



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE  
DALLAS, TEXAS 75202-2733

FEB 25 2009

John Pertgen, Assistant Director  
Offshore Technical and Regulatory Affairs  
International Association of Drilling Contractors  
P.O. Box 4287  
Houston, TX 77210-4287

Re: Vessel General Permit NOI/NOT Submission for MODUs

Dear Mr. Pertgen:

In response to your letter to Scott Wilson, dated January 9, 2009, this is to confirm that is not necessary for vessels (i.e., mobile offshore drilling units) to repeatedly apply for or terminate coverage under the Vessel General Permit (VGP) as these vessels move in and out of the VGP coverage area or when these vessels are covered under another general permit. To clarify when these vessels are subject to the permit requirements, vessel operators may document such occurrences as part of their VGP recordkeeping.

If you have any question or concerns, please feel free to call me at 214-665-7459 or email me at [kaspar.paul@epa.gov](mailto:kaspar.paul@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Paul Kaspar".

Paul Kaspar  
Permits Oversight Section  
NPDES Permits and TMDLs Branch