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News from the USA

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U.S. Coast Guard Security Requirements for Vessels

The U.S. Coast Guard has issued three Port Security Advisories imposing conditions of entry on vessels arriving to the United States from countries that, in the opinion of the U.S.C.G., do not maintain effective anti-terrorism measures. The current Advisory (6-08) issued on June 12, 2008 lists the following countries affected: Cuba, Cameroon*, Equatorial Guinea*, Guinea-Bissau, Indonesia*, Iran, Liberia, Mauritania*, and Syria. In the countries marked with an *, some exceptions are made for specific port facilities that the USCG has determined do maintain effective anti-terrorism measures. Contact us for the list of facilities for which exceptions are made.

Vessels arriving to the U.S. that have called the above countries within their previous five port calls must take the following actions while in countries listed as a condition of entry into U.S. ports:

- 1) *Implement measures per the ship's security plan equivalent to MARSEC 2;*
- 2) *Ensure that access points to the ship are guarded and that the guards have total visibility of the exterior (both landside and waterside) of the vessel. Guards may be provided by the ship's crew, however additional crewmembers should be placed on the ship if necessary to ensure that limits on maximum hours of work are not exceeded and/or minimum hours of rest are met. Otherwise, guards may be provided by outside security forces approved by the ship's master and the Company Security Officer.*
- 3) *Attempt to execute a Declaration of Security;*
- 4) *Log all security actions in the ship's log; and*
- 5) *Report actions taken to the cognizant U.S. Coast Guard Captain of The Port prior to arrival in the U.S.*

Vessels that have called the affected countries during their previous five calls prior to calling the U.S. will be boarded at sea by USCG security personnel prior to U.S. port entry to ensure that the required actions have been taken. If the required measures have not been taken, the vessel may be delayed or denied entry into U.S. ports. Based on the results of the offshore security boarding, vessels *may* be required to hire armed security guards to monitor the access to the vessel and maintain total visibility of the vessel's exterior while in the U.S. The number and location of the armed guards must be approved by the cognizant USCG Captain of The Port. For vessels found to have demonstrated good security compliance, the armed security guard requirement will normally be waived. Please contact us if you have any questions regarding these advisories.



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IMPORTANT NUMBERS

National Response Center:
(202) 267-2675

National Vessel Movement Center:
(304) 264-2502

MTSA / ISPS Help Desk:
(877) 687-2243

CSI 24 Hour Emergency:
(912) 233-8181

Q.I. Notification Drills:

At this time, the only acceptable methods for conducting Qualified Individual (Q.I.) Notification is by telephone, fax, or telex. E-mail is not yet recognized as an acceptable method of contact. When conducting Q.I. Drills, please contact CSI by telephone (24-hour-number 912-233-8181) or fax (912-231-2938). When contacting by telephone, please use our 24-Hour number rather than our individual mobile phone numbers, as there may be times when we are unable to answer our mobile phones. In the case of an actual spill, please contact us by telephone rather than by fax, as our fax machine is not monitored on nights, weekends, or holidays.

Non-Tank Vessel Response Plan Enforcement

The USCG has issued a notice in Federal Register – Vol. 73, No. 121; that effective August 22, 2008, they will begin enforcing the requirement to prepare and submit a Non-Tank Vessel Response Plan (NTVRP) for certain non-tank vessels. The enforcement will initially focus on non-tank vessels of 1,600 gross tons or greater, as these vessels pose the greatest risk to the environment in the event of a worst case discharge. The USCG further advised that for vessels without a properly submitted NTVRP, the Captain of the Port (COTP) will have authority to place operational controls on the vessel. Non-tank vessels of less than 1,600 gross tons will still be required to submit a NTVRP.

Until the NTVRP regulations are issued and in effect, the USCG will continue to issue a 2-year interim operating authorization letter for NTVRPs which meet the requirements found in 33 USC 1321 (j)(5)(D). NTVRPs submitted must meet the following requirements:

- Be consistent with the requirements of the National Contingency Plan and Area Contingency Plans
- Identify the Qualified Individual having full authority to implement removal actions and requires immediate communications between that individual and the appropriate federal official and persons providing personnel and equipment.
- Identify and ensure by contract or other approved means the availability of private personnel and equipment necessary to remove to the maximum extent practicable a worst case discharge, including a discharge resulting from fire or explosion, and to mitigate or prevent a substantial threat of such a discharge.
- Describe the training, equipment, testing, periodic unannounced drills and response actions of persons on the vessel to be carried out under the plan to ensure the safety of the vessel and to mitigate or prevent discharge, or the substantial threat of a discharge.
- Be updated periodically
- Be resubmitted for approval of each significant change

Kindly note all NTVRPs submitted by CSI meet the above requirements. Please contact our office if you have any questions

New Liberian Flag E/NOA Requirement

In accordance with Liberian Registry's Marine Operations Note 4/2008 "Inclusion of Administration on Vessel Advanced Notice of Arrival for U.S. Ports," all Liberian flagged vessels calling U.S. ports are required to include the Liberian NOA Officer in all advanced notices of arrival for U.S. port calls. Notification is made by including the email address noa@liscr.com on the eNOA/D submitted to the U.S. National Vessel Movement Center.

