>

COMPLIANCE VERIFICATION AND ENFORCEMENT	<p>Guidelines including a job aid (checklist) for USCG inspectors was published in a policy letter dated February 11, 2011 that includes a VGP Job Aid in Enclosure 1 which was updated on July 15, 2014.</p> <p>CG-543 Policy Letter 11-01</p> <p>The EPA and USCG have a Memorandum of Understanding (MOU) dated March 13, 2011 that allows the USCG to incorporate VGP compliance verification and enforcement as a routine part of a Port State Control Exam.</p>
	<p><i>We continue to receive reports from time to time that EPA personnel from certain Regional Offices occasionally have accompanied local USCG to conduct inspections. These joint inspections have not been a consistent focused effort or priority for EPA authorities. For the most part, the EPA continues to defer compliance verification primarily to the USCG, who will report and refer non-compliance to the EPA for enforcement action as appropriate. If this changes, we will send out a circular advising of any changes.</i></p> <p><i>We encourage you to share the experiences and observations from your vessel(s) as the EPA does not publicly share their enforcement activities for the benefit of the industry similar to the USCG.</i></p>



2013 VGP COMPLIANCE	O'Brien's has developed a guide with strategies and template forms to document compliance with the VGP, it is recommended that you contact your management for company and vessel-specific guidance and instructions on how to satisfy the requirements of the VGP.	
<i>To obtain a copy of the 2013 VGP Compliance Guide contact your Client Specialist.</i>		
REQUIRED ACTIONS	The following actions should be taken by vessel management and crew to ensure compliance with the 2013 VGP:	
1	Develop a company policy for VGP compliance which includes implementation, monitoring, record-keeping and documentation of vessel-specific best management practices for all applicable discharges.	<input type="checkbox"/>
2	Determine the applicability of the 27 discharges for each vessel. This information is also required in order to complete the eNOI. <i>See O'Brien's 2013 VGP Compliance Guide: Enclosure 5 – Supplemental Discharge Information</i>	<input type="checkbox"/>
3	Document or cross reference the minimum best management practices implemented for each applicable discharge. Many of these practices may already be part of the existing Safety Management System. This information is a key component of demonstrating to inspectors how a vessel complies with the VGP and should be made available upon request during inspections. <i>See O'Brien's 2013 VGP Compliance Guide: Enclosure 1 – Best Management Practices Matrix</i>	<input type="checkbox"/>
4	Conduct routine visual inspections for all applicable VGP incidental discharges at least once per week or per voyage, whichever is more frequent, when in US waters (0-3 nm).	<input type="checkbox"/>
5	Document routine visual inspections in the official ship logbook or separately in accordance with Section 4.1.1.1 of the VGP. <i>See O'Brien's 2013 VGP Compliance Guide: Enclosure 4 – Documenting VGP Compliance</i>	<input type="checkbox"/>
6	Conduct and document an annual comprehensive vessel inspection at least one every twelve (12) months in accordance with Section 4.1.3 of the VGP. <i>See O'Brien's 2013 VGP Compliance Guide: Enclosure 4 – Documenting VGP Compliance</i>	<input type="checkbox"/>
7	When VGP non-compliance is discovered, document appropriate corrective actions in accordance with Section 3 of the VGP. <i>See O'Brien's 2013 VGP Compliance Guide: Enclosure 3 – Corrective Action Assessments</i>	<input type="checkbox"/>
8	Conduct analytical monitoring for certain discharges types: bilgewater (section 2.2.2.1), ballast water (section 2.2.3.5.1.1-5), graywater (section 2.2.15.2) and exhaust gas scrubber effluent (section 2.2.26.2) as applicable.	<input type="checkbox"/>
9	Report analytical monitoring of applicable discharges (see above) at least once per calendar year as a part of the annual report.	<input type="checkbox"/>
10	Complete the annual report electronically using the EPA online reporting system. The report for the previous year must be completed no later than February 28 th of the next year.	<input type="checkbox"/>
11	Ensure that the master, operator, person-in-charge and crew members who actively take part in the management of incidental discharges or who may affect those discharges are adequately trained in implementing the applicable minimum best management practices required by the VGP. <i>General training should be part of a company VGP policy, but need not be formal or accredited courses</i>	<input type="checkbox"/>
12	Recordkeeping: all documentation generated to demonstrate compliance with the VGP should be retained on board for a period of three (3) years (section 4.1-2)	<input type="checkbox"/>



