



MARINE ENVIRONMENT PROTECTION COMMITTEE 60th session Agenda item 3 MEPC 60/3/4 15 January 2010 Original: ENGLISH

RECYCLING OF SHIPS

Relationship between Ship Recycling Facility Plan and Ship Recycling Plan

Submitted by Japan

SUMMARY

Executive summary: This document explains the relationship between the Ship Recycling

Facility Plan and the Ship Recycling Plan

Strategic direction: 7.1

High-level action: 7.1.2

Planned output: 7.1.2.2

Action to be taken: Paragraph 7

Related documents: MEPC 60/3 and MEPC 60/INF.5

Introduction

- Japan, as the coordinator of the correspondence group (CG), submitted the report of the group on ship recycling guidelines to the sixtieth session of the Marine Environment Protection Committee (MEPC 60). One of the focuses of the group's discussion was the relationship between the Ship Recycling Facility Plan (SRFP) and the Ship Recycling Plan (SRP).
- In this document Japan would like to clarify the relationship between these plans in order to facilitate the discussion in MEPC 60.
- 3 The SRFP is a facility-specific plan for a Ship Recycling Facility to demonstrate its compliance with the requirements of "the Hong Kong International Convention for Safe and Environmentally Sound Recycling of Ship, 2009" (hereafter "the Convention"). The SRFP is, therefore, developed only once when the Ship Recycling Facility applies for an authorization from the Competent Authority.

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- Regulation 9 of the Convention stipulates that: "a ship-specific Ship Recycling Plan shall be developed by the Ship Recycling Facility(ies) prior to any recycling of a ship, taking into account the guidelines developed by the Organization"; that it: "shall be developed taking into account information provided by the shipowner"; and that it: "shall include information concerning, *inter alia*, the establishment, maintenance, and monitoring of Safe-for-entry and Safe-for-hot work conditions and how the type and amount of materials including those identified in the Inventory of Hazardous Materials will be managed". It is thus clear that the SRP is a ship-specific document, which a Ship Recycling Facility develops each time "prior to any recycling of a ship" (although "copy and paste" are not excluded). Its documentation requirements (i.e. what should be written in SRP) are still open questions, as the guidelines for the development of the Ship Recycling Plan (hereafter "the SRP guidelines") referred to in regulation 9 of the Convention have not yet been discussed.
- It is true that regulation 10 of the Convention limits the scope of the survey on SRP, conducted by the Administration or its recognized organization, to those matters related to the Inventory of Hazardous Materials and to information concerning safe-for-entry and safe-for-hot work conditions. Japan is of the view that such survey requirements do not mean that the SRP should be a piecemeal and fragmented document only on the handling of Hazardous Materials and gas-freeing. We should consider the fundamental meaning of requiring the Ship Recycling Facility to develop a SRP each time prior to any recycling of a ship. It would be beneficial for the Ship Recycling Facility to consider an appropriate process of recycling for that particular ship with full attention to the safety and environment protection, duly taking into account the ship-specific information provided by the shipowner, and then to document the procedure for its own internal management purpose. Japan believes that such process of development and documentation of SRP, with information sharing process inside the Ship Recycling Facility, is essential for the safety and environment protection, and that this is the core of the Convention.
- We should consider the above-mentioned fundamental objective of developing the SRP, which is a continuous management process. The annex to this document further clarifies the relationship between the SRFP and the SRP.

Action requested of the Committee

7 The Committee is invited to take into account the information contained in this document and to take action as appropriate.

ANNEX

RELATIONSHIP BETWEEN THE SHIP RECYCLING FACILITY PLAN AND THE SHIP RECYCLING PLAN

SHIP RECYCLING FACILITY PLAN SHIP RECYCLING PLAN (SRP) (SRFP) **OBJECTIVES OBJECTIVES** SRFP should contain and cover the necessary SRP should provide methods, and operational procedures information for a Ship Recycling Facility (SRF) to chronological sequence, including descriptions demonstrate its compliance with the requirements of whether and to what extent work will be carried out prior the Convention, and be the premise to obtain a to, at, and after the ship arrives at the Ship Recycling Document of Authorization to conduct Ship Recycling Facility (SRF). (DASR). **FRAMEWORK FRAMEWORK** • SRFP would be comprehensive and facility -specific • Based on the SRFP, SRP would be procedural by time-series and ship-specific document • SRFP, while comprehensive, should describe the • SRP should include a detailed recycling method, general approach and methodology. which could vary much depending on the ship, and be a self-contained, self-explanatory document. SHIP RECYCLING FACILITY SHIP RECYCLING PLAN (SRP) PLAN (SRFP) FOR EACH SHIP FOR FACILITY/DASR STEP-1 PRE-ARRIVAL MANAGEMENT INTRODUCTION AND MANAGEMENT PRE-CLEANING OF HMs/OILs APPROACH **Company Information** Workforce and Training Program Personnel and Subcontractor Management STEP-2 Records Management Past Performance ARRIVAL/ACCEPTANCE CHECK BERTHING/MOORING 2. OPERATIONAL APPROACH Facility Information STEP-3 Vessel Pre-Arrival Management REQUIRED PRECAUTIONS Vessel Arrival Management SPECIFIC SAFETY TRAININGS Ship Recycling Methodology STEP-4 WORKER **SAFETY** AND **HEALTH** WORKS **BEFORE** PREPARATORY **COMPLIANCE APPROACH** CUTTING Regulatory Framework and Compliance Procedures FINAL CLEANING OF TANKS Prevention of Accidents HMs REMOVAL Safe for Entry Procedures Example 3 Safe For Hot Work Procedures Operations and Processes Emergency Preparedness and Response Plan STEP-5 Fire Prevention and Response **CUTTING** WORK PLAN (CUTTING PLAN) WORKFORCE & EOUIPMENT PLAN **ENVIRONMENTAL COMPLIANCE APPROACH** Regulatory Framework and Compliance Procedures Hazardous Materials Management Example 2 Spill Prevention, Control, and Countermeasures Storm water Pollution Prevention STEP-6 **HMs STORAGE**

We take up some patterns in both SRFP and SRP to illustrate the relationship between them, and they are shown below.

