



# THE LONDON

STEAM-SHIP OWNERS'  
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23 December 2008

## TO ALL MEMBERS

Dear Sirs

### **US Environmental Protection Agency (EPA) Vessel General Permit (VGP) Requirements**

The Association's Circular of 2 December 2008 (5:382) informed Members that from 19 December 2008, all commercial vessels 79 feet (24.08 meters) in length or greater with discharges of pollutants incidental to their normal operation, including but not limited to ballast water discharges, into the US three mile territorial sea or inland waters will become subject to the EPA final Vessel General Permit (VGP) requirements and will ultimately need individual permit coverage.

On 18 December 2008, at the request of the involved parties, the US District Court for the Northern District of California issued an order delaying the effective date of vacating the long-standing EPA regulations which excludes certain vessel discharges from the permitting requirements of the Clean Water Act until 6 February 2009. As such, the current exemption (40 C.F.R. § 122.3(a)) will remain in place until that date.

The EPA advises that the effective date of the VGP will still remain as 19 December 2008. However, the EPA will not actually require permit authorisation and Owners will not need to comply with the terms of the finalised VGP requirements until 6 February 2009.

Further information on the VGP requirements, including the final VGP can be accessed at:  
[http://cfpub.epa.gov/npdes/home.cfm?program\\_id=350](http://cfpub.epa.gov/npdes/home.cfm?program_id=350)

Yours faithfully  
A BILBROUGH & CO LTD  
(MANAGERS)

5:383

