
GENERAL TSMS DEFICIENCIES

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Tava S. Foret
Director, Audit and Survey Services



BACKGROUND – AUDIT HISTORY COVERING 2011-2016

- 600+ Third-Party Vendor Reviews *(Proprietary Audit Tool)*
 - 280+ Management Reviews of Towing/Fleeting/Shifting Operations
 - 280+ Towing Vessel Reviews of Towing/Fleeting/Shifting Operations
 - 15+ Shore Tankering Review
 - 15+ Tank Barge Cleaning Facility Review
 - 16+ Barge Inspections
- 730+ AWO RCP Certification Audits *(3-year period beginning JAN 2014)*
 - 230+ AWO RCP Management Audits
 - 500+ AWO RCP Vessel Audits

Vendor Review Audits were performed by Quality Auditing, LC, which was purchased by TVIB in December 2016



TVIB VENDOR REVIEW PROGRAM

- **Proprietary Audit Tool**

- Designed to Perform Objective Audits to Produce Consistent Results
- Web-based Tool Used in the Field with an Online Portal for Vendor Commenting
- Final Report Sent to Customer and Vendor

- **Question Sets Based On A Broad Set of Elements**

- USCG Regulations
- RCP Elements
- Industry Best Practices Not Otherwise Outlined in USCG Regulations and/or RCP Requirements

- **Positive Outcomes from Program**

- Many Operators Added Missing or Deficient Elements
- Confirmed Through Subsequent Visits



THIRD-PARTY VENDOR REVIEW PROGRAM – AREAS COVERED BY AUDIT TYPE

(Proprietary Audit Tool)

Management Review

- Maritime Security
- Environmental Program
- Safety Program
- Training
- Personnel
- Emergency Response
- Operations
- Maintenance
- Internal Auditing
- Fleeting Operations

Vessel Review

- General
- Bridge & Documents
- Navigation Safety Equipment
- Lifesaving
- Pollution Prevention
- Fire Fighting, Protection & Suppression Equipment
- Towing & Terminal Gear Inspection
- Additional Equipment
- Vessel Area of Service



SUMMARY RESULTS FROM VENDOR REVIEWS OF TOWING/FLEETING/SHIFTING OPERATORS

(Proprietary Audit Tool)

RCP Operators

- **13 Operators**
- 8 w/Fleeting Operations
- All Vessels Had Valid USCG Bridging Program Decals
- Management Reviews
 - **Total Average Findings – 18.62**
 - Average Findings in Procedures – 11.15
 - Average Findings in Records – 7.46
- Vessel Reviews
 - **Total Average Findings – 7.54**

NON-RCP Operators

- **7 Operators**
- 7 w/Fleeting Operations
- 6 Vessels Had Participated in a USCG Bridging Program Inspection/5 Vessels Rcvd Decal
- Management Reviews
 - **Total Average Findings – 48.86**
 - Average Findings in Procedures – 38.57
 - Average Findings in Records – 10.29
- Vessel Reviews
 - **Total Average Findings – 21.57**

