

Hazardous Substance Response Plans for Vessels



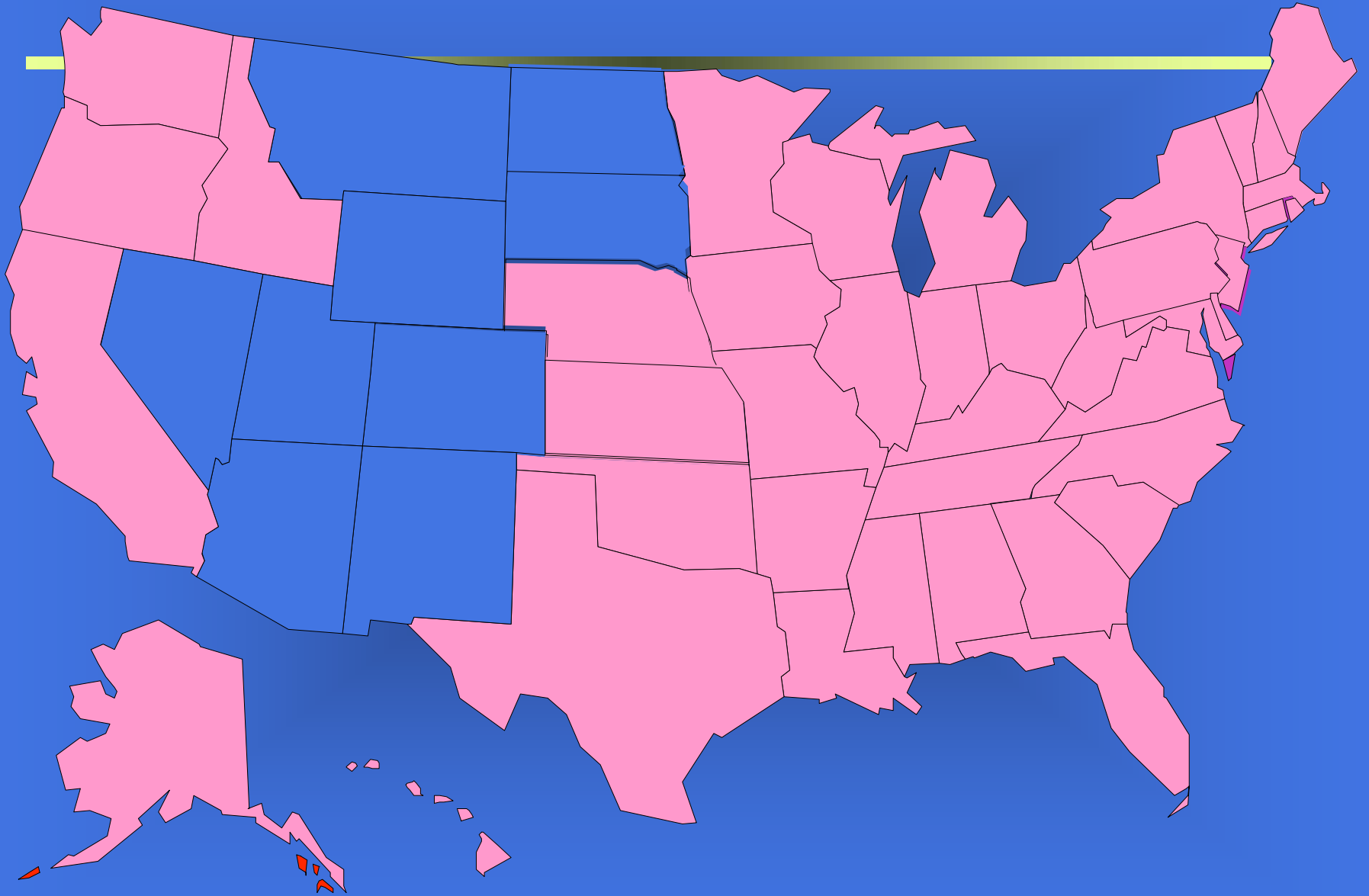
Factoid

q 41 States

-Including every state east of the Mississippi River

q 16 State Capitals

q Are all served by commercially navigable waterways



Why do we care?

