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Summer 2012

North American Emission Control Area (ECA) Effective August 1, 2012

On August 1, 2012, enforcement of the North America Emission Control Area (ECA) will begin. The ECA came into force on August 1, 2011; however, included a one-year grace period to maritime industry time to adapt to the new regulation. This regulation requires all ships operating within the ECA to either: (1) Use fuel oil with a sulfur content not exceeding 1.0% m/m; (2) Use an exhaust gas cleaning system approved by its flag administration; or (3) Adopt any other technology that has been approved by the flag administration, such as LNG as a fuel.

The ECA covers essentially all coastal waters of the United States and Canada out to 200 miles. Appendix VII to MARPOL Annex VI contains the definition and boundaries, with the full coordinates of the ECA. The information may also be found in MEPC.1/Circ.723, dated May 13, 2010. For Canada, waters of the Canadian Arctic are omitted. For the United States, omissions include the following: US Pacific territories; the northwestern Hawaiian Islands; the Commonwealth of Puerto Rico; Western Alaska; the Aleutian Islands; and the US Arctic.

Vessel operators are advised to ensure the maximum sulfur content of fuel oil used onboard their vessels that are calling within the ECA does not exceed the limits as required under Regulation 14.4 of MARPOL Annex VI. With this effective date of the ECA approaching fast, we recommend vessel operators communicate with their bunker suppliers to ensure they will be able to obtain the fuel meeting the requirement. The US Environmental Protection Agency (EPA) has issued guidance that outlines the strict procedures for maintaining compliance. The guidance can be located at: <http://www.epa.gov/compliance/resources/policies/civil/caa/mobile/finalfuelavailabilityguidance-0626.pdf>.

Vessels should ensure they have "ship specific" changeover procedures. We also recommend the vessel have a detailed "blackout" procedure readily available, should they encounter any issues in switching between the fuel types. The crew should also be able to demonstrate to the US authorities how they perform the changeover and maintain their records. With regard to recordkeeping, vessels should maintain a logbook entry noting when and where the fuel was changed, and they should ensure the bunker samples and bunker delivery notes are available for review by US Coast Guard or State agencies.

In addition to the North America ECA, operators should also be aware of the designation of the United States Caribbean Sea ECA, which is expected to enter into force on 1 January 2013, and take effect on 1 January 2014. The area of the U.S. Caribbean ECA includes waters adjacent to coasts of the Commonwealth of Puerto Rico and the U.S. Virgin Islands.



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USCG Inspection Tip

During a U.S. port call, the ship's agent will take several certificates ashore for U.S. Customs Clearance. CSI recommends the vessel retain copies of all certificates taken ashore in case the U.S. Coast Guard comes aboard for an inspection. Copies of U.S. Customs tonnage tax and user fee receipts are not necessary for a U.S. Coast Guard exam.



Fleet Position Lists

Please provide CSI with your fleet's weekly position reports. These position reports help us properly track your vessels' scheduled calls to U.S. ports, and gives us sufficient time to contact the USCG and other agencies to determine if any inspections are scheduled during your vessels' calls. As your Qualified Individual, it is important for us to be aware of your vessels' U.S. schedules.

ISPS Annual Exercises

Company Security Exercises must be conducted once each calendar year, with no more than 18 months between each exercise. Exercises must 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. This is one of the areas the

Annual PREP Exercises

We are in the process of planning and scheduling out 2012 National Preparedness for response Exercise Program (PREP) tabletop exercises as required by OPA 90. When possible, we schedule multiple exercises in a geographic area in order to keep travel expenses down. If you have a preferred time of year you wish to conduct your exercise, please contact CSI in order that we may arrange accordingly. Your assistance in helping us to coordinate such exercises with other companies is very much appreciated.

