



16711/TBSIP Program
D8(dp) Policy Ltr 01-2007
MAR 15 2007

MEMORANDUM

From: T. F. MANN
CCGD8 (dp)

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To: Distribution

Subj: D8 TANK BARGE STREAMLINED INSPECTION PROGRAM (TBSIP)

1. PURPOSE:

- a. This policy letter modifies and supersedes the Eighth District Policy Letter 2-2001 (Tank Barge Alternate Inspection Protocol (TAIP) pilot program). After five years of administering the TAIP pilot program, an analysis was conducted to determine its success in achieving program goals, to identify any inefficiency that needed improvement and to evaluate the level of regulatory compliance for TAIP tank barges compared to tank barges operating under the traditional inspection program. This analysis revealed that the policy had achieved program goals, but several areas needed clarification where the original guidance was either too broad or ambiguous. To clarify and address concerns noted in our analysis, the definitions of "minor damage" and temporary repairs were changed, guidance was given on when a Permit To Proceed is appropriate for TBSIP barges, and the notification requirements for temporary repairs to the local OCMI has been changed. In addition, the random annual oversight inspections were removed from the policy, and Periodic Inspections as required by 46 CFR 31.10-17(b) were added in its place. The annual report required for temporary repairs was eliminated and a monthly status report was added in its place. Finally, the program name was change to the Tank Barge Streamlined Inspection Program, and the authority to issue this policy was updated to 46 CFR Part 8 and NVIC 2-99 Paragraph 4.g.
- b. TBSIP is an optional program for companies that own and operate unmanned U.S. flag tank barges in the Eighth District. Companies that enroll their barges in this program can reduce operational delays by having designated individuals within their company perform the annual inspections required by 46 CFR 31.10-17(a). These individuals must be properly trained as a barge inspector and receive a Letter of Designation in accordance with 46 CFR 30.10-43 from their local TBSIP Homeport OCMI. For inland tank barges, the company will also be allowed to make temporary repairs for minor damage without having to obtain Coast Guard approval. The goal of this program is to reduce costly delays for the barge industry, and reduce workload and travel expenses for the Coast Guard, while still ensuring regulatory compliance for all barges with no compromise to safety.

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2. **DIRECTIVES AFFECTED:** Eighth District Policy Letter 2-2001 is superseded by this policy letter.
3. **BACKGROUND:**
 - a. The national SIP was implemented on August 18, 1998, by 46 CFR 8.500. The objective of the national SIP was to formalize a Streamlined Inspection Program that provided for a continual state of regulatory compliance while reducing Coast Guard time onboard vessels. While the national SIP fulfilled its objective with respect to crewed vessels, it did not consider the unique nature of the unmanned tank barge industry. In response to this, the Eighth Coast Guard District established a Quality Action Team (QAT) to study and develop an alternative inspection scheme specifically for the tank barge industry. The efforts of the QAT resulted in the Coast Guard Eighth District's Tank Barge Alternate Inspection Protocol pilot program. After five years of success in achieving program goals, identifying area of inefficiency and making program improvement, the Eighth District has decided to make this a permanent program.
4. **DISCUSSION:**
 - a. **BASIS FOR PROGRAM:** In the Coast Guard Authorization Act of 1996, the Coast Guard was given latitude to accept alternatives to standard vessel inspection. While the prototype Streamlined Inspection Program (SIP) was still in the test phase, and at the request of the barge industry, D8 units modified the SIP to satisfy the needs of the unmanned tank barge industry. In 1998, the Coast Guard published the final rule for a national SIP program (46 CFR Part 8, Subpart E). The national SIP did not recognize the unmanned aspect of the inspected tank barges, and it required an annual inspection, though cursory, by the Coast Guard which impacted the operational schedule of the barges. Therefore, it did not provide any significant benefits to the tank barge industry. Since 46 CFR Part 8, Subpart E authorizes Districts to waive certain requirements in 46 CFR Part 8, the Eighth District has developed this program specifically for tank barges.
 - b. **ENROLLMENT:** The TBSIP program is not suitable for every company, and unless it is clear that a company is responsible and well managed it will not be allowed to enroll and participate in the program. This program is intended for companies, regardless of size, with an absolute commitment to safety and which employ capable and dedicated maintenance and operation personnel. The initial time and effort necessary to establish a TBSIP program is considerable, and the program must receive the full backing of senior company management to ensure its success. Companies that choose to participate in this program must successfully complete the following enrollment process, and a detailed explanation of this process is contained in Section III of enclosure (1).
 - (1) **Application (and Evaluation):** First, the company must show they are a proactive, responsible, and well-managed company with a good inspection history and a

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commitment to safety. The Coast Guard will review inspection records for the company's barge fleet from the past three years to help make this determination.

