

# Subchapter M Inspection of Towing Vessels Proposed Rules Overview

Presentation for  
Locks Maintenance Workshop

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Timothy Keyser  
Marine Design Center  
Timothy.J.Keyser@usace.army.mil  
(215) 656-6171 / (267) 275-2638



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Marine Design Center

US Army Corps of Engineers  
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**Subchapter M**



# Background (Why?)

- High profile accidents



- Eliminate the term/stigma “uninspected”

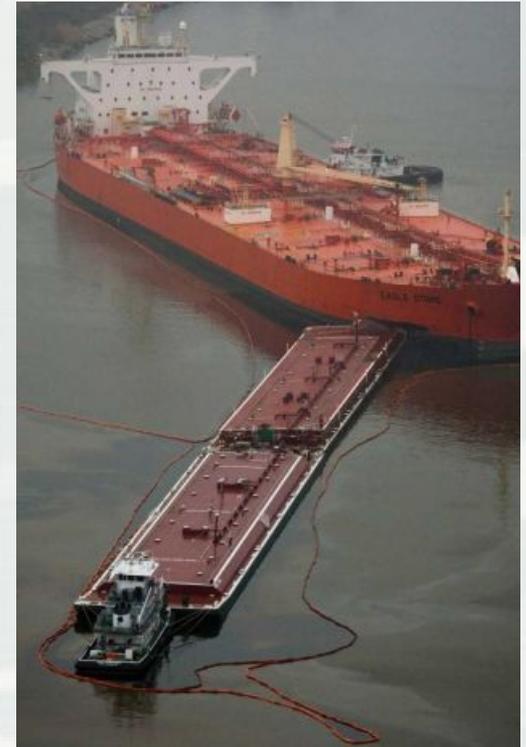
UNINSPECTED TOWING VESSEL  
**SAFETY EXAMINATION**  
UTV

ROUTE	EXPIRES
<input type="checkbox"/> Inland	<b>2012</b> <input type="checkbox"/>
<input type="checkbox"/> Coastal	<b>2013</b> <input type="checkbox"/>
<input type="checkbox"/> Oceans	<b>2014</b> <input type="checkbox"/>
<input type="checkbox"/> Great Lakes	<b>2015</b> <input type="checkbox"/>

MTSA Regulations Apply

U.S. Department of Homeland Security  
THIS VESSEL MEETS ALL USCG UNINSPECTED TOWING VESSEL REGULATIONS

JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
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- Promote safer working practices
- Reduce casualties



# Proposed Rule

- Coast Guard & Maritime Transportation Act of 2004
- CG worked with ABS, a Towing Safety Advisory Committee Working Group, AWO, IMO, ISO and others
- August 2011 – USCG Issued the Notice of Proposed Rulemaking (NPRM)
- **46 CFR Subchapter M – Inspection of Towing Vessels**
  - **Parts 136 thru 144**
- Comment period closed 09 December 2011



# Applicability & Compliance

## • Applicability

- US Flagged towing vessels > 26' engaged in pushing, pulling or hauling alongside
- Towing vessels < 26' if they are towing barges with dangerous or hazardous materials

## • Compliance Options

- Develop and comply with a Towing Safety Management System (TSMS), use 3<sup>rd</sup> party auditors and inspectors
- Submit to an Annual Coast Guard Inspection



# Certificate of Inspection

## •TSMS Option

- 2 years to obtain TSMS Certificate
  - Within 1 year – 25% of fleet must comply and receive COI
  - Within 2 years – 50% of fleet must comply and receive COI
  - Within 3 years – 75% of fleet must comply and receive COI
  - Within 4 years – 100% of fleet must comply and receive COI

## •Coast Guard Inspection Option

- Within 3 years – 25% of fleet must comply and receive COI
- Within 4 years – 50% of fleet must comply and receive COI
- Within 5 years – 75% of fleet must comply and receive COI
- Within 6 years – 100% of fleet must comply and receive COI

## •COI valid for 5 years



# Towing Safety Management System

## (Part 138)

- TSMS is a written document, reviewed/approved by USCG
  - Includes policies and procedures to ensure compliance with Sub M.
  - Management and Vessel Operations Ownership
  - Safety Management System Administration and Management Org
  - Personnel, Vessel Compliance, Subchapter M Compliance, Vendors
- 3<sup>rd</sup> Party Auditor conducts annual inspection on behalf of USCG to ensure compliance with TSMS
- 3<sup>rd</sup> Party Auditor surveys the vessel annually and during the mid-COI dry docking
- USCG conducts a survey for COI issuance and renewal