Electronic Notice of Arrival (eNOA) Software Issues and Updates

The most recent U.S.C.G. Electronic Notice of Arrival (eNOA) Infopath templates includes a news items under "Safety Information" which may be a bit confusing. One item asks "Is at least one crew member qualified to meet the Cruise Vessel Safety and Security Act (46 USC Sec 3508). This question appears on every eNOA, but applies only to cruise ships. For other vessels, simple answer "no." The next item asks if the vessel has a Non-Tank Vessel Response Plan (NTVRP), and asks for the NTVRP Number. As there is no space for tank vessels to enter Vessel Response Plan information, tank vessels and non-tank vessels alike should enter "yes," and provide the control number of your VRP or NT-VRP. Some eNOA software versions also ask if the vessel is on an "Open/Close Loop" voyage. This applies only to cruise vessels. If this item appears on your eNOA template, submit "no" as your answer. The current eNOA formats are NOA Workbook Version 7 for both Microsoft Excel and Version 6.0 for Microsoft InfoPath. Previous versions were retired on June 19, 2012. A three month grace period is in effect, but after September 18, 2012, submissions using previous versions will not be accepted. If using Excel or InfoPath, please contact your company's Information Technology Department to ensure that the updated schema are available. If using a third-party program, such as Globe Wireless, please contact them to ensure that the software is up to date.

Blocked Quick-Closing Fuel Shutoff Valves Will Lead to a Detention

Upon reviewing the USCG's monthly report of IMO reportable vessel detentions, we have noticed an increase in detentions due to quick-closing fuel shutoff valves to fuel oil or diesel oil tanks being disabled or blocked in an open position. SOLAS Chapter II-2, Regulation 15 / 2.5 requires that *"every oil fuel pipe which, if damaged, would allow oil to escape from a storage, settling, or daily service tank situated above the double bottom, shall be fitted with a cock or valve directly on the tank capable of being closed from a safe position outside the space concerned in the event of a fire occurring in the space in which the tanks are situated. In the special case of deep tanks situated in any shaft or pipe tunnel or similar space, valves on the tank shall be fitted, but control in the event of fire may be effected by means of an additional valve on the pipe or pipes outside the tunnel or similar space. If such additional valve is fitted in the machinery space, it shall be operated from a position outside the space."*

This is not a new regulation, however the number of detentions for this deficiency has increased over the last few months. This tells us that the USCG has recently increased their awareness of this issue, and are on a sharp lookout for disabled or blocked quick-closing fuel shutoff valves. As a detention can lead to an increased number of USCG inspections for both the vessel and other vessels operated by the same management, it is worthwhile to inspect all quick-closing fuel shutoff valves prior to arriving in U.S. port to ensure they are not blocked and are operating as intended.

New U.S. Ballast Water Management Bio-Fouling Requirements Now In Effect

The U.S. Coast Guard has issued its Final Rule covering Living Organisms in Ship's Ballast Water Discharged in U.S. Waters. Although implementation dates for ballast water treatment systems do not become effective until December 1, 2013 for new buildings and January 1, 2016 for existing vessels, there are some requirements that are in effect now. Effective June 21, 2012, 33 CFR 151.2050(g) requires that vessels calling the U.S. maintain a Ballast Water Management Plan that includes "detailed fouling maintenance and sediment removal procedures." The U.S. Coast Guard will accept a separate Bio-Fouling Management Plan, developed in accordance with IMO Guidelines contained in IMO Resolution MEPC.207(62) and referenced in the vessel's Ballast Water Management Plan. To meet the requirements of the new regulation, the plan should be onboard vessels by June 21, 2012. This is a regulation applicable in U.S. waters only, therefore vessels would not be required to have the plan onboard until the vessel calls a U.S. port. The initial enforcement by the U.S. Coast Guard is expected to be somewhat passive and educational rather than penalty oriented. As of yet, we are not aware of any enforcement guidance issued by the U.S. Coast Guard to their inspection personnel. CSI will keep you advised of any U.S. Coast Guard enforcement guidance as it becomes available, as well as any onboard inspection procedures observed during U.S. Coast Guard Port State Control examinations we attend. Please contact CSI if you have any questions regarding this new requirement.

