

# **BMP Manual for Oil Handling at Shipyards**

## **Project Update**

National Shipbuilding Research Program (NSRP)  
Environmental Technologies Panel SP-1  
Puget Sound, Washington  
June 25, 2008



# Oil Handling BMP Manual Overview

## ➤ Background

- Oil handling activities at shipyards are subject to multiple requirements:
  - USEPA
    - Spill Prevention Control & Countermeasure
  - USCG
    - Operations Manual
  
- Standards are performance-based and do not always offer or require specific practices

# Oil Handling BMP Manual Overview

## ➤ Project Goal

- To present Best Management Practices (BMPS) applicable to shipyards for compliance with oil-handling requirements of the USEPA and USCG. Project will:
  - build on SPCC Guidebook (O'Brien & Gere, 2007)
  - address USGS requirements
  - give concrete examples for compliance

## ➤ Shipyard partners:

- BAE Systems San Diego Ship Repair
- BAE Systems Norfolk Ship Repair
- Northrop Grumman Newport News

# Project Schedule

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Task One: (98% complete)

Oil-Handling Activities Summary Table to NSRP Team

COMPLETE

Questionnaire and Summary Table to Shipyard Environmental Managers

PLEASE SEND RESPONSES!

Task Two: (10% complete)

Draft Oil-Handling BMP Guidebook to NSRP Team

August 1  
*(3 week delay)*

Task Three:

Presentation and Training on BMP Guidebook at NSRP Meeting

Oct/Nov Meeting  
*(date TBA)*

Task Four:

Final BMP Guidebook to Shipyard Environmental Managers

December 2

# Progress Report - Task One

## ➤ Questionnaire

- Questionnaire sent April 16 and again May 19 to sixteen Environmental Managers to share challenges and best practices shipyards.
  - Responses from five.
    - Thank you AMF, AMA, BIW, EBC, NASSCO, and PHNSY!
  - Visits to two.
    - Thank you BAE-Norfolk and NGNN!
- *In July - will complete some phone interviews for additional information and solicitations for responses from other yards.*

**98% complete**

# Progress Report - Task One

## Questionnaire Responses Summarized

SUMMARY OF BEST MANAGEMENT PRACTICES FOR OIL SPILLING ACTIVITIES (SOP) COMPANIES

	Transfer Operations		Communications		Management of Subcontractors / SPOC				
	Do subcontractors direct or oversee operations of all oil spill operations Manual, does your facility sign or receive a copy of the DQ Form for transfer?	If subcontractors use their hoses and closure devices make 35 CFR 154 requirements and the adequate commitment is provided in contracts? How?	Do you ensure the their hoses and closure devices make 35 CFR 154 requirements and the adequate commitment is provided in contracts? How?	Who is responsible for reporting a spill to the Coast Guard? In the event that a spill occurs on a ship prior to delivery? How do you ensure that a given spill is not reported by more than one entity?	What is the procedure by Coast Guard which a subcontractor informs you that the spill has occurred?	How do you stay and ensure that subcontractors comply with SPOC secondary containment for portable fuel tanks, and fuel tanks on mobile equipment such as compressors and portable generators?	regular inspections of portable fuel tanks and testing? Who maintains records of inspections?	loading and unloading procedures and inspection of control devices such as level gauges? Who maintains records of inspections?	training on operation and maintenance of equipment to prevent a discharge and response to oil spill discharge? Who maintains records of training?
Atlantic Marine Alabama LLC	Yes Use Subcontractor Operations Manual.	No	Yes. Visual inspection during work hours.	Depends on who caused the spill. If the vessel caused the spill they report. If the vessel caused a spill and refuses to report, we report.	We handle all emergency activities through our Security Department and they are trained 24/7.	Visual inspections	We don't. They keep their own records.	We don't. They keep their own records.	We don't. They keep their own records.
Atlantic Marine Florida, LLC	Yes. Use Subcontractor Operations Manual.	No	No	AMF reports all spills at its facility, unless it is subcontracted with the sub.	It is reported to the Project Manager of Project Coordinator	It is specified in the contract and monitored by AMF personnel	Maintenance Dept. inspects and maintains records	Pumping Dept. inspects and maintains records	Training is done internally. H.R. retains records
State's Best Corporation	Yes. Use Subcontractor Operations Manual at mobile facilities.	No	Yes. On site personnel coordinate with subcontractor.	All spills at facility are reported to on site Fire Department. Policy requires all submit notification requirements.	Subcontractor required to report to on site Fire Department	Subcontractor required to obtain approval for portable tanks and equipment	Facility inspects and maintains records	Tank and equipment maintenance by subcontractor	Facility Fire Department is the primary response organization for all spills and maintains all training records.
Bath Iron Works (BIW)	No. Performed under the direction of BIW staff in accordance with BIW operations manual.	NA	NA	BIW is responsible for reporting all incidents to the Coast Guard. Within BIW all reporting will be conducted by the Environmental Compliance Department (ECD).	All significant over water transfers and other potential sources of significant spills are managed by BIW employees. All employees and subcontractors are trained to contact emergency number in the event of a spill which then contacts the appropriate BIW personnel as listed in the Emergency Contingency Plan and Petroleum Transfer Plan.	To date BIW has not addressed the issue with subcontractor equipment. Specific case where subcontractors are storing petroleum on the property in SPOC equipped containers, however, State Compliance can be achieved through the use of portable containment berms.	Subcontractors are responsible for maintaining their own equipment and would be responsible for inspections. While onsite BIW staff can observe and monitor the tanks.	With the exception of tank berms and SPOC equipment while actively in use, BIW does not use contract equipment to transfer petroleum products.	The emergency response subcontractor is responsible for maintaining their own equipment and providing and documenting training for its employees.

