SUMMARY

Executive summary: This document comments on document BLG 15/12, a proposal from Denmark regarding the development of a code for OSVs that carry hazardous and noxious liquid substances in limited quantities.

Strategic direction: 2, 5.2

High-level action: 2.0.1, 5.2.1, 5.2.3

Planned output: 2.0.1.25, 5.2.1.28

Action to be taken: Paragraph 6

Related documents: BLG 15/12; resolutions A.673(16) and MSC.235(82)

Background

1 This document comments on document BLG 15/12 (Guidelines for the transport and handling of hazardous and noxious liquid substances in bulk in offshore support vessels – referred to as the OSV Chemical Code (based on resolution A.673(16)) and is submitted in accordance with the provisions of paragraph 4.10.5 of the Guidelines on the organization and method of work of the MSC and the MEPC and their subsidiary bodies (MSC-MEPC.1/Circ.2).

2 As described in the preamble, the guidelines drafted by Denmark were developed in accordance with the provisions set forth in regulation 11(2) of Annex II to MARPOL 73/78 and provide an alternative to the International Code for the Construction and Equipment of Ships Carrying Dangerous Chemicals in Bulk (IBC Code). The philosophy of the draft guidelines is to apply standards contained in the IBC Code and the International Code for the Construction and Equipment of Ships Carrying Liquified Gases in Bulk to the extent that is practicable and reasonable taking into account the unique design features and service characteristics of OSVs, as well as the limitation placed on amounts to be carried.
Discussion

3 The United States recently developed detailed policy to implement resolution A.673(16) and clarify areas left to the interpretation of each Administration. This is available at www.uscg.mil/imo/us-policy-a673.pdf. The United States believes the experience we gained in this process will be beneficial to the development of a Code for OSVs that carry hazardous and noxious liquid substances in limited quantities.

4 As development of the Code progresses, it is important to recognize that OSVs are a diverse class of vessels with a wide range of designs and uses in addition to carrying hazardous substances and NLSs in bulk. OSVs serve as anchor handling tug supply vessels, emergency rescue and recovery vessels, transport vessels for personnel and excess fuel, and transport platforms for deck cargoes. Many OSVs are outfitted with deck cranes and equipment to blend and pump chemicals for offshore exploration, well stimulation, and production. Given the multifaceted nature of OSVs, certain aspects of the IBC Code may not be appropriate to use as a starting point to establish a new OSV Chemical Code. In particular, blanket application of IBC Code requirements for ship survival capability, fire fighting, and cargo tank venting will unnecessarily restrict new OSV designs and innovations.

5 We recognize the significant effort put forth by Denmark. The United States strongly agrees with Denmark's assertion that further discussion is necessary to properly consider all relevant factors and update the current guidelines. The United States offers the following general comments and looks forward to contributing to the discussion as it progresses:

.1 Cargo Capacities: OSVs continue to increase in range and cargo capacity due to the demands of offshore oil and gas exploration and production, which is increasingly located further offshore. While the greater capacity has brought increased levels of innovation, attention should be given to the increased risks associated with unrestrained NLS carriage capacity. Denmark has proposed no restriction on the total amount that may be carried by an OSV, but suggests the maximum capacity of each individual tank be no more than 350 m³. This is well below the current IBC Code limit of 3,000 m³ per tank for ship type 2 and may be unnecessarily restrictive. In order to provide greater flexibility in ship construction and design, the total tank capacity of OSVs should be limited, but the individual cargo tank capacity should be less restrictive. The size of individual tanks and the overall maximum allowable vessel capacity can be established after having the benefit of further discussion.

.2 Products allowed to be carried: Denmark has proposed application of the summary of minimum requirements provided in chapter 17 of the IBC Code to OSVs that transport ship type 2 cargoes. The United States agrees OSVs should be permitted to carry these NLSs when the vessel meets tank location requirements and other appropriate standards. However, Xylenes and other NLSs currently being carried by existing OSVs under the provisions in resolution A.673(16) may merit special consideration. Placing more stringent requirements on OSVs that transport these commonly carried cargoes would inadvertently impair the ability of a large portion of the OSV community to compete in their current market.
.3 Carriage of Drilling Muds and Brines: Drilling muds and brines are unique because of their high density and widely varying composition. As Denmark stated in their proposed guidelines, a method needs to be developed to allow for simplified classification of these cargoes. Under current United States policy developed to implement resolution A.673(16), OSVs may carry unlimited quantities of drilling muds with a closed cup flashpoint of greater than 24°C (75°F). The United States recommends adoption of a similar requirement, in addition to a limit on the percentage of NLS that the mud may contain.

.4 Ship Survival Capability: Denmark has proposed adopting, with little change, the intact and damage stability criteria from the IBC Code. Although these criteria are suitable for chemical tank ships, we do not believe they are appropriate for application to OSVs. Some of the largest OSVs serve primarily as anchor handling vessels or transport deck cargo and personnel and may carry very small quantities of NLSs. The proposed stability requirements are too conservative for these vessels. Given the significance of this issue, it is recommended that the BLG Sub-Committee seek technical advice from the SLF Sub-Committee.

.5 Cargo Area: Unlike a chemical tank ship, an OSV carries a variety of bulk cargo, much of which may not be hazardous or a NLS. In addition, the deck area above the cargo tanks on an OSV is frequently needed to store cargo and equipment. Denmark's proposed definition and use of the term "cargo area", while more closely aligned with that in the IBC Code, is not appropriate for application to all OSVs, particularly if NLSs are carried in only a small number of the vessel's tanks.

.6 Back-loads: The United States agrees that back-loads should be properly analysed and documented. However, the new code for OSVs should consider current best practices and take into account the cargo analysis capability available on site. In most cases, basic cargo characteristics, including density, flashpoint and presence of toxic compounds (i.e. H2S), can be determined on site and may be sufficient to ensure the safety of the crew and environment.

Action requested of the Sub-Committee

6 The Sub-Committee is invited to consider the above comments and seek additional technical advice from other sub-committees, as appropriate.