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U.S. gears up for ballast water compliance

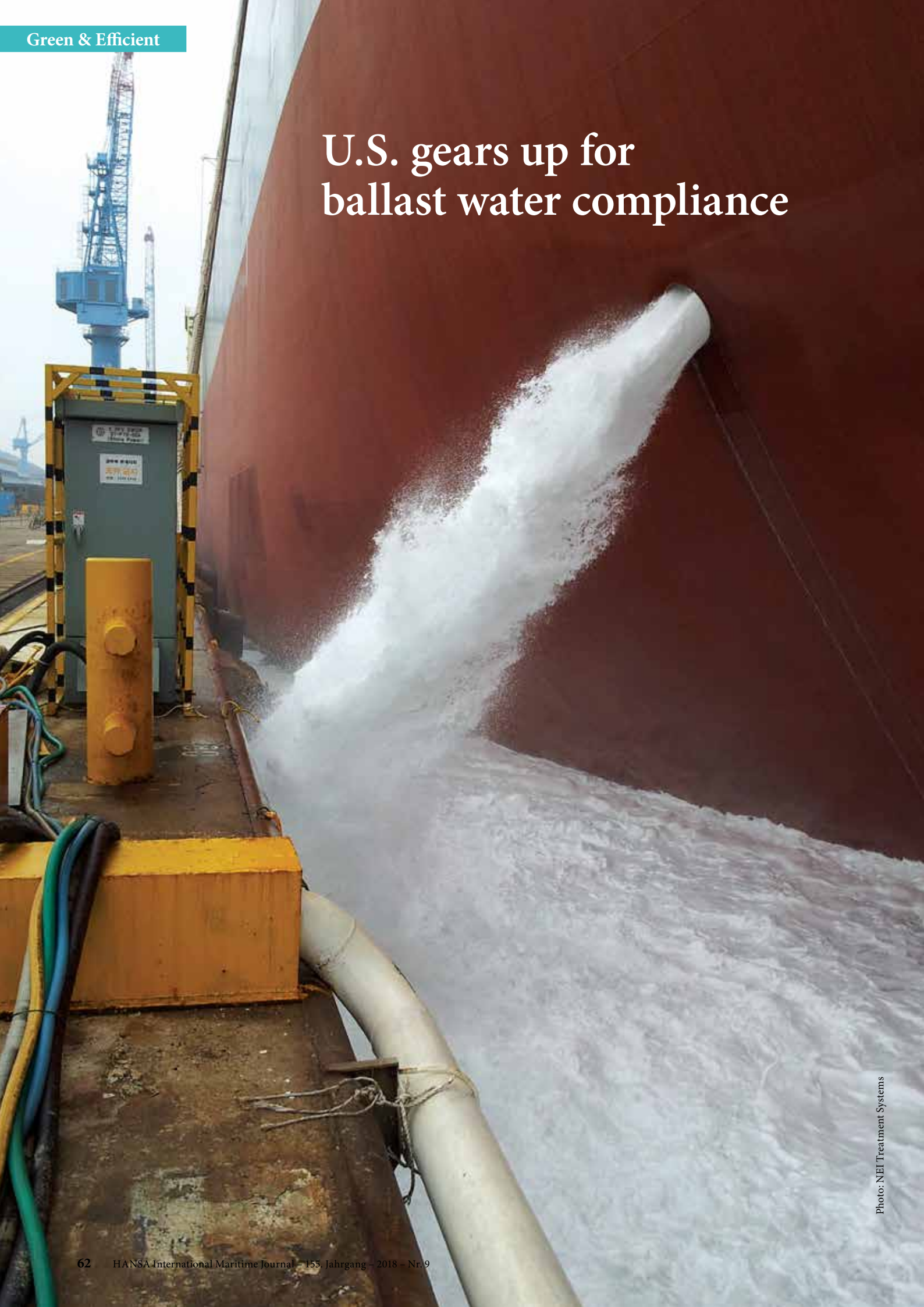


Photo: NEI Treatment Systems

Shipowners trading in U.S. waters can no longer rely on extensions to delay implementation of ballast water regulations. Meanwhile, changes in U.S. Coast Guard policy may introduce new challenges in aligning compliance between U.S. and IMO regulations

After many years of delays, ballast water discharge regulations globally and in the United States are finally becoming real for shipowners. While the IMO has agreed to some limited delays in entry into force of the Ballast Water Management Convention, U.S. Coast Guard policy is evolving from implementation of its discharge requirements to enforcement.

