

Pollution From Ships - 09 /10 November 2007.

Thank you for the introduction, and good afternoon.

When I was first asked to attend this conference as a speaker, I wondered whether someone was seeking belated retribution from me - as my vessel was involved in a pollution incident in the Outer Solent in April 2006 - but looking around, I am pleased to note the absence of any stocks or pillory.

May I ask you to try and imagine a somewhat younger version of yours truly - not too difficult I trust - as a first trip apprentice, sat on a set of bitts on the Poop Deck, adjacent to the stern discharge of a large crude oil tanker. This being at night, on passage from Europe to the Persian Gulf. My instruction from the Chief Officer? Wait until the dirty brown discharge turns black, give it 15 minutes and then call me! Crude oil washing it wasn't. Such was my early induction into the world of marine pollution. Thankfully, by and large those days are long gone.

Ensuing speakers will deal more with the civil and criminal aspects of maritime pollution, so I intend to touch mainly on the day to day aspects of how I as a coastal tanker Master perceive pollution prevention in its various forms. Primarily, this entails the efficient carriage and safe cargo custody of oil products and the protection of the marine environment. However, pollution of the latter can be categorised not only as being due to oil (perceived by many as the prime cause), but air, garbage, sewage and the not often referred to - operational noise levels as well. Add to that the trans-shipment of ballast water, and there is much for the mariner to take care of and pay attention to.

Allow me to return to the Solent incident.....

Having dragged anchor in rather strong winds in the St. Helen's Rds. Anchorage, we safely re-anchored for the night and the winds abated. The following day while on watch, I was horrified to see a 'snail trail' emanating from our stern. Alerting the duty A.B. and the Chief Engineer, we checked around the vessel, then launched the Rescue Boat for a fuller investigation. This confirmed there was indeed oil bubbling up from the under the stern, i.w.o. the propeller and stern tube seal. From that moment on we became pariahs to all and sundry. Typically, as luck would have it, we were loaded with a low flash product - due for discharge at Fawley. Having alerted relevant parties from my DPA through to the QHM at Portsmouth, and while we awaited developments, the scenario went up to SOSREP level. The Chief Engineer determined we had lost approximately 15 ltrs., which may not sound much, but as you know lub oil does spread rather. Fortunately it was company policy to operate the system utilising biodegradable oil. We were given permission to go alongside at Fawley

and discharge, subsequent to which we proceeded to an emergency dry-dock at Milford Haven. When not underway, we had the stern tube header tank isolated. There we discovered the stern tube seal had been damaged by discarded crab-pot lines, which we probably picked up during the re-anchoring at St. Helen's. With the inner and outer stern tube seals renewed, we resumed trading without further trouble. The satisfactory outcome being largely due to company policy with regard to the grade of oil used, and the encouragement of prompt reporting of any incident. The ability to quickly resume trading was also due to the sensible approach of both Class and flag state authority to our remedial actions.

A pollution incident, yes, but one due to unforeseen circumstances beyond our control.

On the other hand, although as Master we undertake all possible endeavours to ensure compliance with port, state and company regulatory requirements, there are times when one is let down by those under one's command - either through inexperience or unfortunately sheer neglect.

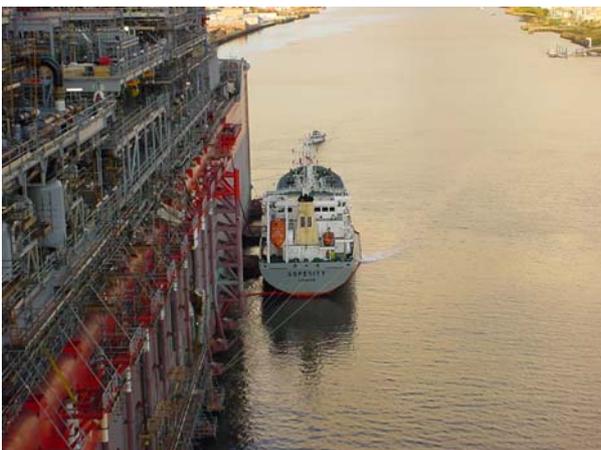
Believe me there is nothing worse than being woken at 0130 hrs. by your Chief Officer to be told that the duty PLA Deputy Hbr. Master is on his way to the vessel to investigate an alleged pollution incident. Having been out to anchor to undertake tank preparation for the next cargo, we were alongside loading lubricating oils at Dagenham. To find, following my call that we were still loading and no-one else had been roused did not best please me. I instructed the Chief Officer to stop loading, call the crew and instigate our anti-pollution procedures. Checking around, there was very little evidence of surface oil on our inboard side - contrary to the 5 tonnes reported by the jetty operator. At the time it was slack HW on a calm night. The Chief Officer had forgotten to replace the cargo line plugs post tank cleaning ops., and some 5 ltrs. of the thick Solvent Neutral lub oil being loaded had literally dribbled over the side.

