



# Limited Shore – Vessel Access Guidelines

**Description**

This document explains Dow procedures and policies for processing vessels at Dow Marine Facilities during a pandemic crisis.

This guidance document is used when the Dow pandemic level is 3 or above. These levels are determined with the WHO and other global and local considerations.

Dow regional and corporate Crisis Management Teams (CMT) monitor pandemic situations closely. These teams will communicate updates (crisis levels, affected countries, etc.) and further instructions as the situation develops.

While the guidance below is useful across a range of pandemic situations, this document has been specifically modified to address the most pressing threat at this time: Coronavirus.

In the event of a pandemic, Port State Control and/or other government entities may implement their own policies and procedures. Provided that Port State Control practices and Dow practices overlap, the more stringent standard should be followed. See the section specifically related to Port State Control below.

**Step Input**

All of the above criteria for using this policy are satisfied.

**Step Output**

Vessel processing with minimum shore-crew exposure.

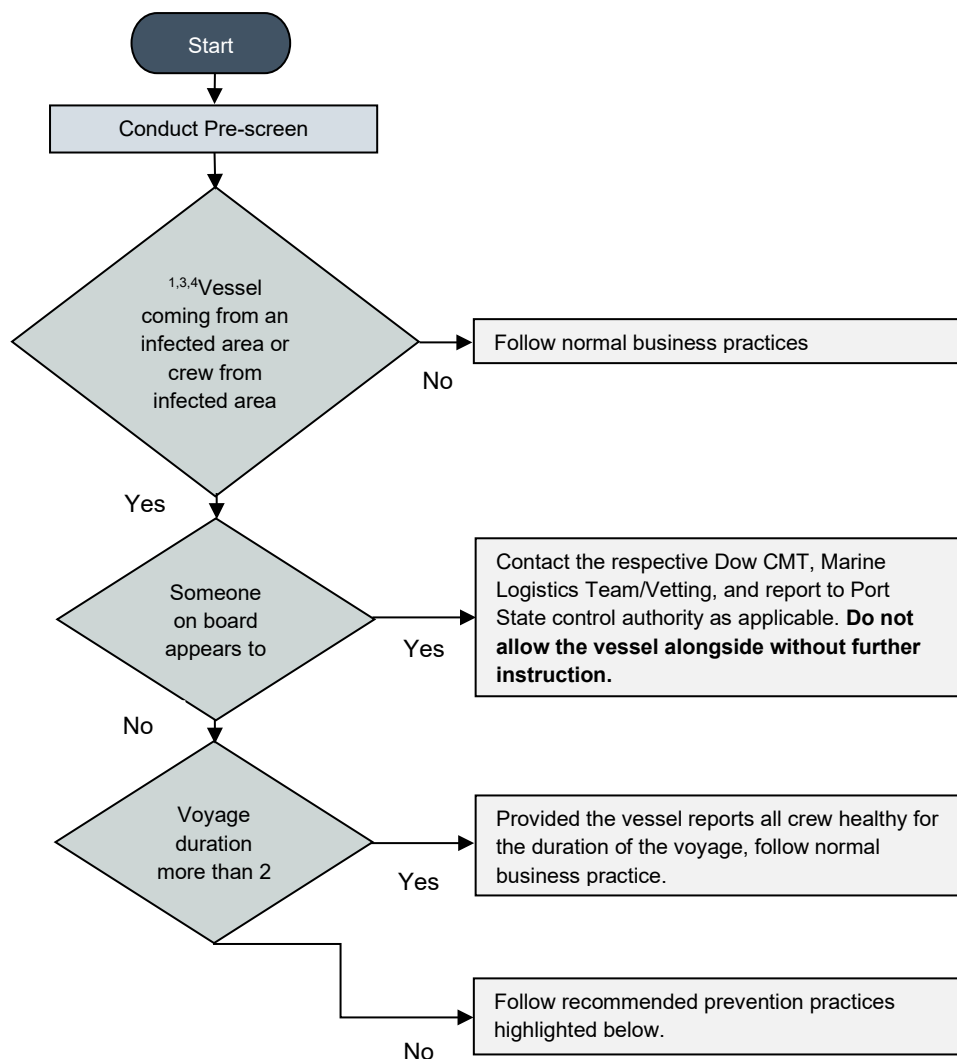
**Key Responsibility**

Role	Responsibilities
Regulatory/Government Affairs	Keep abreast of Port State Control/government policies and provide support to local sites and functions.
Terminal Managers	Keep abreast of Port State Control/government policies. Implement the more stringent policies at their respective terminal (Dow vs. Port State Control). Provide appropriate resources for facility personnel interfacing with vessels (i.e. equipment/supplies needed for decontamination of paperwork and equipment, appropriate training, etc.). Escalate suspect conditions to the CMT and Dow Logistics.
Marine Planners	Keep terminals abreast of incoming vessel status.
Vetting/Risk Assessment	Document vessel issues that occur at terminals so they can be communicated widely.
Crisis Management Teams	Provide crisis updates and guidance

