

OCTOBER 2023

THE TVIB BRIEF



The Effects of Change

Capital expenditures on existing vessels are an investment owners and operators have been willing to make recently given the rising costs of building new vessels in today's, resource strapped, shipbuilding environment. The cost of labor, raw materials and technical expertise have increased exponentially, and owners are faced with weighing the cost of replacing an aging asset against the cost of maintaining one through capital expenditure projects. With the implementation of Subchapter M, owners are now facing a new challenge they likely haven't dealt with before - understanding the effect a regulatory determination, like "major conversion," may have on the bottom line. After all, an unforeseen determination can add costs to the project if the vessel must be updated to "new vessel" standards. For that reason, when it comes to vessel repowers, modifications or alterations to existing vessels, transparency is key. It's that simple. Engage with your TPO and local OCMI early and often to avoid confusion.

Industry Updates

Coast Guard upgrades Navigation Center [website](#) to make it more user friendly.

Is your vessel's AIS info accurate?
Click [here](#) to check.

Have Questions?

To access our full list of FAQs, please visit our website [here](#).

Suggestions?

We would love to hear from you! Submit your idea for hot topics or FAQs to info@thetvib.org or dial 832.323.3392

TPO Customer QuickBase Access

[Click Here](#)

Drydock/Internal Structural Examinations Course

Our last course of the year is scheduled for November 7-9th, located in Paducah, KY. Registration is now open and space is limited!

[Click Here](#)

MEMBER SPOTLIGHT



Since 2013, Richard "Ric" Singley has been a TVIB certified member and is credentialed to perform Sub M Audits, Annual Surveys, and DDISEs. He has been in the marine industry for over 30 years. Ric is also TVIB's current Chairman of the Board.

How were you exposed to this career path?

I retired from the Coast Guard as a marine inspector and started my own business as an independent surveyor shortly after that.

What is your favorite work-related activity?

I really enjoy conducting surveys.

What do you find most challenging about auditing? Surveying?

Learning the different nuances of the industry and how each company approaches compliance.

What is your most predominant daily motivator?

I like helping people. I think that's what lead me to get involved with the board at TVIB.

Richard Singley
S&L Maritime Solutions, LLC.

(985) 688-6427
 singlemaritime@gmail.com

What is your favorite nonwork-related activity?

I have my own trawler, so I spend quite a bit of time tinkering with it but I really enjoy getting it out on the water and fishing. Woodworking is also a hobby that I've enjoyed for years.

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“Replacement in kind for mechanical components is certainly getting harder due to supply chain issues and technological advances. Older parts are getting harder to find and more expensive, so leaning toward updating equipment is certainly understandable, but you’ll need to plan ahead.” -Ric S.

Design Verification

Unless it’s “replacement in kind,” new engines or generators may come with new electrical system requirements and that may change the vessel’s applicability to certain parts of Subchapter M. If it’s unclear as to whether the modifications are “replacement in kind” then contact the local OCMI or engage with your TPO. If modifications are not a “replacement in kind,” 46 CFR 144.140 has a few options relative to what entity may conduct the design verification. Owners can engage a Professional Engineer (P.E.), an authorized classification society or submit plans to the U.S. Coast Guard Marine Safety Center (MSC) directly. If the plans are going to be submitted to MSC directly, then owners should consult the local OCMI and their TPO while following 46 CFR 144.145. Additionally, they’ll need to be familiar with [MSC Technical Note 1-17](#), [CH-1](#) and [MSC Procedure E1-36](#). Each of these resources provides key insights into the design verification process for Subchapter M vessels.



Role of P.E. or Classification Society

If a P.E. or a classification society is being used, then they’ll need to determine what systems will be impacted by your modifications and verify that your plans comply with the applicable design standards outlined in Subchapter M. Additionally, new stability calculations may need to be conducted based on the vessel’s overall weight change due to the modifications. The regulation lays out some very specific requirements that the P.E. or classification society representative will need to be familiar with in 46 CFR 144.145 (b). Any correspondence used to prove compliance with these design standards should reference the applicable regulations. Remember, the P.E. or classification society does not have the authority to make a major conversion determination. They can only verify that the planned modifications will be made in accordance with Subchapter M requirements.

“Don’t risk having your vessel taken out of commission for weeks or months on end, waiting on a determination.” -Ric S.

Major Conversion Determination

Once the design verification has been reviewed and documented by the appropriate entity, owners should coordinate with their local OCMI and TPO, once again, to verify that the modifications do not constitute a major conversion. The OCMI has the discretion to either accept your plans for modification or they can submit them to the MSC for a major conversion determination. You may have to send additional documentation to MSC for a formal determination. Those documents will likely include: an outboard profile, general arrangements before and after alterations, estimated weight changes and a detailed description of the proposed alterations. The determination could take as little as 30 business days but it’s best to plan for 90. Owners need to ensure they have allowed enough time to complete this process prior to making alterations to avoid extra expenditures and frustration in the shipyard.