- (2) Plan Development: Once the Coast Guard has determined the company is eligible for the TBSIP, the company will be permitted to enter the plan development phase. At this time the company must develop a Company Action Plan (CAP) for their organization. They must also develop a Tank Barge Action Plan (TAP) for each barge, although one TAP may be adequate to cover a "class" of similar barges.
 - (3) Operational Evaluation: The company will then undergo an operational evaluation period to determine if the CAP and TAP(s) are suitable; to ensure that company's designated inspectors can properly perform their inspection duties; and to test the company's management practices to see that the inspections are being satisfactorily completed and all discrepancies are being tracked and promptly corrected.
 - (4) Enrollment: Once the OCMI is satisfied with the company's TBSIP Program, the OCMI will enter an endorsement on the Certificate of Inspection (COI) for each barge to indicate it is enrolled in the TBSIP program. The exact wording of this endorsement is provided in Section 4.d.3, on page 5 of this policy letter.
- b. KEY PLAYERS: Personnel shall be designated to fill the following roles to ensure that the TBSIP program is understood and properly implemented.
- (1) Company TBSIP Representative: The primary contact point for the TBSIP program within a tank barge company is designated the "Company TBSIP Representative." The role of the Company TBSIP Representative is to:
 - i. Develop, implement, and update (as appropriate) the CAP and TAP(s).
 - ii. Ensure the "Company TBSIP Examiners" are properly trained, qualified, and have obtained a Designation Letter from the OCMI.
 - iii. Track and schedule IAW this policy and current regulations the appropriate inspections and examinations for all barges enrolled in the TBSIP program. This includes all Periodic Inspections, COIs, Drydock Exams, Internal Structural Exams, Cargo Tank Internal Exams, and Vessel Security Plan Verification Exams.
 - iv. Maintain all TBSIP-related files and records.
 - v. Ensure the TBSIP program is being properly implemented:

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- (a) Inspections are being properly conducted on all enrolled barges, in accordance with the provisions of this program.
 - (b) Corrective actions are being promptly taken for any deficiencies.
 - (c) Temporary repairs are being properly reported, documented, and monitored; repair procedures are completed in accordance with TBSIP policy; and permanent repairs are being completed in a timely manner.
- (2) Company TBSIP Examiner(s): Any properly trained and qualified individual within a barge company who is authorized by the OCMI to conduct the annual inspections and approve temporary repairs shall be designated a "Company TBSIP Examiner." The Company TBSIP Representative can serve as a Company TBSIP Examiner, but others may also be qualified and designated as such. Once the OCMI is satisfied that an individual is properly trained and qualified, the OCMI shall issue a letter to designate them as a Company TBSIP Examiner. To qualify in this capacity, an individual must either:
- i. Demonstrate satisfactory completion of appropriate sections of the Coast Guard Barge Inspector (BI) Marine Safety Training and Qualification booklet,
 - ii. Demonstrate satisfactory completion of an equivalent qualification booklet, developed by the company and approved by the OCMI, or
 - iii. Already have demonstrated competency as an inspector under a prototype Streamline Inspection Program.
- (3) USCG TBSIP Advisor: This is the Coast Guard's counterpart to the Company TBSIP Representative. Each OCMI shall designate at least one person to be the USCG TBSIP Advisor for their inspection zone. These Advisors will need to be thoroughly familiar with this policy letter and the guidance provided in enclosure (1). They should be prepared to assist any company seeking enrollment and participation in the TBSIP program. Also, they will be responsible for coordinating and monitoring TBSIP oversight activities.
- c. INSPECTIONS: Traditionally, Coast Guard Marine Inspectors performed all inspections, as mandated by law. However, as discussed in paragraph 4.a. the law has been changed, and under the TBSIP, Coast Guard inspectors will no longer inspect every barge each year because the Company TBSIP Examiners are authorized by the OCMI to conduct all annual inspections. The Coast Guard will conduct all Periodic Insps, COIs, Drydock Exams, Internal Structural Exams, Cargo Tank Internal Exams, and Vessel Security Plan Verification Exams.

