



P&I 特別回報

第 13-018 号
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日本船主責任相互保険組合

外航組合員各位

米国EPA(環境保護庁)による2013 Vessel General Permit(VGP)要求

背景

2008 年 11 月 28 日付特別回報第 08-011 号及び 2008 年 12 月 26 日付特別回報第 08-013 号をご参照下さい。2008 年 12 月 19 日より、米国領海 3 海里以内(内水を含む)に入域し、通常の船舶運航に伴う排出物を有する全長 79 フィート(24.08 メートル)以上の全ての商船は、VGP の要求を満たすことが義務付けられています。

2013 VGP

第二次 VGP は 2013 年 12 月 19 日から 5 年間有効となり、第一次 VGP に取って代わります。

2013 VGP 最終版を含む VGP 要求に関する概要情報は次のリンクから入手できます。

<http://cfpub.epa.gov/npdes/vessels/vgpermit.cfm>

2013 VGP 要求は、米国領海 3 海里以内(内水を含む)に入域し、通常の船舶運航に伴う排出物を有する全長 79 フィート(24.08 メートル)以上の全ての船舶に影響します。

2013 VGP の対象となる船舶には、商業漁船¹、クルーズ船、フェリー、バージ、移動式海洋掘削装置(mobile offshore drilling units)、オイルタンカー、石油タンカー、ばら積み貨物船、貨物船、コンテナ船、その他貨物船、冷蔵船、調査船、消防及び警察を含む緊急対応船、及び輸送手段として用いられるあらゆる船舶が含まれます。レクリエーション船及び軍事船は VGP 要求の対象になりません。

VGP の対象となる排出物及び適用が制限される排出のリストは添付 1 の通りです。

手続

Notice of Intent (NOI)の提出が必要になる船主/オペレーター

VGP カバー(VGP に基づき排出が認められる)を得るには、登録トン数が 300 総トン以上、もしくは 8 立方メートル(2,113 ガロン)以上のバラスト水を保持・排出することのできる船舶の船主又はオペレーターは、2013 年 12 月 12 日もしくは排出を行う 7 日前までに NOI を提出する必要があります。

NOI の提出期限及び排出が認められるようになる期日の詳細は添付 2 をご参照下さい。

船主若しくはオペレーターは、EPA Electronic NOI (eNOI) システム(www.epa.gov/npdes/vessels/eNOI)を使って NOI を提出しなければなりません。船主若しくはオペレーターが VGP の Part 1.14 に規定される除外条項を満たす場合、eNOI に代えて紙面での NOI 提出が認められる場合があります。但し、紙面での NOI 提出の場合、排出が認められるようになるまでの待ち時間が長くなる可能性があります。

¹ 79 フィート以上の商業漁船に対する猶予期間は 2013 年 12 月 18 日で終了します。

船主及びオペレーターは、VGP 違反にならないよう、排出開始前に NOI が次のリンク (www.epa.gov/npdes/vessels/eNOI)を通じて提出されていることを確認して下さい。

船主若しくはオペレーターは常に NOI のコピーを本船に保持しておかなければなりません。

NOI の提出が不要な船主/オペレーター

登録トン数が 300 総トン未満で 8 立方メートル以上のバラスト水を保持・排出する能力を有さない船舶の船主若しくはオペレーターは、NOI を提出する必要はありません。但し、船主若しくはオペレーターは、VGP Permit Authorisation and Record of Inspection (PARI) フォームを記載しなければなりません。

船主若しくはオペレーターは、常に PARI フォームのコピーを本船に保持しておかなければなりません。

報告

各船の船主若しくはオペレーターは、毎年 Annual Report を電子的方法で提出することが要求されます。Annual Report は暦年ベースで作成し、翌年 2 月 28 日までに提出しなければなりません。従いまして、2014 年の Annual Report は 2015 年 2 月 28 日が提出期限となります。

2013 年の Annual Report を別途提出することは必要ありません。但し、2013 年 12 月 19 日から同年 12 月 31 日までの関係情報は 2014 年の Annual Report に含める必要があります。

Annual Report は次のリンク (www.epa.gov/npdes/vessels) 若しくは eNOI システム (www.epa.gov/npdes/vessels/eNOI)を通じてオンラインで完成させることができます。

