

VGP Sample Forms Available from AWO

1. VGP Applicability Assessment Report Form

This form was developed to assist vessel owners or custodians in determining the applicability of the VGP and Notice of Intent requirements to a barge or towing vessel.

Note: Documents 2-6 were developed to assist vessel owners or custodians in documenting routine visual inspections of barges and towing vessels as required by VGP 4.1.1.1. A vessel owner or custodian may choose which, if any, of these forms best meet his or her needs

2. VGP Towing Vessel Routine Visual Inspection Report Form

3. VGP Barge Inspection Report Form

4. VGP Multi-Barge Inspection Report Form

5. VGP Barge/Towing Vessel Record of Routine Inspection Report Form (Multiple Vessels)

6. VGP Routine Visual Inspection Log

7. VGP Annual Towing Vessel Inspection Report Form

This form was developed to assist vessel owners or custodians in documenting annual towing vessel inspections as required by VGP 4.1.3.

8. VGP Annual Barge Inspection Report Form

This form was developed to assist vessel owners or custodians in documenting annual barge inspections as required by VGP 4.1.3.

9. VGP Annual Vessel Inspection Log

This log was developed to assist vessel owners or custodians in documenting the findings from annual inspections, as required by VGP 4.1.3. and VGP 4.2., #6.

10. VGP Towing Vessel Drydocking Inspection Report Form

This form was developed to assist vessel owners or custodians in documenting towing vessel drydocking inspections as required by VGP 4.1.4.

11. VGP Barge Drydocking Inspection Report Form

This form was developed to assist vessel owners or custodians in documenting barge drydocking inspections as required by VGP 4.1.4. and VGP 4.2.

12. VGP Voyage Log

This log was developed to assist vessel owners or custodians in documenting towing vessel voyages as required by VGP 4.2., #2.

13. VGP Barge Voyage Matrix

This matrix was developed to assist vessel owners or custodians in determining the type of documentation needed throughout the course of a barge voyage from empty to empty.

14. VGP Effluent Limit Violations Log

This log was developed to assist vessel owners or custodians in documenting violations of any effluent limit as required by VGP 4.2., #3.

15. VGP Quarterly Sampling Log

This log was developed to assist vessel owners or custodians in documenting quarterly sampling of any discharge stream that is not readily visually inspected, as required by VGP 4.1.1.1. and VGP 4.1.1.

16. VGP Maintenance & Discharge Information Log

This log was developed to assist vessel owners or custodians in documenting maintenance and discharge information as required by VGP 4.2., #8.

17. VGP Graywater Discharge Log

This log was developed to assist vessel owners or custodians in documenting any graywater discharges by vessel crew size as required by VGP 4.2., #8 ix.

18. VGP Reportable Quantity Discharge Report Form

This form was developed to assist vessel owners or custodians in documenting any discharges of hazardous substances or oil in excess of reportable quantities as required by VGP 4.4.2.

19. VGP Corrective Action Assessment Report Form

This form was developed to assist vessel owners or custodians in documenting corrective action assessments as required by VGP 3.2.

20. Sample Letter to Barge Custodians Regarding VGP Compliance/Overview of VGP Requirements for Unmanned Barges and Reporting between Custodians and Barge Owner/Operators

This template letter can be customized and sent by a barge owner to a custodian (e.g., tower, fleeter, etc.) to clarify expectations and responsibilities regarding VGP compliance.

[Owner's or Custodian's Company Name]

VGP Applicability Assessment Report Form

Vessel General Permit Compliance

***Note:** This form was developed to assist vessel owners or custodians in determining the applicability of the VGP and Notice of Intent requirements to a barge or towing vessel. Vessels less than 79 feet must comply with VGP ballast water requirements only.

Vessel Name: _____

Official Number: _____

Date Assessment Completed: _____

Assessment Time: _____

Vessel Type: _____

- ☐ Barge (such as hopper, chemical, tank, fuel, crane, or dry bulk cargo barge) (See VGP 5.4) ☐ Oil or petroleum tanker (See VGP 5.5)
- ☐ Research vessel (See VGP 5.6) ☐ Emergency vessel (See VGP 5.7)
- ☐ Vessel employing experimental ballast water treatment system (See VGP 5.8)

Vessel General Permit and Notice of Intent (NOI) Applicability			
1. Is the vessel less than 79 feet (24 meters) and discharges ballast water?*	<input type="checkbox"/> No	<input type="checkbox"/> Yes	If Yes, VGP applies
2. Is the vessel 79 feet (24 meters) or longer?	<input type="checkbox"/> No	<input type="checkbox"/> Yes	If Yes, VGP applies
3. Is the vessel 300 gross tons or greater?	<input type="checkbox"/> No	<input type="checkbox"/> Yes	If Yes, NOI must be filed (See VGP 10, Appendix E)
4. Does the vessel have the capacity to hold 8 cubic meters (2113 gallons) or more of ballast water?	<input type="checkbox"/> No	<input type="checkbox"/> Yes	If Yes, NOI must be filed (See VGP 10, Appendix E)
Types of Discharges: (check all that apply)			
Deck washdown and runoff and above water line hull cleaning	(See VGP 2.2.1)		
Bilgewater	(See VGP 2.2.2)		
Ballast water	(See VGP 2.2.3)		
Anti-fouling hull coatings	(See VGP 2.2.4)		
Aqueous film forming foam (AFFF)	(See VGP 2.2.5)		
Boiler / economizer blowdown	(See VGP 2.2.6)		
Cathodic protection	(See VGP 2.2.7)		
Chain locker effluent	(See VGP 2.2.8)		
Controllable pitch propeller and thruster hydraulic fluid and other oil to sea interfaces including lubrication discharges from paddle wheel propulsion, stern tubes, thruster bearings, stabilizers, rudder bearings, azimuth thrusters, propulsion pod lubrication, and wire rope and mechanical equipment subject to immersion	(See VGP 2.2.9)		
Distillation and reverse osmosis brine	(See VGP 2.2.10)		
Elevator pit effluent	(See VGP 2.2.11)		
Firemain systems	(See VGP 2.2.12)		
Freshwater layup	(See VGP 2.2.13)		
Gas turbine wash water	(See VGP 2.2.14)		
Graywater	(See VGP 2.2.15)		
Motor gasoline and compensating discharge	(See VGP 2.2.16)		
Non-oily machinery wastewater	(See VGP 2.2.17)		
Refrigeration and air condensate discharge	(See VGP 2.2.18)		
Seawater cooling overboard discharge (including non-contact engine cooling water, hydraulic system cooling water, refrigeration cooling water)	(See VGP 2.2.19)		
Seawater piping biofouling prevention	(See VGP 2.2.20)		
Boat engine wet exhaust	(See VGP 2.2.21)		
Sonar dome discharge	(See VGP 2.2.22)		
Underwater ship husbandry discharges	(See VGP 2.2.23)		
Welldeck discharges	(See VGP 2.2.24)		
Graywater mixed with sewage from vessels	(See VGP 2.2.25)		
Exhaust gas scrubber washwater discharge	(See VGP 2.2.26)		

