

Client Alert 06-2015

February 3, 2015

2013 VESSEL GENERAL PERMIT ANNUAL REPORT SUBMISSION DEADLINE—FEBRUARY 28, 2015

As we reported in **CLIENT ALERT 30-2014**, the **VESSEL GENERAL PERMIT (VGP)** requires that vessel owners/operators submit an Annual Report documenting VGP activities for each calendar year for each vessel covered by the VGP. Annual Reports for the period December 19, 2013 through December 31, 2014 must be submitted to the ENVIRONMENTAL PROTECTION AGENCY (EPA) by February 28, 2015.

- ⇒ All vessels with a **VGP NOTICE OF INTENT (NOI)** at any time during this period must file an Annual Report, regardless of whether or not the vessel called the US in 2014.
- ⇒ In addition, an Annual Report must still be filed even if the vessel has subsequently been sold or left your management.
- ⇒ Failure to submit an Annual Report is considered non-compliance with the VGP and can result in a USCG deficiency during Port State Control examinations.

HOW TO SUBMIT THE VGP ANNUAL REPORT

Companies that are submitting their own Annual Reports should log onto the EPA's website at <https://ofmpub.epa.gov/apex/vgpenoi/f?p=vgp> and click on the Annual Report/DMRs link. The EPA provides instructions on the submission process.

Alternatively, companies may request ECM to submit your 2014 Annual Reports on your behalf.

Annual Reports can be separated into three (3) categories as described below along with our service fees.

1. Vessels that did **not** call the U.S. in 2014 - \$50/report.
2. Vessels that called the U.S. in 2014 - \$200/report.
3. Vessels that called the U.S. in 2014 and are required to submit a DISCHARGE MONITORING REPORT (DMR) - \$200/report.

(Most vessels are not required to submit a DMR with their Annual Report).

NOTE: Certain vessel owners/operators covered under the 2013 VGP are required to perform and report analytical monitoring of ballast water, bilgewater, graywater, and exhaust gas scrubber wastewater. See the [EPA website](#) for the DISCHARGE MONITORING REPORT requirements.

Contact ECM at ecm@ecmmaritime.com if you would like our assistance in submitting your 2014 Annual Reports. Please include which category(s) listed above apply for each vessel.

If ECM conducted a comprehensive **VGP ANNUAL INSPECTION** on your vessel in 2014, we will submit your **VGP ANNUAL REPORT** for 2014 on your behalf.

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