The result? Me being given an official caution then virtually labelled a liar for stating the quantity spilled to be significantly less than originally reported, and the company being fined £ 2000 plus £ 400 costs plus VAT! Measures and procedures were amended and initiated accordingly to avoid repetition. Disciplinary action was taken against the Chief Officer, whose feet didn't touch the deck for the rest of the trip.

I reiterate the onus is always on you as Master, but then how do you convey to a vastly experienced and eminently qualified senior Second Officer, the error of his ways in lifting scupper plugs to drain accumulated rain water off the deck instead of educting same to the Slop tank? This happened not once but twice with the same officer in the very environmentally sensitive leisure and tourist ports of St. Helier and Poole. Difficult to comprehend the thinking behind the action. Was it forgetfulness, laziness, pure negligence, or a combination of each? To a seasoned

tanker officer of his standing it was not down to a lack of training and awareness. Yet again, you as Master are ultimately responsible for his actions and of course the repercussions. The latter can have serious and damaging commercial implications not only for one's own vessel, but the company's fleet as a whole.

It is not all doom and gloom though. A charter with a difference cropped up just over four years ago when my vessel was tasked with the delivery of 6,500 tonnes of gas oil to the FPSO 'Bonga', while it was fitting out on the river Tyne. This was undertaken in three visits, which by their very nature were environmentally sensitive - not only for the safe and successful cargo transfer, but also for the rather difficult mooring and unmooring. Being ever watchful of the numerous obstacles on the side of the vessel tended to concentrate the mind somewhat during ship-handling. It was very satisfying to complete the whole operation without incident.



Endeavour to instil in all your officers and crew the continued need for care, general awareness, and adherence to correct procedures at all times. Attention to detail and careful planning are paramount and ought to ensure safe and efficient operations.

Much attention these days is focused on the control and reduction of atmospheric emissions, hence the introduction of the I.A.P.P. certificate. Through Annex VI of Marpol, which came into force in 2005, our industry has already introduced

limitations on the amount of Sulphur Oxide (SO_x) and Nitrogen Oxide (NO_x) which may be emitted from ship exhausts. Working in conjunction with the Chief Engineer we must always ascertain the shipping of the correct grade of bunkers - ensuring compliance with both company and industry specifications, particularly regarding the sulphur content. On a day to day basis, it is down to all watch-keepers to monitor exhaust emissions, not only from the main engine, but the auxiliaries as well. Early notification to the Chief Engineer of anything untoward noticed should lead to the timely correction of any problem.

In addition, adherence to a proper planned maintenance programme, viz: main engine and auxiliary overhauls, oil and filter changes, ought to help alleviate uncontrolled and unacceptable emissions. This should be part and parcel of company procedures, and it is incumbent on the on-board management team to ensure this is undertaken correctly.

To many of today's sea-side visitors, the sight of litter and refuse scattered over the shoreline is rather unsavoury and quite rightly so. It is sad to reflect though that the majority of rubbish accruing on our beaches stems not from shipping but from shore-side. The introduction several years ago of the Disposal of Garbage Regulations heralded a much needed and welcome change of attitude towards the dumping of waste at sea. Though seen as onerous at the outset, seafarers were quickly tutored to correctly bag and dispose of ship's garbage in port waste reception facilities. A trend which soon became second nature. Following on from that was a requirement to separate plastics from standard garbage. This is all very well, but here we have a problem. In wishing to comply with this, the question is often asked on-board 'why bother?' Aside from one port on the West coast of Ireland, there are no ports I visit within my North West European trading area where there are separate reception facilities for plastics at all. The separated and bagged plastics invariably end up in the same skip as the rest of the garbage. Current stringent adherence on-board is more often than not way above the level of disposal services offered and operated by many ports.

