

# Focus on: Vessel Deconstruction



## Vessel Deconstruction

“Vessel deconstruction” means dismantling a vessel completely so that no part is left intact, undisturbed, or otherwise unimpacted to the extent that it can be reconstructed or readily identified as an existing portion of the original hull or superstructure. The vessel is reduced such that it has no value except for its basic material content. Deconstruction does **not** include disturbance incidental to vessel retrieval.

Vessel deconstruction activities typically occur in or adjacent to waterbodies and often present the risk of releasing contaminants into the water. Industrial operations that discharge pollutants into waterbodies must be covered by a National Pollutant Discharge Elimination System (NPDES) waste discharge permit, which is administered by the Department of Ecology (Ecology).

Depending on the site-specific facility size, layout, operations, and associated risks with the deconstruction, facilities where deconstruction occurs must apply for, or already be covered under, one of the three types of permits below.

- **Boatyard General Permit**
- **Shipyard Individual Permit**
- **Vessel Deconstruction General Permit**

Vessel owners should ensure that the facility they wish to use is properly permitted.

## Which permit?

### Boatyard General Permit

Boatyard activities include but are not limited to: pressure washing hulls; painting and coating; engine and propulsion system repair or replacement; welding and grinding of the hull; marine sanitation device repair or replacement; fuel and lubrication system repair or replacement; vessel deconstruction activity on land or drydock; bilge cleaning; buffing and waxing; and other activities necessary to maintain a vessel. This definition includes mobile and do-it-yourself activities.



***If deconstruction is to occur on land (or within the boundaries of the boatyard facility),*** and the vessels on which the facility works are “small,” the operator will need coverage under the Boatyard General Permit. In the context of boatyards, “small” means that at least 85% of the vessels are 65 feet or less in length, or the facility generates at least 85% of its gross receipts from working on vessels that are 65 feet or less in length. Boatyards covered by this permit may deconstruct vessels within the boundaries (i.e., the land, barge, drydock, and water) of the boatyard facility without requiring the Vessel Deconstruction General Permit.

Ecology prefers to be notified several weeks prior to the start of deconstruction of any vessels longer than 65 feet.

Cleaning, repair, modifications, and surface preparation or coating of any portion of a vessel's hull while the vessel is afloat is prohibited. The operator must haul the vessel out onto the upland portion of the facility covered by this general permit, or another facility covered by an individual permit issued in accordance with the provisions of Chapter 173-220 WAC. Only minor in-water repair, modification, surface preparation, or coating of topside or superstructure is allowed, limited to 25% of the topside surface.

The permit fees for the Boatyard General Permit varies between \$600 to \$1,210 per year (beginning July 1, 2024). Other requirements include implementation of specified best management practices and monitoring of pressure-washing and stormwater discharges. For such activities, the appropriate permit is the Vessel Deconstruction General Permit.



### Shipyards Individual Permit

Shipyards conduct the same general activities as boatyards, without restrictions of vessel size. Shipyards Individual Permits are crafted specifically for each facility. Some may allow deconstruction, and others may not.

**If deconstruction is to occur on land**, and the vessels on which the facility works are **not** “small” (see above), the operator will need a Shipyards Individual Permit. Permits for these facilities use a combination of best management practices and effluent limits to ensure pollutants are controlled. Each deconstruction project may need a separate Vessel Deconstruction Management Plan depending on the characteristics of the ship and the layout of the work area. The entire deconstruction area must be upland or in drydock, and all debris and potential pollutants must be contained within that area. Deconstruction must include decontamination of the vessel and removal of all hazardous materials.

Depending on the site-specific operations and equipment (e.g., drydocks, syncrolifts, and large ship handling cranes), the fee for this permit can range from about \$4,800 to several tens of thousands of dollars annually. Other requirements include monitoring of discharges, sediment sampling, and development and implementation of formal abatement plans (e.g., for asbestos, lead, and PCBs).

