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## *USCG Issuing Monetary Fines For VRP Violations In Western Alaska*

On November 8, 2013, The U.S. Coast Guard 17th District issued a news release announcing that Coast Guard Sector Anchorage, Alaska is stepping up enforcement of tank Vessel Response Plan violations. Tank vessels bound to or from a U.S. port and transiting through the Western Alaska COTP Zone must have an approved Geographic Specific Appendix in their VRP for Western Alaska prior to transiting or operating within the Captain of the Port Zone, if carrying oil in bulk as cargo or oil cargo residue. Violation of this requirement can include the issuance of a Letter of Warning, or Notice of Violation with a Civil Penalty; however, the Captain of The Port for Western Alaska has decided to issue monetary penalties due to an increased number of violations. Vessel owners failing to comply with 33 CFR 155 Subpart D will be issued a monetary penalty up to \$11,000 per violation per day.

In 2012, an Alternate Planning Criteria was established by the Alaska Maritime Prevention & Response Network to enable tank vessels operating in Western Alaska to comply with an appropriate alternative to the National Planning Criteria established under Title 33 CFR Part 155.

“Since the Alaska Maritime Prevention & Response Network's Alternative Planning Criteria for tank vessels was approved by the Coast Guard, we have issued seventeen Letters of Warning to vessel operators violating these regulations,” said Lt. Ryan Butler, Assistant Chief, Inspections Division, Sector Anchorage. “The tank vessel APC has been approved for over a year now, giving vessel operators ample time to comply. We’re now switching to monetary penalties as a stricter means of enforcing these regulations and to ensure that tank vessels operating within the harsh and unforgiving Western Alaska COTP zone are adequately planning to mitigate and respond to a potential oil spill.” If your vessels call or transit this area, and your Vessel Response Plan does not contain the required appendix for Western Alaska, please contact CSI in order we may make necessary amendments.



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### **Electronic Notice of Departure**

#### **Reminder:**

An Electronic Notice of Departure (eNOD) must be submitted to the NVMC no less than one hour prior to departure from the last U.S. port on a voyage. The time of departure is defined as the time the vessel leaves berth.



## *Incorrectly Set Water Mist Systems Lead To USCG Detentions*



Recently, the U.S. Coast Guard has imposed a growing number of Port State Control Detentions due to inoperative water mist systems. In October 2013 alone, six Detentions were imposed for this reason. The water mist systems have been deemed inoperable in cases where the water supply valve was found in a closed position and/or the system is found set in manual mode rather than automatic mode. Although either condition can be corrected on the spot, the U.S. Coast Guard in numerous Captain of the Port Zones have been automatically imposing SOLAS Detentions. A Detention has long lasting ramifications for both the vessel and the operator. A single Detention imposed by the USCG will subject a vessel to increased inspection for a period of two years; and multiple Detentions within an operator's fleet can place the Company on the list of targeted operators. Avoiding this Detention is very simple. For vessels equipped with a water mist system, the Chief Engineer should ensure that the water supply valve remains open, and all local and remote activation stations are set to "Automatic" rather than "Manual."



## *MGO Changeover in California Waters*

The California regulations require that vessels sailing in Regulated California Waters (RCW) switch over to MGO with a sulfur content of less than 1%. RCW is defined as waters within twenty-four nautical miles of the California Baseline. State inspectors routinely visit vessels to sample the MGO for sulfur content, and to examine nautical charts and logbooks to determine when and where the changeover took place. The California Air Resources Board has issued several fines and penalties to vessels that planned the changeover to take place prior to entering waters within twenty-four miles of the California coast line, but transiting within twenty-four miles of the numerous small islands off the California coast, such as the Channel Islands near Los Angeles/Long Beach and Faralen Island near San Francisco. The fines imposed have been high. In order to avoid these penalties, voyage planning for vessels calling the State of California should carefully take into account that vessel's must switch over to low sulfur MGO prior to transiting within twenty-four miles of all California lands, including the islands off the coast. Though the requirements are to be enforced within the twenty-four nautical mile zone, we recommend that the changeover be completed well in advance of entering Regulated California Waters.

