Controlling Vessel Discharges
BEST MANAGEMENT PRACTICES

Small Vessel Maintenance Activities

Debris from small vessel maintenance taking place over water can result in detergents, heavy metals, oils and greases, toxic substances, sediments, and other pollutants that fall directly into pristine Hawaiian waters.

Releasing pollutants directly or indirectly into the harbor during hull maintenance activities is a violation of the Clean Water Act. Proper employee training, implementation of best management practices (BMPs), and pollution prevention methods are necessary. Such maintenance activities include:

- Painting
- Grinding and chipping
- Using chemicals for rust and paint removal
- Washing exterior surfaces Engine repair

How to Comply (and Implement Best Management Practices):

Preferred: Perform vessel maintenance while vessel is in dry dock, slipway or haul-out facility, or beyond waters under the jurisdiction of the State of Hawaii.

When haul-out or drydock is not possible:

- Wash exterior surfaces with fresh water only; low pressure (<100psi) only. Wet sponges are preferred to rinsing. Never use detergents or other chemicals.Clean with dry methods (sweeping, vacuuming, or damp mopping).
- Hull painting to be performed on pier side of vessel only.
- Install a tarp or other containment device underneath all painting, grinding, or chipping. Magnets and poles work well to secure the tarps. Properly dispose of all captured debris removed from hull.
- Use anti-foulant paints with less toxic ingredients and never those with Tributyltin (TBT). Anti-foulant paints and other compounds containing TBT are prohibited for use throughout the United States.
- Never use chemicals, such as Naval Jelly (Phosphoric Acid) for rust or paint removal while vessel is still afloat.
- Never use any compounds that contain Tetrachloroethylene (TCE) for hull maintenance.
- Maintain the hull and all exterior surfaces more frequently to prevent the build-up of rust, marine growth, and aquatic nuisance species (invasive species).
- Call Marine Traffic Control (587-2076) BEFORE painting begins to allow for inspection by Harbors' personnel.

*The EPA issued a draft **Small Vessel General Permit (sVGP)** in December 2011, but the moratorium on new regulations is in effect until December 2014. If finalized, it would authorize discharges incidental to the normal operation of **non-military and non-recreational vessels less than 79 feet in length and commercial fishing vessels**.*

*The draft permit specifies best management practices for several categories including **fuel management, engine and oil control, solid and liquid maintenance, gray water management, fish hold effluent management, and ballast water management**.*

Website for more info: ***http://water.epa.gov/polwaste/npdes/vessels/index.cfm***