



Vessel Deconstruction General Permit

Department of Ecology – Water Quality Program August 29, 2013 Public Meeting Summary

Questions:

- Who would want this permit?
- Will the permit mandate use of a shipyard or boatyard if one is available and capable of handling the vessel deconstruction?
- Will permit coverage be per vessel, or would someone hold a permit for multiple vessels?
- What public notice requirements will be included? Are these state requirements that go beyond federal requirements?
- Will the permit coverage be limited to specific sizes and/or types of vessels?
- When is the ship “clean enough”?
- Who decides when it is safe to cut on a vessel and how far you can go over water?
- Will the permit address dismantling of smaller vessels (generally < 65’) on land but outside of a shipyard or boatyard, for example, at a vacant lot on Port property?

Concerns:

- The permit could attract out-of-state derelict vessels to Washington
- Invasive species associated with hull fouling should be addressed
- Working outside of permitted shipyards could lead to: unsafe conditions, unqualified persons doing the work, improper disposal of hazardous materials, less regulatory oversight (including OSHA, L&I), higher risks
- Fugitive air emissions associated with cutting
- Disposing of dewatering water off-site is costly and historically this water was allowed to be discharged
- Shipyards incur long-term costs that are difficult to recoup when they accept vessels that increase their generator status under Dangerous Waste Rules

Expectations:

- Address all the regulatory issues associated with deconstruction, not just water quality (hazardous waste, air emissions, OSHA, L&I, etc.). Don’t work in silos
- Create opportunities to make deconstruction less costly, not an additional regulatory barrier
- Salvage/scraping companies need economic incentives to make this work profitable
- Developing the permit will require a technical workgroup including folks doing this work successfully now