This form completed by:

Print Name: _____

Title: _____

Signature: _____

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[Owner's or Custodian's Company Name]

VGP Towing Vessel Routine Inspection Report Form

Vessel General Permit Compliance

Vessel Name: _____

Official Number: _____

Inspection Date: _____

Inspection Time: _____

Instructions: (1) This form is to be completed once per week or once per voyage, whichever is more frequent. (2) Refer to the Best Management Practices in the VGP or the AWO Recommended Practice Guide for more information on the inspection criteria. (3) Any answer of No* may require corrective action. Notify your supervisor immediately. (Note to supervisor: Corrective actions should be documented in accordance with the Corrective Action requirements in VGP 3.1. and 3.2.)

Item	Inspection	Yes	No*	N/A
1	Does the vessel's watch include visual monitoring of the water around and behind the vessel for visible sheens, dust, chemicals, abnormal discoloration or foaming, and other indicators of pollutants or constituents of concern originating from the vessel?			
2	Material storage – Are cargoes and cargo debris stored in a manner to minimize the likelihood that they will be dissolved, washed or blown overboard?			
3	Toxic or hazardous materials – If onboard, are materials stored in sealed containers and properly labeled?			
4	Is the introduction of kitchen oils being minimized to the graywater system?			
5	Are the following areas clean of garbage, oil and any visible pollutant or constituent of concern that could be discharged into the water:			
	➤ Cargo compartments;			
	➤ Machinery spaces;			
	➤ Other deck areas; and			
	➤ All other accessible areas that have access to water.			
6	Are all soaps and detergents onboard for personal use, laundry and other wash waters non toxic and phosphate free?			
7	Is the marine sanitation device working properly?			
8	Is the vessel treating and disposing of its bilgewater appropriately? (Note: Vessels with an oily water separator are not exempt from the visual inspection of bilgewater)			
9	Are all crewmembers trained in [Insert Company Name] VGP compliance procedures and familiar with Best Management Practices, monitoring, training, and inspections?			
10	Are the pollution prevention mechanisms in proper working order (i.e., visual inspections, good housekeeping practices, etc.)?			

Person(s) Conducting the Inspection	
Print Name	Signature

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List any corrective actions required (insert N/A if no corrective action is necessary):

(Note: Corrective actions should be documented on the Corrective Action Assessment Form)

Based upon the vessel's routine inspection as noted in this document, I confirm this vessel has been inspected as indicated above and that the above statements are correct: Yes _____ No _____

Name of Master, Engineer, or Designated Individual

Title

Signature

This document must be kept for a period not less than three years after the termination of coverage under the VGP.

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[Owner's or Custodian's Company Name]

VGP Barge Inspection Report Form

Vessel General Permit Compliance

This report is to be used when inspecting or pumping a barge.

Instructions: (1) This form is to be completed once per week or per voyage, whichever is more frequent. (2) Locations to be inspected: Safely accessible deck and cargo areas and all safely accessible areas where chemicals, oils, dry cargo, or other materials are stored, mixed and used (including, as applicable, cargo holds, boiler areas, machinery storage areas, welldocks and other areas.) [Ref: VGP 4.1.1] (3) The term "sheen" is to be understood as a concentration of oil or grease, including lubricating oils, hydraulic oils, and vegetable or organic oils. [Ref: VGP Fact Sheet 3.4.4]

Vessel Name: _____ Inspection Date: _____ Inspection Time: _____

Barge Number: _____ Barge Owner: _____

Waterway: _____ Location (Mile Point or Latitude & Longitude): _____

Are decks clean?

Yes ☐

No ☐

If no, were decks cleaned?

Yes ☐

No ☐

Is the water around the barge free of sheen?

Yes ☐

No ☐

Supplemental Inspection Requirements (Ref: VGP 5.4.2)

List any corrective actions required (insert N/A if no corrective action is necessary):

Is water in voids sheen free?

Yes ☐ No ☐

Voids to pump?

Yes ☐ No ☐

Sheen present in the water after pumping void?

Yes ☐ No ☐

Hopper pumped?

Yes ☐ No ☐

Sheen present in the water after pumping hopper?

Yes ☐ No ☐

Inspected by (Print Name):

Signature:

Signature indicates that this barge has been inspected as indicated above and corrective action has been initiated for any problems noted.

Submit completed form to barge owner and keep a copy on file at custodian's office.

This document must be kept for a period not less than three years after the termination of coverage under the VGP.

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[Owner's or Custodian's Company Name] VGP Multi-Barge Inspection Report Form

Vessel General Permit Compliance

Barge Owner: _____

Inspection Date: _____

Inspection Time: _____

Fleet Name: _____

Waterway: _____

Location (Mile Point or Latitude & Longitude): _____

Instructions: (1) This form is to be completed once per week or per voyage, whichever is more frequent. (2) Locations to be inspected: Safely accessible deck and cargo areas and all safely accessible areas where chemicals, oils, dry cargo, or other materials are stored, mixed and used (including, as applicable, cargo holds, boiler areas, machinery storage areas, welldrums and other areas). [Ref: VGP 4.1.1] (3) If pollutants or constituents of concern are determined to be originating from the barge(s), corrective actions must be initiated. [Ref: VGP 4.1.1] (4) The term "sheen" is to be understood as a concentration of oil or grease, including lubricating oils, hydraulic oils, and vegetable or organic oils [Ref: VGP Fact Sheet 3.4.4]

Barge Number:	Type of Barge (i.e., hopper, tank, crane, etc.)	Empty or Loaded?	Are Decks Clean?	If No, Were Decks Cleaned?	Is the Water around the Barge Free of Sheen?	Sample Taken?	Supplemental Inspection Requirements [Ref: VGP 5.4.2]		Any Violations Discovered during this Inspection?
							Voids or Hopper Pumped?	Sheen Present in the Water after Pumping?	

Inspected by (Print Name): _____

Signature: _____

Signature indicates that this barge(s) have been inspected in accordance as indicated above and corrective action has been initiated for any problems noted.

Submit completed form to barge owner and keep a copy on file at custodian's office.

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Vessel Owner	
Locations Inspected:	Safely accessible deck and cargo areas and all safely accessible areas where chemicals, oils, dry cargo, or other materials are stored, mixed and used (including, as applicable, cargo holds, boiler areas, machinery storage areas, welldecks and other areas)

Name:		Location (Mile point or latitude & longitude) - fleet:	
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Person in charge /
authorized representative:

Name:		Date:		Time:	
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Vessel Name(s) / Barge Number(s)	Detected problems for a given barge are indicated with a 'Y' in the column below.	A Corrective Action form has been completed for this barge. Indicate with a 'Y' in the column below.