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- (1) Company Roles/Responsibilities: The Company TBSIP Examiners shall conduct the annual inspection required by 46 CFR 31.10-17(a) on each barge enrolled in TBSIP. This inspection has the same scope as the inspection for certification but in less detail unless deficiencies or major changes in the vessel's condition are found. If deficiencies or major changes in the vessel's condition are found, the Company TBSIP Examiner shall conduct a more detailed inspection to ensure the vessel is in satisfactory condition and fit for the route and service for which it is intended. The Company TBSIP Examiners shall inspect each barge in accordance with its TAP, and any deficiencies shall be documented and promptly corrected.
- (2) Coast Guard Roles/Responsibilities: The Coast Guard will retain its responsibility to conduct the periodic inspection and the inspection for certification. This means a Coast Guard Marine Inspector will inspect all new barges to issue the initial COI, conduct a periodic inspection within 3 months before or after the second or third anniversary date of the COI, and conduct an inspection for certification before the expiration of the barge's current COI. It will be the company's responsibility to contact the cognizant OCMI to ensure that the periodic inspection and inspection for certification are scheduled and completed in accordance with current regulation. The Coast Guard will also retain its responsibility to carry out all structural inspections required by 46 CFR 31.10-21, including the Drydock Exam (DDE), the Internal Structural Exam (ISE), and the Cargo Tank Internal Exam (CTIE). The inspection to renew a COI should be scheduled to coincide with the DDE, ISE, and/or CTIE whenever possible, even if it means conducting the COI inspection a year or two early to synchronize these inspection cycles.
- (3) TBSIP Homeport OCMI: The OCMI that enrolls a company and its barge fleet into the TBSIP program (i.e., approves their CAP and TAP(s), designates the Company TBSIP Examiners, etc.) will be identified as the "TBSIP Homeport OCMI." The TBSIP Homeport OCMI will place the following endorsement on the COI of all barges owned and operated by the company that are enrolled in the TBSIP program:

"THIS TANK BARGE IS PARTICIPATING IN THE EIGHTH COAST GUARD DISTRICT'S TANK BARGE STREAMLINED INSPECTION PROGRAM (TBSIP). INSPECTION ACTIVITIES ABOARD THIS BARGE SHALL BE CONDUCTED IN ACCORDANCE WITH ITS TANK BARGE ACTION PLAN (TAP). INSPECTION ISSUES CONCERNING THIS BARGE SHOULD BE DIRECTED TO [NAME OF TBSIP HOMEPORT OCMI]."

- (4) Barges Operating in Multiple OCMI Zones: When a barge enrolled in the TBSIP Program is operating outside of the TBSIP Homeport OCMI's zone and is due for a Periodic Inspection, COI, DDE, ISE, and/or CTIE, the local OCMI may conduct

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these inspections and endorse or if needed reissue the COI. The new COI should be issued by and have the signature of the local OCMI, but shall retain the endorsement listed above to identify the TBSIP Homeport OCMI.

