

Sector Jacksonville Towing Vessel Industry



Domestic Inspections Branch
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Introductions

Welcome and Opening Remarks:

- Mr. Robert Butts – Uninspected Vessel Branch Chief
- Captain Allan– U.S. Coast Guard Sector Jacksonville
- Captain Getchell – JMTX
- Sector JAX Domestic Marine Inspectors
- Towing Vessel Industry Stakeholders



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Overview: Subchapter M

- NPRM
- Applicability
- Subchapter M – Parts
- Compliance Options
- Towing Safety Management System
- Compliance Phase-In



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Subchapter M - NPRM

- <http://www.regulations.gov>
- USCG-2006-24412
- Latest Unified Agenda indicates August 2015 Final Rule



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Applicability

All Towing Vessels 26 ft and longer, and some towing vessels less than 26 ft when pushing, pulling, or hauling a barge that is carrying dangerous or hazardous material.



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SUBCHAPTER M PARTS

- Part 136 – CERTIFICATION
- Part 137 – VESSEL COMPLIANCE
- Part 138 – TOWING SAFETY MANAGEMENT SYSTEM (TSMS)
- Part 139 – THIRD-PARTY ORGANIZATIONS
- Part 140 – OPERATIONS
- Part 141 – LIFESAVING
- Part 142 – FIRE PROTECTION
- Part 143 – MACHINERY AND ELECTRICAL SYSTEMS & EQUIP.
- Part 144 – CONSTRUCTION AND ARRANGEMENT



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SUBCHAPTER M PARTS

- Proposes establishment of Safety Management System (TSMS)
- Coast Guard proposes to accept compliance with existing SMS such as the International Safety Management Code as an equivalent to the TSMS.
- Coast Guard proposes to permit classification societies recognized under 46 CFR Part 8 to conduct the audits and surveys required by Subchapter M without further approval.



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SUBCHAPTER M PARTS

- Coast Guard would provide direct oversight of the third-party organizations that conduct TSMS audits and surveys through approval and observation.
- Coast Guard proposes to rely on registered Professional Engineers (P.E.s) to verify compliance with construction and arrangement standards described in proposed part 144.



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COMPLIANCE OPTIONS

- Towing Safety Management System (TSMS)
 - Enhance safe operations of towing vessels
 - Minimize pollution risk
 - Ensure safety & prevent human injury
- USCG Inspection
 - Traditional regime for ensuring safe Operations and Compliance
 - Flexibility and possible cost savings



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Towing Safety Management System Program Requirements

- Written policy and procedures to provide for the safe operations of towing vessels and protection of the environment
- Defined level of authority and lines of communication between vessels and shore side personnel
- Emergency response procedures
- TSMS compliance verification procedures
- Contractor management procedures
- Internal auditing procedures
- External third party audit procedures
- Management review procedures
- Recommendation evaluation procedures.



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Vessels Compliance for TSMS Option & Third Party Organization Audits

- Prior to obtaining the initial Certificate of Inspection, owner or managing operator must provide a survey report that demonstrates that the vessel complies with the survey requirements of Subchapter M.
- Comply through annual internal surveys and periodic third party audit program.
- Scheduled Dry-Docking/Internal Structural Examinations (Interval based on area of operation).



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USCG Inspection Option

Traditional approach using USCG Marine Inspectors to ensure safe operations and compliance with regulations.

- More prescriptive approach
- Provides some flexibility
- Potential for cost saving when compared to Towing Safety Management System option



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Vessels Compliance for Coast Guard Option

- Scheduled Annual Inspections
- Scheduled Periodic Inspections
- Scheduled Dry-Docking/Internal Structural Examinations
(Interval based on area of operation)