VGP ANNUAL REPORT	EPA is requiring a significant amount of information to be submitted as part of the Annual Report. It is recommended NOT to delay efforts to gather the required information. Owners/Operators should gather the required information for each vessel that has an eNOI in order to prepare, submit and certify the annual report. Some of the information will be readily available by those involved with the technical management and support of your vessel(s) and other information will need to be gathered from each vessel.
1	Log in to the EPA Central Data Exchange (CDX) and update your password. EPA Central Data Exchange (CDX) Login - https://cdx.epa.gov/
REQUIRED ACTIONS	The following actions should be taken by vessel management to ensure completion of the Annual Report <u>no later than</u> February 28 th each year:
2	<p>Is the submission of DMR data applicable to your vessel(s)? Below is a summary of the DMR applicability:</p> <ul style="list-style-type: none"> The bilge water discharge monitoring requirements only apply to new build vessels with keel laid dates after December 19, 2013 that have discharged bilge water in US waters (0-3 nm) during the previous calendar year. The graywater discharge monitoring requirements only apply to new build vessels with keel laid dates after December 19, 2013 that have discharged gray water in US waters (0-3 nm) during the previous calendar year. The exhaust gas scrubber discharge monitoring requirements only apply to vessels with exhaust gas scrubber discharge that has been discharged in US waters (0-3 nm) during the previous calendar year. The ballast water discharge monitoring requirements only apply to vessels that have installed a ballast water treatment system (BWTS) and have discharged ballast in US waters (0-3 nm) during the previous calendar year. <p>For more information, please review the following guidance provided by the EPA: Discharge Monitoring Report Applicability Summary</p>
3	<p>Determine which submission method is appropriate for your company:</p> <p>The choice of submission method is based on a few important factors: 1) the number of vessels in your fleet with VGP coverage, 2) whether or not vessels in your fleet discharged in US waters, and 3) if you are required to submit Discharge Monitoring Report (DMR) data for your vessels.</p>
Option 1	<p>A web-based tool to prepare, certify, and submit individual annual reports one at a time. This approach is suitable for Owners/Operators submitting a few annual reports for vessels NOT required to provide DMR data as part of those annual reports.</p> <p>When to use Option 1: This approach is most appropriate if you are submitting annual reports for less than 4 or 5 vessels (<i>without DMR data</i>). It is also recommended for vessels that are required to submit annual reports, but did not discharge in US waters during the reporting year. If you are preparing annual reports for more than 4 or 5 vessels, it is suggested that you use the batch upload option and complete these reports using the Microsoft Excel spreadsheet for annual reports without DMRs.</p>
Option 2	<p>An Excel spreadsheet-based tool, similar to that used for submitting NOIs for multiple vessels, to enter and upload annual reports and any required DMR data for one or more vessels at a time. Two different annual report spreadsheets are available:</p> <p>Batch Upload Spreadsheet – No DMR (13.3 mb)</p> <p>Batch Upload Spreadsheet with DMR (30.6 mb)</p> <p>When using Option 2: If you do NOT have any DMR data as part of the Annual Report, please make sure you use the "Batch Annual Report Spreadsheet (without DMRs)." If you are required to submit DMR data as part of an annual report, you MUST use the "Batch Annual Report Spreadsheet (with DMRs)" to submit the annual reports – even if only one of the vessels in your batch submission has DMR data.</p>
NOTE	Additional batch upload instructions and tips are available in the EPA online system, within the batch upload spreadsheets and in Circular 017-14



*The EPA has confirmed that there have been **no** changes to the format or questions for the 2017 Annual Report, therefore they encourage using and updating the report data collected for 2016 with the information required for 2017 to streamline the submission process.*

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For assistance in reviewing your batch upload spreadsheets to submit to the EPA, please contact us at:

