

NOVEMBER 2023

THE TVIB BRIEF



What's in your TSMS?

Ever heard this question? "Well, what's written in your TSMS?" When it comes to Permits to Proceed (PTPs), it absolutely makes a difference in what actions an owner may take to proceed to another port for repairs. It may be the difference in notifying the Coast Guard and asking for permission. Owners have the option to tailor their TSMS to address conditions they anticipate may occur that will cause the vessel to be out of compliance with its COI but would allow the vessel to safely proceed to another port for repair. It's important for owners to know what conditions, if any, have been anticipated and addressed in their TSMS before moving forward in the PTP process. Essentially, vessels fall into two categories that will determine the critical next steps in the process.

Industry Updates

USCG: Final Rule for Towing Vessel Firefighting Training

Click [here](#) to view our latest blog post.

MEMBER SPOTLIGHT



Jeremy Tardy is working on his 22nd year in maritime. He spent 3 years on deck, 9 years in the pilot house, and 10 years in shore side management roles. He has been a licensed mariner for 19 years and is President and Co-Founder of Reliant Maritime Solutions.

How were you exposed to this career path?

I grew up in Marmet, WV, along the banks of the Kanawha River where coal barges were seemingly as common as leaves on trees. As a teenager, I was very fortunate to land a job as a deckhand for a lifelong riverman.

What is your favorite work-related activity?

Although I've served in shore side management roles for 10 years now, I still like being between the sticks of a towboat. There is a certain peacefulness and that comes with quietly plying America's waterways while the rest of the country engages in its hustle-and-bustle.

What do you find most challenging about auditing? Surveying?

I've found that the key to overcoming challenges is to have the right vessel and shore side teams with an established culture of prioritizing safety and compliance above all else.

Jeremy Tardy

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What is your most predominant daily motivator?

My most predominant daily motivator is to support our team in every possible way. We have been blessed with some of the very best mariners in the industry who deeply care about each other and our success as a whole, and they deserve the very best working environment that we can provide.

What is your favorite nonwork-related activity?

My wife and I have 4 children that are involved in many sports and activities. We also enjoy just about anything outdoors.

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](#)

Transit Plan Template

A sample Transit Plan template is available to **TVIB members**.

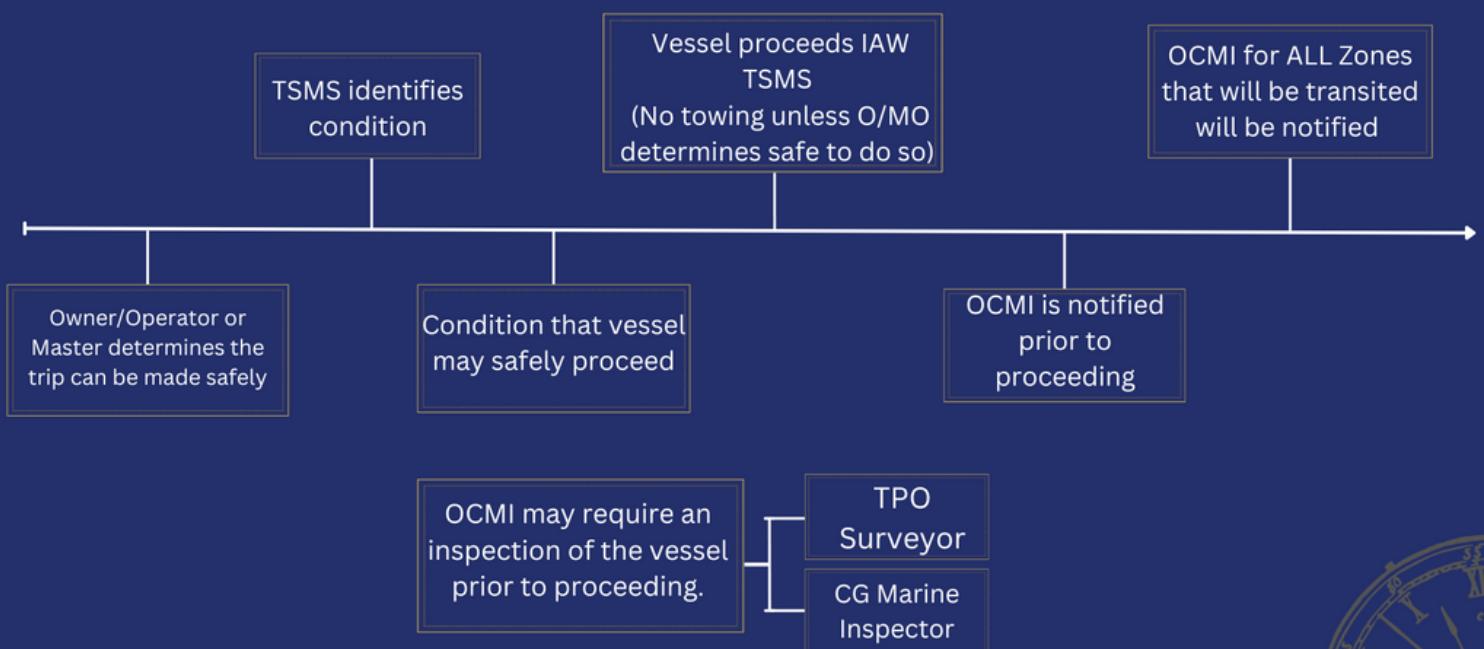
[Click Here](#)

