



INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

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30 December 2010

Water Docket Environmental Protection Agency
Mailcode: 28221T
1200 Pennsylvania Ave., NW.
Washington, DC 20460
Attention Docket ID No. EPA-HQ-OW-2010-0828

Re: Next National Pollutant Discharge Elimination Systems General Permit for Discharges
Incidental to the Normal Operation of Vessels

To whom it may concern:

The International Association of Drilling Contractors is a trade association representing the interests of drilling contractors, onshore and offshore, operating worldwide. Our membership includes all drilling contractors currently operating mobile offshore drilling units (MODUs) in the areas subject to the jurisdiction of the United States, as well as all MODUs registered in the United States.

The purpose of this letter is to respond to the 29 October 2010 EPA Notice (75 FR 66757), which solicited input from stakeholders for suggestions on improving the next issuance of the EPA NPDES Vessel General Permit (VGP).

IADC has recommended that, because of the possible need to enter Permit Waters for repairs or other operations, all MODUs operating on the U.S. Outer Continental Shelf (OCS) establish programs to assure compliance with the VGP and that a Notice of Intent (NOI) should be submitted for each vessel. Additionally, IADC has confirmed with EPA Region 6 that it is not necessary for MODUs to repeatedly apply for and terminate coverage under the VGP when they move in and out of Permit Waters, or when they become subject to an Oil & Gas NPDES General Permit. In lieu of seeking similar confirmation from other EPA regions, IADC suggests that the EPA include a statement, which reflects Region 6's position, in the next VGP revision which states:

“Vessels holding a valid NOI are not required to terminate their NOI when they move in and out of the waters subject to the VGP, or when they become subject to another NPDES General Permit within permit waters, until such time as they proceed beyond the U.S. OCS.”

IADC appreciates the opportunity to comment on this notice and requests that our comments be given due consideration. If you have any questions about these comments or recommendations, 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 written in a cursive style with a large, prominent initial "J".

John Pertgen
Assistant Director, Offshore Technical
and Regulatory Affairs