

## TALKING POINTS OUTLINE

March 15, 2013 Teleconference with OMB and EPA  
Concerns Regarding 2013 Vessel General Permit

1. PARTICIPANT INTRODUCTION (names, titles, companies)
2. REQUEST:
  - (i) exempt vessels with passenger/crew of 250 persons or less from discharge requirements/limits under VGP §§ 5.2.1.1.1-2, **or** (ii) delay applicability to those vessels to permit EPA to gather information and study impact
3. ISSUE INTRODUCTION
4. SURVEY OF INDUSTRY
5. VGP REQUIREMENTS ENDANGER US-FLAG SMALL CRUISE SHIP INDUSTRY
6. VGP VIOLATES CLEAN WATER ACT
7. VGP VIOLATES REGULATORY FLEXIBILITY ACT
8. EPA CONCEDES AWTS MAY NOT BE ECONOMICALLY ACHIEVABLE FOR MEDIUM CRUISE SHIP OWNER/OPERATORS
9. COMMENTS HAVE BEEN PROVIDED AND DISREGARDED
10. DOCUMENTS FOR THE RECORD
  - a. American Cruise Lines issue letter to Kevin L. Bromberg, Esq. of the U.S. Small Business Administration Office of Advocacy dated March 8, 2013 and Attachment A (industry comments) thereto;
  - b. Congressman Andy Harris comment letter to EPA dated February 21, 2012
  - c. Passenger Vessel Association comment letter to EPA dated February 21, 2012
  - d. American Cruise Lines comment letter to EPA dated February 17, 2012
  - e. American Cruise Lines comment letter to EPA dated December 31, 2010
11. CONCLUSION: the EPA has not cited one report, state law or example of a medium cruise ship in the 100-249 passenger/cruise range in its analysis as using or having the capacity to install AWTS