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August 1, 2008

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Water Docket
Environmental Protection Agency
Mail Code 2822T
1200 Pennsylvania Ave. NW
Washington, DC 20460

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**Re: WRITTEN COMMENT REGARDING Docket ID No. EPA-
HQ-OW- 2008-0055 for the VGP Draft National Pollutant
Discharge Elimination System (NPDES) General Permits for
Discharges Incidental to the Normal Operation of a Vessel,
Oceans and Coastal Protection Division Office of Wetlands,
Oceans, and Watersheds**

Advisory Board
Charlie Ayers
Redwood City, CA

Matt Butler
Eugene, OR

Sue Devine
New York, NY

Dear Sir or Madam:

Michael Franti
San Francisco, CA

On behalf of Rock the Earth, a Colorado nonprofit corporation with a national membership of concerned citizens, we are writing to comment on the Draft National Pollutant Discharge Elimination System (NPDES) General Permits for Discharges Incidental to the Normal Operation of a Vessel. As discussed below, we address the Vessel General Permit, as Rock the Earth has been active in advocating increased cruise ship regulation by EPA.

David Gans
Oakland, CA

**Richard
Goodstone**
New York, NY

Rock the Earth works closely with the music industry and its fans, many of whom are concerned with the fate of our public lands, air and water. We act as advocates to ensure the existence of a sustainable and healthy environment for all.

Bob Hollis
El Dorado Hills, CA

Bob Lippman
Castle Valley, UT

Jason Mastrine
Portland, OR

Dr. Roderick Nash
Crested Butte, CO

Rock the Earth also recognizes the growing intersection of the cruise industry with the music industry. Music producers and promoters of all different genres of music are now collaborating with some of the largest cruise lines to create "once-in-a-lifetime" experiences for music fans of all kinds in which the lines between the stage and the audience are blurred and fans get to mingle with their favorite artists in a fun and relaxed setting. As of 2007, there are now well over two dozen music oriented cruises departing American ports each year. The cruises are usually genre-centered and include classical, opera, blues, jazz, rock, bluegrass, Christian and country music themes. From the Rhythm & Blues Cruise to the Jazz Cruise, from the Barenaked Ladies' "Ships & Dips" Cruise to the Rock Cruise, from Jam Cruise's jamband oriented cruise to Tim McGraw and Faith Hill's country-oriented cruise,

Lara Pearson
Incline Village, NV

Peter Shapiro
New York, NY

Rebecca Sparks
Oakland, CA

thousands of die-hard music fans are taking cruises each year with little knowledge as to the incredible deleterious impact the ships upon which they are sailing are having on the environment.

As the leading environmental advocacy organization to work with the music industry, we take our role in this issue seriously. Our vast and growing national membership of concerned and conscious music fans know that environmental issues directly caused by cruise ships are not being addressed. We hope that by speaking on behalf of the concerned environmentalists within the music community, we can encourage those within the music industry – in particular, the artists and producers who work with the cruise industry – to use their stature and financial resources to do the same and require the cruise industry to meet or exceed not only federal requirements, but implement mechanical changes to best preserve one of the most important resources we have as human beings – our ocean and coastal areas.

Therefore, Rock the Earth strongly approves of the long overdue implementation of NPDES permits for ocean going vessels.

More specifically, Rock the Earth believes :

- 1) That uses of Tetrachloroethylene (TCE) other than drycleaning should be explicitly included from permit coverage;
- 2) That the permits issued should establish stringent numeric discharge limits for discharges incidental to the normal operation of a vessel for which the proposed permit would solely impose Best Management Practices (BMPs);
- 3) That EPA should limit discharges of bilgewater in embayments such as the Chesapeake Bay for large vessels that regularly leave waters subject to this permit;
- 4) That the requirement of mandatory saltwater flushing for all vessels with unpumpable ballast water and residual sediment which sail more than 200 nm (nautical mile) from any shore is appropriate.
- 5) That Ballast Water Exchange requirements should be applicable for vessels engaged in coastwise trade on the Atlantic or Gulf Coasts that will discharge to waters subject to this permit;
- 6) That the proposed operational limits for large cruise ships at first blush, seem appropriate, but the discharge standards proposed for within 1 nautical mile of any shore should be extended to 3 nautical miles from any shore, regardless of the speed of the vessel; and
- 7) That the proposed prohibition on discharges of untreated graywater within 1 nm of shore for large and medium cruise ships, and into nutrient-impaired waters such as the Chesapeake Bay and Puget Sound for large cruise ships, is appropriate. However, more appropriate would be imposed primary treatment of all graywater prior to discharge.

Rock the Earth thanks the EPA for proposing an NPDES for large ocean going vessels and the opportunity to provide comment. We hope that EPA will respond to these comments as soon as possible. In addition, we would be happy to answer any questions you might have about these

comments and/or to set up a meeting with EPA staff to discuss them in detail. We look forward to your response.

Marc A. Ross
President & Executive Director
Rock the Earth