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THE TVIB BRIEF



Preparing for COI Renewals

Let's face it, Sub-M compliance has a lot of firsts and preparing your vessel for its first COI renewal may bring on a lot of questions, concern, and anxiety. As we move into this next phase of Coast Guard oversight it's key to understand that it's as much about communication as it is preparation. Here are a few suggestions and auditor insight from our member spotlight that may help you get over this next compliance hurdle.

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Updated Guidance

Work instructions for Drydock Examination (DD) and Drydock Extension (DDX) Policy Clarifications and U.S. Flagged Vessels Inspected Under Multiple Subchapters ("Multi-Service") have been added to our website, you can access them [here](#).

MEMBER SPOTLIGHT

Chris Kern is a Lead Auditor and Surveyor located in Southeast, TX. He has been certified with TVIB since 2020 and is open to new clients with the ACTion group throughout the United States.

How long have you been in this industry?

I have been in the marine industry for 23 years. I started out in the United States Navy in 1996. I worked in operations in the blue water sector for 12 years before transitioning to inland towing operations, logistics and compliance.

How were you exposed to this career path?

As an Operations Manager at two towing companies, I was directly responsible for towing vessel safety and compliance. I worked with TVIB during my time at both companies. Also, I worked closely with the ACTion group during that time. My interactions with TVIB and the ACTion group team really educated me and informed my decision to pursue this career path.

What's your favorite work-related activity?

Onboard vessel activities. I really enjoy interacting with the crews about safety and compliance topics. I always point out in the opening meetings that having a TPO auditor or surveyor onboard is a great opportunity for the crew. If the U.S. Coast Guard boards the vessel, normally the interaction is brief and to the point. I encourage all crew members to ask questions about Subchapter M, RCP, safety, and compliance. It is very rewarding when the crews utilize these opportunities to learn from the activities.

What do you find most challenging about auditing? Surveying?

Some crew members still perceive that the TPO auditor or surveyor is there to generate problems and/or get them into trouble during the activities. They are fewer and fewer every year, but this perception has created instances where crew members are not willing to openly engage during the activities. If someone, including myself, participating in the activity did not learn something during our interactions then we all missed an opportunity.

What is your favorite nonwork-related activity?

Family time no matter the activity. I love spending time with my two daughters and my wife. Towboaters are pretty cool, but my girls are my favorite!

What is your most predominant daily motivator?

Every day I want to do something to improve myself, someone else or the space my family lives in.



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Have Questions?

To access our full list of FAQs, please visit thetvib.org/faq

Suggestions?

We would love to hear from you! Submit your idea for hot topics or FAQs to info@thetvib.org or dial 832.323.3992

TPO Customer QuickBase Access

[Click Here](#)

Drydock/Internal Structural Examinations Course

Our next 3-day course is scheduled for August 22nd! This is the first in-person course for the year, located in Channelview, TX.

[Click Here](#)

Preparing for COI Renewals

“ Drills would be the one thing I would single out and recommend everyone to work on going into the COI renewal period. I think there is real opportunity for shore-based safety and compliance to help improve the consistency of drills onboard. -Chris K ”

Know Your Zone

If you know when and where the COI renewal is going to take place, then you may be a step ahead. Some open dialogue with your local OCMI representative or marine inspector will be a big plus. It's the most important aspect of how this activity will transpire. It's common knowledge that requirements and expectations can change depending on the OCMI Zone you are in, so engaging your local ITV Inspector may be the most important first step of this process. Chris says, "From the few COI renewals, I have witnessed so far, be prepared for anything. Just like the phase-in period of COI issuances, there seems to be a wide and differing range of what could be required at each OCMI." They will likely have insights into what documentation you will need to submit to them prior to the activity. They can also tell you what to expect when it comes to the scope of the inspection.



Timeline Awareness

Review the regulations and Coast Guard guidance. 46 CFR 136.210 spells out some very specific requirements and deadlines relative to renewing COIs. Review your fleet's COI expiration dates and plan accordingly. Schedule your final survey for the 5-year COI cycle as early as possible. That will allow plenty of time for your TPO to process it and for implementing any corrective action, if required. The application for renewal is due 30 days prior to the expiration date. Look at CVC-WI-013(6). It's a good resource and has a helpful timeline graphic that may be useful. Read each vessel's COI very carefully and determine if any changes need to be made based on lessons learned from the previous 5 years. There may be some changes to make simply because the COI was populated with the wrong information or maybe you have a change in your operation that needs to be reflected on the COI. Also, consult your TSMS on any changes specific to manning. This is a good time to make sure the minimum manning requirements set forth in your TSMS align with your COI. In any case, if the COI needs to be amended this is an excellent time to do it. Make sure you are using the most current COI as a reference and always fill out a new application.



Documentation

Have the full record of documents available for the Coast Guard to review. Remember, regulations require owners or managing operators to retain documentation for 5 years. Conduct a thorough review of your vessel's documentation. If you realize you're missing something engage with your TPO. During the inspection, the Coast Guard will, likely, ask for records that exceed the requirements of 46 CFR 136.210 (a)(2). It's good to be ready for that ahead of time. Make sure the crew knows where the documents are kept. If you're a TVIB TPO customer, make sure to utilize our database for tracking customer info & fleet compliance activities. Customers can interact with the database to update contact info, close out findings, and view audit and survey history.