[illegible]

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[Owner's or Custodian's Company Name] VGP Routine Visual Inspection Log

Vessel General Permit Compliance

Vessel Name: _____

Instructions: Use this log to record findings from Routine Visual Inspections. **REF: VGP 4.2, #4** “Log of deficiencies and problems found during routine inspections conducted under Part 4.1.1, including a discussion of any corrective actions required by Part 3 if applicable. Include date, inspector’s name, findings, and corrective actions planned or taken. If no deficiencies or problems are found during a routine inspection, record that the inspection was completed with the inspector’s name and date. Routine visual inspections must be recorded as completed according to Part 4.1.1.” and **REF: VGP 4.1.1** “.....In addition to a routine inspection weekly or once per voyage, a ship’s watch must include visual monitoring of the water around and behind the vessel for visible sheens, dust, chemicals, abnormal discoloration or foaming, and other indicators of pollutants or constituents of concern originating from the vessel. Particular attention should be paid to deck runoff, ballast water, and bilgewater. If pollutants or constituents of concern are determined to be originating from the vessel, corrective actions must be initiated.....”

[illegible]

This document must be kept for a period not less than three years after the termination of coverage under the VGP.

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[Owner's or Custodian's Company Name]
VGP Annual Towing Vessel Inspection Report Form

Vessel General Permit Compliance

Instructions: (1) This form must be completed at least once every 12 months. Visually inspect all areas of the vessel affected by the requirements in the VGP that can be inspected without putting the vessel on drydock. (2) Special attention should be paid to those areas most likely to result in a discharge violating the VGP. (3) Areas that inspectors must examine include, but are not limited to: vessel hull for living organisms, flaking antifoulant paint, exposed TBT; ballast water tanks if applicable; oily water separators (OWS) sensors, as applicable; oil and chemical storage areas, cargo areas, and waste storage; and, all visible pollution control measures to ensure that they are functioning properly. **Note:** When comprehensive vessel inspection schedules overlap with a routine vessel inspection required under [REF: VGP 4.1.1](#), the annual inspections may be also be used as the routine inspections, as long as components of both types of inspection are included. [\[REF: VGP 4.1.3\]](#)

Company Information	
Company Name:	
Company Address:	
Company Phone Number:	
Company Fax Number:	
Company Email:	
Names of Persons Participating in This Inspection	
Inspector/Auditor Information	
Name of Inspector(s)/Auditor(s):	
Title:	
Company Name:	
Address:	
Phone:	
Signature(s):	
Date:	

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[Owner's or Custodian's Company Name] VGP Annual Towing Vessel Inspection Report				
ITEM #	Material Storage	YES	NO	N/A
1.	Have all materials, cargo and cargo debris which may be dissolved, washed or swept overboard been cleaned, covered or stored in a manner that prevents discharge?			
2.	Are dry clean-up methods such as sweeping and bagging used to remove excess contaminants before sooting or exposure to rain water?			
3.	Are possible contaminants stored under cover or indoors whenever possible?			
4.	Are substances such as paint chips or rust particles swept and collected for appropriate disposal?			
ITEM #	Toxic or Hazardous Materials	YES	NO	N/A
5.	If onboard, are any toxic or hazardous materials kept in protected areas?			
6.	Are any discharges for safety reasons documented?			
7.	Are all containers in good condition?			
8.	Are all containers labeled?			
ITEM #	Fuel Spills/Overflows	YES	NO	N/A
9.	Are vessel specific fueling procedures being followed?			
10.	Have the appropriate employees received training on proper fueling procedures?			
ITEM #	Discharge of Oil, Including Oily Mixtures	YES	NO	N/A
11.	Has any oil, fuel, oil mixture, etc. been discharged in the past 12 months? (If yes explain below)			
12.	Was a corrective action assessment performed?			
13.	Was corrective action completed?			
14.	Is MARPOL signage posted?			
15.	Is discharge of oil signage posted?			
ITEM #	Deck Washdown and Runoff	YES	NO	N/A
16.	Are all decks kept clear of debris, garbage, residue, oily substances, cargo and spills?			
17.	Is any spillage cleaned as soon as safely possible – preferably with dry clean-up methods?			
18.	Are decks kept painted in a manner that prevents corrosion and chipping?			
19.	Are all washdowns conducted with non toxic – phosphate-free cleaners?			
Comments				
1. Identify any additional noteworthy findings:				
2. Summary of observations:				
3. Areas for improvement:				

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[Owner's or Custodian's Company Name] VGP Annual Towing Vessel Inspection Report				
ITEM #	Bilge	YES	NO	N/A
20.	No slop or fuel has been intentionally drained into the bilge, except for in an emergency?			
21.	The person responsible for the engine room monitors the levels of the slop tank and bilge?			
22.	Are the following records kept for the bilge properly completed:			
	o Bilge Logsheets Form			
	o Bilge Waste Logbook			
	o Engine Room Log			
	o Bilge Wastewater Evaporator Log			
23.	If onboard, is the bilge wastewater evaporator working properly?			
24.	If onboard, are the oily water separator and the OWS sensor working properly?			
25.	Receipts from transfer are submitted as part of the Bilge Waste Logsheets form?			
ITEM #	Discharges of Ballast Water	YES	NO	N/A
26.	Ballast water is free from any sheen?			
27.	Is there a copy of the Ballast Water Management Plan onboard the vessel?			
28.	Ballast water tanks are cleaned as needed? Date of last cleaning: _____			
29.	Ballast water discharge and uptake quantity is recorded?			
ITEM #	Cathodic Protection	YES	NO	N/A
30.	If vessel is on drydock, was inspection performed?			
31.	If vessel is on drydock, was any maintenance performed? If so, specify below?			
	o Date of last inspection: _____			
	o Date of last cleaning: _____			
	o Date of last maintenance: _____			
ITEM #	Fire Main System	YES	NO	N/A
32.	Are decks cleared of any debris or possible contaminants before using the fire main for training or washing?			
33.	Is each instance of fire main usage logged?			
ITEM #	Graywater	YES	NO	N/A
34.	Are any galley oils and/or greases introduced into the system?			
35.	Are food, oil and grease removed from dishes as much as possible prior to rinsing or washing?			
Comments				
1. Identify any additional noteworthy findings:				
2. Summary of observations:				
3. Areas for improvement:				