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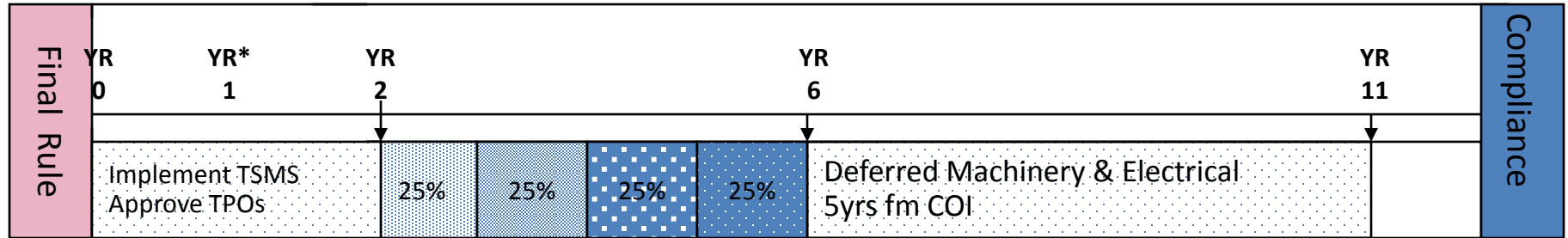
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Inspection of Towing Vessels

Compliance Phase-in for a Towing Company



- This chart shows the compliance timeline depicted in the proposed rule. The proposed rule phases-in the requirements to lessen the burden on the towing companies.



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Inspection of Towing Vessels

- After the final rule is issued, a company has two years to develop its TSMS if they utilize the TSMS option. The initial COI must be obtained within 4 years from the TSMS approval. Certain requirements for electrical and machinery systems, such as pilothouse alerter system and remote shutdown devices, were deferred until five years after the initial COI. Towing vessels moving oil or hazmat in bulk also have certain electrical and machinery requirements deferred until five years after the first COI.



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Inspection Policy & Procedures

Scheduling CG Inspection (LTJG Martinez)

- Scheduling of inspections should be made with at least 10 DAYS advance notice for Annual Inspections and Dry-Docks.
- We cannot guarantee any call outs or inspections quicker and without advance notice.
- For deficiency checks (CG-835s), please contact us prior to the due date to avoid any restrictions to operations.



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Inspection Policy & Procedures

- In order for us to provide you with the best service, scheduling of inspections should be done during office hours by calling 904-564-7650 (Direct line) and not through individual inspector's personal numbers.
- E-mail: jaxdomestic@uscg.mil
- For subsequent inspections for certification (i.e. 5 year COI), you must comply with 46 CFR 176.404 by submitting the application for inspection at least 30 days prior to the expiration date of the Certificate of Inspection.



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Application For Inspection

U.S. DEPARTMENT OF HOMELAND SECURITY U.S. COAST GUARD CG-3752 (Rev. 6-04)	APPLICATION FOR INSPECTION OF U.S. VESSEL	FORM APPROVED OMB NO: 1625-0002 Expiration Date: 04/30/2014
<p>An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number.</p> <p>The Coast Guard estimates that the average burden for this report is 15 mins. You may submit any comments concerning the accuracy of this burden estimate or any suggestion reducing the burden to: Commandant (G-MOC), U.S. Coast Guard, Washington, DC 20593-0001 or Office of Management and Budget, Paperwork Reduction Project (1625-0002), Washington, DC 20503.</p>		
TO: Officer in Charge, Marine Inspection Marine Inspection Zone _____ The undersigned applies to have the <input type="checkbox"/> Steam Vessel <input type="checkbox"/> Motor Vessel <input type="checkbox"/> Motorboat <input type="checkbox"/> Barge <input type="checkbox"/> Other (Indicate) _____	Address to reply to: TELEPHONE NUMBER: DATE:	
named _____ Official or Award No. _____ Inspected under the laws of the United States; to be employed as a <input type="checkbox"/> Passenger Vessel (No. of Passengers _____) <input type="checkbox"/> Cargo Vessel <input type="checkbox"/> Tank Vessel <input type="checkbox"/> MODU <input type="checkbox"/> Other (Indicate) _____ on the following route: (Waters, Geographical limits) _____ _____ Liquid cargo in bulk <input type="checkbox"/> will <input type="checkbox"/> will not be carried as follows: <input type="checkbox"/> Flammable or Combustible (Indicate grade) _____ <input type="checkbox"/> Chemicals (Indicate) _____ Length of vessel _____ ft. Hull material: <input type="checkbox"/> Steel <input type="checkbox"/> Other (Indicate) _____ Vessel will be at (Port, Pier, etc.) _____ The current Certificate of Inspection expires on _____ Inspection is desired on _____ Cargo Ship Safety Construction Certificate to be issued by <input type="checkbox"/> ABS <input type="checkbox"/> USCG. Vessel <input type="checkbox"/> is <input type="checkbox"/> is not to be classed.		