### **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.

## ***USCG Marine Safety Alert: Bridge Resource Management in Pilotage Waters***

The U.S. Coast Guard Inspections and Compliance Directorate has issued a Marine safety Alert addressing Bridge Resource management in pilotage waters. The alert is a reminder that navigation watch teams should at all times use Bridge Resource Management (BRM) best practices and techniques, even when the ship is being directed by a properly licensed pilot. BRM is the effective management and utilization of all available resources, both human and electronic, by the navigation watch team to ensure the safe navigation of the vessel. The essence of BRM is a safety culture and management approach that facilitates communication, cooperation, and coordination among the individuals involved in a ship's navigation. BRM is required by the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW).

A recent marine casualty investigation of a bridge allision involving a deep draft tank ship revealed the local pilot was navigating the vessel in highly reduced visibility conditions, without any substantive navigation assistance or input from the vessel's bridge watch team. The pilot and both watch officers on the vessel's bridge had taken a BRM course within the last five years. The pilot's course was a "BRM-P" course (i.e., a BRM course designed and approved to focus on the functions, tasks, experiences, and needs of compulsory pilots). The vessel's operating company had policy and procedures in place requiring crews to utilize BRM, yet communications between the crew and the pilot were lacking.

Masters are reminded they are ultimately responsible for the bridge watch team's conduct and safe navigation. This includes maintaining discipline in promoting teamwork and information exchange, especially when cultural or language barriers may exist between the pilot and the vessel's crew. The presence of a properly licensed pilot does not relieve a vessel's bridge team of its responsibilities for safe navigation.

The Coast Guard strongly recommends vessel owners, operators, and masters ensure effective BRM is being utilized aboard their vessels, and that mechanisms exist to ensure that a *cooperative, mutually-supportive working relationship* is developed between the bridge team and the pilot in recognition of their respective responsibilities for safe navigation.



### **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

### **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 of call one of us on our mobile phone as directed by the message.

Also, please begin each notification drill by stating "This is a drill," and be prepared to provide the vessel's call sign.



## *NTVRP Implementation Date Reminder*

On December 19, 2013, the USCG issued a Marine Safety Information Bulletin (MSIB# 42-13) reminding industry that owners and operators of non-tank vessels 400 GRT and above operating on the navigable waters of the United States are required to prepare and submit oil spill response plans by January 30, 2014. The MSIB states because many of the requirements in the NTVRP final rule are statutory mandates and regulatory constraints on the USCG's ability to extend the implementation date, the USCG does not intend to extend the implementation date for the required submission of NTVRPs. The USCG will implement an Interim Operating Authorization (IOA) process to assist owners and operators with meeting the deadline.

The USCG will issue six-month IOA letters, as necessary, pursuant to 33 CFR 155.5023. To meet the requirements and receive an IOA letter, vessels must submit a plan containing the minimum following information:

- 1) Identification of a Qualified Individual (QI) and alternate QI;
- 2) Identification of an OSRP by contract or written consent;
- 3) Identification of a salvage and marine firefighting provider and submission of a salvage contract and funding agreement; and
- 4) Signed certification statement as required by 33 CFR 155.5023(b).

Early submission of NTVRPs is recommended, even if the certification statement identifies NTVRP elements that are incomplete, in order to receive an IOA Letter.

If you have not already done so, please contact CSI for further assistance in preparing and submitting your NTVRP.

### **ISPS Tip**

Most Ship Security Plans require that a Visitors' Log be maintained by the gangway watch detailing persons who board the vessel, the purpose of their visit, and their arrival and departure times. Frequently, we have observed gangway watchman handing a pen to the visitor to make the log entry. We recommend that the gangway watchman make all Visitors' Log entries himself in order to ensure that all entries are correct and legible.