Marine Operations	<p>Screen incoming vessels to ensure they are not coming from infected areas nor have infected crew onboard. Communicate any suspect conditions to the Site Leadership, Health Services, and Dow Vetting. Report the issue to the applicable Port State Control Authority as applicable.</p> <p>Sites are responsible for controlling access to their docks/jetties including what vessels are allowed to berth and which personnel are allowed to board/leave the vessel (exception may be for government officials whereby access is mandated by law).</p>
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## Pre-Screening

Sites are required to pre-screen vessels prior to arrival based on the three criteria below.



<sup>1</sup> Infected area designated by the Dow CMT. See [FAQ](#).

<sup>2</sup> Since leaving the infected area

<sup>3</sup> This statement is inclusive of any crew that may be joining the vessel from a Dow site.

<sup>4</sup> When a vessel arrives at a port to which health regulations apply, the master may be required to make a report about the health conditions on board his vessel and also about any circumstances on board which are likely to cause the spread of infectious disease. The IMO [Maritime Declaration of Health](#) is often used in these situations, and the form may be a helpful document for sites to request/use in their screening processes.

## General

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Where indicated by pre-screening activities, the following guidelines should be strictly observed.

- Terminals will assist with mooring activities. If and when Dow personnel are required to board a vessel appropriate PPE and practices should be utilized to minimize potential exposure.
  - Based on the best info at this time from Dow Health Service the following represents the minimum PPE and decontamination methods:
    - Surgical gloves (preferably double gloved and/or worn under work/chemical gloves).
    - N95 Mask (requires fit testing for employees engaged in the product transfer and communication activities with vessel crew. Please contact your local Health Services Department to schedule fit test).
    - Lysol or equivalent disinfectant. For paperwork, use of a plastic envelope with customized cutouts to facilitate paperwork completion may limit the amount of exposed paperwork and would be easier to disinfect the plastic envelope than paper.
- Dow should request that the vessel also use PPE whenever vessel and shore are involved in unavoidable face to face interactions. The vessel has the authority to refuse such a request. While the transfer may continue without the crew wearing PPE, a letter of protest should be issued and Dow Vetting contacted ([.DL GLOBAL VESSEL APPROVAL](#)).
- Agents, crew and other personnel traffic to and from vessels should be limited as much as possible via the use of launches and utilizing prior/later berths. In such situations where personnel traffic crossing the dock/jetty is unavoidable and the respective personnel do not appear to have the appropriate PPE, Dow should either provide the appropriate PPE or restrict access. Below bullet point is the exception to this statement. Note: Providing shore access to mariners is a legal requirement in some countries. Other regulatory requirements may also apply before crew can be disembarked including, but not limited to applicable clearances by customs or other relevant agencies.
- Government agencies such as Customs, Port State Control, etc. always maintain the right to enter the facility/board a vessel.

The suggested Personal Protective Equipment and decontamination techniques to use after being in close proximity to others mentioned above come from the WHO and Dow Health Services. Personal protection methods useful in preventing further spread of a pandemic may evolve as the pandemic evolves.

Useful links to the US Center for Disease Control and World Health Organization.

[https://www.cdc.gov/coronavirus/2019-ncov/index.html?CDC\\_AA\\_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2Fnovel-coronavirus-2019.html](https://www.cdc.gov/coronavirus/2019-ncov/index.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2Fnovel-coronavirus-2019.html)

<https://www.who.int/health-topics/coronavirus>

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**Tank Inspections**

As many tanks as possible should be inspected prior to arrival at the Dow/3PL terminal.

Where surveyors need to board vessels for tank inspections/gauging activities, face-to-face interactions should be minimized via radio/phone communications. While vessel crew will likely be present, personnel separation of 6 feet (2 meters) should be maintained. Additionally, decontamination protocols for paperwork should be established.

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**Pre-Transfer**

When possible and within the guidance of Port State Control, pre-transfer conferences should utilize common shore- terminal communication systems and/or electronic means rather than face-to-face interaction.

Paperwork should be exchanged by fax or email where at all possible. If neither is possible, the paperwork is allowed to be moved back and forth via crane.

