



INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

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20 October 2003

Docket Management Facility
(USCG-2003-14273)
U.S. Department of Transportation, Room PL-401
400 Seventh Street SW.
Washington, DC 20590-0001

Re: Mandatory Ballast Water Management Program for U.S. Waters

To Whom It May Concern:

The International Association of Drilling Contractors is a trade association representing the interests of drilling contractors, onshore and offshore, operating worldwide. Our membership includes all the drilling contractors operating mobile offshore drilling units (MODUs) in the areas under the jurisdiction of the United States and all MODUs registered in the United States.

In response to the Notice of Proposed Rulemaking (USCG-2003-14273) which appeared in the 30 July 2003 *Federal Register*, we offer the following comments and recommended changes:

(Note: Recommended additions are shown in **bold**, and deletions in ~~bold red strikethrough~~.)

1. Regarding § 151.2035 (a)(7):

(7) Maintain a ballast water management plan that has been developed specifically for the vessel that will ~~allow any ship's officer~~ **those responsible for its implementation** to understand **their duties in relation to the plan** and follow the vessels ballast water management strategy.

***Reason for change:** To provide greater consistency with the language of regulation B-5 of the proposed Ballast Water Management Convention. Further, in recognition that persons other than a "ship's officer" may be required to implement the plan on certain ships subject to these regulations, e.g. a ballast control operator on a Mobile Offshore Drilling Unit.*

2. Regarding § 151.2035 (b)(4):

(4) Discharge ballast water to ~~an approved~~ **a reception facility accepted by the Coast Guard for the receipt and treatment of ballast water.**

***Reason for change:** The Coast Guard has not established criteria for the “approval” of ballast water reception facilities, nor does it indicate that it plans to do so. Will authority for regulating such facilities rest with the Coast Guard or the Environmental Protection Agency?*

If you have any questions regarding these recommendations or comments, please contact me by phone at: (713) 292-1945, ext. 207.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Spackman". The signature is fluid and cursive, with the first name "Alan" being more prominent than the last name "Spackman".

Alan Spackman
Director, Offshore Technical
and Regulatory Affairs