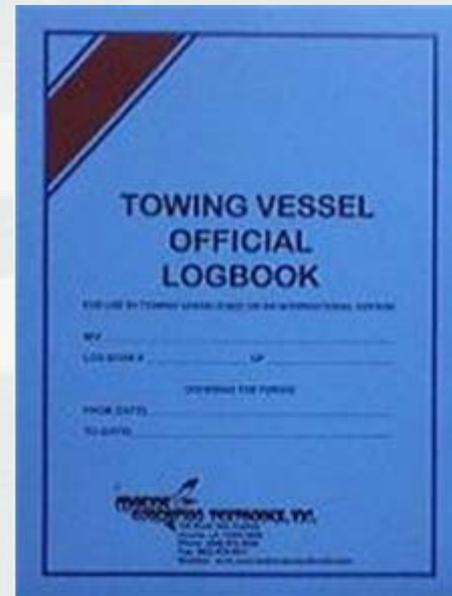
# Annual Surveys (3<sup>rd</sup> Party or USCG)

- Verify compliance with TSMS
- Verify record keeping requirements
- Hull Structure
- Machinery Fuel & Piping Systems
- Steering Systems
- Pressure Vessels & Boilers
- Electrical
- Lifesaving
- Fire Protection
- Towing Gear
- Navigation Equipment
- Sanitary Examination
- Unsafe Practices
- Vessel Personnel
- Misc Systems & Equipment



# Operations (Part 140)

- Crew Safety
  - Emergency Duties and Drills, Safety Orientations, Fall Protection, etc.
- Vessel Operations Safety
  - Stability, Openings, Navigation, Prevention of Oil Pollution, Security, Tests & Inspections
- Navigation & Communication Equipment
  - Charts, Radar(s), Communication Equipment, Navigation Lights
- Towing Safety
- Vessel Records (Official Logbooks)





# Lifesaving (Part 141)



- Survival Craft – inflatable buoyant apparatus (cold water) or buoyant apparatus (warm water)
  - Stowage and marking requirements
- Life Jackets – w/berthing: 1 per person and 1 per watch stander
  - Stowage and marking requirements
- Life Buoys – generally 3 or 4 required depending on vessel size
- Distress Signals
- EPIRBs & Line Throwing Devices





# Fire Protection (Part 142)



- Requirements for minimum number of portable and semi-portable fire extinguishers (generally only 3)
- Requirement for fixed system to be CG approved
- Built after 2003, required to have fixed system in engine room



- Fire pump requirement (specifications, operation, control)
- Required to have fire detection system in engine room, smoke alarms in berthing and heat detectors in galley.



# Machinery & Electrical System and Equipment (Part 143)

- Machinery and General Alarm requirements
- Communications between engine room and pilothouse
- Fuel system and Remote Shut-Off
- Bilge Pumps
- Pressure Vessels – relief valves at 110% of working pressure



# Machinery & Electrical System and Equipment (Part 143)

- Electrical Systems
  - Require a load analysis to be approved and appropriate power source selected
  - Equipment, panel and cable marking requirements
  - Deadfront switchboard
  - Grounded electrical systems
  - Installation and wire way requirements
- Emergency lighting for 3 hrs
- Pilothouse Alerter System
- Two sources of electricity for alarms, E-lights, navigation lights, pilothouse lights, radios and navigation equip.
  - if battery: 3 hrs duration



# Construction and Arrangement (Part 144)

- Structural Standards - ABS rules for intended route
- Stability – must meet 46CFR170.173 (Unusual Proportion)
- Emergency Escapes – 2 from quarters or spaces where crew are normally employed
- Rails or equivalent protection around the periphery of all decks
- Exhaust – clear of woodwork and insulated



# General Information

- If currently ABS classed – OK
- If built to ABS class, but not classed – probably OK
- If Load Lined – OK
- Crew work hour limits not included in NPRM, but will be eventually included
- There are a lot of little details in the NPRM



# Now What??

- Compliance Will Cost Money
  - Vessel upgrades, 3<sup>rd</sup> Parties, Inspections, Dry Docking, Recording Keeping, TSMS
  - Operators should bring to program money for compliance
- Method of Compliance
  - TSMS or Annual Coast Guard Inspection
  - Project Office, District, Division, HQ
  - Compliance lead/responsibility



# EPA Vessel Discharge Permit 2013

- VGP will expire in 2013
- EPA issued the proposed VGP for December 2013
  - Stricter bilge and effluent discharge requirements
  - Ballast water BMPs and requirements
  - Environmentally Acceptable Lubricants
- EPA issued a proposal Small VGP for December 2013
  - Vessels < 79-feet
  - Record keeping, BMPs, Bilge, Ballast, etc.





# DISCUSSIONS/QUESTIONS

Timothy Keyser

[Timothy.J.Keyser@usace.army.mil](mailto:Timothy.J.Keyser@usace.army.mil)

O: (215) 656-6171 / C: (267) 275-2638