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[Owner's or Custodian's Company Name] VGP Annual Towing Vessel Inspection Report				
ITEM #	Graywater (continued)	YES	NO	N/A
36.	Cooking oils and greases are properly stored until disposed of at an approved vendor?			
37.	Cooking oil transfer is logged?			
38.	Is there a visible sheen, discoloration or foam from the gray water discharge?			
39.	All soaps and detergents for personal use and laundry are non toxic and phosphate free?			
ITEM #	Gasoline	YES	NO	N/A
40.	Has a discharge of gasoline or kerosene occurred in the past 12 months?			
41.	If yes, were corrective actions taken?			
ITEM #	Refrigeration and Air Condensate Discharge			
42.	Is condensate kept from contact with toxic or oily substances?			
43.	Are decks around areas where condensation may occur kept clear?			
44.	Is there condensation in any voids or holds?			
45.	If present in holds, has it been inspected for a sheen or contamination?			
46.	If yes, was contamination present?			
ITEM #	Non – Oily Machinery Waste Water	YES	NO	N/A
47.	Is all non-oily waste water kept from contact with possible contaminants?			
ITEM #	Rudder Bearing Lubrication Discharge	YES	NO	N/A
48.	Have any rudder bearing related discharges occurred in the past 12 months?			
49.	If so, was the corrective action assessment performed?			
50.	If on drydock: Were seals inspected?			
51.	If on drydock: Was maintenance performed on seals?			
ITEM #	Stern Tube Oily Discharge	YES	NO	N/A
52.	Are seals in acceptable condition and free from leaks?			
53.	Are seals inspected regularly? Date of last inspection: _____			
54.	If on drydock, was any maintenance performed on seals?			
ITEM #	Vessel Hull	YES	NO	N/A
55.	Is the above water portion of the hull free from:			
	○ Living organisms?			
	○ Flaking paint?			
	○ Corrosion?			
	○ Is cleaning needed?			
Comments				
1. Identify any additional noteworthy findings:				
2. Summary of observations:				
3. Areas for improvement:				

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[Owner's or Custodian's Company Name] VGP Annual Towing Vessel Inspection Report				
ITEM #	Vessel Hull (continued)	YES	NO	N/A
56.	If on drydock, was the underside of the vessel inspected for:			
	○ Is cleaning needed?			
	○ Living organisms?			
	○ Flaking paint?			
57.	Corrosion?			
57.	Are cleaning/maintenance needed? Date performed: _____			
58.	Are all visible pollution containment structures in good condition?			
ITEM #	Discharges into Quality Impaired Waters	YES	NO	N/A
59.	Has this vessel been notified in any way that it is or has operated in quality impaired waters?			
60.	If yes, did the waters have an EPA issued total maximum daily load?			
61.	If applicable, were those requirements met?			
ITEM #	Routine Visual Inspections: Weekly Inspection	YES	NO	N/A
62.	Have weekly visual inspections been performed?			
63.	Is documentation of the inspections kept on file onboard the vessel?			
64.	Has a corrective action assessment been performed for each violation?			
ITEM #	Routine Visual Inspections: On Watch Inspection	YES	NO	N/A
65.	Does each watch periodically visually inspect the water around the vessel for a sheen, discoloration or foam?			
66.	Has a corrective action assessment been performed for each violation?			
67.	Is this documented onboard?			
ITEM #	Quarterly Sampling	YES	NO	N/A
68.	Are the following discharge streams sampled each quarter if they are not readily visually inspected:			
	○ Ballast water?			
	○ Graywater?			
	○ Water treated in oily water separator?			
69.	Has a corrective action assessment been performed for each violation?			
70.	Is this documented onboard?			
Comments				
1. Identify any additional noteworthy findings:				
2. Summary of observations:				
3. Areas for improvement:				

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[Owner's or Custodian's Company Name] VGP Annual Towing Vessel Inspection Report

ITEM #	Drydock Inspection Report	YES	NO	N/A
71.	Is a report on file from the last drydocking? Date of last drydocking: _____			
ITEM #	Corrective Action	YES	NO	N/A
72.	Please list all violations that occurred in the last 12 months below.			
73.	Was a corrective action assessment performed for each violation?			
74.	Has corrective action been completed?			
75.	Were all corrective action deadlines kept in accordance with the Vessel General Permit?			
76.	Have all instances of non-compliance been reported to the appropriate company official?			

List of Violations	
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[illegible]

Observations	
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[illegible]

ITEM #	Recordkeeping on the Vessel	YES	NO	N/A
77.	All owner/operator information (Certificate of documentation)?			
78.	Pilothouse log?			
79.	Deck maintenance (i.e. sweeping, grinding, chipping and washing)?			
80.	Findings from on watch visual inspections?			
81.	Log of any violations?			
82.	Corrective action assessments?			
83.	Drydock inspection reports?			
84.	Any specific instructions given to the vessel by State or Federal EPA?			
85.	Bilge transfer and other related transfers including slop and galley grease/oil?			
86.	Paint application?			
87.	Stern tube maintenance?			
88.	Rudder bearing maintenance?			

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[Owner's or Custodian's Company Name] VGP Annual Towing Vessel Inspection Report				
ITEM #	Recordkeeping on the Vessel (Continued)	YES	NO	N/A
89.	Quarterly visual inspections?			
90.	Weekly inspections?			
91.	Ballast water information?			
92.	Fire main use?			
93.	Findings from weekly visual inspections?			
94.	If applicable, have records been retained for three (3) years?			
ITEM #	Training: Deck Crew Familiar With:	YES	NO	N/A
95.	[Insert Company Name] Best Management Practices (BMP)?			
96.	Responsibilities related to BMP?			
97.	Their responsibility to keep records of the following:			
	○ Sweeping/scooping the vessel?			
	○ Grinding, chipping etc.?			
	○ Findings from on watch and monthly inspections?			
ITEM #	Training: Engineer/Lead Deckhand Familiar With:	YES	NO	N/A
98.	[Insert Company Name] BMP?			
99.	Responsibilities related to BMP?			
100.	Their responsibility to keep records of the following:			
	Findings from on watch, monthly and quarterly inspections?			
	Ballast water information?			
	Bilge/slop and related transfer information?			
	Stern tube maintenance?			
	Rudder bearing maintenance?			
ITEM #	Pilothouse Personnel Familiar With:	YES	NO	N/A
101.	[Insert Company Name] BMP?			
102.	Responsibilities related to BMP?			
103.	Responsibility to ensure they and the rest of the crew are following the BMP plan?			
104.	Responsibility to ensure the crew is maintaining the proper records?			
105.	Their responsibility to keep records of the following:			
	○ Inspections and maintenance performed on barges while in tow?			
	○ Those records are sent to barge maintenance department?			
	○ Any violations of the Vessel General Permit (VGP)?			
	○ Corrective action assessment?			
	○ Fire main use?			
	○ Paint application?			
	○ Owner/Operator information, such as the Certificate of Documentation?			
Comments				
1. Identify any additional noteworthy findings:				
2. Summary of observations:				

