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

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

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Keeping our Waterways Clean: Isn’t It Just a Few Problem Vessels?
An International CADV: T/V Florence Filberg

- **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
Recommendation for A Well Defined Interim Funding Program

- 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
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

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

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

- 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

• 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

• 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 cites 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

• 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