vgp@wittobriens.com

EALs	The EPA requires the use of environmentally acceptable lubricants (EAL) for all oil-to-sea interfaces, including wire rope and mechanical equipment subject to immersion if there is any reasonable chance of an operational discharge (absent a catastrophic event).	
<p>The EPA does <i>not</i> maintain a list of approved EALs or manufacturers of EALs. They do provide the following guidance on the choice of an appropriate EAL:</p> <p>“Environmentally Acceptable Lubricants” means lubricants that are “biodegradable” and “minimally-toxic,” and that are “not bioaccumulative” as defined in Appendix A of the VGP. For purposes of the VGP, products meeting the permit’s definitions of being an “Environmentally Acceptable Lubricant” include those labeled by the following labeling programs: Blue Angel, European Ecolabel, Nordic Swan, the Swedish Standards SS 155434 and 155470, Convention for the Protection of the Marine Environment of the North-East Atlantic (OSPAR) requirements, and EPA’s Design for the Environment (DfE).</p> <p>Additional guidance from the EPA is available in the following document dated November 2011:</p> <ul style="list-style-type: none"> • Environmentally Acceptable Lubricants EPA 800-R-11-002 <p>For stern tube systems including protective seals on controllable pitch propellers, azimuth thrusters, propulsion pods and rudder bearings an operator <i>may</i> elect to use an alternative seal design (i.e. air or seawater lubricated systems) in lieu of an EAL.</p> <p><i>EPA recommends that a vessel operator have third party certification that the seal design is unlikely to leak during normal operation, and therefore, will no longer function like an oil-to-sea interface.</i></p>		
REQUIRED ACTIONS The following actions are required for <i>all</i> oil-to-sea interfaces:		
1	If technically feasible, install and use an EAL in <i>all</i> oil-to-sea interfaces (<i>skip to Step 5</i>).	<input type="checkbox"/>
2	If not technically feasible to install and use an EAL for a particular oil to sea interface maintain records documenting the reasons for the decision not to use an EAL along with the supplemental documentation described below based on the reason for technical infeasibility.	<input type="checkbox"/>
TECHNICAL INFEASIBILITY For the installation and use of EALs to be considered technically infeasible one or more of the following conditions must apply:		
	<ul style="list-style-type: none"> No EAL products are approved for use in a given application that meet manufacturer specifications for that equipment. <p><i>Maintain a certification statement from the manufacturer on board the vessel.</i></p>	<input type="checkbox"/>
	<ul style="list-style-type: none"> Products which come pre- lubricated (e.g., wire ropes) have no available alternatives manufactured with EALs. <p><i>Maintain a certification statement from the manufacturer on board the vessel.</i></p>	<input type="checkbox"/>
	<ul style="list-style-type: none"> Products meeting a manufacturers specification are not available within any port in which the vessel calls. <p><i>Maintain a certification statement from the company on board the vessel that an appropriate EAL is not available in the ports the vessel frequently calls.</i></p>	<input type="checkbox"/>
	<ul style="list-style-type: none"> Change over and use of an EAL must wait until the vessel's next scheduled dry docking. <p><i>Maintain a company/class/manufacturer certification statement on board the vessel that installation or switch-over to EALs for a particular system can only be completed in dry dock.</i></p>	<input type="checkbox"/>
3	Conduct a corrective action assessment to document non-compliance (technical infeasibility) and appropriate corrective actions (see VGP section 3).	<input type="checkbox"/>
4	Report non-compliance (technical infeasibility) and corrective actions in the annual report.	<input type="checkbox"/>
5	Be prepared to make all documentation available to USCG/EPA inspectors upon request (<i>Either demonstrating the use of EALs or technical infeasibility as described above</i>).	<input type="checkbox"/>





VESSEL CLASS-SPECIFIC REQUIREMENTS	Section 5 of the VGP outlines additional class-specific requirements for certain vessels. Below is a brief summary of some of the significant additional requirements for certain vessels:
CRUISE SHIPS (LARGE/MEDIUM)	Increased graywater management and monitoring requirements including pool and spa discharges as well updates to the educational and training requirements (section 5.1-2).
LARGE FERRIES	Additional effluent limits (deck water, graywater) and educational and training requirements (section 5.3).
BARGES	Additional supplemental inspection requirements and effluent limits (section 5.4).
OIL OR PETROLEUM TANKERS	Additional authorized discharge (Inert Gas Scrubber Effluent), supplemental inspection requirements including a visual sheen test as well as updates to the educational and training requirements (section 5.5).
RESEARCH VESSELS	Additional supplemental authorized discharges and effluent limits (section 5.6).
EMERGENCY AND RESCUE VESSELS	Additional supplemental authorized discharges and effluent limits (section 5.7).

ADDITIONAL REFERENCES	Below is a list of additional references that are also very useful:
2013 VGP eNOI System Login - https://ofmpub.epa.gov/apex/vgpenoi/f?p=141:101	
VGP Vessel Discharge Sample Collection and Analytical Monitoring Reference Guide	
EPA VGP Frequently Asked Questions – https://www.epa.gov/npdes/vessels-frequent-questions	
VGP Additional Resources – https://www.epa.gov/npdes/vessels-additional-resources	


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COMPLIANCE WITH ADDITIONAL STATE CONDITIONS / REQUIREMENTS FOR THE VGP


