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Deputy Commissioner
of Maritime Affairs

THE REPUBLIC OF LIBERIA

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National Transportation Safety Board
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Ref: NTSB Accident #DCA15MM017, collision between bulk carrier Conti Peridot and the chemical tanker Carla Maersk, on March 9, 2015, in the Houston Ship Channel, Texas

Sub: Party Submission Liberian International Ship and Corporate Registry

Dear Mr. Eric Stolzenberg & Mr. Rob Jones,

This Administration is providing the following Party Submission which includes; conclusions, recommendations and probable cause in accordance with Safety Board rule and 49CFR 845.27. We thank the National Transportation Safety Board for the opportunity to provide these recommendations in an effort to improve the safety of marine transportation and to prevent similar events from occurring in the future. If you have any questions regarding our submission, please contact investigations@liscr.com.

Summary of Findings:

On March 9, 2015, at about 0930 (LT) the Pilot boarded CONTI PERIDOT at the Galveston Anchorage. At this time, the visibility was good but some fog was forecasted. There was also patchy rain around the Houston Ship Channel area. CONTI PERIDOT was proceeding inbound, from Galveston Anchorage, to City Dock 25, where she was to discharge steel pipes.

The CARLA MAERSK was out bound to sea laden with Methyl Tertiary Butyl Ether (MTBE), a volatile chemical.

Around 1130 (LT) fog set in and the pilots closed the bar. After the fog set in, the CONTI PERIDOT passed three outbound vessels and it became difficult to control the vessel's heading as the ship was going from bank to bank within the channel. Just prior to the collision the CONTI PERIDOT passed the outbound vessel CAILA LEADER. The CONTI PERIDOT swung towards the east bank and then back to west bank and then back towards the east bank. The pilot then went back towards the channel center line.

At approximately 1231 hours (LT), a collision occurred between Liberian flagged bulk carrier CONTI PERIDOT and chemical/products tanker CARLA MAERSK. The collision occurred in the Houston Ship Channel between buoys # 89 and # 90. The approximate position of the collision was 29.40.35 N 094-58.74 W.

There was a considerable release of MTBE. Due to the presence of these vapors in the local community, a 'shelter in place' order was put into effect in the surrounding areas. No personnel were injured on either vessel, but as the CONTI PERIDOT was downwind of the CARLA MAERSK, some of the crew were exposed to MTBE vapor. The CONTI PERIDOT incurred heavy damage to the stem bar and bulbous bow, as well as lost ground tackle. The CARLA MAERSK received considerable damage to her portside, which necessitated a cargo transfer to ensure that the vessel had positive stability.

In the days preceding the event, the Houston Ship Channel had been shut down on occasion due to foggy weather conditions and reduced visibility. The collision between CONTI PERIDOT and CARLA MAERSK was the second collision to occur within seven days. The other collision had occurred in reduced visibility as well. CONTI PERIDOT had been at anchor for a few days, awaiting a berth and in the recent days there had been several long periods of fog.

According to the pilots statements, at no time had there been any communication regarding the fact that CONTI PERIDOT was handling badly. The CARLA MAERSK had altered her course to starboard to try and avoid a collision but CONTI PERIDOT struck CARLA MAERSK on the portside, just forward of midship.

Probable Cause(s)

There was no technical or mechanical breakdown which contributed to this collision. It is probable that human error, on behalf of different parties, contributed to this incident.

The Master onboard CONTI PERIDOT - During the transit, when the visibility was reduced and it was obvious that the pilot was having difficulties controlling the heading of the vessel; the Master did not address these concerns with the Pilot. However, the Master should have communicated with the Pilot and Vessel Traffic Services (VTS) regarding his concerns as he is ultimately responsible for the safety of the vessel.

Pilot onboard CONTI PERIDOT - The pilot was having problems maintaining a constant heading and the Portable Pilot Unit (PPU) illustrates that the CONTI PERIDOT previously had trouble maintaining a steady course as she passed the three outbound vessels. The Pilot stated that at no time did he communicate the difficulties in steering to any other vessel or the VTS.

Vessel Traffic Services - The VTS, who are monitoring the traffic movement in the Houston Ship Channel, would or should have seen the steering problem that the CONTI PERIDOT was having. They could have then advised the CONTI PERIDOT and other outbound and inbound vessels regarding the difficulties of maintain a heading. It is likely that actions by the VTS would have given the Pilot on the CONTI PERIDOT time to have returned to a steady course.

Contributory Factor(s)

Before boarding the vessel, the Pilot reviewed an operations note regarding the undesirable steering characteristics of the CONTI PERIDOT when at even keel. This operations note was created due to a previous pilotage experience by a Houston Ship Channel Pilot. The previous Pilot had recommended that the vessel should be trimmed by the stern for better course keeping performance. The vessel was at an even keel when she commenced her voyage under pilotage. If the vessel had been trimmed by the stern, CONTI PERIDOT may have had better course keeping characteristics.

The local weather at the time of the incident contributed to the collision. The Houston Ship Channel was previously closed due to foggy conditions. The CARLA MAERSK reported having fair visibility and

that CONTI PERIDOT was visible approximately 900 feet prior to the collision. The CONTI PERIDOT reported that they were in zero visibility at the time of the collision. Rule #19 (Inland Navigation) states that “Every vessel shall proceed at a safe speed adapted to the prevailing circumstances and conditions of restricted visibility”.

As noted in the above probable cause, Vessel Traffic Services (VTS) did not communicate with CONTI PERIDOT as the collision situation was developing. The purpose of VTS is “to improve the safety and efficiency of navigation, safety of life at sea and the protection of the marine environment, the adjacent shore area, worksites and offshore installations from possible adverse effects of maritime traffic”. VTS Houston-Galveston’s primary purpose “is to prevent groundings, allisions, and collisions by sharing information and implementing appropriate traffic management measures”. The absence of VTS communication was a contributing factor to the collision.

Conclusion(s)

The CONTI PERIDOT and CARLA MAERSK were operating in reduced visibility in the Houston Ship Channel. The failures by Pilot and crew aboard CONTI PERIDOT and the local Vessel Traffic Services to recognize and acknowledging the vessel’s poor course keeping capabilities prior to the incident, and to react proactively to address the issue is also a contributing factor to the collision.

Recommendation(s)

The navigational bridge team aboard CONTI PERIDOT should participate in additional training. This training should include, at a minimum; the International Regulations for Preventing Collisions at Sea (COLREGS), bridge resource management, ship handling and Master/Pilot exchange.

The Pilot Board and Association should consider similar training, as described for CONTI PERIDOT, be implemented for the involved Pilot. In addition, training on utilizing available resources such as notes from previous pilots and knowledge of the vessels’ crews could be of great benefit, for the involved Pilot and other Pilots serving the Houston Ship Channel.

As previously stated in our party submission regarding the SUMMER WIND, “Vessel Traffic Services Houston-Galveston should conduct a study of the more heavily trafficked crossing areas inside the Houston Ship Channel to determine the need for closer monitoring of those areas. Any areas that are found to require more attention should be included in revised training and operational procedures for VTS personnel”.

Sincerely,

A black rectangular redaction box covering the signature of Stephanie A. Condino.

Stephanie A. Condino
For the Deputy Commissioner of Maritime Affairs
Republic of Liberia