



UNITED STATES COAST GUARD

EIGHTH DISTRICT

Towing Vessel Inspections Field Notice

Inspections & Investigations Division (DPI)

January 24, 2018

D8-TVIFN 18-1

Operational Enforcement Discretion

Purpose: Provide Operational Commanders with enforcement guidance when considering deficiencies or non-conformities during implementation of Subchapter “M” throughout the Eighth Coast Guard District. Operational Commanders shall note although Subchapter “M” regulations go into effect on July 18, 2018, the overall risk profile for towing vessels has not dramatically changed. As such, it is my intention to allow operational commanders the flexibility to defer enforcement of appropriate Subchapter “M” requirements until further enterprise-wide guidance is promulgated.

Discussion: Operational Commanders shall implement Subchapter “M” within their fleets of responsibility at a pace unit resources can support based on local evaluation of risks posed to the marine transportation system. The operational requirements listed below likely pose minimal risk to the operational safety of this fleet depending on the vessel’s route and service. Operational Commanders may consider deferring enforcement, via the issuance of CG-835s, of the following requirements until further guidance is issued:

- **Visual Distress Signals:** There are regulatory inconsistencies on certain classes of vessels operating on rivers and lakes, bays, and sounds with regard to the requirements for visual distress signals.
- **Dayshapes and Navigation Lights:** For the following conditions on vessels operating inside the boundary line: Vessel Aground, Not Under Command, Vessel at Anchor, and Restricted in Ability to Maneuver.
- **Pressure Vessel Maximum Allowable Working Pressure (MAWP):** If the MAWP is not indicated on the pressure vessel by a stamp, nameplate, or other means visible to the crew, the owner may be required to provide additional documentation regarding the details of the pressure vessel and its associated equipment. Calculations for determining the MAWP may be conducted using the National Board of Boiler and Pressure Vessel’s NB-132 Revision 8 document or as determined by a Professional Engineer.
- **Existing Fire Control Panels:** Operators should be encouraged to seek an equivalency through their TPO or CG-ENG for fire control panels not installed in accordance with regulations.
- **Fire pump pressure testing:** It is not uncommon for inspectors or industry partners to test the pressure of the fire pump with a pitot tester. In some cases, the requirement for a fire pump to display 50 psi’s may far exceed the pressure necessary to reach all parts of the vessel. Marine inspectors should use

their best judgment in determining adequacy of the fire main and not rely solely on the reading from a pitot gauge.

- **Shaft Tachometers:** Because shaft tachometers are not required by regulation, towing vessels must only be capable of monitoring thrust.
- **Shipboard lighting with 90 minute-batteries:** Many vessels are equipped with a popular manufacturer's light with a 90-minute duration battery for emergency lights. The regulation calls for a 2-hour lighting requirement. Units should document the back-up batteries specifics in the MISLE narrative.

COI application

- We recommend units communicate with local owners/operators whom choose the TSMS option and utilize the decal policy for initial COI issuance to send their application for COI to the Coast Guard office where they received their most recent decal.

Training

- The D8 Subchapter M training for MI's will be held in New Orleans, LA March 7-8, 2018. At this time, we will have one spot available for each unit in the Eighth District. More information to follow.

Questions or comments concerning this field notice may be directed to the D8 Towing Vessel Coordinator, Jill Bessetti, (504) 671-2264 or Jill.A.Bessetti2@USCG.mil.
