



July 24, 2018
NTC 07-2018

CSI Notice to Clients 07-2018

**SUBJECT: BALLAST WATER MANAGEMENT BEST PRACTICE
RECOMMENDATIONS**

Under 33 CFR 151.1510, vessels with an installed Ballast Water Management System (BWMS) approved by the U.S. Coast Guard, or an Alternate Management System (AMS) accepted by the U.S. Coast Guard, and planning to discharge ballast water in a U.S. port, must take on the ballast water to be discharged in the U.S. port through its BWMS or AMS and discharge its ballast water through the BWMS or AMS. If a vessel find itself in a situation whereby it is unable to take on ballast water through its BWMS or AMS due to it operating in freshwater with a BWMS or AMS not approved for freshwater, or due to contaminants (muddy water) that may potentially clog the BWMS or AMS filters and render the unit inoperable, we recommend the following:

1. Take on freshwater or contaminated water as needed for the safe operation of the vessel, bypassing the BWMS or AMS.
2. Once outside port limits, beyond twelve miles, at a suitable and safe location, discharge the freshwater or contaminated water directly overboard, by passing the BWMS or AMS.
3. Take on clean saltwater ballast through the BWMS or AMS.
4. Record the source of the ballast water on the Ballast Water Management Report as the location where the clean saltwater ballast was taken onboard and submit to the NBIC.

Under 33 CFR 151.2040 (b), if the installed BWMS/AMS stops operating properly during a voyage, or the vessel's BWM method is unexpectedly unavailable, the Master of the vessel must ensure that the problem is reported to the nearest U.S Coast Guard COTP as soon as practicable. Noting a BWMS/AMS failure on the NBIC Ballast Water Report or on the eNOA does not constitute notification to the U.S. Coast Guard COTP; notification to the U.S. Coast Guard COTP should be done via the local port agent.

The Coast Guard will normally allow a vessel that cannot practicably meet the requirements of 33 CFR 151.2025 (a) (1) because its installed BWMS is inoperable, or the vessel's BWM method is unexpectedly unavailable, to employ one of the other ballast water management (BWM) methods listed in 33 CFR 151.2025(a). If the Master of the vessel determines that the vessel cannot employ other BWM methods due to the voyage or safety concerns, the Coast Guard will normally allow the vessel to discharge ballast water in areas other than the Great Lakes and the Hudson River north of the George Washington Bridge. If the Coast Guard approves such an allowance, the vessel must discharge only that amount of ballast water operationally necessary to ensure the safety



and stability of the vessel for cargo operations. If it is feasible for the vessel to carry out a mid-ocean exchange, we recommend it be done. Ballast water records must be made available to the local COTP upon request.

It is critical the vessel makes a report as soon as practicable to the U.S. Coast Guard COTP at the U.S. port the vessel will call. Some of the questions that the Coast Guard may ask, which should be covered in the Master's report are as follows:

1. What is the make and model of your BWMS/AMS or AMS?
2. Did you use the BWMS/AMS or did your vessel use empty/refill/sequential/flow through?
3. How much ballast water are you proposing to discharge?
4. When did the crew discover the BWMS/AMS was inoperable?
5. What is the cause of the inoperable BWMS/AMS?
6. What is the repair plan?
7. What is your repair plan timeline?
8. Since installation, has the BWMS/AMS failed before?
9. Has Class been notified?

CSI is always available to assist our clients. Should you have any questions concerning the above, please contact us at csi@compliancesystemsinc.com.

For additional information and services, please visit our website:
<http://compliancesystemsinc.com/>