



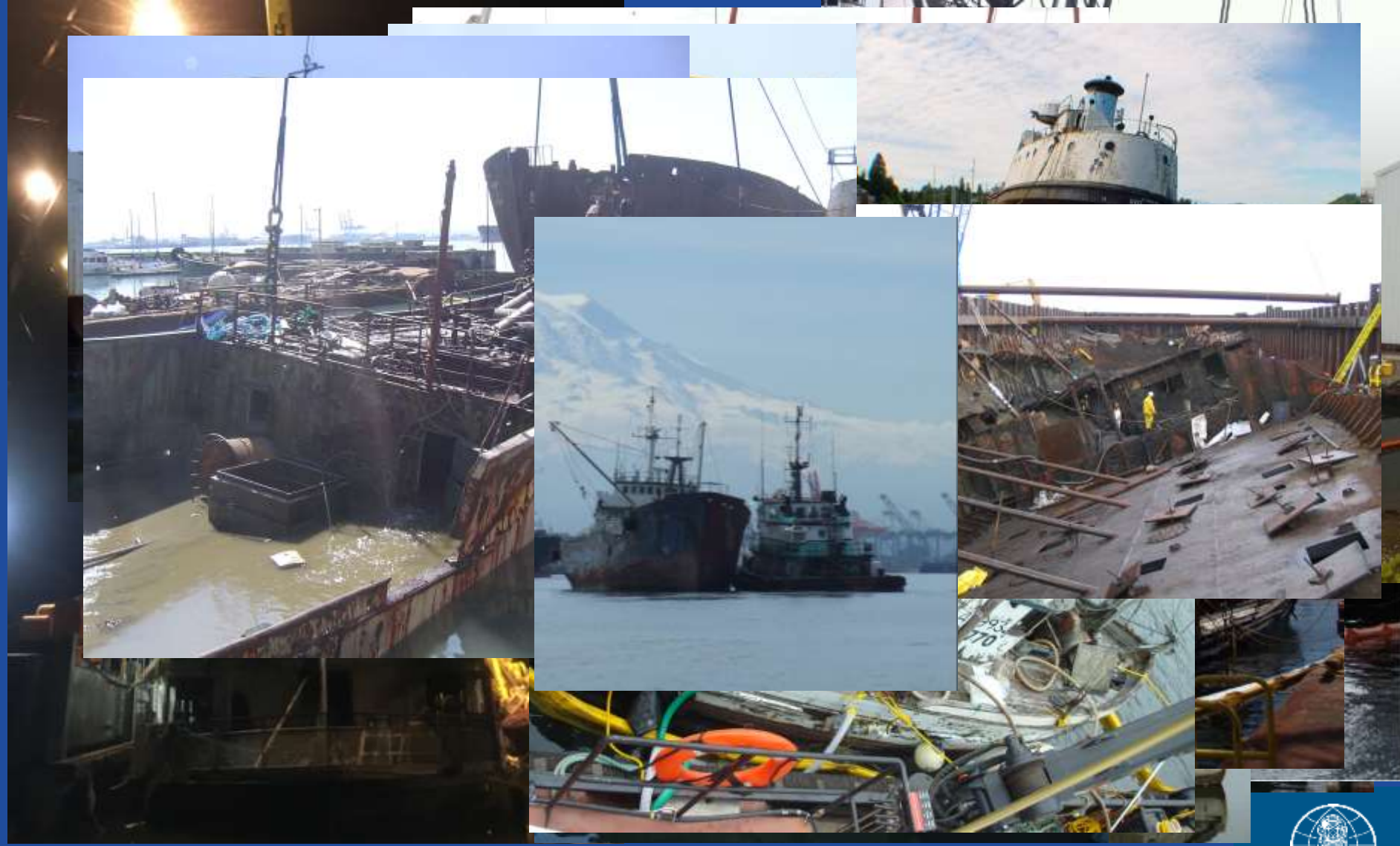
# Commercial Abandoned & Derelict Vessels (CADVs) A National Strategy Recommendation

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Global Diving & Salvage, Inc.  
Kyle Watson, Salvage Master

August 22, 2018

# Keeping our Waterways Clean: Isn't It Just a Few Problem Vessels?



# An International CADV: T/V Florence Filberg

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**2005: Sank at a dock in Ballard, WA; USCG refloat**