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Inspection Policy & Procedures

- As a reminder, always review your COI information to ensure annuals, dry-dock and expiration dates are not missed.
- The owner/operator is responsible to ensure the COD and user fees are up-to-date prior to the inspection dates in order to avoid inspection cancellation or not having the COI endorsed until you provide our office with receipts.
- Vessel Inspection User Fees can be completed by contacting the USCG Finance Center Customer Service Center at 1-800-941-3337 or <http://www.fincen.uscg.mil/vif.htm>



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Inspection Policy & Procedures

Conducting CG Inspection (LTJG Cintron)

- Certificate of Inspection (COI)
- Permit to Proceed
- CG 835 (Deficiencies)
- Revoking COI



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Certificate of Inspection

	United States of America	Certification Date:	09 Dec 2011
	Department of Homeland Security	Expiration Date:	09 Dec 2016
	United States Coast Guard	IMO Number:	
	<i>Certificate of Inspection</i>		
For ships on international voyages this certificate fulfills the requirements of SOLAS 74 as amended, regulation V/14, for a SAFE MANNING DOCUMENT.			

- Valid for 5 years
- Annual inspections may be 90 days before or after the anniversary date
- DE/ISE/COI Renewal dates are drop dead (exp. date)



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Drydock & Internal Structural Examination

---Hull Exams---

Exam Type	Next Exam	Last Exam	Prior Exam
Drydock	31May2015	31May2013	15Jun2011
Internal Structure	31May2015	31May2013	15Jun2011

Proposed regulations would require:

- Drydock *two time* in a 5 years period with not more than 36 months between drydock (saltwater >6 months in a 12 month period)
- Drydock *once* in a 5 year period (saltwater < 6 months in a 12 month period)



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Extensions

- OCMI may grant DE extensions for T-Boats
- Up to a maximum of 1 year
- IAW, MSM Volume II, Materiel Inspection, COMDTINST M16000.7B, section B3.A.4.b
- Commandant (CG-CVC) only grants DE extensions in the most unusual circumstances.



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Examples of Extensions

- Financial hardship alone is not a valid reason for granting a drydock extension.
- Sudden unavailability of drydock space (e.g., weather damage to facilities, or of the scheduled drydock facility going out of business)
- Circumstances clearly beyond the owner's control.



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Underwater Survey in Lieu of Drydocking “UWILD”

- Vessel must be <15 years old unless already in the program
- Steel or aluminum hull vessel only
- Fitted w/ effective hull protection
- Submit application at least 90 days prior
- IAW 46CFR176.615 & 46CFR115.615 Reference NVIC 1-89



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Permit To Proceed (PTP)

CG-948 (Rev. 06-04)

PERMIT TO PROCEED TO ANOTHER PORT FOR REPAIRS
U.S. DEPARTMENT OF HOMELAND SECURITY
UNITED STATES COAST GUARD

OMB Approved No. 1625-0057
FILE NO.

PORT _____

DATE _____

DISTRICT OF _____

The S.S. _____ of _____, in the State of
M.V. _____

O.N. _____, whereof

is Master, has been examined and inspected this date and I find that the said vessel is requiring repairs, to wit:

The said Master requesting that the said vessel be permitted to proceed to the port of _____ for the purpose of making the said repairs, I do hereby, after due consideration, regarding it as safe to do so, permit her to proceed to said port, touching at intermediate ports in her course, as if she had, in every particular, complied with the requirements of law.*

Officer in Charge, Marine Inspection

NOTE: Inspector must state upon the face of this permit the condition upon which it is granted, and whether the vessel is to be allowed to carry freight or passengers, the quantity and number.

* Provided, however, that no vessel whose certificate has expired will be permitted to carry passengers while en route to another port for repairs. In issuing this permit, Inspector shall notify the master, if proceeding into another district, that application must be made for inspection and certificate in the district where the repairs are made.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control number.