Vessel Response Plan Approvals

Please take the time to review the latest copy of your USCG VRP Approval Letter or USCG NTVRP Interim Operating Authorization Letter. Kindly note only the Captain of the Port (COTP) Zones listed on this letter are approved for trading. Most of you will note that Guam, Prince William Sound and Western Alaska COTP Zones are not included, as additional Oil Spill Removal Organization (OSRO) resources must in place “under contract or other approved means” in order to receive approval. You will note however that these COTP Zones are still included in Chapter 9 – Geographic Appendices of your Plan. In order to receive interim authorization or approval for these COTP Zones, we must provide verification of a contract or other approved means, however should not need to amend the Plan as these COTP Zones are already included. Please contact our office if you have any questions regarding you Vessel Response Plan or Non-Tank Vessel Response Plan.

Fire Fighting Practices

We at CSI have noted a trend during onboard fire drills that the crew have been known to connect the flexible fireproof lifeline (about 30 m in length) to the non fireproof lanyard that is sometimes connected to the safety utility belt. If the fireman got caught up in a fire it could be possible for the lanyard to catch fire and break the lifeline connection to the fireman. We recommend that the crew connect the fireproof lifeline directly to a fixed point on the Self Contained Breathing Apparatus (SCBA) or to the D-ring on the safety belt.

Continuous Synopsis Records

IMO Resolution A.959(23) states that all original Continuous Synopsis Record (CSR) documents must be kept onboard a vessel throughout the vessel’s lifetime. During our vessel inspections and audits, we have frequently noted that the original documents have been returned to the Company, and copies have been retained onboard . In some cases, when this has been discovered by the U.S. Coast Guard during Port State Control exams, deficiencies have been issued requiring that all original CSR documents be returned to the vessel. Normally, the deficiency is written requiring that the original CSR documents be returned to the vessel within 30 days or prior to the next U.S. voyage after sailing foreign. However in some cases where a CSR document was missing and no copy was available, the deficiencies required that each missing original CSR document be returned to the vessel prior to departure from the port in which the deficiency was issued. In order to avoid such a deficiency, we recommend that when sending updated CSR records to vessels, specific written instructions be sent advising the Master to ensure that each previous original document is present. If an original document is missing, contact the vessel’s Flag State Administration to have a replacement document issued, as the Administration is required to keep copies of each document issued in case a replacement original is needed.

VRP Requirements:

Please ensure that each vessel carries either the original or a notarized copy the U.S. Vessel Response Plan (VPR) Approval Letter. CSI keeps typically keeps the originals on file in our office and sends notarized copies to the vessel. If a vessel is missing the original or a notarized copy, please contact us so we can prepare a notarized copy and send it to the vessel



ISPS Tip:

When practical, we recommend that the gangway watchman make all entries in the Visitors’ Log rather than allowing the visitor to make the entry. This ensures that the entry is accurate and legible.



ISPS Annual Exercises:

Company Security Exercises must be conducted once each calendar year, with no more than 18 months between each exercise. The exercises should test communications, coordination, resource availability, and response. Each vessel should carry documentation that the Company Exercise was conducted, even if the vessel did not directly participate in the exercise.

Hydrostatic Pressure Testing for Bunker Lines

During some recent U.S. Coast Guard Port State Control exams, we have seen deficiencies issued due to improper annual pressure testing of bunker lines. In these cases, pressure testing was conducted pneumatically, using compressed air rather than a fluid medium. 33 CFR 156.170, which outlines requirements for equipment tests and inspections, states that hoses and piping must be tested at a static liquid pressure at least 1½ times the maximum allowable working pressure (MAWP). The test fluid used for testing is limited to liquids that are compatible with the line as recommended by the manufacturer. Thus far, the deficiencies issued have been easily corrected, with no delays to the vessels. In each case, the hydrostatic test was required to be conducted prior to the vessels' next U.S. bunkering, and a report of the test was sent to the U.S.C.G., clearing the deficiency.

Asian Gypsy Moth

Over the past few weeks, U.S. agricultural inspectors from Customs-Border Protection have discovered live Asian Gypsy Moth (AGM) egg masses on several cargo vessels calling U.S. ports. In some cases, vessels were deemed to be significantly infested, and expelled from port until all egg masses and lifeforms could be removed and destroyed. In all cases, significant delays in cargo operations and clearance occurred. Such delays may be avoided by adherence to strict sanitation standards of identifying, removing, and destroying all AGM egg masses prior to port arrival. The periods of risk for AGM flight and infestation ranges from June 1 to August 15 in Southern Japan, and July 15 to October 1 in Northern Japan and Far East Russia. China and Korea have similar flight periods of risk. All vessels sailing from at-risk ports should conduct an intensive vessel inspection to remove and destroy all egg masses prior to entering U.S. waters. The egg masses may be found anywhere on the vessel superstructure and anywhere that doors were open while in port. Locations may include barrel containers used for trash or liquids, mooring lines, air intake vents, on the hull, cargo hold framing, safety rails, and cargo containers.



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