CALIFORNIA	California certified the EPA Vessel General Permit (VGP) with the following additional permit conditions/requirements when operating in state waters:	
1	Large passenger vessel and cruise ship graywater discharges are prohibited in state waters. Graywater discharges from vessels that weigh 300 gross tons or more are also prohibited if such vessels have sufficient holding capacity.	<input type="checkbox"/>
2	A copy of the NOI must be sent to the State Water Resources Control Board via email at calvgp_cert@waterboards.ca.gov .	<input type="checkbox"/>
<i>For more information regarding compliance in California see the California checklist.</i>		


CONNECTICUT	Connecticut certified the EPA Vessel General Permit (VGP) with the following additional permit conditions/requirements when operating in state waters:	
1	Discharge of treated/untreated bilgewater and graywater, exhaust gas scrubber washwater, and fish hold effluent into Connecticut waters from any vessel is prohibited.	<input type="checkbox"/>
2	A copy of the NOI must be sent to the Department of Energy and Environmental Protection (DEEP) via email at dep.webmaster@ct.gov .	<input type="checkbox"/>
3	All vessels must maintain the ability to measure salinity levels in each ballast water tank on board the vessel to ensure ballast exchange in marine waters with salinities between 20 and 25ppt.	<input type="checkbox"/>




HAWAII	Hawaii certified the EPA Vessel General Permit (VGP) with the following additional permit conditions/requirements when operating in state waters:	
1	Submit the requested eNOI information via the Hawaii Department of Health DOH-CWB website at: https://eha-cloud.doh.hawaii.gov/epermit/app/#/formversion/f5e55acc-2074-4f70-b8d6-01d9369bf933 (if clicking the above link does not work, please copy and paste it directly in to your browser) To certify the information entered you will need to print out the certification statement, sign and return it to the Hawaii DOH as instructed, a wet ink signature is required.	<input type="checkbox"/>
2	Submit all non-compliance in state waters on a non-compliance reporting form available via the DOH-CWB website: https://eha-cloud.doh.hawaii.gov/epermit .	<input type="checkbox"/>
<i>For more information regarding compliance in Hawaii see the Hawaii checklist.</i>		


MAINE	Maine certified the EPA Vessel General Permit (VGP) with the following additional permit conditions/requirements when operating in state waters:	
1	Large passenger vessels are prohibited from discharging graywater into no discharge zones (NDZ).	<input type="checkbox"/>
2	All vessels entering Maine waters must maintain the ability to measure salinity levels in each ballast tank onboard to ensure salinity of 30ppt.	<input type="checkbox"/>


MICHIGAN	Michigan certified the EPA Vessel General Permit (VGP) with the following additional permit conditions/requirements when operating in state waters:	
1	Discharges of blackwater (sewage) and graywater from vessels covered by the VGP are prohibited in Michigan waters as it is designated as an EPA No Discharge Zone (NDZ).	<input type="checkbox"/>
2	Oceangoing vessels covered by the VGP are prohibited from discharging ballast water in Michigan's waters unless the vessel has obtained a Certificate of Coverage under the Ballast Water Control General Permit (Permit No. MIG140000).	<input type="checkbox"/>
3	Oceangoing vessels that discharge ballast in Michigan waters must monitor ballast water discharge at least once each year for living organisms and report a summary of the results to Michigan Department Environmental Quality (MDEQ) no later than December 31 each year.	<input type="checkbox"/>
<i>For more information on the MI Ballast Water Control General Permit see the Great Lakes checklist.</i>		


MINNESOTA	Minnesota certified the EPA Vessel General Permit (VGP) with the following additional permit conditions/requirements when operating in state waters:	
1	Vessel must obtain and comply with the existing Minnesota ballast water general permit (MNG300000) detailed above or subsequent modifications of that permit issued by MPCA.	<input type="checkbox"/>
2	Vessels are required to conduct ballast water exchange for voyages originating outside the US EEZ in water at least 200 nautical miles from any shore, in waters at least 2,000 meters in depth which result in a salinity level of at least 30 parts per thousand prior to entering Minnesota waters regardless of the installation of treatment systems.	<input type="checkbox"/>
<i>For more information on the MN Ballast Water Control General Permit see the Great Lakes checklist.</i>		




NEW HAMPSHIRE	New Hampshire certified the EPA Vessel General Permit (VGP) with the following additional permit conditions/requirements when operating in state waters:	
1	New Hampshire waters have been designated an NDZ, all sewage discharge including graywater containing sewage, whether treated or untreated, is prohibited.	<input type="checkbox"/>
2	Graywater without sewage should be discharged at pump-out facilities or beyond three nautical miles of the New Hampshire shoreline and the Isles of Shoals wherever feasible. This is infeasible at this time for vessels without holding tanks for graywater, but these vessels should plan to install such holding tanks during one of the next two scheduled dry-docking events if such installation is technically feasible and would not jeopardize the safety of the vessel.	<input type="checkbox"/>