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3. Areas for improvement:

Other Notes

Print Name and Signature of Each Crewmember Participating in Inspection or Corrective Action:

Print Name

Signature

[Company Name]

VGP Annual Barge Inspection Report Form

Vessel General Permit Compliance

Instructions: (1) This form must be completed at least once every 12 months. Visually inspect all areas of the barge affected by the requirements in the VGP that can be inspected without putting the barge on drydock. (2) Special attention should be paid to those areas most likely to result in a discharge violating the VGP. (3) Areas that inspectors must examine include, but are not limited to: barge hull for living organisms, flaking antifoulant paint, exposed TBT; ballast water tanks if applicable; oily water separator (OWS) sensors, as applicable; oil and chemical storage areas, cargo areas, and waste storage; and, all visible pollution control measures to ensure that they are functioning properly. Note: When comprehensive barge inspection schedules overlap with a routine barge inspection required under REF: VGP 4.1.1, the annual inspections may be also be used as the routine inspections, as long as components of both types of inspection are included. [REF: VGP 4.1.3]

Barge Owner:	Date Inspected:	Time Inspected:
Barge Number	Barge Type (i.e., Open Hopper, Cover Top, Tank, Crane):	

Are the VGP requirements for vessel discharges applicable to the barge being met? Answer for each below:				
ITEM #	ITEM	YES	NO	N/A
1.	Material Storage: <ul style="list-style-type: none"> ▪ Materials are stored in a manner that will minimize the likelihood that they will be washed or blown overboard. ▪ Water draining from storage areas does not come in contact with oily materials. ▪ Corrective action taken if needed? 			
2.	Fuel Spills/Overflows: <ul style="list-style-type: none"> ▪ Crews trained in transfer procedures. ▪ Fueling operations conducted in accordance with fueling procedures. ▪ Containment used around vents. ▪ All oil absorbent pads or other appropriate equipment in proper location and well stocked. ▪ Fuel and hydraulic systems checked for damage and leaks. ▪ Corrective action taken if needed? 			
3.	Discharges of Oil including Oily Mixtures: <ul style="list-style-type: none"> ▪ Oil or oily mixtures, etc. have been put through an oily water separator if one is available. ▪ If no oily water separator onboard, slop or oily mixtures properly stored in slop tanks/drums. ▪ All discharges in compliance with MARPOL regulations. ▪ Corrective action taken if needed? 			
4.	Deck Washdown and Runoff: <ul style="list-style-type: none"> ▪ Discharge from deck washdowns free from floating solids, foam, halogenated phenol compounds, dispersants, and surfactants. ▪ Cargo on gunnels shoveled back into hopper (provided the cargo is the same), swept against the coaming, or placed in waste bag or container and properly disposed of. ▪ All other debris disposed of properly. ▪ Decks clear of all debris, garbage, and oily substances before deck washdown and departing from port. ▪ Spill rails and scuppers in place on tank barges. ▪ Corrective action taken if needed? 			
5.	Ballast Water: <ul style="list-style-type: none"> ▪ Ballast water free of sheen. ▪ Ballast water tanks clean. ▪ Ballast water discharge and uptake recorded. ▪ Corrective action taken if needed? 			
6.	Antifouling Hull Coatings: <ul style="list-style-type: none"> ▪ All antifouling hull coating is registered, sold or distributed, applied, maintained and removed under FIFRA label. ▪ Initial application of antifouling coating appropriate for barge and at lowest effective biocide release rate. 			

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ITEM #	ITEM	YES	NO	N/A
7.	Cathodic Protection: <ul style="list-style-type: none"> ▪ If barge is on drydock - was inspection performed? ▪ If barge is on drydock - was any maintenance performed? ▪ Date of last inspection: _____ ▪ Date of last cleaning: _____ ▪ Date of last maintenance: _____ ▪ Corrective action taken? 			
8.	Non-Oily Machinery Waste Water: <ul style="list-style-type: none"> ▪ Non-oily wastewater discharged into waters subject to the VGP must be free from oil and toxic bio-accumulative additives. ▪ Corrective action taken if needed? 			
9.	Vessel Specific Requirements for Barges: <ul style="list-style-type: none"> ▪ Voids and/or wing spaces visually inspected to ensure that no oil is present before pumping. ▪ All free water was pumped out of voids or wing tanks and monitored while pumping to minimize the discharge of solids. ▪ After every instance of pumping water from areas below deck, or immediately after washing down the deck, visual inspection conducted to ensure that no visible sheen is produced in the water around the barge. ▪ Cargo residue cleaned from cargo compartments before washing compartments and discharging wash water overboard. ▪ Tank barges equipped with spill rails if required by barge's class society. ▪ Corrective action taken if needed? 			
10.	Tow Wire and Intercon Lubrication: <ul style="list-style-type: none"> ▪ Lubrication applied in a manner that minimizes drips and spills. ▪ After applying lubricant to wire rope and mechanical equipment, equipment wiped down thoroughly to remove excess lubricant. ▪ Corrective action taken if needed? 			
List any areas of the barge that were not inspected.				
List any corrective actions required (insert N/A if no corrective action is necessary).				
(Note: Corrective actions should be documented on the Corrective Action Assessment Form)				
Inspected by (Print Name):		Signature:		
Signature indicates that this barge has been inspected as indicated above and corrective action has been initiated for any problems noted.				

Submit completed form to barge owner and keep a copy on file at custodian's office.

This document must be kept for a period of not less than three years after the inspection date.

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[Owner's or Custodian's Company Name]

VGP Annual Vessel Inspection Log

Vessel General Permit Compliance

Vessel Name: _____

Instructions: Use this log to record findings from Annual Vessel Inspections. REF: VGP 4.2, #6 "Log of findings from annual inspections conducted under Part 4.1.3, including a discussion of any corrective actions planned or taken required by Part 3. Include date, inspector's name, findings, and corrective actions taken." Annual inspections should be completed using the VGP Annual Inspection Report form. Each inspection should be logged here and the corresponding completed VGP Annual Inspection Report maintained onboard the towing vessel.

Date of Inspection	Name of Inspector and Signature	Summary of Violations Found and Statement of Any Corrective Actions Planned or Taken.

This document must be kept for a period not less than three years after the termination of coverage under the VGP.

