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## ***USCG Safety Alert: Tank Sampling Dangers***

The United States Coast Guard Inspections and Compliance Directorate has issued a Marine Safety Alert addressing dangers of Hydrogen Sulfide (H<sub>2</sub>S) exposure during tank sampling typically conducted by Port State Control officers during Certificate of Compliance inspections. During a recent inspection, a USCG inspector was exposed to a dangerous concentration of H<sub>2</sub>S and suffered a serious injury. The exposure occurred during a tank vessel exam onboard a tank vessel carrying Grade E Sour Crude. A PSC team requested a ship's crew member check cargo tank oxygen levels using the ship's portable gas meter. The crew member accessed the cargo tank via a deck sounding valve. When the valve was opened the pressurized cargo tank atmosphere escaped releasing inert gas and H<sub>2</sub>S vapors. During the evolution the personal gas meters of one crew and one USCG inspector alarmed for H<sub>2</sub>S. The inspector whose alarm sounded was standing 1–2 feet downwind from the sounding valve. Within days the inspector developed severe exposure symptoms consistent with H<sub>2</sub>S exposure.

As a result the Coast Guard **strongly recommends** that those involved in cargo tank sampling or atmosphere testing:

- Be familiar with and adhere to ISGOTT safe work practices.
- Assess personnel risks.
- Don appropriate personal protection equipment including gas monitoring detectors, respirator or SCBA.
- If gas monitoring detectors are used ensure:
  - ◆ detectors are maintained and properly calibrated
  - ◆ alarm settings values are properly set
- Be aware and familiar with the hazards of the cargos involved as well as exposure indicators and emergency response procedures.

## ***Compliance with CSR Requirements***

On May 27, 2014, the USCG issued Marine Safety Information Bulletin (MSIB) Number 007-14 addressing compliance with Continuous Synopsis Record (CSR) requirements. Missing or incomplete CSRs may result in Port State Control deficiencies and vessel delays. Although the MSIB is directed at U.S. flagged vessels, CSR requirements set forth in SOLAS Chapter XI-1, regulation 5, require all passenger and (cont. on page 2)



### **In This Issue:**

USCG Safety Alert: Tank Sampling Dangers	<b>1</b>
Compliance with CSR Requirements.	<b>1</b>
Update on PCSOPEP Non-Compliance Notifications and Acceptance Procedures	<b>2</b>
Use of Outdated Forms When Reporting Marine Casualties in U.S. Waters	<b>3</b>
U.S. Enforcement of BWMS Compliance Dates	<b>4</b>

### **ISPS Annual Exercises:**

Company Security Exercises must be conducted once each calendar year, with no more than 18 months between exercises. 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.



**Port State Control Tip:**

During periodic testing of emergency and general service fire pumps, we recommend that while pumps are running at full capacity, a crewmember on deck walk the full length of the fire main line to ensure that there are no leaks. While leaks at a flange connection may be quickly corrected with a few turns of a wrench, a hole or leak in a main section of pipe would require hot work to repair, and could be grounds for a SOLAS detention if observed by a Port State Control inspector.

**Annual Prep Exercises:**

OPA 90 regulations require U.S. Vessel Response Plan Holders carry out an annual Spill Management Team Tabletop Exercise (SMT TTX). We are finalizing scheduling of our 2014 SMT TTXs under the National Preparedness and Response Program (PREP). When possible, we schedule multiple exercises in geographic areas in order to keep travel expenses to a minimum for our clients. If we have not yet scheduled your 2014 exercise, and you have a preferred date you wish to conduct your exercise, please contact CSI in order that we may schedule your exercise accordingly.

(cont. from page 1) cargo vessels of 500 gross tons and above engaged on international voyages to carry a CSR onboard.

In accordance with IMO Resolution A.9599(23) a CSR file comprises:

- 1) all CSR documents (Form 1) issued over the life of the ship.
- 2) all amendment forms (Form 2) attached to each individual CSR document.
- 3) all indices of amendments (Form 3) relating to each CSR document.

Each *original* CSR document is to be sent to the vessel and retained onboard throughout its lifetime. It is the responsibility of the Company to ensure that the CSR file is complete, accurate, and maintained (as original) on board. In the event of loss or damage to the vessel’s CSR file, the Company should immediately contact the vessel’s Flag State Administration to request replacement of the lost or damaged documents.

Some Flag State Administrations’ CSR procedures differ slightly. For example, Marshall Islands typically issues certified copies rather than original CSR documents; therefore it is important for each Company and vessel to become familiar with the Flag State Administration’s policies and procedures.

***Update on PCSOPEP Non-Compliance Notifications and Acceptance Procedure***

On May 8, 2014, the Panama Canal Authority (PCA) issued Advisory to Shipping No. A-11-2014 outlining updates to PCSOPEP non-compliance notification and sanctions acceptance procedures.

The Authority’s EVTMS (Enhanced Vessel Traffic Management System) is sending alerts to the agent regarding the status of vessels’ PCSOPEP requirements to help avoid sanctions to those vessels that do not have a current Notice of Acknowledgement (NOA) certificate, but meet one of the following criteria:

- NOA expired
- Vessel has PCSOPEP Non-Compliance Form from last visit
- Vessel has never been issued a NOA certificate

These alerts are automatically generated at 168, 120, and 97 hours prior to the arrival of the vessels. The Authority asks that the agent not forward these alerts to the vessel. If an agent is unsure if the vessel has a valid plan, he is instructed to contact the Authority’s PCSOPEP office at 507-276-4635 or pcsopep@pancanal.com.