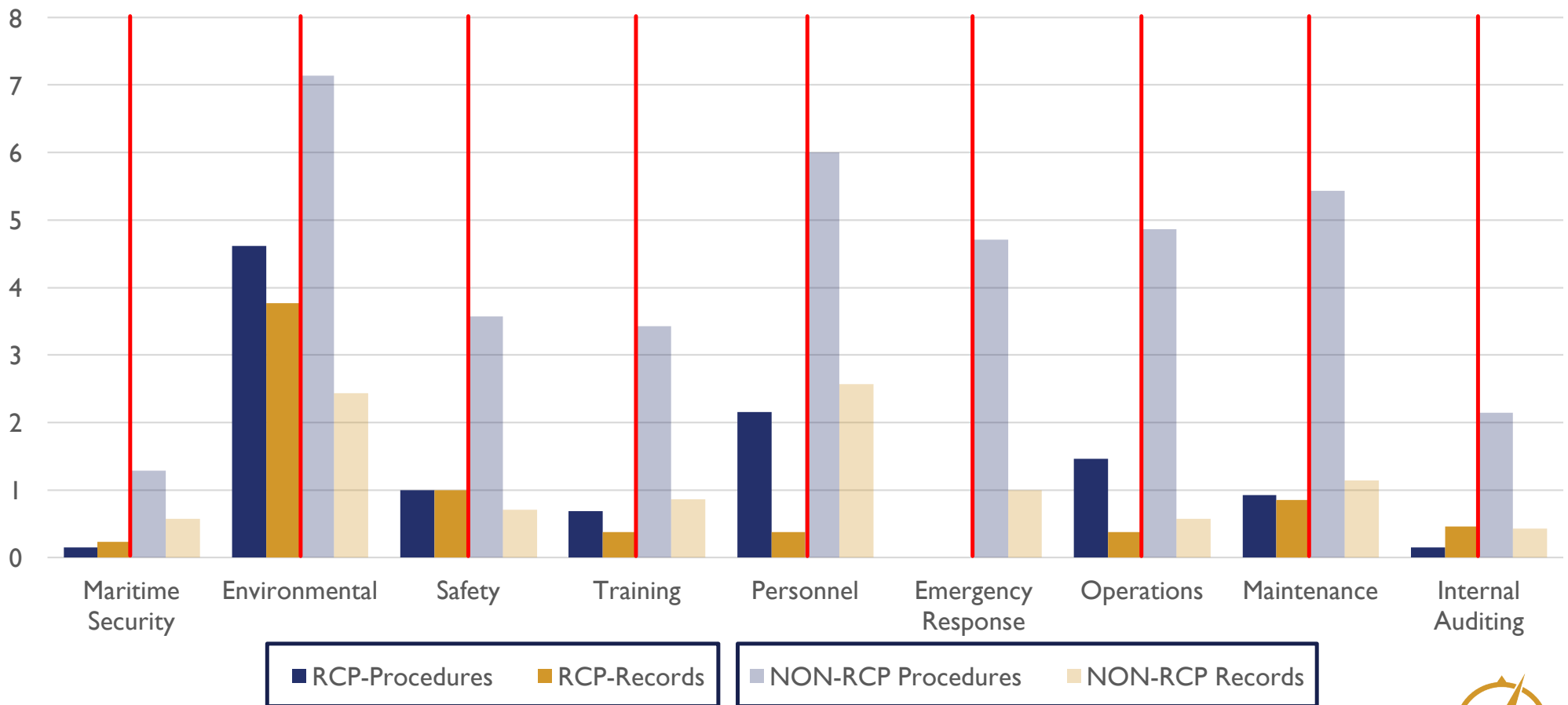
Random Sample of 5 Review from 2011, 5 Reviews from 2014, and 10 Reviews from 2016



VENDOR MANAGEMENT REVIEW FINDINGS

(Proprietary Audit Tool)