NEW YORK	New York certified the EPA Vessel General Permit (VGP) with the following additional permit conditions/requirements when operating in state waters:	
1	Discharge of bilge water is prohibited in New York waters.	<input type="checkbox"/>
2	Existing ballast water exchange and flushing requirements for voyages originating outside the exclusive economic zone (EEZ) remain in effect regardless of whether the vessel is equipped with a BWTS.	<input type="checkbox"/>
3	Annual monitoring and reporting of living organisms after a BWTS is installed.	<input type="checkbox"/>
4	Additional best management practices for Confined Laker vessels that operate exclusively in the Great Lakes (see section 6.19.4).	<input type="checkbox"/>

OHIO	Ohio certified the EPA Vessel General Permit (VGP) with the following additional permit conditions/requirements when operating in state waters:	
1	Vessels that operate outside the EEZ and more than 200 nautical miles from shore, and then enter the Great Lakes via the St. Lawrence Seaway System must conduct salt water flushing of ballast tanks. This condition applies both before and after treatment system deadlines in the VGP.	<input type="checkbox"/>
2	Vessels are prohibited from discharging ballast water sediment in Ohio waters.	<input type="checkbox"/>

RHODE ISLAND	Rhode Island certified the EPA Vessel General Permit (VGP) with the following additional permit conditions/requirements when operating in state waters:	
1	The discharge of bilge water from any vessel covered under the VGP whose voyage originates outside the EEZ shall discharge all existing bilge water prior to entering Rhode Island waters. If the vessel is unable to discharge their bilge water prior to entering Rhode Island waters, the operator is prohibited from discharging bilge water within Rhode Island waters.	<input type="checkbox"/>
2	Existing ballast water exchange and flushing requirements for voyages originating outside the EEZ remain in effect regardless of whether the vessel is equipped with a BWTS.	<input type="checkbox"/>
3	Annual monitoring and reporting of living organisms after a BWTS is installed.	<input type="checkbox"/>



WASHINGTON	Washington certified the EPA Vessel General Permit (VGP) with the following additional permit conditions/requirements when operating in state waters:	
1	In order to minimize the generation and release of wastewater, vessel operators shall use best management practices that include mechanical methods to thoroughly clean bulk and break-bulk cargo holds. <i>Unless flammable or explosive vapor concentrations make the risk too great, hold cleanliness shall be documented photographically before washing with water.</i> Solid wastes from hold cleaning must be transferred onshore for disposal in an approved landfill. This includes agricultural products such as grains.	<input type="checkbox"/>
2	The discharge of wash down water from holds containing metal ores, prilled coal tar (pencil pitch), coal, and petroleum coke is <i>prohibited</i> .	<input type="checkbox"/>
3	The discharge of tank cleaning and wash down water from petroleum and chemical tank ships is <i>prohibited</i> .	<input type="checkbox"/>
4	Discharge of wash water from holds that contained concrete, sand, gravel, and other similar inorganic products shall be allowed as long as it is managed in such a way as to prevent <i>a visible increase in turbidity or raising receiving water pH more than 0.5 units or above 8.5.</i>	<input type="checkbox"/>
5	The discharge of fish hold effluent while at a dock, pier, or mooring is <i>prohibited</i> .	<input type="checkbox"/>
6	Notification to the Washington State Department of Health (WDOH) within 24 hours is required for graywater discharges in violation of VGP 2.2.15, 5.1 or 5.2 or untreated sewage discharges at +1 360 236 3330 or +1 360 789 8962 (after hours).	<input type="checkbox"/>
<i>For more information regarding compliance in Washington see the PacNW checklist.</i>		

WISCONSIN	Wisconsin certified the EPA Vessel General Permit (VGP) with the following additional permit conditions/requirements when operating in state waters:	
1	Vessels must obtain any permits required by the State of Wisconsin for vessel discharges (WDNR's ballast water discharge general permit WI- 0063835-01-2).	<input type="checkbox"/>
2	Vessels that operate outside the EEZ and more than 200 nautical miles from shore, and then enter the Great Lakes via the St. Lawrence Seaway System must conduct salt water flushing of ballast tanks.	<input type="checkbox"/>
3	Discharges of graywater or sewage into Lake Michigan, a NDZ, are subject to penalties.	<input type="checkbox"/>
<i>For more information on the WI Ballast Water Discharge General Permit see the Great Lakes checklist.</i>		