Permit to Proceed and Transit Plans

A TSMS Identified Condition

In this case, some critical thinking and preparation paid off and the vessel's TSMS addresses the exact situation it is now facing. It's still incumbent upon the owner, managing operator or the master to use their judgement to determine if the trip can be completed safely. There are many things to consider when making that call but eventually, they'll have to determine if the vessel can tow? Remember, a PTP is being considered because there is damage to the vessel, failure of an essential system, or failure to comply with a regulation or a TSMS requirement. Owners, managing operators or masters need to consider the impact of facing one or all these situations when determining whether it's safe to proceed. Before proceeding, the owner or managing operator must notify the cognizant OCMI where the noncompliance occurred. Then they'll have to notify any other OCMI zones they'll be transiting through.

Vessel w/TSMS *Specifically Identifies Condition*



Once we had identified the problems and potential solutions, we first worked through a Risk Assessment with our mariners to ensure that we could continue to safely navigate until permanent repairs could be made.

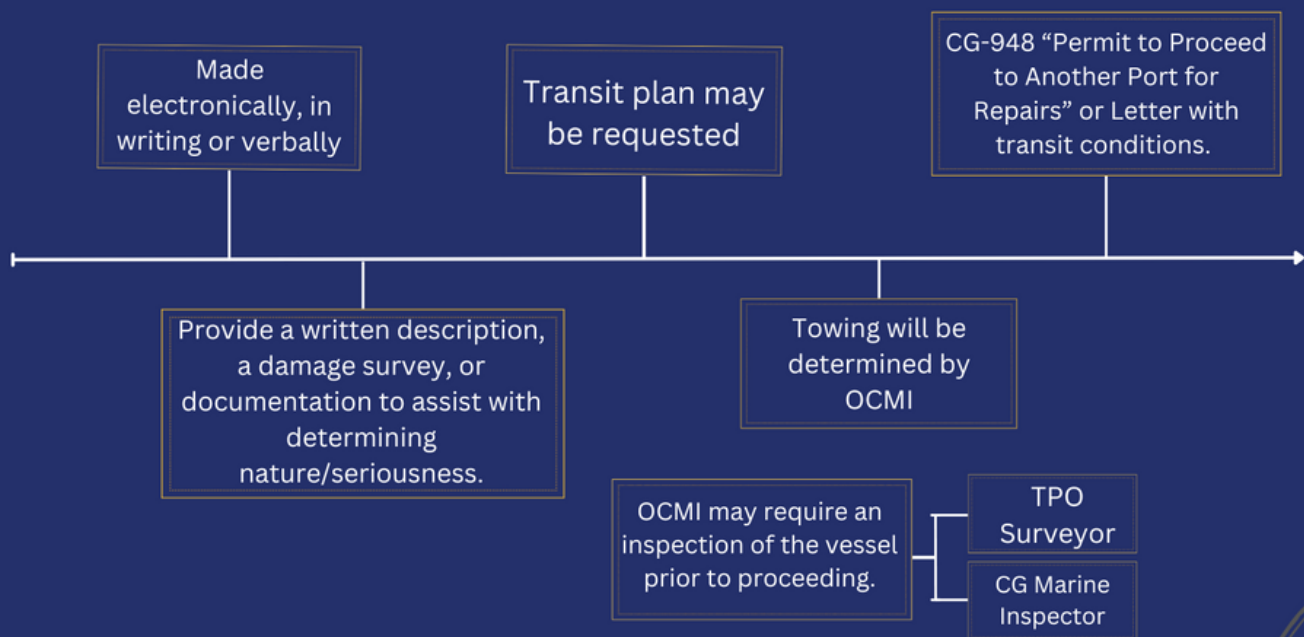
-Jeremy T.

Permit to Proceed and Transit Plans

No TSMS or Condition not Identified in the TSMS

If the vessel is Coast Guard option or the TSMS has not identified the specific condition the vessel is facing then the owner, managing operator or master must request permission from the OCMI to proceed in accordance with 46 CFR 136.240(b). Depending on the situation, the Coast Guard will use a CG-835V, Form CG-948 "Permit to Proceed to Another Port for Repairs" or a formal letter to state the conditions under which the vessel may proceed. Since the Coast Guard will determine whether the vessel can conduct towing operations while proceeding to a port for repair, owners should utilize transit plans to demonstrate how they will mitigate risks during the transit. In both categories, the Coast Guard may require an inspection by a Coast Guard Marine Inspector or an examination by a surveyor from a TPO.

Vessel w/TSMS *Condition not Identified*



Transit Plans

If the Coast Guard requests a Transit Plan, it should have a few key elements. Include the capabilities of the towing vessel relative to the size of the tow. A towing diagram will help and should include any assist vessels that may be utilized and what the available horsepower will be for all the vessels. A description of the route the vessel will take, including any planned stops or delays is important, especially if you're transiting multiple OCMI zones. Also, provide a detailed description of all additional measures taken to help mitigate the risks brought on by the vessel's condition. This may include dewatering equipment, increased monitoring of the condition, temporary repairs, and communication plans. If you would like more information on this topic, you can access our latest YouTube video [here](#). TVIB offers a sample Transit Plan that can be accessed on our member portal; however, the Coast Guard may have additional requirements depending on the zone.