EXAMPLE-1

SHIP RECYCLING FACILITY PLAN SHIP RECYCLING PLAN (SRP) (SRFP) 2. OPERATIONAL APPROACH STEP-2 **Facility Information** ARRIVAL/ACCEPTANCE CHECK Vessel Pre-Arrival Management BERTHING/MOORING Vessel Arrival Management - Mooring Arrangement (Ship Specific) **Mooring arrangement** SRP should include: (Comprehensive/ Facility Specific) - Mooring calculation upon severe •Ship shall be securely moored to the conditions taking the shape of each ship xxxxx berth with the xx mm wire ropes into consideration. and/or chains. •Required safe mooring forth shall be checked before arrival of the ship. •Ships condition shall be controlled steadily safe by ballasting in accordance with the hull cutting plan and the mooring arrangement shall be adjusted STERN BOW Transverse accordingly. θ angle of wind/current PCC: Loa x B x D Wind pressure = Max xxxx tonsMax tensile strength of wire rope = xxxx tons Calculation Result Operational procedures Max. External force for each ship (DETAIL) Line No. Detailed mooring arrangement plan to secure the ship from such severe conditions including required reinforcement for both ship and shore. xxxx mm dia wire ropes Spring lines: No.1 ~4 Bow lines: No.8 -9 Stern lines: No. 10~12 Landing plan with the mooring arrangement taking the necessary ballast adjustment into consideration.

EXAMPLE-2

SHIP RECYCLING FACILITY PLAN SHIP RECYCLING PLAN (SRP) (SRFP) STEP-2 **ENVIRONMENTAL COMPLIANCE** 4. **APPROACH** ARRIVAL/ACCEPTANCE CHECK Regulatory Framework and Compliance Procedures Hazardous Materials Management SRP should describe ship specific procedure Detailed procedures of Identification of HMs SRFP should describe: Management process of the HMs including additional sampling method How to identify the HMs onboard the ship In case that the Facilities finds the Inventory of Hazardous Materials in question and/or the Inventory of Hazardous Materials does not clearly identify the location and volume of Based on the IHM, SRF shall check and identify whether Asbestos and/or ACMs are utilized at; Engine room steam piping lines • Hazardous Materials, sampling analysis and/or Engine room HFO supply lines visual inspection should be carried out. the following points/materials Since suspicious as ACMs taking the building years of the ship into account, visual check shall be carried out, followed by the additional sampling as necessary. IHM Table A Asbestos Operational procedures No. for each ship (DETAIL) Part I No. 1~176 gaskets No. xxxx Steam Pipe Insulation No. xxxx Under deck Fire Insulations Visual check of the HMs shall be carried out by Mr. xxxx on th day bbbb. Sampling of Asbestos shall be carried out in accordance with the Section xxx of SRFP. STEP-4 PREPARATORY WORKS BEFORE CUTTING FINAL CLEANING OF TANKS **HMs REMOVAL** Method of marking, labelling, etc. Detailed removing process of HMs corresponding IHM with identified type, quality and place of HMs How to safely remove the identified HMs How to storage the removed HMs with drawings How to transport, trace the fate of HMs 1. How to Remove the Asbestos No. 1~176 gaskets Part Operational procedures Fr.No. 42 to 56 along engine side shall be for each ship (DETAIL) sealed with the plastic sheets. Cold cut of piping with scrapers is applied for these gaskets Removed gaskets shall be stuff into the xxxx plastic bag. No. xxxx Under deck Fire Insulations Fr. No. 55 to 65 under Up. Dk shall be sealed with the plastic sheet. Exhaust mechanical fan with HEPA filter shall be set on the Up. Dk Air leak test shall be carried out before removing the Fire insulation board. Wet agent shall be sprayed on the area

EXAMPLE-3	
SHIP RECYCLING FACILITY PLAN (SRFP)	SHIP RECYCLING PLAN (SRP)
SHIP RECYCLING FACILITY PLAN	STEP-3 REQUIRED PRECAUTIONS SPECIFIC SAFETY TRAININGS Safe for Entry Procedures For O2 - The following spaces shall be required the Oxygen inspection upon arrival Name of Space/Tank Location No.1 Prov. Ref chamber Up Dk P Fr. 44 - 56 No. 1~6 Cargo Hold Fr.58 - 180 No. 1 P FO Tank Fr. 110 - 140 - The spaces above mentioned shall be secure that the O2 contents not less than 18% Should the O2 level is below 18% the following ventilation measure shall be applied Name of Space/Tank Ventilation No.1 Prov. Ref chamber Mech Ventilation 2.7 kw Fan No. 1~6 Cargo Hold Open Hatch Cover
	Man holes for 6 hrs No. 1 P FO Tank Open Man holes with Mech Ventilation (Expl. Proof type) 7kw x 2 sets In order to ensure safety, competent person (Mr.xxx) should make a preliminary assessment of the following spaces to be entered, taking into account previous cargo carried, ventilation of the space, coating of the space and other relevant factors. Name of Space/Tank No. 1~6 Cargo Hold Fr.58 - 180 Slop Tank P&S Fr.48 - 58 No. 1 P FO Tank Fr. 110 - 140 HFO Service Tank Eng. Room Mid Deck Fr. 44 - 48 Oil residue shall be checked and record with the IHM. After the preliminary assessment of these spaces, gas contents shall be carried out