VESSEL GENERAL PERMIT

It has been a year since the enactment of the new iteration of the Vessel General Permit (VGP), as well as, the rollout of BOSS VGP…the barge line's solution to managing the inspection requirements under this new regulation. We thought we would check in with one of our clients who has implemented BOSS VGP and has used it throughout this past year.

The below article was written by Rick Johnson at M/G Transport Services LLC summarizing their experience in complying with this regulation.

"THANK YOU INTEGRA, YOU MADE MY JOB SO MUCH EASIER…"

By Rick Johnson

The environmental standards for these regulations are, for the most part easily attainable by all dry cargo hopper barge operators. The difficulty lies in the inspection and record keeping requirements imposed on barges with no crew and no machinery.

As an example, for 300 dry cargo hopper barges, the VGP regulations require that the vessels be inspected (Routine Visual Inspection) at a minimum of once every seven days, then there are the additional requirement of Dry-Docking Inspection whenever a barge is dry-docked and also a comprehensive Annual Inspection. All of these requirements generate a combined total of over 16,000 documents for 300 barges that must be completed in strict accordance to the EPA's record keeping requirements <u>AND</u> maintained by the operating company for a period of 3 years. So for the 300 barges you are looking at collecting, archiving and maintaining for EPA or Coast Guard auditing and inspection over 48,000 records. A daunting and space consuming task at minimum if you were to use a paper based system. Then there is the requirement to be able to provide records upon request by the EPA or Coast Guard. Sorting through 48,000 paper records would be difficult. With us using BOSS VGP, once the data is collected from the towboats and fleets, it is entered into Integra's BOSS VGP for storage…get it - enter it - forget it. No more paper, you have the ability to pull up on your computer for any day, or range of dates, any location, and any barge all at the touch of a keyboard query. **Once entered the archiving, storage and recall is flawless and easy.**

"…WITH BOSS VGP IT LITERALLY TOOK MINUTES."

The Annual Report required to be submitted to the EPA is by far the most difficult requirement of the VGP regulations. At the end of the year there is a series of over 130 questions that must be asked for each vessel a company operates. While most of the questions do not apply to dry cargo hopper barges you must still go through them to see if they apply. The most difficult part of the Annual Report is the Noncompliance Tab. In this section you have to list any and all occasions of noncompliance for each vessel throughout the entire year. Since dry cargo barges have no ballast, water treatment or other machinery the main area of review is meeting the inspection requirements. This requires that you take each vessel and measure your inspection data for the year against the requirement of "at minimum, a

routine visual inspection every seven days" (7 day inspection window).   Well, there are two ways of doing this, getting all the inspection records out for a single vessel and sitting down and going week by week on a calendar to see how many times a vessel exceeded the "7 day inspection window" or by using Integra's BOSS VGP it is automatically done by one keystroke on the reports tab. Simply amazing is all I can tell you. **It would have been torturous to do it manually, but with BOSS VGP it literally took minutes.** The EPA requires that the VGP Annual Report be uploaded to them using an .xml file. If you have ever seen an .xml file they are nearly impossible to read let alone review. With BOSS VGP, the report came out as a Microsoft Excel Spreadsheet for us to review and then once reviewed it is just another keystroke to transform that data into an .xml file. **Completing the VGP Annual Report since we used BOSS VGP throughout the year to enter and store our data was easy and painless.** Additionally, as an added benefit of BOSS VGP, on the Noncompliance column BOSS VGP gives the total number of routine visual inspection each vessel has had throughout the year.

 Quite honestly, I don't see how any company with more than a few vessels can comply with the record keeping requirements of the EPA's NPDES VGP program without having such a computer program such as Integra's BOSS VGP.

Thank you Integra, you made my job so much easier!