



Safe Access to Bunkering Vessels

Spill Prevention, Preparedness, and Response



Why safe access matters

- **In-person pre-transfer conference:** Safe access is needed so the receiving vessel's person in charge and the delivering vessel's or facility's person in charge can hold an in-person pre-transfer conference as required by WAC 317-40-070.
- **Barge access:** Safe access is needed to give crew members and 3rd parties access to the barge to perform their duties and to allow Ecology access to verify compliance with regulations through announced and unannounced inspections.
- **Emergency response:** Safe access provides an essential egress route in an emergency.
- **Spill prevention best practice:** Without safe access and the in-person pre-transfer conference, PICs are not able to verify that the deliverer and receiver have a shared understanding of the transfer plan.

Safe access requirements

Both deliverers and receivers have a responsibility to ensure SOLAS approved safe access is rigged and ready prior to the start of the transfer.

- **Receiving vessel requirements:** Receiving vessel must have an accommodation ladder between the vessel and facility or to another vessel. If the vessel's master determines the accommodation ladder is inaccessible from the delivering vessel, another means of access that meets SOLAS standards must be provided (WAC 317-40-050).
- **Deliverer requirements:** Delivering vessel personnel may not begin bunkering unless access is provided to and from the receiving vessel (WAC 317-40-080).

Exceptions to safe access requirement

- **Weather:** If the vessel master determines access is not safe due to weather or sea state, the master may allow communication either visually, by voice, sound-powered phones, radio, or air horn as required under 33 CFR. Sec. 155.785.
- **Configuration of receiving vessel:** If a vessel master determines that SOLAS approved safe access cannot be rigged due to the receiving vessel hull, superstructure, or fixed equipment, then communication can be done by radio or by the methods outlined in WAC 317-40-050 (8).

Safe access compliance tips

- **Always start with the accommodation ladder as the first choice for safe access.** Accommodation ladders should be the first choice for safe access. SOLAS approved pilot ladders are allowable when the master determines the accommodation ladder is inaccessible. Aluminum ladders are not allowable for safe access between vessels.
- **Establish safe access before the transfer begins.** It is critical to make safe access arrangement before the start of the transfer. This is a WAC requirement; attempting to set up safe access during a transfer is distracting to both the deliverer and receiver.
- **Safe access should be rigged and ready, standing by for immediate deployment when needed.** Accommodation ladders can be raised off the deck of the barge to allow for barge movement provided they are rigged and ready to lower and use when needed.
- **Consider safe access during barge spotting.** Safe access should be a key consideration when spotting a barge. The location of the ship's bunker manifold and mooring line bitts must be considered to ensure access can be safely rigged.

Safe Access and In-Person Pre-Transfer Conference: Compliance Pathways

Safe Access and In-Person pre-transfer conferences are important elements of an oil transfer that are situationally dependent. The lists below are intended to provide examples of scenarios that are considered to be in compliance with these requirements.

Safe access – Compliance pathways:

- Accommodation ladder deployed.
- Accommodation ladder rigged and ready, standing by for immediate deployment when needed for the duration of the transfer.
- Pilot ladder deployed. (If the gap between vessels is greater than 1.5 ft a pilot ladder is not a viable option)
- Pilot ladder rigged and ready, standing by for immediate deployment when needed for the duration of the transfer. (If the gap between vessels is greater than 1.5 ft a pilot ladder is not a viable option)
- Receiving vessel master determined access not safe due to weather or sea state.
- Receiving vessel master determined access cannot be rigged due to the receiving vessel hull, superstructure, or fixed equipment.

In person pre-transfer conference – Compliance pathways:

- Pre-transfer conference is held in person onboard either vessel.
- Pre-transfer conference is held face to face from separate vessels when PICs can easily speak to each other (within ~5 feet from each other).
- Receiving vessel master determined access not safe due to weather or sea state so pre-transfer conference is held by voice or radio.
- Receiving vessel master determined access cannot be rigged due to the receiving vessel hull, superstructure, or fixed equipment so pre-transfer conference is held by voice or radio.

Safe Access and In-Person Pre-Transfer Conference: Frequently Asked Questions

What if I can see the other PIC directly in front of me and can easily talk to the PIC without going to the other vessel?

You can hold the pre-transfer conference face to face from separate vessels if you can easily speak to the other PIC (within ~5 feet from each other). Safe access still needs to be rigged and ready.

What should I do if a vessel asks to set up an accommodation ladder, but we can easily speak face to face from our separate vessels?

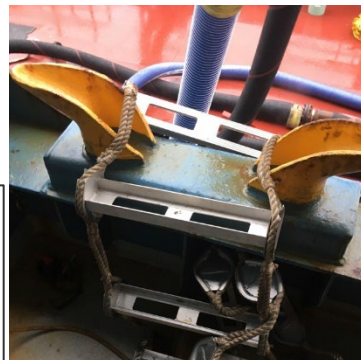
If the receiving vessel asks to set up an accommodation ladder, please do not decline it unless it is unsafe. You don't need to use that access if you can talk directly across decks, but it needs to be rigged and ready.

What if a pilot ladder isn't a viable option due to the size of the fenders or the gap between vessels?

An accommodation ladder (instead of a pilot ladder) should always be the first choice for safe access unless the receiving vessel master determines use of an accommodation ladder is unsafe due to weather or impossible due to vessel structure.

Safe and unsafe access examples

Vessel access must be strong, stable, clean, and well-lit to avoid accidents, which can result in serious injuries and loss of life.

Mode	Safe	Unsafe
Gangway/accommodation ladder	<ul style="list-style-type: none">• Tight rope guardrails.• Stable stanchions.• Secured to ship's side.• Handrails in place.	<ul style="list-style-type: none">• Loose or unstable handrails.• Accommodation ladder not secured to ship's side.
Pilot ladders See Pilot Ladder Poster.pdf (impahq.org)	<ul style="list-style-type: none">• Meets SOLAS Regulation 17 standards.• Steps equally spaced.• Appropriate spreaders.• Each step rests firmly against the ship.• 9-meter maximum height.• Safe, convenient, and unobstructed access to the ship's deck.	<div><p>Access is obstructed by fuel hoses and not secured properly.</p></div> <ul style="list-style-type: none">• Does not meet SOLAS standards.• Steps not equally spaced.• Spreaders lashed between steps.• Access obstructed.
All access modes	<ul style="list-style-type: none">• Free of ice, oil, paint, or grease.• Well lit.	<ul style="list-style-type: none">• Grease from wire rope on steps and/or handrails.• Lighting too far away or directed away from access.



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To request an ADA accommodation, contact Ecology by phone at 360-407-6831 or email at ecyadacoordinator@ecy.wa.gov, or visit <https://ecology.wa.gov/accessibility>. For Relay Service or TTY call 711 or 877-833-6341.