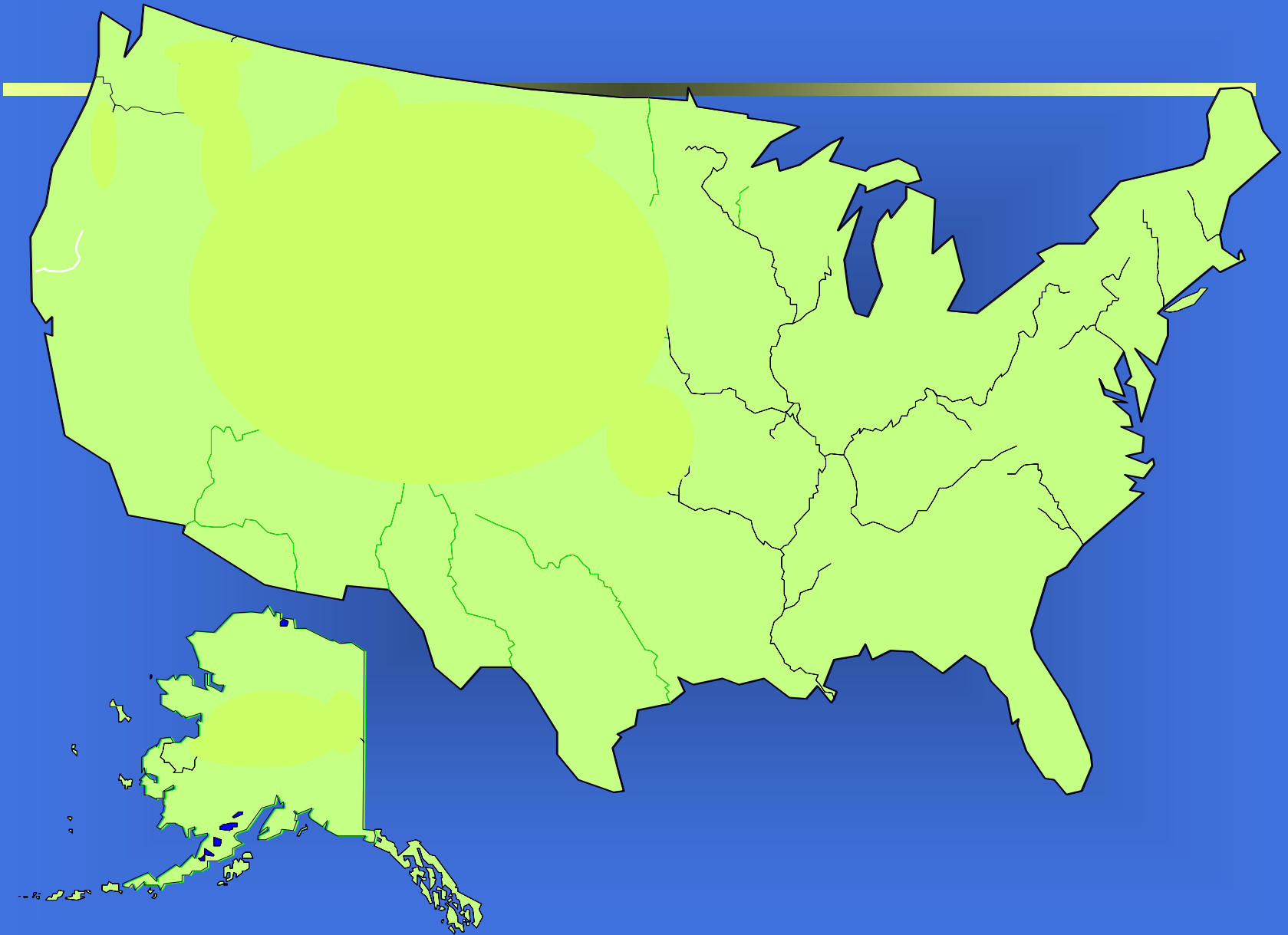
In 1998 the following cargoes traveled on our waterways:

- q **36,789,409 tons** of chemical fertilizers (about 50% on the Mississippi River alone)
- q **119,746,328 tons** of chemicals (excluding fertilizers)

In 2003, the tonnage figures were:

- q **35,178,734 tons** of chemical fertilizers (again, about 50% on the Mississippi River alone)
- q **136,121,544 tons** of chemicals (excluding fertilizers)





Who is affected?



