

Fleet Memorandum #3 (Post for Public Review)

Overview

On June 15, 2009 the Brooks McCall was moored at Freeport Launch Service in Freeport, Texas. The vessel was being mobilized for a project. Three trucks of fuel were requested. During fueling operations, involving the third truck, fuel was observed running down the stairs from the 02 level, port #2 fuel vent. Fuel flowed onto the starboard back deck and into the water. It was estimated that approximately 25 gallons entered the water. Meredith Management was called as the company QI (qualified individual) to manage the spill. Meredith Management notified regulatory authorities and called in a spill cleanup company to assist with clean up operations.

An incident investigation revealed several factors that likely contributed to the spill. The following were cited:

1. The engineer in charge was not a licensed engineer. Although not required by the vessel's safe manning letter, a licensed engineer is likely to have more exposure to good practices involved in fueling.
2. A bunkering checklist had not been filled out and used. This checklist is designed to walk personnel through the bunkering procedure and minimize the risk for a spill. The bunkering protocol is described in the Company's Safety Management Manual, SOP-GEN-007.
 1. There was no confirmation that all tanks had been sounded properly.
 2. There was no evidence that stand-by personnel were posted at the fueling point and at vent on the 02 level, in fact the engineer in charge was in the engine room when the spill occurred.
 3. There was no evidence that the Master was engaged during operations.
3. Vessel crew was unfamiliar with NTVRP/SOPEP protocols and the SOPEP kit was incomplete. A NTVRP/SOPEP drills are required quarterly and must be logged into NS-5. SOPEP kits are to be kept complete at all times. The NTVRP and SOPEP manuals describe spill notification and procedures in detail. The crew should be familiar with these.
4. Training and verification were insufficient. The lack of proper response suggests that training and verification were not followed. Several individuals involved in the spill had not received TDI-Brooks mandated training for ISM Code, Safety at Sea and other trainings considered important to the position.

5. Paperwork for fueling delivery could not be located. Any documents associated with fueling operations need to be retained.

Mitigation

A fuel spill is a serious incident and major conformity. Spills can be expensive and damaging to the Company's reputation. TDI-Brooks maintains a SOPEP (for international locations) and NTVRP (U.S. waters), a contract with Meredith Management to handle all U.S. spills (not a resource for international), a SOPEP kit, bunkering procedures and other protocols.

1. Management crewing the vessel should consider all skills associated with a position such as a ship's engineer. In today's environment a vessel crew must be aware of the complexities associated with operating a vessel according to International Safety Management Protocols.
2. Additional training and verification measure need to be undertaken. Crew need to be versed in the Company's Safety Management System.
- 3. A bunkering checklist needs to be completed for all bunkering operations and filed.**
4. Management needs to be more engaged with vessel operations to ensure that safe working protocols are followed and confirm their commitment to safe work.
5. Spill notification procedures need to be drilled to ensure comfort.

The U.S.C.G. issued a fine of \$250, but direct costs for spill management and clean up was around \$15,000.