**2007: New owner tows vessel to Canada and abandoned in Sooke Harbor**



**2009: Arson in Sooke Harbour, Canada**

**2011: Removal by Dept. of Fisheries and Oceans**



# A Three Pronged Approach for Success

## **What We Can Do Now**

- Consistent , well defined federal funding source
- Address operational restrictions

## **How We Can Do It Later**

- Sustainable commercial funding stream for addressing a vessel's end-of-lifecycle



# Step 1: An Interim Funding Stream

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# Recommendation for A Well Defined Interim Funding Program

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- 98% of the cost of ADV's falls on 6% of the vessels...the commercial variety
- Use of the Oil Spill Liability Trust Fund (OSLTF)

**Challenge:** current taxes funding state and federal programs are not necessarily going to the removal of CADVs



# Step 2: Revised Regulations To Facilitate Deconstruction Activities

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# Final Disposition of CADVs: Why Is It A Problem



## Limited Commercially Viable Options

- Primary business
- Scheduling
- NPDES (National Pollutant Discharge Elimination System) Permit risk

## Abatement Standards

- Oils & Fuels
- Asbestos
- PCBs (Polychlorinated Biphenyls)
- Paint and Anti-Fouling Systems
- Coolants & Refrigerants
- Batteries
- Mercury





# Alternatives to NPDES Facilities: Deconstruction In-Situ

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**S/S Catala, 2005-2006, Ocean Shores, WA**  
**\$5.0M**



**F/V Heron, 2007, Everett, WA**  
**\$599,800**



# Alternatives to NPDES Facilities: Deconstruction at Adhoc Location

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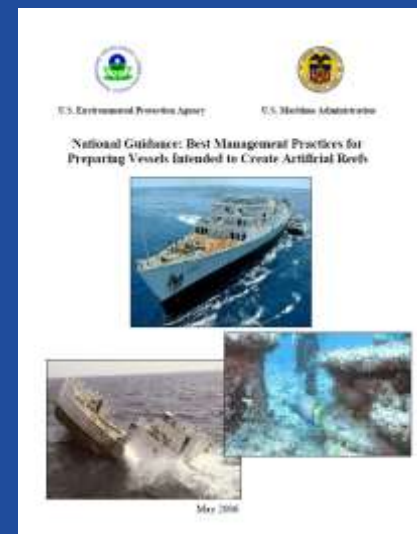


**T/V Challenger, 2016, Juneau, AK**  
\$1.2M to raise and put on the beach



# Alternative to NPDES Facilities: Ocean Scuttling

- Ocean scuttling can be permitted
- In an emergency it can be permitted quickly
- It is an arduous process and can be denied



# Recommendation for Practical Deconstruction Options

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- Shipyard Incentivization
  - Development of BMPs outside of NPDES Permit
  - Tax/audit credit for voluntary involvement in ship deconstruction
- Adhoc deconstruction location BMPs
  - NEBA
- Revision of current USEPA scuttling permit to promote usage in non emergency commercial vessel operations



# Step 3: Development of A Long-Term, Commercially Funded Program

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- Commercial Vessel Liability Trust Fund
- Budget now for the certain future cost of the problem
- But it's such a long, drawn out solution. How can we implement a program that takes decades to achieve sustainability?



# UST's Compared to CADV's

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- Commercial Underground Storage Tanks (USTs) were constructed and utilized in post WWII America, and began leaking petroleum products into the environment 30-50 years later

- Hazardous and Solid Waste Amendments of 1984 and SARA in 1986
- Funds were only used to clean up existing sites
- New sites require insurance and bonds
- OSLTF funds could be used to address existing CADV's
- Until a permanent commercially funded program matures and becomes sustainable



# CVLTF

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- Pre-construction estimate for future dismantling
- Shipyards pay new-build keel-laying tax into fund
- Commercial operators pay use tax into fund
- Mandatory insurance requirements for each operator
- Last commercial operator must use CVLTF for dismantling if unable to sell to insured commercial operator
- Illegal to sell commercial vessels to private parties
- Illegal for the U.S. Government to sell military vessels to private individuals



# Concluding Remarks

## What can we do now?

- Identify a singular federal funding source that eases the coordination (the dance) and softens the blow to underfunded coastal state ADV programs
- Embark in practical approaches towards minimizing ongoing environmental degradation (kicking the can down the road) through managed acceptable deconstruction operations

## What should we do later?

- Stem the tide of continual influx of CADVs by federal mandate of a long term/final disposition policy to provide future funds (through commercial means) apportioned by years of ownership





# Parting Words

