



Towing Vessel Considerations

Paul Hite 14 May 2019



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ABS Service Network



Third-Party Organizations

TSMS Option Compliance



TPO Functions

- Verify regulatory compliance through third-party surveys (machinery/hull) and audits (Safety Management System) on behalf of USCG (NOT ACP)
- Approve and provide oversight of internal survey programs
- Perform repair survey work if permitted by local OCMI
- Encourage operator transparency with the flag state

Positive Momentum

- USCG, AWO and TPOs have worked with industry through a number of issues with few outstanding matters remaining
- TVNCOE and OCMI have been ready/willing to assist operators from day 1
- Numerous industry day outreach events hosted by USCG
- Permit to proceed process is keeping vessels moving



Photo Credit David Rider,
Seamen's Church Institute

Challenges

- Reporting protocol (e.g. 2692, repair work)
- Inconsistent interpretation of regulations between zones
- Paper copies of SMS documents posing potential hazards
- Crew TSMS knowledge of mature systems (continual improvement)

Addressing Deficiencies

TSMS Option Vessels



Safety Moment



Structural Hazards



Holed vent pipe main deck



Open junction box main deck



Cut main deck and supporting member

CG-CVC Policy Letter 17-10 Excerpt

“The Coast Guard’s expectation is that owners and/or managing operators will actively identify non-conformities and document the items in accordance with their approved TSMS. The TPOs will then verify the non-conformities are properly addressed as well as independently verify the vessel and company are in compliance with the regulations. When a non-conformity is found, the TPOs should ensure that corrective measures have been taken, the issue is resolved in a timely manner, and the appropriate documentation is maintained.”

Current Deficiencies

- Vessel Restricted in Ability to Maneuver (VRAM) lights and corresponding day shapes
- Fire detection control panel location
- Fixed CO2 system bottles located in protected space
- Ventilation opening/closures missing
- Vessel structural fractures

Current Deficiencies (cont.)

- Crew TSMS Knowledge
- Unsatisfactory drill performance
- Internal audits not performed annually for all management offices, **branch offices**, or vessels
- ~~Flares~~ *required*
- Others?



Thank You

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