As a result of an evaluation of the sanction acceptance process by the shipping agent for non-compliance with PCSOPEP regulations, there has been a change in the actions required by the agent. Upon official receipt of the PCSOPEP Non-Compliance Form, shipping agents must

(cont from page 2) offense, to the Vice-presidency for General Counsel no later than the next working day following receipt of notification. This letter must be signed by a representative of the shipping agency and accompanied with a copy of their personal identification card. The corresponding Letter of Guarantee may be accessed at [www.pancanal.com](http://www.pancanal.com).

A Letter of Guarantee in the amount of \$2,500 USD is required for a vessel's first offense; while a Letter of Guarantee of \$5,000 USD is required for a vessel's second offense.

## ***Use of Outdated Forms When Reporting Marine Casualties Occurring in U.S. Waters***

In April 2013, the US Coast Guard (USCG) notified the industry that forms CG-2692 "Report of Marine Casualty" and CG-2692B "Report of Required Chemical Drug and Alcohol Testing Following a Serious Marine Incident" had been revised. Although there are apparently not many substantial changes from the previous versions of these forms, the USCG emphasizes in a recent notice that the new forms are the only approved versions that will be accepted for reporting a marine casualty.

Clients with vessels operating in US waters should ensure that their fleets have available the most recent versions of the US marine casualty report forms and commence using these immediately. It is also important to ensure that crews and operational personnel are well aware of the requirement to immediately notify the USCG of any hazardous conditions or casualties onboard, as failure to report a vessel's hazardous condition could be considered a criminal act.

The most recent versions of forms CG-2692 and CG-2692B are available online in PDF at <http://homeport.uscg.mil> and by following the following menu path: Missions > Investigations > Casualty Reporting Forms or by contacting CSI via email.

With few exceptions, commercial vessel operators are required to report a casualty immediately if it occurs upon the navigable waters of the US. The criteria for what constitutes a reportable incident are set out in 46 CFR 4.05-1. Groundings, bridge strikes, losses resulting in reduced vessel maneuverability, impacts on vessel seaworthiness or fitness for service or route, loss of life, injury requiring professional medical treatment, property damage in excess of USD 25,000, or significant harm to the environment are all examples of casualties that should be reported.

A phone call or fax to the USCG typically satisfies the immediate initial notice requirement; but formal report of the incident, in the form of CG-2692 must also be filed within five days.



### **IMPORTANT NUMBERS**

**National Response Center:**  
(202) 267-2675

**National Vessel Movement Center:**  
(304) 264-2502MTSA / ISPS  
**Help Desk:**

(877) 687-2243

**CSI 24 Hour Emergency and other Inquiries:**  
(912) 233-8181

### **Port State Control Tip:**

USCG Marine Safety Alert 06-14 advises that USCG PSC inspectors have found numerous SABRE Emergency Escape Breathing Apparatus in an unprepared status. The "Quick Fire" functionality that puts the EEBD into operation when the bag is opened and the hood is worn was not in its "primed" state. When purchased or returned from servicing, this equipment will have a small removable label viewable through a window on the bag stating "QUICK FIRE NOT PRIMED—ANTI-TAMPER DEVICE AND FITTING INSTRUCTIONS INSIDE." Once delivered, a competent ship's employee should attach the Quick Fire cord and remove the label, allowing the device to operate correctly. Officers and crew should thoroughly review operating manuals and ensure that all safety equipment is properly prepared for service.



**ISPS Tip:**

Although Code and most Ship Security Plans do not require the use of numbered Visitors' Passes, many vessels implement them as a means of accounting for visitors embarking and disembarking the vessel. For the sake of good order, we recommend that numbered visitors' passes be inventoried at each change of watch to ensure that all are accounted for. If a visitor's pass is found to be missing, the Ship Security Officer should be promptly notified.

## ***U.S. Enforcement of Compliance Dates for Ballast Water Management Systems***

Vessel owners have several ways in which to comply with the implementation dates contained in the ballast water discharge standard final rule in the absence of Coast Guard type-approved Ballast Water Management Systems (BWMS). The regulation allows a vessel owner with a foreign type-approved BWMS, installed before the vessel's compliance date in Table 151.2035(b), to use that system to comply with the ballast water management regulations, provided that system has been accepted by the Coast Guard as an Alternate Management System (AMS).

The Coast Guard can issue AMS acceptance to a BWMS when the vendor of that system requests in writing to the Coast Guard for AMS acceptance in accordance with 33 CFR 151.2026. The AMS must be installed on the vessel prior to the date of the vessel's implementation date as described in 151.2035(b), and may employ the AMS for no longer than 5 years from the vessel's implementation date.

Vessel owners may also choose another method to meet the ballast water discharge standard such as using water from a U.S. public water system for ballast, discharging ballast water to a facility onshore, or do not discharge any ballast water while in U.S. waters. These methods are provided for in 33 CFR 151.2025.

If none of the above options are practicably available, vessel owners can also request an extension to the compliance schedule in 33 CFR 151.2035(b). The availability of an AMS does not prohibit a vessel owner from receiving an extension. 33 CFR 151.2036 provides the process for requesting these extensions when it can be documented. that despite all efforts to meet the ballast water discharge standard requirements, compliance is not possible. Extension requests must be submitted to the Coast Guard no later than 12 months before the scheduled compliance date. The compliance date for existing vessels is based on the vessel's first scheduled dry-docking date after the applicable 2014 or 2016 date specified in table 33 CFR 151.2035 (b). The Coast Guard determined the vessel construction dates and ballast water capacity were the appropriate ways to implement the changes.