- (5) Inspection Issues and Serious Deficiencies: Any inspection issues and serious deficiencies identified by an OCMI other than the TBSIP Homeport OCMI shall be brought to the attention of the TBSIP Homeport OCMI, especially if they call into question the suitability of the TAP or the competency of a Company TBSIP Examiner. Minor deficiencies should be recorded, tracked and corrected in accordance with the barge's TAP. A "Notice of Merchant Marine Inspection Requirements" (CG-835) should not be issued unless serious deficiencies are found that dictate Coast Guard follow-up. Authority for removing an individual barge from the program rests with the TBSIP Homeport OCMI. Authority for removing a company and its entire fleet of barges from the program rests with the District Commander, and shall be considered upon recommendation of the TBSIP Homeport OCMI. For guidance on remedial action and disenrollment procedures see Section VI, Part B of enclosure (1).
- d. OVERSIGHT: The Coast Guard and Company TBSIP representative will conduct annual administrative reviews and perform oversight on the company's temporary repair practices, as discussed below and in Section 4.f. of this policy letter.
- (1) Company Roles/Responsibilities:
- i. Track all deficiencies issued by TBSIP Examiner and audit each TBSIP Examiner to ensure they are properly carrying out their inspection duties.
 - ii. Track all temporary repairs and summarize these repairs in a monthly report that is submitted to the TBSIP Homeport OCMI. More details about this report are provided in Section 4.f.(4) of this policy letter.
- (2) Coast Guard Roles/Responsibilities:
- i. TBSIP Homeport OCMIs: Oversight of the TBSIP program will be carried out as detailed in Section VI, Part B of enclosure (1). The TBSIP Homeport OCMI shall perform the following annual oversight activities:
 - (a) Conduct an administrative review of the company's TBSIP program and review all of the company's TBSIP-related files and paperwork.
 - (b) Conduct a performance review (audit) on each designated Company TBSIP Examiner to see that they are properly carrying out their inspection duties, and to provide them with any updates on inspection policies, regulations, and laws.

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The USCG TAIP Advisor will coordinate and monitor these oversight activities, but other Coast Guard Marine Inspectors may be utilized to carry out performance review (audit) on each designated Company TAIP Examiner located in other OCMI zones.

- ii. Non-TBSIP Homeport OCMIs: OCMI's shall perform the following oversight and inspections activities:
 - (a) At the request of the TBSIP Homeport OCMI, the cognizant OCMI should conduct a performance review (audit) on each designated Company TBSIP Examiner.
 - (b) Upon being notified of a failure to a temporary repair on a TBSIP Barge, the cognizant OCMI should notify the TBSIP Homeport OCMI and coordinate permanent repairs.
 - (c) When requested by a Company TBSIP Representative, the cognizant OCMI should conduct Periodic Inspections, COIs, Drydock Exams, Internal Structural Exams, Cargo Tank Internal Exams, and Vessel Security Plan Verification Exams. Activities should be documented in MISLE and be in accordance with section 4.d.(5) of this policy letter.
- e. TEMPORARY REPAIRS: For barges enrolled in TBSIP, the company may temporarily repair *minor damage* (defined below) without prior-approval of the Coast Guard. All temporary repairs shall conform to the procedures and restrictions contained in Section VII of enclosure (1). Repairs are limited to no more than 1 temporary repair per void and 3 temporary repairs total on a barge.
 - (1) Minor Damage: Damage to the outer hull plating, including fractures and holes not to exceed 12 inches X ¼ inch or 3 square inches, located either above or below the waterline.

The (12 in x ¼ in) or (3 in²) Criterion

This criterion was formed during a TBSIP Workshop held in September 2006 and was developed and based on broad Coast Guard and industry representation. The desire was to give some objective measurement guideline to the definition of minor damage which was ambiguous in the previous TBSIP policy.

(2) Temporary Repair Guidelines:

- i. The company TBSIP Examiner must be on scene to examine the damage and provide specific approval for the temporary repair and sign and submit a repair

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report to their TBSIP Homeport OCMI. For more details on this report, see Section VII, Part D, of enclosure (1).

- ii. When temporary repairs are made, the company must notify the TBSIP Homeport OCMI as soon as practical but within a maximum of 24 hours of when the damage occurred. This will allow the TBSIP Homeport OCMI to ensure repairs are documented in MISLE.
 - iii. All temporary repairs shall conform to the company's standardize repair procedures and restrictions contained in Section VII of enclosure (1).
 - iv. The company is required to monitor the temporary repairs. If there is any evidence of failure in a temporary repair, the company shall immediately affect permanent repairs to the satisfaction of the cognizant OCMI. The cognizant OCMI should then notify the TBSIP Homeport OCMI.
 - v. The company is required to track all temporary repairs made to its barge fleet and provide a monthly report to their TBSIP Advisor summarizing the temporary repair status on all barges that were made the previous month. This report shall also include all barges that have been permanent repaired so that the TBSIP Homeport OCMI can clear the repair in MISLE. For more details on this report, see Section VII, Part D, of enclosure (1).
- (3) Relationship to 46 CFR 4.05-1 (Reportable Marine Casualty): In terms of the minor damage definition, an "occurrence that materially and adversely affects the seaworthiness of the vessel", contained in 46 CFR Part 4.05-1 (a)(4) is not considered to have occurred if the below conditions are met. A Notice of Marine Casualty will, therefore, not be required. This includes situations where:
- i. The minor damage was not caused by or does not meet any other notice of marine casualty reporting requirements contained in 46 CFR 4.05-1.
 - ii. A single void space is discovered to be flooded and after dewatering, minor damage is discovered.
- (4) Relationship to 46 CFR 31.10-25 (Inspection Covering Repairs): The Company TBSIP Representative is authorized to approve temporary repairs on barges discovered with minor damage. The Company TBSIP Representative shall also notify the Homeport OCMI of the repairs in accordance with Section 4.f.(2) of this policy letter. This does not apply to any extensive alterations involving the safety of the vessel.
- (5) Use of Permit To Proceed (PTP) and CG-835s: A PTP or CG-835 should not be issued for minor damages documented per this policy.

