U.S. Coast Guard

Implementation of Ballast Water Discharge Standard



Presented at GL ANS Panel Meeting, October 2015

U.S. Coast Guard
Ninth Coast Guard District
Cleveland, Ohio

Overview

- Applicability/Requirements
- Compliance Options for Ship owners
- Coast Guard Type Approval and Independent Labs
- Alternate Management Systems (AMS)
- Extensions to Implementation Date
- Compliance and Enforcement
- EPA VGP and Canada

Applicability/Requirements

Regulation	Requirement
Jurisdiction	U.S. territorial sea – 12 nautical miles
Applicability/Exemptions	Vessels equipped with BW tanks and operate in waters of U.S. Does not apply to: non-seagoing vessels; sea-going vessels that do not operate outside EEZ and are less than 1,600 Gross Register Tons or 3,000 ITC; and, vessels that operate exclusively in 1 COTP Zone.
Implementation Schedule Dates are January 1 unless specified (First regularly scheduled drydocking after a vessel's compliance date)	New Vessels (Dec 1, 2013 keel laying): On delivery Existing Vessels (BW capacity in cubic meters): <1,500: 2016 1,500 - 5,000: 2014 >5,000: 2016
Great Lakes	Applies to sea-going vessels over 1,600 GRT that depart the Great Lakes, transit beyond Anticosti Island, return and pass upstream of Snell Lock, aka "Salties."

Compliance Options

1. No BW Discharge



2. Coast Guard Approved Ballast Water Management System



3. Discharge to Facility Onshore or to Another Vessel for Purpose of Treatment



4. Use only water from a U.S. Public Water System



Two Temporary Compliance Alternatives

1. Alternate Management System (AMS) – Temporary Designation for up to 5 years

2. Receive an Extension to Implementation Date – Extension period will vary/ dependent upon TA system availability

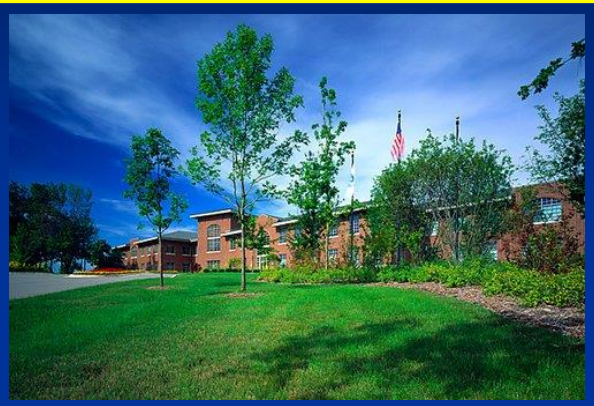
Type Approval

Choice of two paths:

1. Evaluation of some/all existing test data and information from type approval testing for a foreign administration.
   - Applicant must include:
     - Data and information;
     - Explanation of how submission meets or exceeds Coast Guard type approval requirements.
   - Data and information must be reviewed by independent laboratory (IL)
   - Additional testing/evaluation by an IL may be required.

2. Evaluation of test data and information produced and submitted by an IL.

Five Independent Labs



NSF Int'l, Ann Arbor, MI



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DNV



Det Norske Veritas
Hovik, Norway

Danish Hydraulic Institute (DHI)
Horsholm, Denmark



California Maritime
T/S Golden Bear

Coast Guard Type Approval Principles

- Independence
- Comprehensive assessment
- Market-ready technologies
- Requirements are specified in <u>regulations</u>



Not Guidelines!

Temporary Compliance
Alternate Management Systems (AMS)

- Temporary acceptance of a treatment system that has been type approved by a Foreign Administration in accordance with the BWM Convention.
  - AMS deemed to be *"at least as effective as BWE"*
- Bridging strategy to address fact that foreign type-approved systems:
  - Were installed prior to publication of the FR
  - Continue to be installed prior to availability of USCG approved BWMS
- Currently 55 AMS Acceptances have been granted to BW systems with Foreign Administration approval.

Type Approval Status

- Coast Guard has received three formal applications for type approval, which include IL's evaluation, at this time.
- Several more systems are being tested at IL for type approval testing
- Another 30 vendors have submitted Letters of Intent to submit a TA application

BWDS Implementation: Installation Date Extensions

- Vessel operators can apply for extensions
- Basis for extension: CG type approved BWMS, shore facility, U.S. public water supply, or retention in U.S. waters are not available or practicable
- Extensions for minimum time needed to comply with BWM requirements
- Currently being issued with a compliance date of:
  - January 1, 2016 for vessels with DD in 2014; and
  - January 1, 2017 for vessels with DD in 2015

Compliance and Enforcement

- Assess compliance during regular vessel inspections
  - Port State control examinations for foreign flags
  - Domestic vessel inspections
- Follow existing compliance approach
  - Documents (certifications and records)
  - Crew knowledge
  - Equipment condition and operation
  - Sample discharge if warranted
- Sampling and analysis methods and tools in development
- Ballast Water Working Group





EPA VGP and Transport Canada

EPA

- Joint Letter Signed by Coast Guard & EPA Explains Coordinated Approach in Reviewing Extension Requests Submitted to the Coast Guard
- Current VGP expires in December 2018

Transport Canada

- Canada is signatory to IMO Ballast Water Management Convention
- Will initiate rulemaking once Convention comes into force
- For Great Lakes, will likely be consistent with USCG BWDS and type approval requirements

Questions?