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[Owner's or Custodian's Company Name]

VGP Towing Vessel Drydocking Inspection Report Form

Vessel General Permit Compliance

Instructions: This report is to be completed after towing vessel drydocking. **[REF: VGP 4.1.4]**

Vessel Name _____ Official Number _____

Gross Tonnage _____ Call sign _____ Port of Registry _____

Vessel Owner _____

Vessel Owner's Address _____

Items	Yes	No	N/A
Is the chain locker on the vessel clean of sediment and living organisms?			
Have the following areas been inspected for living organisms:			
• Vessel hull			
• Propellers and rudders			
• Sea chests			
• Other surface areas			
If any living organisms found, were they removed and neutralized?			
Has the hull coating been applied, maintained and removed consistent with FIFRA label, and any exposed existing or any new coating applied contains only biocides and toxics approved for use in the U.S.?			
Have cathodic protection, anodes or dialetic coatings been cleaned and/or replaced?			
Has protective seal on the rudder bearings been inspected and changed (if required)?			
Was all pollution control equipment checked to assure proper operation?			

Custodian's Certification Statement

Based upon the vessel's drydock inspection as noted in this document, I confirm this vessel has been inspected as indicated above and that the above statements are correct: Yes _____ No _____

Name of Custodian or Designated Representative _____ Title _____

Signature _____ Date _____

Submit completed form to Towing Vessel Owner.

Also, keep a copy on file at Custodian office.

This document must be kept for a period not less than three years after the termination of coverage under the VGP.

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[Owner's or Custodian's Company Name] VGP Barge Drydocking Inspection Report Form

Vessel General Permit Compliance

Instructions: This report is to be completed after barge drydocking. [REF: VGP 4.1.4 and VGP 4.2.3.]

Barge Owner: _____ **Barge Number:** _____

Shipyard Name: _____ **Inspection Date:** _____ **Inspection Time:** _____

Custodian's Certification Statement

Items	Yes	No	N/A
Has the hull, chain locker and other surface areas been inspected for living organisms, and if found, were they removed and/or neutralized?			
Has the hull coating been applied, maintained and removed consistent with FIFRA label, and any exposed existing or any new coating applied contains only biocides and toxics approved for use in the U.S.?			
Are cathodic protection, anodes or dialectic coatings cleaned and/or replaced?			
Pertaining to questions above, describe any maintenance or repairs/comments:			
If wing tanks are free from water, do they contain any contaminants?			
If wing tanks have been pumped out, does surrounding water have an oily sheen?			
List any other violations discovered during this inspection:			
Was a corrective action assessment performed for each violation?			
Briefly discuss any corrective actions that were taken to address earlier violation:			

Based upon the vessel's drydock inspection as noted in this document, I confirm this vessel has been inspected as indicated above and that the above statements are correct: Yes _____ No _____

Name of Custodian or Designated Representative

Title

Signature

Date

Submit completed form to Barge Owner.

Also, keep a copy on file at Custodian office.

This document must be kept for a period not less than three years after the termination of coverage under the VGP.

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[Owner's or Custodian's Company Name] VGP Voyage Log

Vessel General Permit Compliance

Vessel Name: _____

Instructions: Use this log to record the towing vessel's voyage(s). **REF: VGP 4.2, #2** "Voyage Log must be maintained, including dates and ports of arrival, vessel agent(s), and last and next ports and countries of call (when known)". ***Note:** Log country name if not USA.

Voyage Number	Arrival Date	Agent(s)	Arrival Port and *Country	Last Port and *Country of Call	Next Port and *Country of Call

This document must be kept for a period not less than three years after the termination of coverage under the VGP.

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[Owner's or Custodian's Company Name]
VGP Barge Voyage Matrix

***Note: This matrix was developed to assist vessel owners or custodians in determining the type of documentation needed throughout the course of a barge voyage from empty to empty.**

Segments	VOYAGE (Empty - Empty)	Documentation	Action	Documentation
Fleet	Tug places empty barge into tow	Barge orders		
Line Haul	Line haul vessel arrives fleet and picks up barge/tow	Boat orders		
	Line haul vessel crew inspects barge for damages/needed repairs/water in wing tanks	Tow diagram	If water is found in wing tanks barge is pumped to identify if vessel needs repairs	Inspection form if necessary
	Line haul vessel crew inspects wing tanks for water every 6 hours	Inspection form if necessary	If water is found in wing tanks barge is pumped to identify if vessel needs repairs	Inspection form if necessary
Fleet	Line haul vessels drops barge at fleet	Barge orders	If water is found in wing tanks barge is pumped to identify if vessel needs repairs	Invoice
	Fleet crew inspects barge for damages/needed repairs/water in wing tanks	Fleet diagram	Arrangements are made to perform repairs	Invoice
	Repaired barge returned to fleet	Fleet diagram		
Terminal Loading	Tug places barge in terminal fleet	Barge orders		
	Tug inspects barge twice daily	Fleet diagram		
	Tug delivers barge to terminal	Barge orders		
	Tug picks up barge after terminal loads	Barge orders		
	Tug crew inspects barge wing tanks for water/damages upon pick up	Barge orders	If water is found in wing tanks barge is pumped to identify if vessel needs repairs	Inspection form if necessary
	Tug places barge in fleet	Fleet diagram		
	Tug inspects barge twice daily	Fleet diagram		
	Tug places barge in tow of line haul vessel	Tow diagram		
Line Haul	Line haul vessel crew inspects barge for damages/needed repairs/water in wing tanks	Tow diagram	If water is found in wing tanks barge is pumped to identify if vessel needs repairs	Inspection form if necessary
	Line haul vessel crew inspect wing tanks for water every 6 hours		If water is found in wing tanks barge is pumped to identify if vessel needs repairs	Inspection form if necessary
Fleet	Barge is delivered to fleet waiting discharge at Terminal	Barge orders		
Terminal Unload	Tug places barge in fleet	Fleet diagram		
	Tug inspects barge twice daily	Fleet diagram		
	Tug delivers barge to terminal	Barge orders		
	Tug picks up barge after terminal unloads	Barge orders		
	Tug inspects barge wing tanks for water/damages upon pick up	Fleet diagram		
	Tug places empty barge in fleet	Fleet diagram		
	Tug brings empty to wash dock	Barge orders		
	Barge is inspected by wash dock supervisor looking for damages/needed repairs/water in wing tanks	Barge orders		
Fleet	Barge is washed during this time	Barge orders	If repairs are found then arrangements and approval for repairs are set up	Inspection form
			Repairs are completed either topside or moved to drydock for underwater repairs	Invoice
			If barge is drydocked then drydock supervisor inspects the barge and lays out repairs	Invoice
	Repairs are completed and moved back to fleet	Barge orders		
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[Owner's or Custodian's Company Name]

VGP Effluent Limits Violation Log

Vessel General Permit Compliance

Vessel Name: _____

Instructions: Use this log to record any violation of any effluent limit. **REF: VGP 4.2, #3** "If you have any violation of any effluent limit, you must document the violation. You must also record: (1) A description of the violation, (2) Date of the violation, (3) Name, title and signature of the person who identified the violation, (4) Name, title and signature of the person who is recording the violation (if different from person who identified the violation), (5) If a corrective action assessment pursuant to Part 3.2 is needed, attach a copy or indicate where the corrective action assessment is stored, and (6) If a corrective action assessment was previously conducted pursuant to Part 3.2 (and revisions are not needed for this violation of the effluent limit), a reference to that previous corrective action assessment."