- q Tank vessels that carry any bulk hazardous substance cargo or cargo residue per their Subchapter “O” Endorsement and found on the Clean Water Act list (40 CFR 116.4).

(This includes both ships and barges)

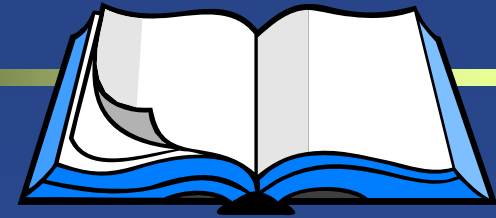
How many vessels?

HAZ/SUB Rules potentially affect:

- * 560 U.S. and foreign flag tankers.
- * 1900 + tank *barges* that carry bulk chemicals in U.S. waters.



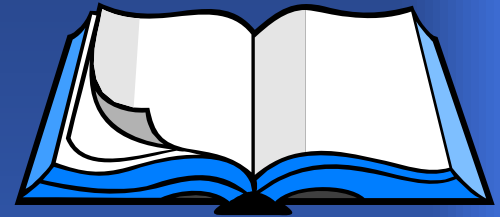
Plan Contents



- * General information
- * Notification procedures and list of contacts
- * Risk-based decision support process
 - Describe process to identify, evaluate, control and communicate risk
- * Spill mitigation procedures
- * Response resources (Equipment/Personnel)
- * Training and Exercises

Plan Contents (cont.)

- * Chemical-specific appendix
- * Geographic-specific appendix
- * Vessel-specific appendix



Areas of Attention

A stylized illustration of a maze with a person at a desk and a person's head in a trap. The maze is composed of grey walls and paths. In the center, a person with blonde hair is sitting at a desk, looking towards the right. In the bottom right corner, a person's head is visible, appearing to be stuck in a trap or a dead end of the maze. The background is a solid blue color.

MAJOR ISSUES

- * List of Chemicals
- * MARPOL Reg 16 Implementation
- * Certification of Responders
- * Timeframes

MEDIUM ISSUES

- * Requirement for QI Training
- * Technical Specialists
- * Sinker Technology

List of Chemicals

q **Current NPRM**

q **Rule applicable to vessels handling a CWA HAZSUB in bulk**

q **A bulk mixture having at least 10% of CWA chemical by weight**

q **Cargoes vary in composition around 10%**

q **Blue water fleet would like USCG to expand list to align with MARPOL**

q **Companies resistant to divulge chemical compositions due to trade secrets**

q **Raises issue of “cargo residue”**

MARPOL Regulation 16

q Annex II, Regulation 16 requires HAZSUB response plans for vessels sailing on the high seas.

q Entered into force January 1, 2003.

q MARPOL list of chemicals is more extensive than U.S. list.

q MARPOL plan requirements are less stringent than our NPRM.



Certification of Responders

- q Owner/Operator will certify that risks have been evaluated and resources listed in the plan are adequate for responding to a Worst Case Discharge.
- q Statement that all resource providers acknowledge being listed in the plan



APPROVAL

National Standard for Emergency Chemical Response

- q Goal: Measurement tool for HAZSUB response team capability
- q USCG solicited help from Chemical Transportation Advisory Committee (CTAC) for recommendations
 - È Team components (clothing, equipment, technical specialists, etc.)
 - È Training
 - È Time factors for response

Required Equipment and Response Times

- q Air monitoring/Water sampling - 2 hours
- q PPE - 2 hours
- q Modeling - 2 hours

In addition:

- q Lightering - location dependent (12 - 36 hrs)
- q Firefighting & Salvage - 24 hours



Qualified Individual Requirements



- q The QI must have full authority to implement response actions.
- q **Therefore**, QIs will be required to meet the OSHA incident commander training requirements of 29 CFR 1910.120
- q Hazardous Waste Operations Emergency Response (HAZWOPER) training and certification.

Expertise: Have access to -

- q Product specialist
- q Toxicologist
- q Certified Industrial Hygienist
- q Chemist or Chemical Engineer
- q Certified Marine Chemist



Identified Vessel Equipment

- List resources capable of being on scene within 24 hours:



Floaters:

- sorbent boom
- containment boom
- recovery devices
- 10,000' inland boom

Sinkers:

- adequate boom
- silt curtains
- dredges, pumps, and any other equipment necessary.