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NOTE: When barges are discovered with greater than minor damage as described above or when the minor damage is caused by other incidents contained in 46 CFR 4.05-1, a reportable marine casualty is deemed to have occurred. In these cases, casualty reporting per 46 CFR 4.05-1 is required, and the cognizant OCMI shall be contacted immediately. The cognizant OCMI must also approve any repairs. When deemed necessary by the cognizant OCMI, a Permit to Proceed may be issued to vessels requesting to proceed outside of their local AOR to affect permanent repairs.

- (6) Permanent Repairs: Permanent repairs shall be completed at the first opportunity but no later than **45 days** after the minor damage is discovered. There are no operating restrictions in effect during this 45-day period.

Intent of 45-day Period

A barge with sound temporary repairs may continue to operate for up to 45 days. However, should an opportunity for permanent repairs occur during this 45-day period, the permanent repairs must be accomplished. The intent is that the company remains alert for an opportunity to affect permanent repairs. The 45-day period is not intended as a blanket approval to operate a damaged barge, by-passing opportunities for permanent repair until the 45-day period is nearly exhausted.

- (7) Deferment of Permanent Repairs beyond 45 days: Deferments will not be granted.

5. ACTION:

- a. Effective immediately, Eighth District OCMI's should use the guidance contained in this policy letter and enclosure (1) to implement the TBSIP program.
- b. This guidance should be provided to any tank barge company interested in joining the program, and a USCG TBSIP Advisor shall be designated at each field unit to assist companies in establishing TBSIP.
- c. TBSIP Homeport OCMI's shall ensure each company enrolled in TBSIP review their CAP and each barge's TAP for compliance with the provisions of this revised Policy Letter.

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Encl: (1) Guide to the Tank Barge Streamlined Inspection Protocol (TBSIP)

Dist: All Eighth District Sectors, MSUs and MSDs

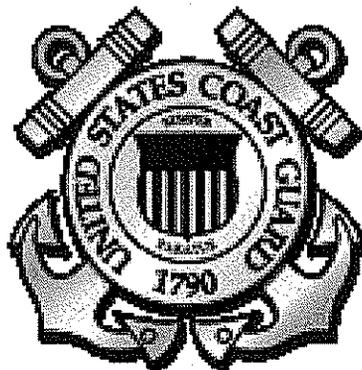
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GUIDE TO THE

TANK BARGE

STREAMLINED INSPECTION PROGRAM

(TBSIP)



for Unmanned
U. S. Flag
Tank Barges

An Eighth Coast Guard District Program

Developed jointly by the Maritime Industry and
the United States Coast Guard

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I. INTRODUCTION

This document is a guide to the Eighth Coast Guard District's Tank Barge Streamlined Inspection Program (TBSIP) for unmanned U.S. flag tank barges. It contains detailed guidance to aid both Coast Guard personnel and interested tank barge owners or operators in developing and implementing a TBSIP program.

This is an optional program for companies that own and operate unmanned U.S. flag tank barges. Companies that enroll their barges in this program can reduce operational delays by having designated individuals within their company perform the annual inspections. The company will be permitted to conduct these inspections on all barges regardless of route. For inland tank barges, the company will also be allowed to make temporary repairs for minor damage without having to obtain Coast Guard approval.

