

SMALL VESSEL DISMANTLING BEST MANAGEMENT PRACTICES

Fact Sheet – June 2014



The purpose of this fact sheet is to describe the water quality protection best management practices (BMPs) and requirements applicable to small vessel dismantling. Vessel dismantling activities include the raising and securing of sunken vessels, removing hazardous waste, dismantling, and salvaging. Because vessel dismantling activities have the potential to cause water and environmental pollution, failure to implement these BMPs or more environmentally protective practices may result in unauthorized discharges of pollutants into waters of the United States and in enforcement by the San Francisco Bay Regional Water Quality Control Board (Water Board).

VESSEL DISMANTLING

Vessel dismantling consists of removing any vessel that is no longer seaworthy because of wear, damage, or abandonment, and either recycling or disposing of the vessel and its on-board materials.

Dismantling is an industrial activity that may generate a variety of pollutants, which can harm water and wetland habitats (e.g., petroleum, solvents, paint chips, asbestos, plastic, cutting and welding slag, sediment, nuisance marine growth, vessel ballast, bilge water, and other refuse).

If the vessel weighs more than 100 tons or is longer than 100 feet, the dismantling party must contact the Water Board to determine permitting requirements (see Vessel Salvaging, Permits Needed fact sheet¹). In addition, regardless of vessel size, if a dismantling operation is located in an environmentally sensitive area or multiple vessels are being dismantled at a single location, the dismantling party must contact the Water Board to verify whether your project will require a permit.

REQUIRED PLANS

Regardless of whether a permit is required, all owners and/or operators planning to conduct vessel dismantling must have plans at the work site that include the following:

Scope of Work and Schedule

General scope of work and timeframe for demolition and disposal activities.

Spill Prevention and Response

Procedures for spill prevention, control, and BMPs for any accidental discharges of pollutants to surface water. These procedures must include daily visual monitoring for sheens, turbidity, and debris occurrence.

Hazardous Wastes

Procedures for segregation, testing, and disposal of hazardous wastes, including process water, bilge or ballast water, and other liquid discharges. To the extent practicable, hazardous wastes must be removed prior to conducting any dismantling operations.

Stormwater Pollution Prevention

Procedures to prevent pollution from stormwater runoff, including BMPs to reduce pollutant runoff from demolition and disposal activities, process materials, and, as appropriate, procedures for containment, testing, and treatment or disposal of polluted stormwater.

BEST MANAGEMENT PRACTICES

Vessel Removal and Transport

The vessel may be removed from the water using a crane or air bags and subsequently securely transported. Removal and transportation operations must avoid, to the extent practicable, sediment suspension and impacts to aquatic habitat and wildlife.

Dry Dock and Land-Based Dismantling

To reduce the possibility of discharging contaminants to the environment, the optimal location for vessel dismantling is within a National Pollution Discharge Elimination System (NPDES) permitted dry dock or land-based industrial facility.

If dismantling at an NPDES permitted facility is impracticable (e.g., the hull is unsound and unfit for lifting or transport without disintegrating) and dismantling is conducted at an unpermitted land-based facility, a dismantling pad must be constructed and the work conducted during dry weather. Constructing the dismantling pad on concrete or asphalt is preferred. The dismantling pad must consist of a high-density polyethylene (HDPE) liner (minimum of 20-millimeter thick), or equivalent, overlaid with geotextile fabric and 4 to 6 inches of clean class II road base to protect the liner. The pad must be constructed with a 6 inch high perimeter berm beneath

the HDPE liner to prevent fluid from leaving the contained area.

All dismantling activities — including the draining of fluids — must take place on the dismantling pad. All nearby storm drain inlets must be sealed to prevent any fluid discharge to the storm drain system. The dismantling pad and all residual materials within the pad must be properly disposed of upon project completion.

Stationary equipment located outside the dismantling pad, such as generators and waste liquid storage tanks, should have secondary containment or be placed on spill pads.

Dust and airborne debris from demolition operations must be minimized. The activities must be discontinued during high wind events or contained so that dust and airborne debris are maintained within the vessel dismantling pad. In addition, appropriate abatement measures for contaminants, such as lead-based paint, polychlorinated biphenyl-containing electrical equipment, and asbestos, must be in place prior to dismantling.

In-Water Dismantling

Vessel salvagers must minimize dismantling operations conducted in-water. In some instances, due to poor vessel integrity, dismantling may be conducted in-water in an orderly sequential manner with the following engineering controls:

- Specific care must be taken to strategically dismantle the vessel to limit listing. Demolition debris mass and volume within the derelict vessel and the salvage barge must be shifted with care to maintain stability and floatability.

- The in-water dismantling area must be contained with absorbent pads, debris skirts, and collection booms. Any gaps between the decks of the salvage barge and the derelict vessel must be covered and appropriately secured. Straw wattles may be placed at strategic locations on the vessels to restrict waterborne solids from entering the water. Retrieval nets must be available and used to remove debris inadvertently discharged to surface water.
- Liquid removal equipment, such as pumps, storage tanks, and skimmers, must be available in the event of an unpermitted discharge to water. The established BMPs for spill prevention and control must be in place prior to conducting the dismantling operation. These BMPs must take into account vessel integrity, the possibility of unknown on-board hazardous wastes, and proximity to sensitive habitats.

EMERGENCY RESPONSE

An environmental emergency is an imminent, substantial threat to public health or the environment arising from the release or imminent release of a hazardous material (including wastes). Any significant release or threatened release of a hazardous material constitutes an environmental emergency and requires immediate reporting to 911, the California Office of Emergency Services, and the National Response Center (see contacts below).

CONTACTS

Report a spill to the California Office of Emergency Services at 800-852-7550, the National Response Center at 800-424-8802 and the Regional Water Board Spill Hotline at 510-622-2369.

For questions, contact Laurent Meillier of the Water Board at 510-622-3277 or LMeillier@waterboards.ca.gov.

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http://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/stormwater/Industrial/docs/Vessel_Salvaging_FS.pdf