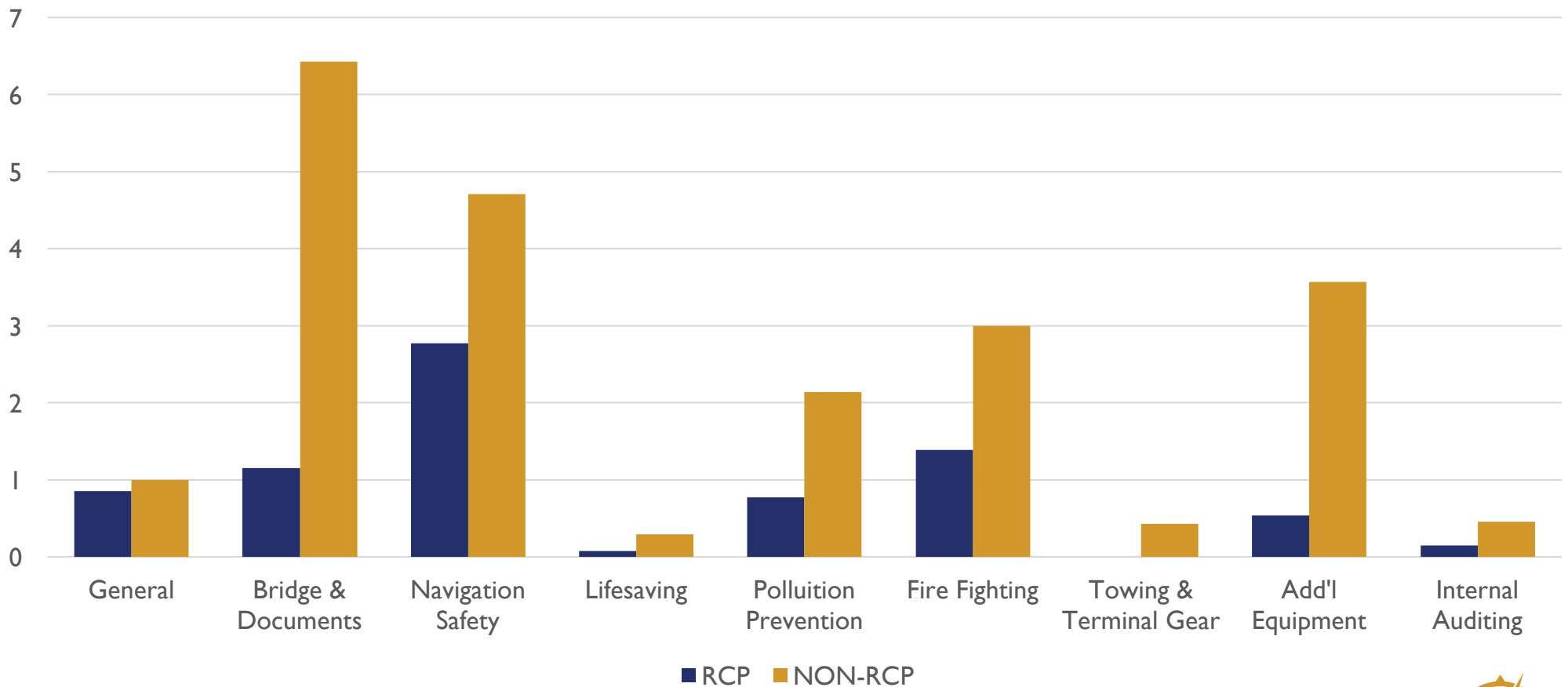
Average Number of Findings By Area and Operator Type



VENDOR VESSEL REVIEW FINDINGS

(Proprietary Audit Tool)

Average Number of Findings By Area and Operator Type

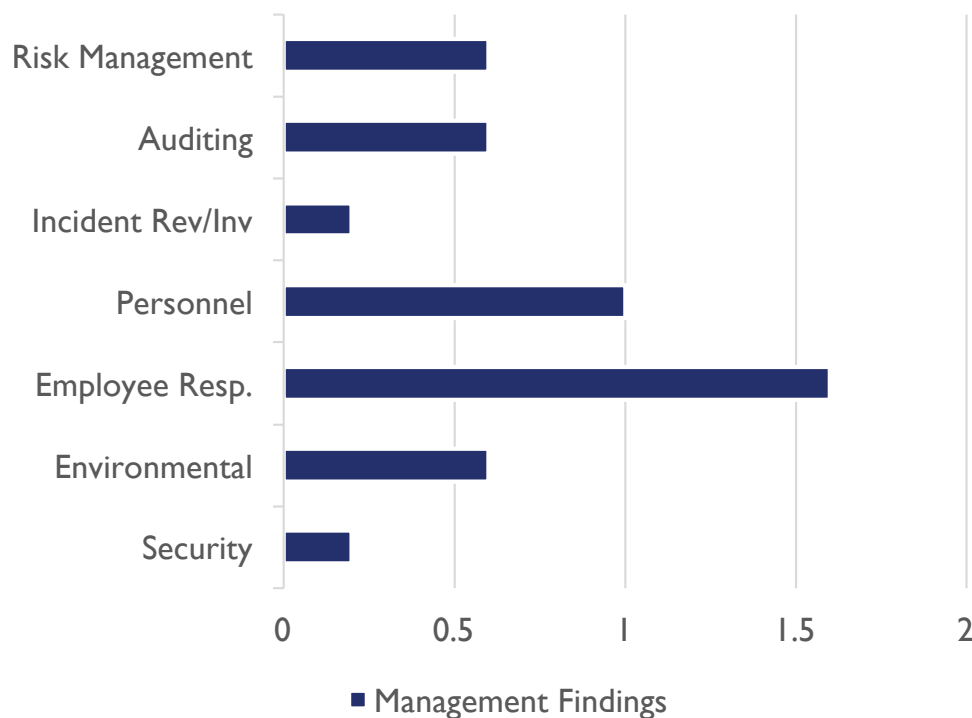


RCP AUDIT FINDINGS BY AUDIT TYPE/AREA

(Proprietary Audit Tool)