国際 P&I グループのすべてのクラブが同様の内容の回章を発行しています。

以上

添付 1 : VGP の対象となる排出物及び適用が制限される排出のリスト

添付 2 : NOI の提出期限及び排出が認められるようになる期日の詳細

Annex I

Discharge types eligible for coverage under the VGP

- *Deck Washdown and Runoff and Above Water Line Hull Cleaning*
- *Bilgewater/Oily Water Separator Effluent*
- *Ballast Water*
- *Anti-fouling Hull Coatings/Hull Coating Leachate*
- *Aqueous Film Forming Foam (AFFF)*
- *Boiler/Economizer Blowdown*
- *Cathodic Protection*
- *Chain Locker Effluent*
- *Controllable Pitch Propeller and Thruster Hydraulic Fluid and other Oil Sea Interfaces including Lubrication Discharges from Paddle Wheel Propulsion, Stern Tubes, Thruster Bearings, Stabilizers, Rudder Bearings, Azimuth Thrusters, and Propulsion Pod Lubrication, and Wire Rope and Mechanical*
- *Equipment Subject to Immersion*
- *Distillation and Reverse Osmosis Brine*
- *Elevator Pit Effluent*
- *Firemain Systems*
- *Freshwater Layup*
- *Gas Turbine Wash Water*
- *Graywater*

Except that Graywater from commercial vessels within the meaning of CWA section 312 that are

operating in the Great Lakes is excluded from the requirement to obtain an NPDES permit (see CWA section 502(6)), and thus is not within the scope of this permit.

- *Motor Gasoline and Compensating Discharge*
- *Non-Oily Machinery Wastewater*
- *Refrigeration and Air Condensate Discharge*
- *Seawater Cooling Overboard Discharge (Including Non-Contact Engine Cooling Water; Hydraulic System Cooling Water, Refrigeration Cooling Water)*
- *Seawater Piping Biofouling Prevention*
- *Boat Engine Wet Exhaust*
- *Sonar Dome Discharge*
- *Underwater Ship Husbandry*
- *Welldeck Discharges*
- *Graywater Mixed with Sewage from Vessels*
- *Exhaust Gas Scrubber Washwater Discharge*
- *Fish Hold Effluent*

Limitations on Coverage under the VGP

- *Discharges Not Subject to Former NPDES Permit Exclusion and Vessel Discharges Generated from Vessels when they are Operated in a Capacity Other than as a Means of Transportation*

Discharges that are outside the scope of the former exclusion from NPDES permitting for discharges incidental to the normal operation of a vessel as set out in 40 CFR §122.3(a), as in effect on December 18, 2008, are ineligible for coverage under this permit. This permit does not apply to any vessel when it is operating in a capacity other than as a means of transportation. For any discharges identified in this permit, discharges are not eligible if they contain materials resulting from industrial or manufacturing processes onboard or other materials not derived from the normal operations of a vessel.

Vessels when they are being used as an energy or mining facility, a storage facility, a seafood processing facility, or when secured to the bed of waters subject to this permit or to a buoy for the purpose of mineral or oil exploration or development are not eligible for coverage under this permit. Furthermore, “floating” craft that are permanently moored to piers, such as “floating” casinos, hotels, restaurants, bars, etc. are not covered by the former vessel exclusion and would not be covered by this vessel permit.

- *Sewage*

Discharges of sewage from vessels, as defined in CWA section 502(6) and 40 CFR §122.2, are not required to obtain NPDES permits. Instead, these discharges are regulated under section 312 of the CWA and 40 CFR Part 140 and 33 CFR Part 159. Under CWA section 312(a)(6), the definition of sewage includes graywater discharges from “commercial vessels” (as defined in CWA section 312(a)(10)) operating on the Great Lakes. If a vessel operating on the Great Lakes is not a “commercial vessel” as defined in CWA section 312(a)(10), the vessel’s graywater discharges are eligible for coverage under this permit, and are subject to the additional permit requirements in Part 2.2.15.1.

- *Used or Spent Oil*

Discharges of used or spent oil no longer being used for their intended purposes are not eligible for coverage under this permit.

- *Garbage or Trash*

Discharges of rubbish, trash, garbage, or other such materials discharged overboard are not eligible for coverage under this permit. “Garbage” includes discharges of bulk dry cargo residues as defined at 33 CFR §151.66(b) (73 Fed. Reg. 56492 (September 29, 2008)) and agricultural cargo residues. Discharges of garbage are subject to regulation under 33 CFR Part 151, Subpart A.