Date of Violation	Description of Violation	Violation Discovered by:	This Record Made by:	Corrective Action Assessment Record
		Name: _____	Name: _____	<input type="checkbox"/> Attached or Located: _____ Previous action located: _____
		Title: _____	Title: _____	
		Signature: _____	Signature: _____	
		Name: _____	Name: _____	<input type="checkbox"/> Attached or Located: _____ Previous action located: _____
		Title: _____	Title: _____	
		Signature: _____	Signature: _____	
		Name: _____	Name: _____	<input type="checkbox"/> Attached or Located: _____ Previous action located: _____
		Title: _____	Title: _____	
		Signature: _____	Signature: _____	
		Name: _____	Name: _____	<input type="checkbox"/> Attached or Located: _____ Previous action located: _____
		Title: _____	Title: _____	
		Signature: _____	Signature: _____	

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[Owner's or Custodian's Company Name]

VGP Quarterly Sampling Log

Vessel General Permit Compliance

Vessel Name: _____

Instructions: Use this log to record each quarterly sampling. **REF: VGP 4.1.1.1** "You must document the date and time of inspection, ship locations inspected, personnel conducting the inspection, location of any visual sampling and observations, note any potential problems and sources of contamination found, and it must be signed by the person conducting the inspection, if not the Master" **REF: VGP 4.1.1** "At least once per quarter, you must sample any discharge stream such as bilgewater or graywater if accessible that is not readily visually inspected, such as effluent streams discharged below the water line. Inspect the sample for any signs of visible pollutants or constituents of concern, including discoloration, visible sheens, suspended solids, floating solids, foam, or changes to clarity. If you discover signs of oil, other pollutants, or other constituents of concern exceeding the applicable effluent limit, you must record the steps you have taken to prevent the continued discharge of these pollutants or constituents of concern and what corrective actions were taken to remediate the problem(s). Sampling of readily visible discharges is not required, but is recommended if the inspector cannot easily view their discharge characteristics (such as clarity or discoloration, presence of oily sheens, presence of foams, etc.)."

Date and Time of Inspection	Name of Inspector and Signature	Note Location of Visual Sampling and Observations, Violations Found, and Corrective Actions Needed

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[Owner's or Custodian's Company Name]

VGP Maintenance & Discharge Information Log

Vessel General Permit Compliance

Vessel Name: _____

Instructions: The following additional information must be kept in a record onboard the vessel. Existing records may be used for this purpose and location of the information noted in this form.

REF: VGP 4.2, #8:

1. **Deck maintenance:** Record dates, materials used, application process, etc. for any maintenance of the deck surface that involves more than routine daily cleaning activities such as sweeping.
2. **Bilgewater:** Record dates, location, oil concentration (for MARPOL vessels) or visible sheen observation (non-MARPOL vessels) and estimated volume of bilgewater discharged whether discharged overboard or to shore reception facilities.
3. **Anti-fouling paint application:** Record dates, materials used, application process, etc. for any anti-fouling paint applied to the vessel.
4. **Aqueous Film Forming Foam (AFFF):** Record dates, estimated volumes, and constituents of any discharges of AFFF.
5. **Chain locker inspections:** Record dates of inspections and any rinsing conducted within waters subject to the VGP.
6. **Maintenance of oil-to-sea interfaces:** Record dates and locations of any maintenance of stern tube, thrusters, controllable pitch propellers or any other such equipment that occurs while vessel is in waters subject to the VGP.
7. **Any emergencies requiring discharges otherwise prohibited in waters listed in Part 12.1 of the VGP.**
8. **Gas turbine wash water:** Record dates and estimated volume of any discharge within waters subject to the VGP. If disposed of ashore, record hauler and volume.
9. **Estimated volume and location of graywater discharged while in waters subject to the VGP.**

Date	Discharge Type	Record Location	Comments	Name of Person Making Log Entry

This document must be kept for a period not less than three years after the termination of coverage under the VGP.

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[Owner's or Custodian's Company Name] VGP Graywater Discharge Log

Vessel General Permit Compliance

Vessel Name: _____

Vessel Owner: _____

Instructions: For purposes of graywater recordkeeping requirement, the following estimates should be used:

- A linehaul vessel with a crew of 7 might have graywater discharges of approximately 210-595 gallons per day.
- A linehaul vessel with a crew of 6 might have graywater discharges of approximately 180-510 gallons per day.
- A harbor vessel with a crew of 3 might have graywater discharges of approximately 90 gallons per day.

Ref: VGP 2.2.15, VGP 4.2, #8 ix, VGP Fact Sheet 4.4.15, AWO Recommended Practice Guide

[illegible]

Submit completed form to Towing Vessel / Barge Owner.

Also, keep a copy on file at Custodian office.

This document must be kept for a period not less than three years after the termination of coverage under the VGP.

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[Owner's or Custodian's Company Name]

VGP Reportable Quantity Discharge Report Form

Vessel General Permit Compliance

Vessel Name/Number: _____ Vessel Owner: _____

Instructions: This report is to be used when a discharge of hazardous substances or oil in excess of reportable quantities occurs. "Within 14 calendar days of knowledge of the release, the date and description of the release, the circumstances leading to the release, responses to be employed for such releases, and measures to prevent reoccurrence of such releases must be recorded in your recordkeeping documentation consistent with Part 4.2 of [the VGP]." Ref: VGP 4.4.2

Date & Time of the Release: _____ Location of the Release: _____

Description of the release:

Circumstances leading to the release:

Responses to be employed for such releases:

Measures to prevent reoccurrence of such releases:

Printed Name of Person Completing the Form: _____

Signature of Person Completing the Form: _____ Date: _____

Submit completed form to Towing Vessel / Barge Owner.

Also, keep a copy on file at Custodian office.

This document must be kept for a period not less than three years after the termination of coverage under the VGP.

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[Owner's or Custodian's Company Name]

VGP Corrective Action Assessment Report Form

Vessel General Permit Compliance

This report is to be used as soon as you or a member of your crew becomes aware of a violation of the VGP.