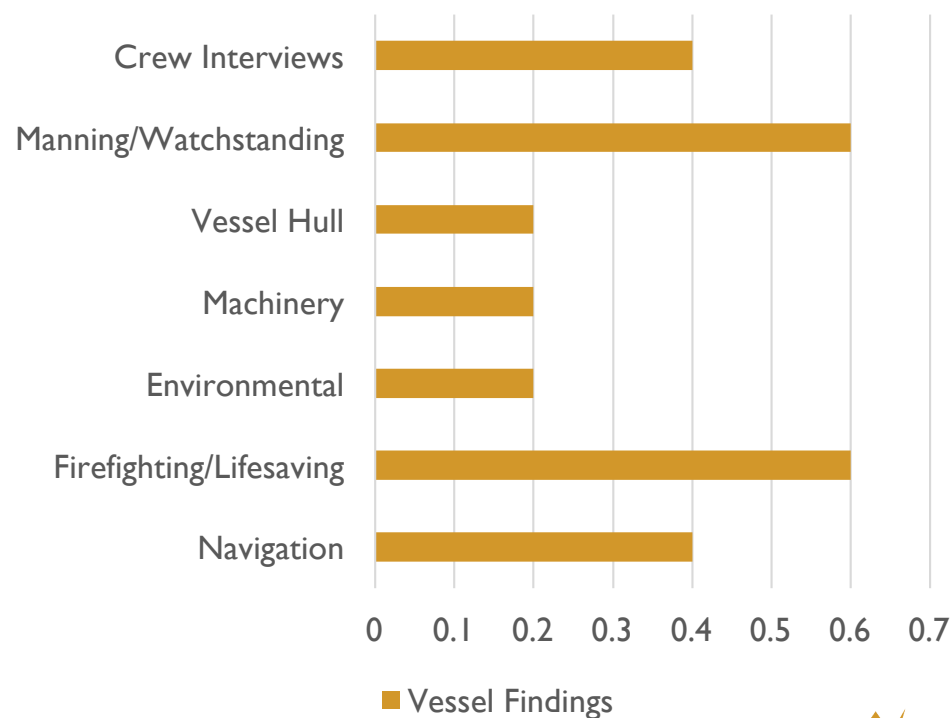
RCP Management Audit Findings

Average of 4.80 Per Audit



RCP Vessel Audit Findings

Average of 2.6 Per Audit



Random Sample of 5 RCP Audits from 2016 (Management and Vessel, Same Company)



VENDOR REVIEW – MANAGEMENT FINDINGS ENVIRONMENTAL

(Proprietary Audit Tool)

- **Average of 8.80 Findings**

- 5.50 Procedures

- 3.30 Records

- **Procedures**

- **Written Waste Disposal Programs**

- Bilge Waste, Oily Waste/Rags, Used Oil, Fuel Filters, Lubricating Grease, Hazardous Materials, Used Batteries (Wet/Dry Cell), Medical Waste, Garbage and Trash, and Food and Cooking Oil

- **Maintenance Procedures for MSDs**



VENDOR REVIEW – MANAGEMENT FINDINGS PERSONNEL

(Proprietary Audit Tool)

- **Average of 4.65 Findings**
 - 3.50 Procedures
 - 1.15 Records
- Hiring – Conditional Job Offers, Verify Background and/or Experience, Minimum Employment Age
- Annual Drug/Alcohol Testing, Annual MIS Reporting, USCG DAPI Audit, and Operational and Safety Training
- Pre-Employment and Periodic Physicals
- Disciplinary
- Operational Safety Training Prior to Initiating Work
- Crew Endurance Management (CEMS)
- Work Hour Limitations
- 46 CFR 40.25 2-Year DOT Employment Verification
- Employee Performance Evaluations



VENDOR REVIEW – MANAGEMENT FINDINGS PERSONNEL

(Proprietary Audit Tool)

- **Average of 4.65 Findings**
 - 3.50 Procedures
 - 1.15 Records
- Records
 - Annual MIS Report
 - Drug and Alcohol Training Records
 - Disciplinary
 - Pre-Employment
 - Employee Performance Evaluations
 - FCC Restricted Radiotelephone Operators Permit or Higher Class



