

## BACKGROUND INFORMATION

### HISTORY

In July 2013, Ecology announced a preliminary determination to develop a general permit for the deconstruction of vessels over water. Discharges associated with vessel deconstruction are currently not permitted outside of facilities with either individual NPDES permits (shipyards) or coverage under the Boatyard general NPDES permit.

Ecology periodically responds to reports of vessels being deconstructed outside of permitted facilities, very often resulting in unpermitted discharge of pollutants. Examples range from metal cutting on superstructures of floating vessels to complete deconstruction of vessels on the shoreline between high and low tide cycles. The most costly example is the deconstruction of the Davey Crockett on the lower Columbia River. More information is available here:

<http://www.ecy.wa.gov/programs/spills/incidents/DavyCrockett/DavyCrockett.html>.

Ecology held a public meeting to discuss the proposed permit in Tacoma on August 29, 2013. Ecology then formed a technical advisory group (TAG) to assist with permit development in response to feedback from that initial meeting. The TAG included representatives from shipyards, salvage companies, marine consulting, an environmental organization, and the Washington State Department of Natural Resources (DNR).

The TAG met again on October 22, 2013 and November 14, 2013. On January 22, 2014, Ecology released a preliminary draft version of this permit for an informal comment period through February 28<sup>th</sup>. Ecology also held a TAG meeting on February 25, 2014 to discuss the preliminary draft. Meeting materials and summaries for all TAG meetings are available from Ecology's website

(<http://www.ecy.wa.gov/programs/wq/permits/vesseldeconstruction/index.html>).

Ecology also received written comments prior to issuing the formal draft permit from the Puget Sound Shipbuilders Association, a local consultant, and a local Marine Chemist. Comments expressed significant health and safety concerns about issuance of a general permit for an activity traditionally confined to shipyards.

### DESCRIPTION OF THE INDUSTRY

Vessel deconstruction is also commonly referred to as: ship breaking, ship recycling, and ship dismantling. In the United States, very limited vessel deconstruction is permitted outside of shipyards and boatyards. Applicable Standard Industrial Classifications (SIC) and North American Industry Classification System (NAICS) for shipyards and boatyards are:

**SIC No. 3731 (NAICS No. 336611) Ship Building and Repairing:** "Establishments primarily engaged in building and repairing all types of ships, barges, and lighters, whether propelled by sail or motor power or towed by other craft. This industry also includes the conversion and alteration of ships." (Includes; Ship dismantling at shipyards)