If we wish to continue with the admirable world wide efforts in reducing waste and improving the environment, it is high time better facilities were available at ports. This in turn should not be a means for ports to generate increased revenue either. Instead of harassing Masters and placing the burden on the ship-owner, more should be done to encourage cheaper means of disposal. For the waste disposal companies this is a captive market, ensuring welcome profits. To be quoted a fee of £ 80 for the disposal of one empty 20 ltr. paint drum, purely due to residual content is unacceptable to say the least. Approximately six weeks ago, in a port in the NE of Scotland, I wished to dispose of 30 m³ of clean oil tank-washings, and was quoted a figure in excess of £ 3000, namely £ 110 per m³. That is bordering upon greed,

especially considering around 90% of that quantity would be water. A degree of pricing realism would be welcomed throughout the industry.

There are ports where greater emphasis is placed upon the weight of waste on arrival, that being landed and remaining on board on departure - rather than on the number and well being of the seafarers themselves. Though we are happy to oblige and to comply with port requirements, that approach only goes to show in our minds the level of esteem in which seafarers are held. Though we maintain proper records, it is also quite often difficult to obtain signed receipts for garbage disposal. I endeavour to ensure the correct means of disposal for what may be termed special waste, i.e. expired pyrotechnics and medicines, batteries, old fridges and oil drums etc. All are annotated on Waste Disposal notifications and recorded in the Garbage Record book, but when you encounter lack of facilities during a run of port visits there is always the temptation to dump it all together in the next suitable skip.

As mentioned earlier, you must be continually aware as Master, of strict adherence to correct waste disposal practices at all times. I'll refer back to the unfortunate Second Officer who lifted the deck scupper plugs, for it was the same gentleman who sought to land expired cargo sample bottles ashore at Jersey. Not only did he forget to empty them, but he had placed them in the skip destined for the island's incinerator. The phrase 'eyes in the back of your head' comes to mind. Fortunately his oversight and lack of attention was spotted and corrected in good time, and the incinerator is still operational!

Next down the line comes the I.S.P.P. - International Sewage Pollution Prevention certificate. Again it is down to the on-board management team to ensure the correct operation and maintenance of the sewage treatment plant, whereby ensuring that only properly treated sewage is discharged at sea. A quick note for any budding catering staff present, the bugs in the sewage tank are not partial to sweet corn!

Ballast Water Management is high on the agenda likewise, with consideration now being given to ballast water changes on passage in order to minimise the cross contamination of marine life in environmentally sensitive areas. Currently the only place affecting me is if I proceed to load out of Bantry Bay in Eire.

Another area slowly gaining prominence is the consideration towards operational noise levels, particularly in my case at smaller ports where berths are in relatively close proximity to housing. I do recall several years ago as a Second Officer discharging at Shoreham, on a vessel fitted with hydraulic deep-well pumps. A member of the local constabulary appeared around 2300 hrs. stating his station had received complaints regarding noise levels from the vessel, which had to stop until the morning. Having requested he place his instruction in writing, I enjoyed an unexpected night in bed!

The latest generation of technically advanced product tankers we operate were constructed precisely with these considerations in mind, and are designed to undertake their port work within a noise envelope no greater than 45db at 25m from the vessel.

From the aforementioned you will obviously see there is much for me as Master to pay attention to in order to help maintain both clean and safe seas. I encourage my officers and crew to report pollution of any kind, and instruct my Deck officers to enter sightings of oil pollution in particular - whether at sea or in port - into the Deck logbook. Not only do you have to look after the marine environment, but you must look after your own interests as well. Uphold your professional standards, and do not falsify records - it is not worth the risk. Penalties are both justified and severe.

One last comment. Referring back to my unfortunate pollution incident locally, sometime post resumption of normal trading we underwent a vetting inspection on behalf of one of the oil majors. All boxes were ticked bar one. The Chief Engineer had omitted to enter the oil loss through the stern tube seal into the relevant narrative section of his ORB Part 1, and we were pulled up on this. His reply that there were far more urgent and important matters in hand at the time, I thought was given with remarkable restraint - but it does emphasise the need for attention to detail.

I rest my case and thank you for listening.