U.S. Coast Guard's Large Fleet Designation Program

Ship management companies, owners, operators, and charterers that have twenty-five or more vessels in their fleet and that have made at least one U.S. port call in a twelve month period are eligible to apply for the U.S. Coast Guard's Large Fleet Designation Program. Participating companies are entitled to "additional detentions" before being placed on the U.S. Coast Guard's list of targeted owners, managers, operators. Normally, an owner, manager, or charterer is targeted for additional Port State Control exams when two vessel's under their control are detained by the U.S. Coast Guard within a twelve month period. Under the U.S. Coast Guard's Large Fleet Designation Program, companies are permitted three to six detentions in a twelve month period, depending on the size of the fleet as follows:

25-199 vessels	3 Detentions
200-232 vessels	4 Detentions
333-399 vessels	5 Detentions
400 or more	6 Detentions

Companies may participate in the program for twelve months, and then must reapply in subsequent years. Please contact CSI for further information on how to apply for this program.



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

ISPS Tip

Most Ship Security Plans require that a Visitors' Log be maintained at the gangway and include the names of persons boarding the vessel, the purpose of their visit, the time of arrival and departure, and sometimes the visitor's signature. Occasionally, we have observed the gangway watch stander handing the pen to the visitor to make the Visitors' Log entry. We recommend that the gangway watch stander make all entries in the Visitors' Log himself to ensure that the entries are correct and legible. All columns in the log should be completed, including the time the individual departs the vessel.



Tankers Calling Western Alaska / Unimak Pass

In February 2012, the Western Alaska Alternative Planning Criteria for Tankers (WA-APC-T) was approved by the U.S. Coast Guard and the implementation of the WA-APC-T commenced in May 2012. The approved WA-APC-T provides for a combination of risk reduction measures, response capabilities, and oil spill removal equipment as an alternative for meeting the Coast Guard's oil spill removal equipment capabilities outlined in the Oil Pollution Prevention Regulations in 33 CFR Part 155.

Vessels transiting the Aleutian Islands and Unimak Pass on a voyage to or from the United States (non-innocent passage) are required to obtain: (1) supplemental Oil Spill Removal Organization (OSRO) coverage from the Western Alaska OSRO, Alaska CHADUX Corporation, and (2) a WA-APC-T approval by the U.S. Coast Guard. The Alaska CHADUX coverage is in addition to the OSRO coverage already listed in your Vessel Response Plan (VRP).

In order to meet the WA-APC-T requirements, the non-profit organization, Alaska Maritime Prevention and Response Network (Alaska MPRN) was established to fulfill the directive of the WA-APC-T, which includes: maintenance and operation of an Automated Identification System (AIS) network and satellite tracking in Western Alaska and providing expanded oil pollution prevention equipment capabilities, including, but not limited to, emergency towing systems, oil containment boom, oil skimmers and temporary storage containers.

With the AIS/LRIT tracking systems in place, the US Coast Guard and Alaska MPRN will be able to monitor vessels transiting Western Alaska, and by noting their previous and next ports of call, they will be able to determine if the vessel is on an innocent passage or not. For vessels with the WA-APC-T Coast Guard approval, the vessels will be required to comply with the required procedures, which includes 96-hour advance notice of arrival in the 200-mile Exclusive Economic Zone (EEZ), and compliance with planned routes as outlined in the APC approval.

The annual calendar year cost for the Alaska CHADUX is \$850.00 for transiting through Alaska waters, and for Alaska MPRN the cost is \$6,000.00 for tankers and \$1,800.00 for vessels carrying oil as a secondary cargo.

For additional information regarding Alaska MPRN and the APC requirements, please visit their website at: <http://ak-mprn.org>.

CSI Tip

When contacting CSI to conduct a Qualified Individual Notification Drill or to report an actual incident, please use our **24-Hour Response Telephone Number (912-233-8181)** as our primary point of contact. This number is monitored 24 hours a day, seven days a week. If for some reason, this number connects you to a voice mailbox, please leave a detailed message or call one of us on our mobile phone as directed by the message. Following are our individual numbers:

Rich Wigger	+1 912 441 7554
Robbie Shea	+1 912 441 5495
Alan West	+1 912 224 4546
Debbie Nash	+1 912 484 8181



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