



Department of Ecology – Water Quality Program
October 22, 2013 TAG Meeting
Meeting Summary

Permit Coverage: *opinions expressed*

- Only cover vessels that cannot get to a shipyard
- Only cover vessels that can safely be moved
- Use individual permits for vessels that cannot be moved
- Any vessel can be moved with the right equipment available
- Only cover vessels in danger of sinking
- Cover multiple vessels under one application for coverage
- Cover one vessel per application
- Classify ships differently and regulate the process differently for each (e.g. distinguish barges from powered vessels, delineate by size, etc.)
- Ecology needs to evaluate risks, liabilities, and feasibility of BMPs in deciding who to cover

Other: *ideas and observations expressed*

- Several shipyards currently bid on WDNR derelict vessel projects, so there does not appear to be a shortage of yards willing and able to do the work
- Coast Guard does not *approve* tow plans, so this is not a useful distinction for whether a vessel is safe to move or not
- An advisory board should be formed, with regular meetings, to address all vessel salvage – i.e. one board to decide appropriate action vessel by vessel
- Clarify who has jurisdiction – Coast Guard, Ecology Spills, WDNR, and Local Jurisdictions?
- Consider a cross-jurisdictional team, like WDOT MAP team to address this activity
- Individual permittees (shipyards) have more liability (i.e. out of business if they lose the NPDES permit) than someone with a general permit for one deconstruction at a time
- Consider requiring plans/sign-off on asbestos, lead, mercury, PCB, Hot work, etc. in permit (or permit application) as assurance that proper practices are being followed



Vessel Deconstruction General Permit

Department of Ecology – Water Quality Program

November 14, 2013 TAG Meeting

DRAFT Proposal for Vessel Deconstruction General Permit

Permit Coverage:

- Application required/coverage received for each individual vessel
 - Allows public comment, submittal review, and vessel specific determination of appropriateness of coverage under the general permit
 - Coverage could be obtained quickly (45-60 days) v. individual permit (6-12 months)
 - An individual permit (e.g. shipyard permit) is likely to be more appropriate for facilities processing multiple vessels
- No restrictions on coverage based on shipyard availability or ability to move vessel
 - Permit will be designed to be as protective as current shipyard permits
 - Application and permit requirements can address increased risks associated with over-water deconstruction (e.g. deconstruction plans, hazardous waste assessments, BMPs)
 - Public comment opportunities are available with per-vessel coverage
 - Ecology will review each application for appropriateness of general permit coverage and vessels may be required to obtain individual permit coverage (or move to a permitted facility) if general permit will not fully address vessel-specific considerations
- *Potential* additional restrictions based on business license and/or minimum financial assurances

Application Requirements:

- General information on vessel, location of work, anticipated waste streams
- Confirmation of public notice and applicable SEPA requirements
- Verification of hazardous materials testing (Asbestos, lead, PCBs, mercury) as appropriate to the vessel's anticipated waste streams, and a solid waste disposal plan
- Deconstruction and Site Management Plan (*signed by an appropriate professional*)

Permit requirements:

- Limits and/or benchmarks, monitoring, and reporting requirements
- Implementation of Deconstruction and Site Management Plan
- Notification prior to commencing work
- Written and photo documentation
- Additional requirements/restrictions to address 303(d) listed waters and TMDLs