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Testing of Inert Gas Systems During USCG Certificate of Compliance Inspections

Recently, there has been an increasing number of USCG issued deficiencies and detentions, due to difficulty or inability to properly demonstrate the proper functioning, testing, and calibration of Inert Gas Systems (IGS) during USCG Certificate of Compliance (COC) exams. Often times, the reason for these problems is that the vessels do not routinely carry cargoes requiring inerting, which can lead to complacency and unfamiliarity. Regardless of whether or not a vessel is carrying, or will carry cargoes requiring inerting, IGS must be in operable condition, and crews must be able to demonstrate all functions and testing procedures.

In the past, when a vessel could not demonstrate proper operation of the IGS, but was not carrying a cargo requiring inerting, the USCG would usually issue a deficiency to be corrected within thirty-days or prior to the next U.S. port call after sailing foreign. Recently, however, the USCG has been issuing deficiencies requiring correction to the satisfaction of the USCG, prior to departure from the port in which the vessel was inspected. In some recent cases, the USCG has declined to accept Conditions of Class requiring that the IGS related deficiencies be corrected within a prescribed time frame.

If your vessel is bound for a U.S. port and is scheduled for a COC inspection, fully inspect and test the IGS well prior to arrival at the inspecting port. If defects are discovered, and the cargo onboard does not require inerting, we recommend that you notify your Classification Society prior to arrival at the inspecting port to request a Condition of Class. We also recommend that the defect be properly documented in accordance with your company procedure for documenting, reporting, and tracking such occurrences. Additionally, the defect should be noted on the eNOAD. If the IGS is not operating properly, and the cargo onboard does require inerting, please notify CSI immediately, as it may be necessary to notify the USCG of a Hazardous Condition as defined by 33 CFR 160.204. Failure to report a Hazardous Condition can result in expensive delays and high monetary penalties.



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USCG Inspection Tip:

During a U.S. port call, the ship's agent will take several certificates ashore for Customs clearance. We recommend that the vessel retain copies of all certificates taken ashore in case the USCG comes aboard for an inspection. Copies of U.S. Customs tonnage tax and user fee receipts are not necessary for a USCG inspection.



Ballast Water Management Program Update

The USCG recently published two important documents regarding its Ballast Water Management (BWM) Program: Marine Safety Information Bulletin (MSIB) 13-15 and CG-OES Policy Letter No. 13-01 Revision 1. Vessel owners/operators may a copy of each of these documents, by contacting CSI.

Key provisions of MSIB 13-15 include the following:

The BWM regulations do not define “first scheduled drydocking”. The following guidance is applicable to the first scheduled drydocking and other drydocking dates for existing vessels:

- a. A vessel’s “first scheduled drydocking” date for the purposes of compliance with the BWM implementation schedule is the date the vessel enters a drydock.
- b. A drydocking begun after the date specified in either Table 151.1512 (b) or 151.2035(b), as applicable, which is necessary for emergency repairs is not considered the first scheduled drydocking.
- c. A scheduled drydocking begun after the date specified in either Table 151.1512(b) or 151.2035(b), as applicable, to satisfy a statutory bottom survey requirement or to accomplish planned work, as opposed to emergency work, is considered the “first scheduled drydocking”

An underwater inspection in lieu of drydocking (UWILD) is not considered the “first scheduled drydocking”; instead:

- a. For vessels that undergo one UWILD and one drydocking for statutory purposes every five years, the first scheduled drydocking is the first drydocking conducted for statutory purposes after the date specified in either Table 151.1512(b) or 151.2035(b), as applicable;
- b. For vessels that do not routinely undergo drydockings, their original compliance date is 1 January 2014 or 1 January 2016, depending on the vessel’s ballast water capacity.

A vessel that must comply with the requirements under 33 CFR 151.1512 or 151.2035 for approved BWM methods; may be issued an extended compliance date if compliance with the requirement under 33 CFR 151.1510 or 151.2025 is not possible. CG-OES Policy Letter 13-01 Revision 1, revised the terms of extended compliance dates. A vessel’s extended compliance date will now be the “next scheduled drydocking” after the vessel’s original compliance date. Existing extension letters will not be re-issued, but this change in terms will be made when a vessel applies for a supplemental extension. The Policy Letter also contains the procedures for applying for such extensions.

ENOA/D Reminder:

When submitting your eNOA/D to the National Vessel Movement Center, the agent at the port of call should be listed as the **24 Hour Contact**. Local USCG offices use this contact number to confirm port specific information that the local agents are best able to provide. In the event that an agent has not been appointed at the time the eNOA must be submitted, you may use CSI as the point of contact. In such cases, it is important to amend the eNOA immediately once an agent has been appointed to reflect the agent details.



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 and other Inquiries:
(912) 233-8181

Changes in Accepted Formats for Electronic Notice of Arrival / Departure

As per the newly published Electronic Notice of Arrival/Departure (eNOA/D) regulations in 33 CFR 160, as of September 30, 2015, the USCG National Vessel Movement Center (NVMC) will no longer accept eNOA/D submissions that contain the eNOA/D information as text within the body of emails or attachments of scanned documents.

Acceptable eNOA/D formats include:

- 1) Emailed submission of either of the latest two published NVMC Workbooks located at www.nvmc.uscg.gov under the Downloads Tab and sent to enoad@nvmc.uscg.gov.
- 2) Via the NVMC eNOA/D website.
- 3) Via third-party application submissions conforming to standards found at www.nvmc.uscg.gov under the Developer Tab and sent to enoad@nvmc.uscg.gov.
- 4) Via the NVMC InfoPath template version 6.3.0 until its retirement. Submitters utilizing this product may submit their eNOA/D online by using the built-in submit functionality or by emailing it to enoad@nvmc.uscg.gov.

There are several ways to contact the NVMC for assistance. General questions can be emailed to sans@nvmc.uscg.gov, and technical support inquiries can be emailed to techsupport@nvmc.uscg.gov. Please note that actual eNOA/D submissions can only be sent to enoad@nvmc.uscg.gov

The NVMC can also be reached by telephone at 1-800-708-9823 or 1-304-264-2502; or by fax at 1-800-547-8724 or 1-304-264-2684. Questions on NOA/D regulations can be telephoned to 1-202-372-1218.

California Ocean-Going Vessel Fuel Rule

The California Air Resources Board (CARB) has issued Marine Notice 2015-1 advising vessel operators using low sulfur non-distillate fuels, primarily described as ultra-low sulfur fuel oil (ULSFO), that they may be violating the sulfur limit. These fuels, as purchased, are generally reported to be below, but close to, the 0.1% sulfur regulatory limit; however, shipboard in-use samples collected and tested by CARB staff have sometimes been found to exceed the regulatory limit. This may be due to shipboard contamination with high sulfur fuels in tanks or pipes, or other factors. Operators and masters should consider various options to minimize the risk of inadvertently exceeding the regulatory limit. Information on California's OGV Fuel Regulation can be found at: <http://www.arb.ca.gov/ports/marinevess/ogv.htm>.



Unannounced State Drills

Occasionally, State regulators, particularly on the U.S. West Coast, will board vessels to conduct unannounced pollution exercises. Some states, such as Oregon, require the Q.I. To actually make notification calls to the U.S. National Response Center and/or the OSRO.

If a state or local official boards your vessel to conduct an unannounced drill, be sure to contact your Q.I. If Compliance Systems is your Q.I., contact us on our **24-Hour Response Telephone Number: (912) 233-8181.**

Drill Procedures Tip

When conducting a QI Notification Drill, or any other Emergency Procedures Drill by telephone, please begin each telephone call with "This Is A Drill."