The TBSIP is not suitable for every company, and unless it is clear that a company is proactive, responsible, and well managed then it will not be allowed to enroll and participate in the program. This program is intended for companies, regardless of size, with an absolute commitment to safety and which employ capable and dedicated maintenance and operations personnel. The initial time and effort necessary to establish a TBSIP program may be considerable, and the program must receive the full backing of senior company management to ensure its success.

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A. Background

In the Coast Guard Authorization Act of 1996, the Coast Guard was given latitude to accept alternatives to standard vessel inspection. While the SIP was still in the test phase, and at the request of the barge industry, D8 units modified the SIP to satisfy the needs of the unmanned tank barge industry. In 1998, the Coast Guard published the final rule for a national SIP program (46 CFR Part 8, Subpart E).

The national SIP policy program did not recognize the unmanned aspect of their inspected tank barges, and it still required an annual inspection, though cursory, by the Coast Guard which impacted the operational schedule of the barges. Therefore, it did not provide any significant benefits to the tank barge industry.

In May 1999, D8 chartered a Quality Action Team (QAT) in response to the barge industry's request to have the Coast Guard reevaluate its national SIP, keeping in mind the unique nature of the barge industry. The QAT explored alternatives that would meet the special needs of the barge industry while ensuring the same levels of safety and statutory compliance. The QAT selected the prototype SIP developed by MSO Houston and Kirby Inland Marine as the model for the Tank Barge Alternate Inspection Protocol pilot program.

On March 1, 2007 the Coast Guard Eighth District amended the Tank Barge Alternate Inspection Protocol pilot program and issued a new permanent policy called the Tank Barge Streamlined Inspection Program. The inspection and oversight procedures put forth in this guide take into account this new policy.

B. How it works

This is an optional program for companies that own or operate unmanned U.S. flag tank barges within Eight Coast Guard District. To truly appreciate the TBSIP, it is important to understand what it is and what it is not, how it works, and what are the goals and benefits of the program.

The significant difference between TBSIP and the traditional inspection program is in the *process* of how compliance is ensured. The TBSIP is an alternative process for ensuring compliance with the regulations, where Company TBSIP Examiners conduct the annual inspections of the barges. These Company TBSIP Examiners undergo a qualification process and receive a Designation Letter from the Coast Guard. The Coast Guard performs annual oversight on companies enrolled in this program by conducting an administrative review of the company's TBSIP paperwork, and an audit of all designated Company TBSIP Examiners. In addition, the Coast Guard conducts the Periodic

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Inspections, Inspection for Certification, Drydock, Internal Structural, Cargo Tank Internal and Security Verification Exams.

Companies participating in the TBSIP program is required to develop and implement an OCMI-approved Company Action Plan (CAP), and a Tank Barge Action Plan (TAP) for each barge, which describe their inspection management system and provide specific inspection procedures to ensure enrolled barges are maintained in compliance with the regulations. The OCMI shall designate in writing each individual from the company who has demonstrated the knowledge and competence to perform the annual "topside" inspections, which they shall carry out in accordance with the CAP and TAPs. The CAP and TAPs will:

- (1) Stipulate the company's commitment to a partnership with the Coast Guard to ensure the tank barges are maintained in compliance with the regulations.
- (2) Identify the responsibilities of company personnel to ensure that this commitment is fulfilled, identify the specific tank barge systems that will be examined, and specify:
 - When to conduct the inspections,
 - What to look for,
 - How to document the inspections, and
 - How to report and correct any deficiencies.

The company will develop these plans under the guidance of a USCG TBSIP Advisor, who will assist the Company TBSIP Representative to fully understand how the TBSIP is supposed to work.

C. Enrollment Process

Enrollment in TBSIP involves a four-phase process:

- I. **Phase One: Application.** The company performs a self-evaluation and then submits a written request to the cognizant OCMI to be considered for TBSIP enrollment. The OCMI will review the operational history and inspection records for the company and its barge fleet over the last 3 years to determine if they are in fact a good candidate for the TBSIP.
- II. **Phase Two: Plan Development.** After a satisfactory review of the company's inspection history, the OCMI will assign a TBSIP Advisor to provide guidance to the Company TBSIP Representative who is responsible for

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developing the required action plans (CAP and TAP(s)).