The Coast Guard estimates that the average burden for this report is 5 mins. You may submit any comments concerning the accuracy of this burden estimate or any suggestion reducing the burden to: Commandant (G-MOC), U.S. Coast Guard, Washington, DC 20593-0001 or Office of Management and Budget, Paperwork Reduction Project (1625-0057), Washington, DC 20503.



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Permit To Proceed (PTP)

- The cognizant OCMI may permit the vessel to proceed to another port for repair
- Form CG-948 may be issued by the cognizant OCMI to the owner, managing operator, or the master of the vessel stating the conditions under which the vessel may proceed to another port.



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Endorsement

Annual/Periodic/Quarterly Reinspections				This Amended certificate issued by:			
Date	Zone	A/P/Q	Signature				
03 Dec 2012	SEC San Juan	A	Schock, Andrew	DAVID F. BERLINER CDR, USCG, By direction			
-	-	-	-	Officer in Charge, Marine Inspection			
-	-	-	-	SECTOR SAN JUAN			
-	-	-	-	Inspection Zone			

- Endorsed when Marine Inspector completes annual exam on the vessel.



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Amendments

---Certificate Amendments---

Current Amendment

Port Amending/ Sector San Juan

Date Amended/ 31May2013

-Remarks-

COMPLETED DRYDOCK EXAM.

1. Port Amending/ SEC SanJuan

Date Amended/ 08Dec2012

-Remarks-

COMPLETED ANNUAL EXAM.

- Amended when Marine Inspector updates USCG system
- Conditions of the COI change
- COIs must be validated to make all amendments permanent.



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Deficiencies

- CG Form 835
 - What is wrong
 - The standard
 - The regulation (cite)
 - How it should be corrected (not specifically)
 - Time to complete repairs
- Non compliance with CG-835
 - Prior To Operation may be issued



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Deficiencies

- As we continue to improve and facilitate services we have also created an email address for the owner/operators to submit documentations, repair proposal, pictures or any other pertinent information required by the marine inspector. Please submit any documents to

jaxdomestic@uscg.mil



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Revoking COI

- Depending on the seriousness of the deficiency the OCMI may refuse to issue or revoke the vessel's Certificate of Inspection (COI).



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Enforcement Actions

- Letter of Warning: No appeal process, refusal leads to Civil Penalty & OCMI may issue a Letter of Warning to all parties
- Notice of Violation: 33 CFR 1.07-11, 60 days to pay before collection agency or if declined: Class I civil penalty to be adjudicated by the Hearing Office
- Civil Penalty: Goes before a Hearing Officer, Penalty amounts are determined by the circumstances under which the violation occurred



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Top 10 Deficiencies

ENS Raby
Marine Inspector Apprentice



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Hull Material Deterioration

Different materials available:

- Fiber Glass (NVIC 8-87)
- Wood (NVIC 7-95)
- Steel (NVIC 7-68)
- Aluminum (NVIC 11-80)

It doesn't matter what material your vessel is made of, always check for:

Deterioration, Corrosion, Rot, Decay, Wastage



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Fire Fighting Equipment

- Missing or discharged fire extinguishers.
- Inoperable or leaking fire pumps.
- Missing, wasted or broken fire hoses or nozzles.
- Outdated servicing or maintenance.
- Lack of training to operate emergency engine override.
- Missing or corroded mounting bracket.



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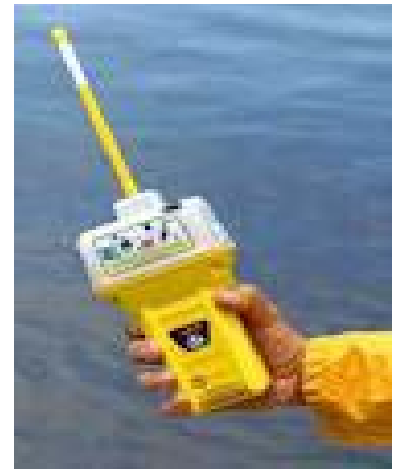
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Communication Devices

- Bell missing or improper installation.
- EPIRB's registration is expired.
- Call Sign doesn't match between FCC Radio Station
- Certificate and EPIRB's NOAA's Registration.
- Expired EPIRB's batteries or EPIRB's is inoperable.
- Missing of Emergency Broadcast Placard.
- Inoperable Public Address systems.