Voice communication should be through phones, dock radios, mobile phones, etc. Shore radios are allowed to be moved back and forth via crane.

All paperwork, radios, etc. should be handled, quarantined, and de-contaminated via Port State Control and World Health Organization Personal Protective Equipment recommendations and methods.

In cases, where face to face interaction is required, social distancing (6 feet / 2 meters) and PPE should be used as described above.

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**Manifold Connections**

Dow should request that all vessel manifold connections are to be made via ship personnel. If the vessel declines, Dow personnel should utilize Lysol (or equivalent) disinfectant to sanitize the respective manifold areas. While vessel crew will likely be present, personnel separation of 6 feet (2 meters) should be maintained.

After disconnection, terminal load arm and cargo hose connections should be handled, and de-contaminated via Port State Control and World Health Organization Personal Protective Equipment recommendations and methods.

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**Emergencies**

Any emergencies involving safety and security will be handled on a case by case basis with consideration of:

- Urgency
- Port State Control/Government policies in place
- Terminal Leadership
- Regard for the policies establish above
- Severity

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**Post Transfer Reporting**

Communication via email should be reported to the Dow Vetting/Risk Assessment group via the distribution list below.

[.DL GLOBAL VESSEL APPROVAL](#)

This group will document the infected vessels so that their status can be tracked via the Vetting Database.

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## Port State Control

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Port State Control (PSC) is a generic term used to refer to the respective government agencies around the world that enforce maritime regulations. For Example, in the United States, the Port State Control authority is the United States Coast Guard.

In all cases, specific site procedures have to be in compliance with regulations and acceptable to appropriate authorities. For example, if the United States Coast Guard (USCG) doesn't allow the Declaration of Inspection (DOI) to be completed over the phone/radio or via the crane. Rather, it is a requirement that this paperwork be completed in person utilizing the proper personal protective equipment (PPE) and interaction procedures (See General section below). Note: Declaration of Inspection is a US Coast Guard paperwork requirement It performs a function similar to the internationally recognized Ship-Shore Safety Check List.

Port State Control may also have specific pandemic instructions. For example:

- U.S. regulations in Title 42 Code of Federal Regulations (CFR), Subpart 71.21, require the master of a ship destined for a U.S. port to immediately report the onboard occurrence of any ill person among passengers or crew to the quarantine station with jurisdiction over the port at which the ship will arrive.
  - The Quarantine Station with jurisdiction over the western US Gulf and the Galveston Lightering Zone is located in Houston, Texas and can be contacted at (281) 230-3874.
  - Any ill person(s) should be isolated in a private cabin until they are evaluated by a doctor to prevent transmission to others. Contact with other crew should be minimized. If masks are available, the ill person(s) should wear a mask while not in isolation to prevent further spread. Any person(s) on board a vessel which has ANY of the above listed 2019-nCoV symptoms or any other reportable illness are deemed by the Captain of the Port to potentially affect the safety of the vessel and/or the port and meets the definition and reporting requirements for a Hazardous Condition noted in 33 CFR 160.216.
  - Vessel operators are also encouraged to contact their Flag State. Failure to report the above information immediately to the U.S. Coast Guard while a vessel is bound for or operating in the Captain of the Port area of responsibility may subject the vessel to civil penalty of up to \$94,219
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## Revision History

The following information documents at least the last 3 changes to this document, with all the changes listed for the last 6 months.

Date	Revised By	Changes
July 17, 2006	Lance Nunez	Created
April 29, 2009	Lance Nunez	Removed Acronyms, added definitions of Declaration of Inspection and Port State Control, modified the applicable pandemic levels from "5, 6, or 7" to "4, 5, or 6" per leadership direction, removed the "Draft" water mark.
May 6, 2009	Lance Nunez	Clarified the criteria for using this policy (Description and Step Input sections); Added that Marine Operations are allowed to restrict shore access except in cases where it is required by law (Key Responsibilities section); Added clarification as to who would need to wear/be fit tested, vessel PPE expectations, and handling dock/jetty traffic (General section); Added suggestions for conducting face to face interactions such as social distancing and/or conducting the meeting outside (Pre-Transfer Section)
1/28/2020	Lance Nunez	New Guidance Document Updated to reflect the latest coronavirus threat.
2/5/2020	Lance Nunez	Added the link to the FAQ on the Microsoft Team site. Added the need to check for if someone from China joined the vessel within the last 14 days to the pre-screening criteria.
3/27/2020	Lance Nunez	Added reference to the IMO Maritime Health Declaration form and updated the social distance recommendations to match WHO/CDC (2 meters rather than 1 meter).