



## INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

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9 January 2009

Mr. Scott Wilson  
Environmental Protection Agency  
EPA Region 6 (6WQ-P)  
1445 Ross Ave.  
Dallas, TX 75202

Mr. Scott Wilson:

As a follow up to our phone conversation and discussion on 8 January 2009, IADC is requesting your confirmation that vessels (*i.e.* MODUs) do not need to repeatedly apply under the Notice of Intent and then formally withdraw (via a Notice of Termination) from Vessel General Permit (VGP) coverage when they move in and out of the geographic limits of the VGP coverage area, or when they becomes ineligible for coverage under the VGP because they have become subject to coverage under another General Permit (*e.g.*, discharges from the Oil and Gas Extraction Point Source Category).

If you have any questions or require further information regarding this correspondence, please contact me by phone at (713) 292-1945, ext. 203.

Sincerely

A handwritten signature in black ink that reads "John Pertgen". The signature is fluid and cursive.

John Pertgen  
Assistant Director, Offshore Technical  
and Regulatory Affairs