Department of Ecology – Water Quality Program
Technical Advisory Group (TAG) for proposed Vessel Deconstruction General Permit

Initial Technical Questions

Currently, deconstruction of a vessel outside of a National Pollutant Discharge Elimination System (NPDES) permitted shipyard or boatyard is effectively prohibited. Fourteen shipyards and 70 boatyards hold NPDES permits. Ecology proposed a general permit for deconstruction over water as a way to increase options for vessel deconstruction when a yard is unavailable. A yard may be unavailable either because the vessel cannot be safely moved to the yard, or because the yard is unable or unwilling to allow deconstruction at their facility.

Ecology also has concerns with inexperienced, unqualified individuals attempting to deconstruct vessels based on perceived scrap value for the steel and other metals. We feel that requiring general permit coverage to regulate this activity in a way that protects water quality will discourage this type of activity making it prohibitive for unqualified individuals.

Ecology understands there are increased risks associated with deconstruction over water. A general permit for this activity must be as protective as current permits for land/drydock-based deconstruction. Best management practices (BMPs) required in the permit are expected to be equivalent to current permits and in some cases more extensive due to the increase risks associated with over water work.

Initial thinking on permit structure

- Similar in administrative structure to Ecology's Construction Stormwater General Permit
- Effluent limitations, monitoring, reporting, and BMPs as needed to address anticipated discharges (stormwater and process water)

Initial thinking on permit requirements

- BMPs drawn primarily from individual shipyard NPDES permits
- Additional requirements to address increased risks associated with working over water

Initial questions for TAG

- What plans (cutting, ballasting, spill response, etc.) are required to address safe deconstruction? Should they be similar to current/past efforts completed in emergency response situations?

- Should Ecology require certification of deconstruction plans by – Naval Architect, other professional?
- What scenarios for deconstruction are anticipated?
    - Deconstruction of a vessel while floating?
    - Deconstruction of a vessel on a barge?
    - Other?
- What discharges are anticipated during deconstruction?
    - Stormwater?
    - Process water?
    - Ballast water?
    - Dewatering and/or bilge water?
    - Incidental discharges such as paint chips, metal grinding and cutting debris, hull fouling materials, slag, etc.
    - Other?
- Among these anticipated discharges, which would the operator desire to discharge directly to surface waters – with or without treatment?

- Suggestions for addressing non-water quality regulations?
    - What product(s) would be helpful in addressing: asbestos and lead abatement, hazardous and dangerous waste handling and disposal, etc.?