

## Vessel Guidance for EPA Sampling

Thank you for considering allowing EPA to take samples of effluent from your vessel. For your information, the following is guidance you are encouraged to follow in your preparation for the upcoming EPA sampling event onboard your vessel.

### Background

- Senate Bill 3298 ([http://www.epa.gov/npdes/pubs/vessel\\_S3298.pdf](http://www.epa.gov/npdes/pubs/vessel_S3298.pdf)) requires that EPA conduct a study of discharges of effluent from properly functioning marine engines; discharges of laundry, shower, and galley sink wastes; and other discharges incidental to the normal operation of vessels deemed appropriate to evaluate.
- The vessel types targeted by S.3298 include commercial fishing vessels and other non-recreational vessels less than 79 feet in length.
- EPA has identified commercial fishing, tug/towing, water taxis/small ferries, tour boats, and recreational vessels used for non-recreational purposes as the priority vessel classes selected for sampling.

### Guidance

As specified by S.3298, EPA is characterizing discharges incidental to the normal operation of vessels. To the extent possible, **while also adhering to the safe operation of your vessel**, please consider the following guidance in preparing for an EPA sampling event.

- EPA intends to sample normal discharge cycles/events. Please do not alter vessel operations from its normal (typical) operation. For example, do not perform any special cleaning in preparation for sampling, add or eliminate alter any typical discharges, increase or decrease the volume or other characteristics of discharges, etc.
- In the interest of time and to minimize EPA's impact to vessel operations, EPA prefers to collect discharge samples pierside rather than underway. We cannot, however, collect discharge samples pierside if the discharge is not or cannot be generated and/or discharged pierside. For certain discharges, this may require not discharging certain wastewaters prior to returning to pier, but instead allowing them to accumulate for sampling.
- Please let EPA know whether conducting sampling pierside compromises, in any way, the characteristics of your discharges (sources, volumes, constituents). If so, EPA will consider whether the sampling should instead be conducted while underway, or whether it should sample a different vessel.
- The sample volume needed to conduct a full suite of planned analyses varies by discharge type and ranges from 2 to 9 liters (0.5 to 2.5 gallons). If sample volume is insufficient, EPA may perform only a subset of planned analyses.

### **Bilge Water**

- Please do not perform any special bilge cleaning, add or eliminate any normal sources of bilge water, increase or decrease the volume or alter any other characteristics of your vessel's bilge water sources, etc. in preparation for sampling.
- Please do not discharge bilge water prior to returning to pier, but instead allow bilge water to accumulate for sampling. EPA requires approximately 9 liters (2.5 gallons) of sample to conduct a full suite of analyses, but can perform only a subset of analyses if sample volume is insufficient.

### **Deck Washdown**

- Please do not perform any special deck cleaning, move or remove deck equipment, change or eliminate cleaning solutions, etc. in preparation for sampling.

- Please do not wash your deck prior to returning to pier, but instead postpone deck washing until a sampling event is planned. Ideally, the planned deck washing sampling event will not deviate significantly from your normal deck washing schedule (e.g., one day before or after a normal weekly deck washing schedule).
- EPA requires approximately 7 liters (2 gallons) of sample to conduct a full suite of analyses, but can perform only a subset of analyses if sample volume is insufficient.
- Deck runoff will only be sampled if we go underway and runoff is generated, or in the case of rain during the sampling event.
- Above waterline hull washing will only be sampled if the hull is cleaned during the sampling event.

### **Graywater**

- Please do not perform any special cleaning or change or eliminate cleaning solutions, etc. in preparation for sampling.
- Please do not perform graywater activities such as washing dishes or laundry prior to returning to pier, but instead postpone these activities until a sampling event is planned, if possible.
- If you have a graywater holding tank, please do not discharge graywater water prior to returning to pier, but instead allow graywater to accumulate for sampling.
- EPA requires approximately 8 liters (2.2 gallons) of sample to conduct a full suite of analyses, but can perform only a subset of analyses if sample volume is insufficient.
- If you use potable water as your graywater system source water, we may sample your potable water in addition to your graywater to determine background concentrations.

### **Engine Effluent**

- Please do not perform any special propulsion engine or electrical generator maintenance or cleaning, or change from typical fuel or engine lubricant, etc. in preparation for sampling.
- If your engines are normally operated at a variety of engine power levels (idle, slow troll, half-throttle, full-throttle), then EPA will be interested in characterizing engine effluent at each of these levels. Consider and report to EPA whether sampling should be conducted while underway to characterize normal engine operation.

### **Refrigerated Sea Water Discharge and Other Fish Hold Discharge**

- Please do not perform any special cleaning of the hold.