VENDOR REVIEW – MANAGEMENT FINDINGS OPERATIONS

(Proprietary Audit Tool)

- **Average of 3.1 Findings**
 - 2.65 Procedures
 - 0.45 Records
- Procedures
 - Placarded Storage and Flammables and Combustibles
 - Oil Transfer
 - Safe Use of Wires, Lines, Chains Shackles, Ratchets, Winches, and Capstans
 - Rigging Requirements and Minimum Specifications
 - Inspection and Replacement Program for Rigging
 - Maintain Spill Containment/Recovery Equipment Onboard
 - **33 CFR 155.700 Person-In-Charge (PIC) of Transfer Operations On Towing Vessels**



VENDOR REVIEW – MANAGEMENT FINDINGS MAINTENANCE

(Proprietary Audit Tool)

- **Average of 3.45 Findings**
 - 2.50 Procedures
 - 0.95 Records
- Procedures
 - Routine and Non-Routine Repair Program
 - Lock-Out/Tag-Out
 - Guards Placed Around Exposed Moving Parts
 - Drydocking and Routine Hull Inspections
- Inspection of Watertight Closures or Other Openings for Water or Weather Tightness and Integrity
- Inspection of Rails, Ladders, Bulwarks, Lighting, Walking Surfaces, Chain Guards, Handrails, and Safety Chains for Wastage, Weakness, and Safety Considerations
- Inspection of Emergency Walkways and Hatchways
- Use of Piping Diagrams and the Marking of Piping Systems



VENDOR REVIEW – MANAGEMENT FINDINGS MAINTENANCE

(Proprietary Audit Tool)

- Records
 - Preventive Maintenance
 - Routine and Non-Routine Repairs
 - Lock-Out/Tag-Out
 - Corrective Action Process



VENDOR REVIEW – VESSEL FINDINGS BRIDGE & DOCUMENTS

(Proprietary Audit Tool)

- **Average of 3.0 Findings**
- Findings
 - Engine Room Alarm Panel Repeater Unavailable in the Wheelhouse
 - Master Unaware of the General Rules for Intoxicant Use
 - A Representative of the Crew Did Not Conduct a Security Briefing
 - A Representative of the Crew Did Not Conduct a Safety Briefing
 - MSDSs Were Not Readily Available to Crewmembers
 - Cargo Hazard Information Not Observed Onboard the Vessel for Cargo Carried in Barges Towed by the Vessel
 - Expired Alcohol Test Strips (2-hour Rule)
 - Vessel's Official Number Was Missing or Improperly Marked
 - Hailing Port Missing or Improperly Marked



VENDOR REVIEW – VESSEL FINDINGS

NAVIGATION SAFETY EQUIPMENT

(Proprietary Audit Tool)

- **Average of 3.45 Findings**
- Findings
 - **Navigation Lights**
 - Permanent Label Stating the Intensity of the Light
 - Placement of Lights (Forward)
 - Measurement of Space Between Lights
 - No White Masthead Light
 - No Magnetic Compass
 - No Swing Meter
 - Bell Missing or Insufficient in Size
 - Station Logs – Radio Logs Not Maintained
- Original FCC Ships Station License Onboard but Not Posted
- USCG Light List Obsolete Edition
- No USACE Notices to Navigation or USCG LNM Onboard
- No Copy of Inland Navigation Rules Onboard
- No VTS Users Manuals for Areas of Operation
- Not Making Monthly Entries Indicating the Batteries or Reserve Power Sources Have Been Checked and are Functioning Properly
- Radio Operator Without A Restricted Radiotelephone Operator Permit or Higher Class License



VENDOR REVIEW – VESSEL FINDINGS

FIREFIGHTING, PROTECTION & SUPPRESSION EQUIPMENT *(Proprietary Audit Tool)*

- **Average of 1.95 Findings**
- Findings
 - Fire Extinguishers - Out of Date Inspection Tag
 - Fixed Fire Pump – No Documentation to Verify Pump is Capable of Producing the Required Pressure of 50 psi
 - General Alarm
 - No Records for Weekly Testing
 - Had Flashing Red Light, but No Signage
 - Fuel Shut-Off Valves Not Marked or Improperly Marked
 - No Placarded Storage for Flammable Products





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www.thetvib.org

Tava S. Foret

Director, Audit And Survey Services

832.323.2155

tavaf@thetvib.org