### Vessel Deconstruction General Permit

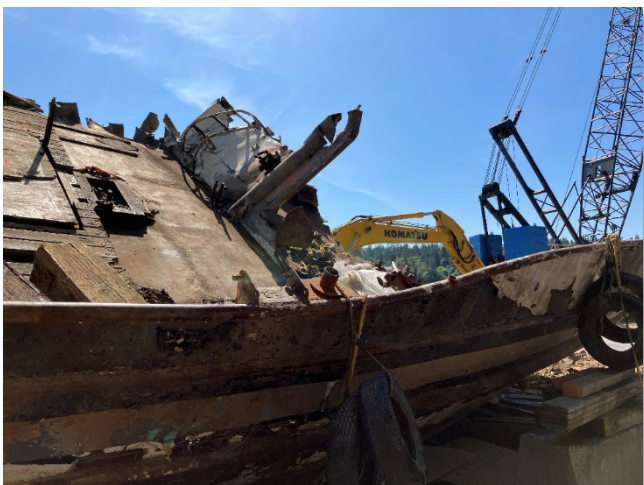
The Vessel Deconstruction General Permit addresses deconstruction of floating vessels and vessels deconstructed while over water, on a floating drydock, on a barge, or in limited cases on land, and not associated with a facility that holds a permit for this work.

**If deconstruction is to occur in or over water**, including on a drydock (not covered under a Shipyards Individual Permit or Boatyard General Permit), barge, or pier, the operator will need coverage under the Vessel Deconstruction General Permit. The Vessel Deconstruction General Permit is for situations where the activities are not covered by either the Boatyard General Permit or Shipyards Individual Permit.



Each deconstruction project requires a separate Vessel Deconstruction Management Plan. The operator is responsible for ensuring that the vessel hull retains sufficient structural integrity to allow removal from the water for final deconstruction (i.e., complete deconstruction/removal). Conducting the final deconstruction in the water is considered a last resort, only to be pursued after all alternative options have been exhausted.

The permit fee is assessed on a per-project and comprises a base fee along with a sum of applicable subcategories, which range from \$3,550 to \$18,700 per vessel deconstructed (beginning July 1, 2024). Other requirements include extensive monitoring of discharges, and development and implementation of formal abatement plans (e.g., for asbestos, lead, and PCBs).



## Emergencies

In case of an emergency (such as a vessel sinking or other extreme hazard to water quality), Ecology may allow a deconstruction project to occur on land under the Vessel Deconstruction General Permit. Relevant special circumstances include:

- The vessel cannot be moved to a boatyard or shipyard because none exist in the immediate vicinity, or the vessel cannot be transported to one due to its fragile condition.
- The operator conducting the deconstruction can do so nearby on land and meet the requirements of the Vessel Deconstruction General Permit by preventing discharges of contaminated stormwater or other wastewaters during the operation. Ecology will make a final determination of the required permit on a case-by-case basis.

## Contacts for More Information

### Department of Natural Resources Derelict Vessel Program

Troy Wood  
 (360) 902-1574  
[Troy.Wood@dnr.wa.gov](mailto:Troy.Wood@dnr.wa.gov)

### U.S. Environmental Protection Agency Vessel General Permit

[VGP@epa.gov](mailto:VGP@epa.gov)

### Department of Ecology Boatyard General Permit

James Hovis  
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[James.Hovis@ecy.wa.gov](mailto:James.Hovis@ecy.wa.gov)

### Shipyard Individual Permit Northwest Regional Office<sup>1</sup>

Monika Kannadaguli  
 (425) 256-0059  
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### Southwest Regional Office<sup>2</sup>

John Diamant  
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### Vessel Deconstruction General Permit

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**ADA accessibility:** To request an ADA accommodation, contact Ecology by phone at 360-407-6831 or email at [ecyadacoordinator@ecy.wa.gov](mailto:ecyadacoordinator@ecy.wa.gov), or visit <https://ecology.wa.gov/accessibility>. For Relay Service or TTY call 711 or 877-833-6341.

<sup>1</sup> The Northwest Region includes: Island, King, Kitsap, San Juan, Skagit, Snohomish, and Whatcom counties.

<sup>2</sup> The Southwest Region includes: Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Lewis, Mason, Pacific, Pierce, Skamania, Thurston, and Wahkiakum counties.

## In-water hull cleaning is prohibited

Ecology and the Washington State Department of Natural Resources have prohibited the cleaning by commercial divers or others of vessel hulls painted with sloughing or ablative anti-fouling paints or with tin-based compounds while the vessel is afloat. The use of mechanical or hydraulic devices for in-water hull cleaning and the manual scraping of hard growth off surfaces painted with anti-foulants are also prohibited.

Owners and operators of large vessels, regulated by the U.S. Environmental Protection Agency Vessel General Permit, who remove fouling organisms from hulls while the vessel is waterborne must employ methods that minimize the discharge of fouling organisms and antifouling hull coatings. Rigorous hull-cleaning activities should take place in a drydock or at a land-based facility where the removal of fouling organisms or spent antifouling coatings can be contained.