- *Photo-Processing Effluent*

Discharges from photo-processing operations are not eligible for coverage under this permit.

○ *Effluent from Dry Cleaning Operations*

Discharges of spent or unused effluent from dry cleaning operations are not eligible for coverage under this permit. This includes any spent or unused tetrachloroethylene (perchloroethylene) from these operations.

○ *Discharges of Medical Waste and Related Materials*

Discharges of medical waste as defined in 33 USC 1362(20) are not eligible for coverage under this permit. Discharges of spent or unused pharmaceuticals, formaldehyde, or other biohazards no longer being used for their intended purposes are not eligible for coverage under this permit.

For purposes of this permit, the liquid produced by dialysis treatment of humans is not deemed to be “medical waste,” and, like other human body waste, is subject to regulation under CWA §312 if introduced into marine sanitation devices, or under VGP Part 2.2.25 if added to a blackwater system combined with a graywater system. The direct overboard discharge of such liquid without treatment is not eligible for coverage under this permit.

○ *Discharges of Noxious Liquid Substance Residues*

Discharges of noxious liquid substance residues subject to 33 CFR Part 151, Subpart A or 46 CFR §153.1102 are not eligible for coverage under this permit.

○ *Tetrachloroethylene (Perchloroethylene) and Trichloroethylene (TCE) Degreasers*

Discharges of tetrachloroethylene (perchloroethylene) and trichloroethylene (TCE) degreasers or other products containing tetrachloroethylene or trichloroethylene are not eligible for coverage under this permit.

○ *Discharges Currently or Previously Covered by an another NPDES Permit*

The following discharges are not eligible for coverage under this permit:

- Vessel discharges covered, as of the effective date of this permit, under an individual or a general NPDES permit other than the VGP, unless EPA specifically allows coverage under Part 1.8.2, or otherwise provides written permission to be covered under this permit, or
- Discharges from vessels covered by any NPDES permit that has been or is in the process of being denied, terminated, or revoked by EPA or a state permitting authority (this does not apply to the routine reissuance of permits every five years).

Source: Final 2013 VGP

Annex II

NOI submission deadlines and discharge authorisation dates

Category	NOI Deadline	Discharge Authorisation date
Vessels authorized to discharge under the 2008 VGP	No later than December 12, 2013 or 7 days prior to discharge into waters subject to this permit, whichever is later	For eNOIs: December 19, 2013 or, if not submitted by December 12, 2013, 7 days after complete NOI processed** by EPA For Paper NOIs: 30 days after complete NOI processed by EPA
New Owner/Operator of Vessel – transfer of ownership and/or operation of a vessel whose discharge is previously authorized under this permit	By date of transfer of ownership and/or operation	Date of transfer or date EPA processes NOI, whichever is later
New vessels delivered to owner or operator after December 19, 2013	For vessels submitting eNOIs: 7 days prior to discharge into waters subject to this permit For vessels submitting Paper NOIs: At least 30 days prior to discharge into waters subject to this permit	For eNOIs: 7 days after complete NOI processed by EPA For Paper NOIs: 30 days after complete NOI processed by EPA
Existing vessels delivered to owner or operator after December 19, 2013 that were not previously authorized under this permit	For vessels submitting eNOIs: 7 days prior to discharge into waters subject to this permit For vessels submitting Paper NOIs: At least 30 days prior to discharge into waters subject to this permit	For eNOIs: 7 days after complete NOI processed by EPA For Paper NOIs: 30 days after complete NOI processed by EPA

* Based on a review of your NOI or other information, EPA may delay the discharge authorization date for further review, or may deny coverage under this permit and require submission of an application for an individual NPDES permit, as detailed in Part 1.8 of the permit. In these instances, EPA will notify you in writing of the delay or the request for submission of an individual NPDES permit application. If EPA requires an individual permit for an existing vessel previously covered by this general permit, EPA will allow the permittee a reasonable amount of time to obtain individual permit coverage before their general permit coverage terminates.

** NOI processing means that a complete electronic NOI has been submitted and successfully signed and certified by the permittee, or in the case of a paper NOI, that EPA has received your NOI and input the information into its electronic system. Submitting a paper NOI may result in processing delays dependent upon the volume of NOIs received by EPA.

Source: Final 2013 VGP