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Dead End Electrical Wires

- Must serve some piece of equipment.
- Spliced or exposed cables.
- Twist type cable connectors must be enclosed in a junction box.
- Plastic tie wraps are for bundling.
- Must be installed with metal supports. (exemption <65 ft).
- Marine type 14 AWG or larger.



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Expired First Aid Kit

- Must be under approval series 46 CFR 160.041.
- Stowed in a watertight container.
- Check expired or missing medications:
 - Aspirins
 - Eye wash
 - Antibacterial ointment
 - Burn ointment
 - Ammonia inhalants
 - Iodine applicators



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Life Saving Devices & Distress Signals

- Missing or expired distress signals.
- Retro-reflective material must be in good condition.
- Deteriorated grab lines and life lines on PFD's, life floats and buoyant apparatus.
- Expired waterlight batteries.
- Broken PFD's and life floats.



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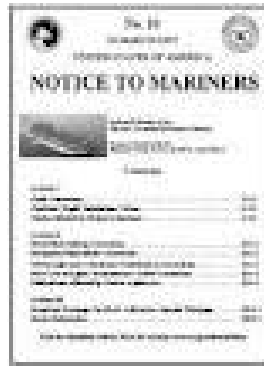
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Navigation Publications

-Missing or outdated publications:

- Nautical Chart
- U.S. Coast Pilot
- CG Light List
- Tide tables
- Current tables



- Always update nautical charts with Notice to Mariners.



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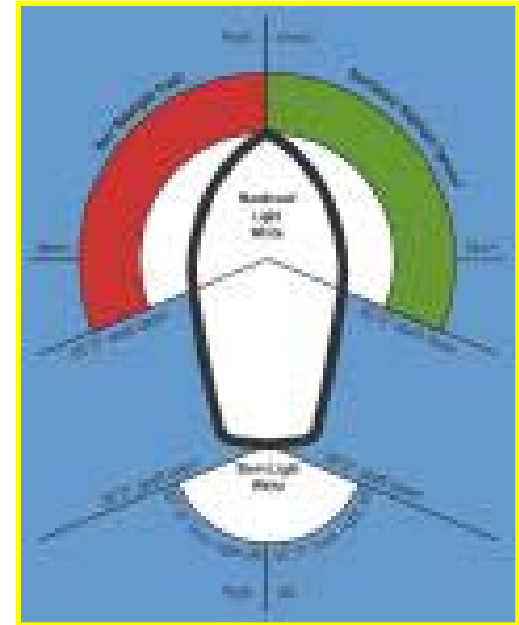
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Navigation Lights

- Missing or burned out light bulbs.
- Broken or missing navlights covers.
- Bulbs must meet UL 1104.
- Includes stern, mast and sidelights.



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EPIRB's Hydrostatic Release

- Improper installation.
- Expired date
- EPIRB's mounting bracket must be installed in a FLOAT-FREE location.



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Bilge Alarms & Pumps

- Inoperable audio and visual alerts
- Inoperable bilge pumps
- Broken or inoperable float for high water alarm and bilge pump.
- Bilge pipe strainers are missing, broken, clogged or corroded.



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How can I prevent deficiencies?

- Take care of your vessel and provide maintenance on a weekly and regular basis.
- Develop and implement a Safety Management System.
- Conduct self pre-inspections on your vessel prior to undergoing a USCG inspection.
- EARLY REPAIRS = SAVING MONEY \$\$\$ AND TIME
- For more information you can access the following website <http://homeport.uscg.mil>



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Drug and Alcohol Program

D. A. P. I.
(LTJG Williams)

- Chemical Testing Program Compliance Audit
- USCG Chemical Testing Program Checklist
- Maintenance and Procedures
- Marine Employers Drug Testing Guidance



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Marine Casualty

LT John Nee
Senior Investigation Officer

- Reporting Procedures
- CG-2692
- Time Limit Requirements
- Report Oil and Chemical Spills



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Question & Answers

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Closing Remarks

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Chief, Prevention Department

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