



Safe Access to Vessels

Spill Prevention, Preparedness, and Response



Why safe access matters

- **Safety:** Vessel access must be strong, stable, clean, and well-lit to avoid accidents, which can result in serious injuries and loss of life.
- **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 173-180-235 and WAC 317-40-070.
- **Emergency response:** Establishing safe access prior to a transfer ensures that it is available if needed in a spill or emergency.
- **Inspector access:** Ecology may verify compliance with regulations through announced and unannounced inspections. To conduct inspections, we need to be able to use the required safe access.

Safe access requirements

- **Bunkering operations (WAC 317-40-080):** Delivering vessel personnel may not begin bunkering unless access is provided to and from the receiving vessel.
- **Bunkering operations (WAC 317-40-050):** Receiving vessel must have an accommodation ladder between the vessel and facility or to another vessel.
- **Facility oil handling standards (WAC 173-180-225):** Class 1 and Class 3 facilities must provide safe access if the vessel cannot.
 - Access must be secured at both top and the bottom when in use.
 - The entire ladder and where it is accessed from the vessel and facility must be well lit during low light or low visibility conditions.


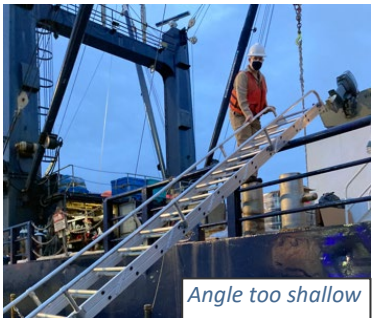

Exceptions to safe access requirement

- **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 C.F.R. Sec. 155.785.
- **Physical configuration of vessel:** If the gangway is inaccessible, another means of access that meets the International Convention for the Safety of Life at Sea (SOLAS), such as a Pilot's ladder, can be used. If safe access is not achievable in any form due to the physical configuration of the receiving vessel (split house), it meets the intent of the WAC to communicate by radio or by the methods outlined in WAC 317-40-050 (8).

Safe access best practices

- **Establish safe access well before the transfer begins:** It is critical to make safe access arrangement as early in the transfer setup as possible since setting up safe access during a transfer is distracting to both the deliverer and receiver.
- **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 the location of bitts for mooring lines must be considered to ensure access can be safely rigged.
- **Include safe access procedures in SMS and operation manuals:** Safe access use, care, and maintenance procedures require a high level of attention and should be incorporated into a vessel operator's Safety Management System (SMS) or a facility's operations manual or standard operating procedures.

Safe and unsafe access examples

Mode	Safe	Unsafe
All access modes	Free of ice, oil, paint, or grease.	Grease from wire rope on steps and/or handrails.
	Well lit.	Lighting too far away or directed away from access.
Ladders See F417-268-000 Ladder Safety Guide (wa.gov) WACs of interest: <ul style="list-style-type: none"> • WAC 296-876 and WAC 296-304-05003 ladders • WAC 296-56-60121 docks and dock facilities • WAC 296-304-05007 access to vessels • WAC 296-304-05009 access to drydocks 	Secured at the top and bottom.	Ladder leaning against vessel without upper lashings, increasing risk of ladder slipping or tipping while climbing.  <p><i>Not secured</i></p>
	Correct angle: base of the ladder is one foot away from the vessel for every four feet of height.	Ladder angle too steep, increasing risk of falls, or too shallow, reducing capacity and requiring walking across rungs without handrails.  <p><i>Angle too shallow</i></p>
	Ladder extends three feet above landing.	Does not extend three feet above the landing.
Pilot ladders See Pilot Ladder Poster.pdf (impahq.org)	Meets IMO safety standard. Steps equally spaced, appropriate spreaders, etc.	Does not meet IMO standards. Steps not equally spaced, spreaders lashed between steps, access impeded.  <p><i>Access impeded by fuel hoses</i></p>
Gangway/accommodation ladder See WAC 296-304-05007 access to vessels	Tight rope guardrails, stable stanchions. Accommodation ladder secured to ship's side.	Loose or unstable handrails. Accommodation ladder not secured to ship's side.



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