Vessel Name/Number: _____ Vessel Owner: _____

Date of occurrence:		Time of occurrence:	
Location(s) on vessel/barge where violation occurred:			
Violation discovered:			
Type of impacts observed (From BMPs):			
Witnesses Identifying Problem(s) & Person Recording Problem(s):			
Name (Print)		Title	
Signature			
Witness:			
Witness:			
Witness:			
Recording:			
Cause of problem(s) if known (If unknown, describe the steps that will be taken to determine the cause):			
Corrective action(s) to be implemented to eliminate problem(s):			
Schedule of activities for completing corrective action(s) (Check one):			
		<input type="checkbox"/> ASAP but no later than two (2) weeks	
		<input type="checkbox"/> ASAP but no later than three (3) months	
		<input type="checkbox"/> Prior to launching vessel/barge after next drydocking	
		<input type="checkbox"/> Planned drydocking date:	
Corrective Action(s) Implemented:			
Description of corrective action implemented:			
Date:		Time:	
Employee Recording Corrective Action(s):			
Name		Title	
Signature			

Submit completed form to Towing Vessel / Barge Owner.

Also, keep a copy on file at Custodian office.

This document must be kept for a period not less than three years after the termination of coverage under the VGP.

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[Owner's or Custodian's Company Name]

Sample Letter to Barge Custodians RE. VGP Compliance

***Note:** *This template letter can be customized and sent by a barge owner to a custodian (e.g., tower, fleeter, etc.) to clarify expectations and responsibilities regarding VGP compliance.*

[Company Letterhead]

[Insert Date]

Mr./Ms. [Insert Custodian's Responsible Person]

Custodian's Company Name

Mailing Address

City, State, Zip Code

RE: Compliance with EPA's Vessel General Permit (VGP)

Dear Mr./Ms. [Insert Custodian's Responsible Person]:

The purpose of this letter, on behalf of [Insert Company Name], is to discuss the Environmental Protection Agency's (EPA) Vessel General Permit for discharges incidental to the normal operation of commercial vessels that came into effect on February 6, 2009, and to ensure that our respective operations are prepared to comply with the requirements. The VGP is part of EPA's National Pollutant Discharge Elimination System (NPDES) permit program.

[Insert Company Name] is pleased to inform you that we are fully prepared to meet the VGP requirements, which are summarized in Attachment 1. We have begun to use the attached forms **[attach any forms you will be using to document VGP-required inspections, etc.]** to document compliance with the VGP requirements for our own operations. We will also use these forms to document compliance when barges owned by other companies are in [insert company name]'s custody and control.

In order to ensure that our barges remain in compliance with the VGP when under the custody and control of [insert custodian company name], we seek your confirmation, by an authorized representative's signature below, that you have implemented a VGP compliance and documentation program and that you will ensure that any and all [insert company name] barges that you may transport comply fully with the VGP while in your custody and control.

Please feel free to contact [Insert Responsible Person's Name] at [Insert Phone Number] should you have any questions or wish to discuss this matter further. Thank you for your cooperation.

Sincerely,

[Responsible Person's Signature]

[Job Title]

Agreed: [Insert Custodian's Company Name], by signature of its authorized representative below, agrees, while [Insert Company Name] barges are in [Insert Custodian's Company Name]'s custody and control, to perform all actions required to keep such [Insert Company's Name] barges in compliance with all requirements of the EPA Vessel General Permit.

By: _____

Title: _____

Date: _____

Attachment(s) - [Insert Company Name], VGP Compliance Document/Form(s)

This form was developed as a sample that AWO members may use as a suggested guide for developing their own means of recording inspections and other information required under EPA's Vessel General Permit (VGP). The form has not been reviewed or approved by EPA and does not represent any consensus or industry standard regarding how recordkeeping should be done. Companies are under no obligation to use this form, and each must decide what manner of recordkeeping will help it meet the requirements of the VGP.

**Attachment 1 to Sample Letter to Barge Custodians re. VGP Compliance:
Overview of VGP Requirements for Unmanned Barges
and Reporting between Custodians and Barge Owner/Operators**

The Environmental Protection Agency (EPA) Vessel General Permit (VGP) contains requirements governing discharges from commercial vessels over 79 feet, including barges. There are four principal VGP sections affecting unmanned barges. This attachment highlights those sections, and refers to the VGP, which can be found here: http://www.epa.gov/npdes/pubs/vessel_vgp_permit.pdf. This attachment also refers to the American Waterways Operators (AWO) Recommended Practice Guide, which clarifies the requirements of the VGP for barge and towing vessel operators, and can be found here: <http://www.americanwaterways.com/index/AWO%20BMP%20Manual%202.pdf>.

1. **Deck Cargo Residue and Deck Runoff**. During the loading and unloading of barges, it is common for some cargo to inadvertently fall on the decks of barges. The VGP requires barge operators to minimize (reduce and/or eliminate to the extent achievable) the amount of cargo that is swept into the water or runs off into the water due to rain, wind, swells, etc. See VGP section 2.2.1. and section 5 of the AWO Recommended Practice Guide for specific requirements. [Note: The VGP requires vessel operators to minimize 26 types of vessel discharges, of which deck washdown/runoff is only one. Barge owner should identify any other discharges for which the custodian will be responsible for VGP compliance while the barge is in his custody and control.]
2. **Barge Pumping** – The VGP includes requirements for barge operators to minimize the discharge of oil, toxic materials, solids or cargo residue into the surrounding water when pumping out void and wing tanks and when cleaning out cargo compartments. See VGP section 5.4 and Section 22 of the AWO Recommended Practice Guide for specific requirements.
3. **Inspections** – While many companies already inspect their barges regularly, the VGP specifically requires vessel operators to perform, and document, routine visual inspections and comprehensive annual inspections. The VGP also requires that, when a vessel is drydocked, the operator document that certain areas of the vessel have been cleaned and/or inspected and/or maintained. See VGP Section 4.1 and pages 18-21 of the AWO Recommended Practice Guide for specific requirements.
4. **Corrective Action Assessment** – The VGP requires vessel operators to take corrective actions to eliminate any violation of the VGP and ensure it does not happen in the future. The VGP contains specific triggers for corrective actions and timetables for completing them, depending on the violation. See Section 3 of the VGP and pages 15-17 of the AWO Recommended Practice Guide for specific requirements.
5. **Recordkeeping**: The VGP contains extensive recordkeeping requirements to document inspections and corrective actions. To see the specific recordkeeping requirements for each, see Section 4.2 of the VGP and pages 21-22 of the AWO Recommended Practice Guide. These records will then be filed where the records must be maintained for a period of three (3) years after the permit has expired.

A copy of any records produced by [insert custodian company name] should be sent to [insert company name] [describe agreed-upon method of transmission and time requirements].

Example:

Report(s) must be sent to [insert Owner/Operator Company name] via the following email address [insert Owner/Operator Companies email address]. The subject line of the email should read “VGP Inspection Report.” Multiple VGP Inspection Reports may be included in one email as is done with the daily traffic reports currently being sent to [insert Owner/Operator Company name].

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