# Progress Report - Task One

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- Example Responses

**How do you ensure that subcontractors perform regular inspections of portable fuel tanks to ensure integrity? Who maintains records of inspections?**

“We don't. They keep their own records.”

“Maintenance Dept. inspects and maintains records”

“Facility retains inspection requirements and records”

“Subcontractors are responsible for maintaining their own equipment and would be responsible for inspections. While onsite shipyard staff can also visual monitor the tanks.”

“Subcontractors are required to comply with Best Management Practices which require regular visual inspection of oil storage tanks. Contractor is responsible for maintaining integrity testing records (when required) for their own equipment.”

# Progress Report - Task One

- Pictures of improvised containment methods

*Do you have any to share?*



## Progress Report - Task Two

### ➤ Prepare Draft BMP Manual

- Manual will share best idea(s) for
  - Containment methods and devices
  - Management of portable containers and equipment
  - Performing inspections
  - Recordkeeping
  - Release reporting
- Ideas shared will be evaluated by O'Brien & Gere and Shipyard Partners based on efficacy and cost.
- Solutions to unmet challenges will be sought.

**10% complete**

# Progress Report - Task Two

## ➤ Draft Table of Contents

### Best Management Practices for Oil-Handling Activities at Shipyards

#### Preface

#### *Description of Project*

#### 1. Introduction

##### *1.1. What is a Best Management Practice?*

##### *1.2. Importance of Best Management Practices*

#### 2. Overview of shipyard industry and applicable oil handling requirements

##### *2.1. Oil-Handling Activities at Shipyards*

##### *2.2. Applicable Regulatory Requirements – EPA and USCG*

#### 3. Spill Containment

##### *3.1. Minimum requirements*

##### *3.2. Challenges*

##### *3.3. BMPs*

#### 4. Transfer Operations

##### *4.1. Minimum requirements*

##### *4.2. Challenges*

##### *4.3. BMPs*

#### 5. Materials Management

##### *5.1. Minimum requirements*

##### *5.2. Challenges*

##### *5.3. BMPs*

#### 6. Maintenance and Repair Activities

##### *6.1. Minimum requirements*

# Oil Handling BMP Manual Overview

## ➤ Task Three - Presentation

- Provide training/sharing session at Fall NSRP Environmental Panel Meeting
- Draft BMP Manual will be provided to shipyards prior to training session

# Oil Handling BMP Manual Overview

- Task Four - Finalize BMP Manual
  - Incorporate additional ideas from training session.
  - Distribute copies of final BMP Manual to shipyards

# Oil Handling BMP Manual Overview

- Questions?
  
- Send your questionnaire back -
  - Take some pictures!
  - Share your best practices!