

## Boyce Sherwin

1) Institute a ban on the discharge of exhaust gas scrubber washwater from all scrubber types, including bleed off or sludges, in MOU waters. This proposed MOU amendment met the criteria as it was specific to the MOU waters and was accompanied by scientific data to support the amendment. However, if adopted, some of the wording of this amendment is likely to change to conform with regulations under the MARPOL treaty regarding exhaust gas scrubber washwater.

2) Ecology proposes to incorporate the Vessel Sewage No Discharge Zone (NDZ) for Puget Sound into the MOU to reflect the Washington state NDZ regulation. Chapter 173-228 Washington Administrative Code (WAC), adopted on April 9, 2018, and effective May 10, 2018. Additional information is available online at <https://ecology.wa.gov/Water-Shorelines/Puget-Sound/No-discharge-zone>. As written, the MOU allows for treated sewage (blackwater) discharges after advanced wastewater treatment that are now not allowed by the NDZ regulation. To be consistent with the regulation and to prevent vessel sewage discharges in MOU waters, all allowances of the sewage discharges in MOU waters should be prohibited. This would not affect graywater discharge in the MOU