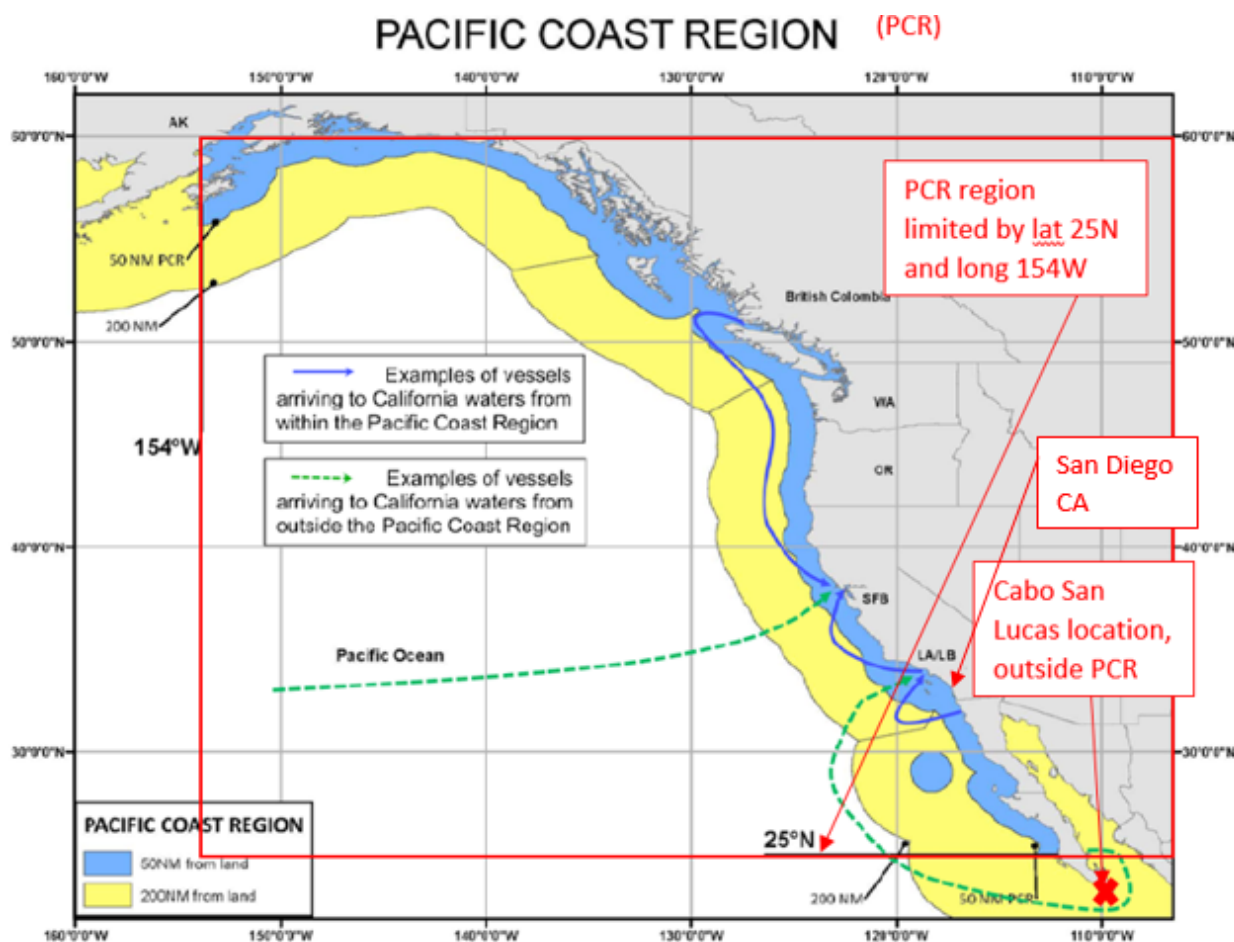


Case Study- Ballast Water Violation - California

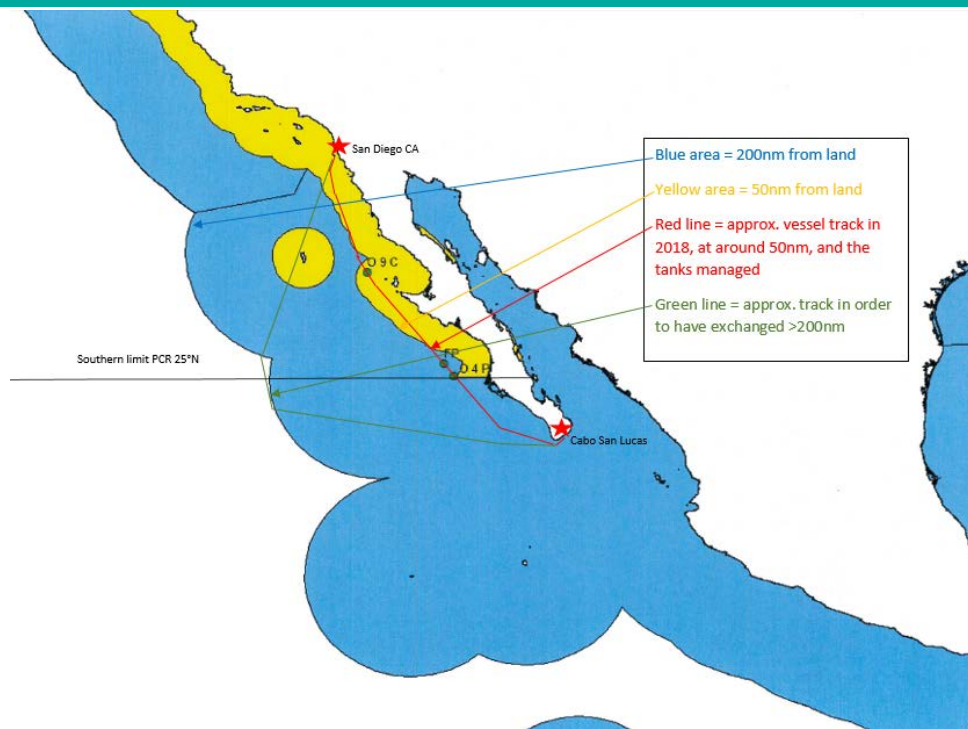
What happened

- A vessel departed the port of Cabo San Lucas (Mexico) to San Diego California. The vessel carried ballast water onboard that had to be discharged in San Diego.
- The California regulations require for vessels (which do not have a ballast treatment system) if coming from outside a specific predefined area called Pacific Coast Region (Cabo San Lucas lies outside this region) to carry out a mandatory ballast exchange at more than 200nm from land and in minimum depth of 2000m (see Map 1). This is also incorporated in the VMS by Bulletin 9 on local ballast water regulations.



Map 1 – California ballast exchange requirements:

- After departure from Cabo San Lucas the ballast water was however exchanged by the empty-refill method onboard at distances around 50nm from land instead of 200nm as per the California regulations (see Map 2 on next page).
- The ship reported then its ballast water management actions to California as required.
- About a year later the vessel received a Notice of Violation for a fine of 60'000\$ claiming improper management of ballast water as the ballast was exchanged at 50nm instead of 200nm.



Map 2 – Vessel's route and exchange (red) and how it should have been performed (green)

Causes and contributory factors

- The improper ballast management was due to wrong interpretation of the applicable state regulations
- Since then the vessel had been installed with a USCG Ballast Water Treatment System and onboard staff re-familiarized with the California ballast requirements.

Corrective actions

Vessels:

- 1) Thoroughly analyze and verify local regulations in due time as part of the voyage planning
- 2) Reiterate the VMS requirements including supporting Bulletins and procedures- [Fleet Ops](#) > [4.0 Marine Operations](#) > [4.1 Navigational Operations](#) > 4.1.9 Itinerary and Port Risk Assessment

The Company:

- 1) Circulate a Case Study fleetwide
- 2) Re-issue Bulletin 9 on local ballast water regulations
- 3) During planning of itineraries verify feasibility and local requirements



Completed