Shipowners trading in U.S. waters have until recently been able to defer installation of a Ballast Water Management System (BWMS) on existing vessels by obtaining a USCG extension. Vessels with dry docking in 2016 or 2017 were previously able to obtain an extension to the next scheduled dry docking in five years' time due to insufficient availability of USCG Type Approved BWMS.

However, based on the recently-published USCG NVIC 01-18 circular, shipowners can no longer rely on this system of extensions to delay implementation.

The USCG has indicated that the six BWMS already approved should be able to cover nearly all classes of vessels and are compatible with a broad range of operational requirements.

The timescale has become very limited – with a duration of a year or less from the date of an upcoming drydock – unless there are extraordinary circumstances justifying more than twelve months' extension. For vessels with dry dock in 2018, the extension period has been reduced to 30 months from five years due to the increasing number of USCG Type Approved systems available.

These changes could become problematic for shipowners and operators of »mid-life« vessels who are trying to align USCG compliance with the later IMO D-2 compliance date for commercial reasons.

Vessels drydocked in 2016, as well as those with scheduled drydocking through 2018, with extensions, are in a better position to align U.S. and IMO compliance dates. Vessels with scheduled drydocking in 2019 onwards are unlikely to align the two, meaning they would need to opt for earlier installation of a BWMS.

These points should be taken into account when planning for the installation



USCG ballast water enforcement gets real

and execution of BWMS retrofit projects. The challenges associated with the operational and installation aspects of the different BWMS were documented in a best practice workshop held by ABS last year, providing a snapshot of industry's progress toward compliance.

Lack of technical support

The most common feedback that ABS receives is a lack of technical support from the BWMS vendors, lack of training materials or training program for the crew, delayed delivery of the spare parts and delay in after sales service delivery from the BWMS vendor.

We continue to communicate with our clients and shipowners who were involved in the workshop to hear their feedback with respect to their experience of having an installed BWMS onboard their vessel on a regular basis.

In addition to selecting the right system, owners are faced with making decisions on their retrofit plan which can also include developing compliance timelines, extension requests, crew training and other necessary steps to meet the requirements.

To help clients understand their options and obligations for compliance with IMO and USCG regulations, since 2015 ABS has offered a BWMS Technology Evaluation service, supporting shipowners during the transition and in the evaluation of a BWMS that is suitable for their vessels.

The ABS service covers two key aspects; pre-selection or shortlisting of suitable BWMS and support for requesting USCG extensions. For the former, an interactive, multi-phase process uses an extensive database of BWMS including technologies, design capabilities/limitations, installation requirements, power requirements, operating considerations and restrictions on equipment use.

The pre-selection service provides clients with a concise and complete understanding of each available USCG-approved BWMS or those that are of interest. The BWMS evaluation study includes provision of an in-depth report and options with respect to few of the most potentially suitable USCG-approved BWMS – including those »in the pipeline« that might give a credible reason to delay installation.

ABS will conduct detailed analysis of each vendor's equipment suitable for each ship's installation challenges and create a comparison table based on specific and critical to retrofit success-failure indicators for each of a set of parameters for each BWMS.

Historical information for a number of other BWMS not on the pre-selection list is used to create a »universe« of the parameters which allows ABS to generate a valid score for each (ie: weight, footprint, power demand, energy consumed, chemical consumption, etc.).

The USCG extension support service aims to assist clients in understanding their current situation and if obtaining a USCG Extension is feasible. ABS can assist the client in demonstrating a high level of understanding of the systems as part of their USCG extension strategy for each ship's compliance.

ABS analyses the client's current situation and their reasons for requesting an extension. We will then advise the feasibility of requesting the extension, discuss the compliance methods and make sure that the client has a realistic BWM retrofit plan, so as to allow compliance at the end of the extension period.

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