- III. **Phase Three: Program Implementation.** Once the CAP and TAP(s) have been completed and approved, each "Company TBSIP Examiner" shall be trained and obtain a designation letter, and a 1 year trial period will be conducted for the company to implement its TBSIP program and the Coast Guard to evaluate the program. The trial period will be used to determine if the CAP and TAPs are suitable; to ensure that the Company TBSIP Examiners can properly perform their inspection duties; and to test the company's management practices to see that the inspections are being satisfactorily completed and all discrepancies are being tracked and promptly corrected.
- IV. **Phase Four: Enrollment.** At the end of the trial period, and at the request of the company, the USCG TBSIP Advisor will conduct a TBSIP Oversight Inspection, assisted by the Company TBSIP Representative, to evaluate the company's TBSIP program. If satisfactory, the OCMI will endorse the COI of each tank barge to indicate its enrollment in TBSIP.

D. Goals and Benefits

The goal of the TBSIP program is to develop and implement a program that will benefit both the barge industry and the Coast Guard. This program not only empowers barge companies to conduct all annual inspections, but also, for inland tank barges, it allows companies to make minor temporary repairs and proceed with their voyage without having to obtain Coast Guard approval. This program should reduce costly delays for the barge industry as well as to reduce unnecessary workload and travel expenses for the Coast Guard, while still ensuring regulatory compliance for all tank barges and an equivalent level of safety.

Some benefits that have been realized by companies participating in the prototype program include:

- Increased scheduling flexibility and reduced operational delays,
 - Better management of vessel conditions and costs,
 - Increased involvement and "ownership" by company personnel in the safe operation of their vessels.
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E. Conclusion

TBSIP will be a “win-win” program for the barge industry and the Coast Guard. It embraces the Coast Guard’s marine safety management principles of

- *Prevention Through People (PTP),*
- *Partnerships for Quality, and*
- *Risk Management.*

The Coast Guard has championed these initiatives because it recognizes that company personnel play the primary role in ensuring the safe operation of their vessels. These initiatives challenge the Coast Guard to establish partnerships with those it regulates develop effective and realistic solutions to safety concerns, prioritize its resource usage in response to risk, and design programs that effectively minimize risk.

For any questions, please contact the Eighth Coast Guard District’s Prevention Division, D8(dpi), at (504) 671-2105.

NOTE: Nothing in this guide is intended to prevent small entities’ from participating in this program. This guide identifies tasks, positions and documentation in sufficient detail to illustrate the concepts, principles and goals for enrollment and participation. Companies, including those with very small operations, can meet the conditions of participation in a variety of ways, subject to the acceptance of the OCMI. (E.g. small companies may choose to assign several duties to a single individual, condense and simplify the required documentation, and/or minimize inspection tasks to the extent appropriate for the specific barge equipment).

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II. DEFINITIONS

The following is a list of definitions for common terms found throughout this Guide.

Cargo Residue:

That portion of the cargo remaining aboard a barge after its contents have been unloaded to the maximum extent practicable utilizing normal offloading procedures, and before the barge is either refilled or cleaned of the residual cargo and purged to remove hazardous vapors.

Casualty:

Same as a "Marine Casualty" or "Accident," as defined in Title 46, Code of Federal Regulations (CFR), Subpart 4.03-1.

Civil penalty:

A fine that is assessed for a violation of federal law, processed under the provisions of 33 CFR 1.07 and 33 CFR 20.

Company:

The owner of the tank barge, or any organization or person such as an operator, manager, or bareboat charterer, who operates a tank barge under the provisions of TBSIP.

Company Action Plan (CAP):

A document describing a company's organization, responsibilities, and management policies that is required for participation in the TBSIP, and which must be approved by the Coast Guard.

Company TBSIP Examiner:

An individual authorized by the Coast Guard to conduct annual inspections of the company's tank barges and approve temporary repairs (providing they comply with the provisions of Section VII of this Guide). This individual must be approved and designated in writing by the Coast Guard (specifically, by the TBSIP Homeport OCMI).

Company TBSIP Representative:

The Company's primary contact point for TBSIP. This individual is responsible for such things as the development and implementation of the Company Action Plan (CAP) and Tank Barge Action Plans (TAPs), and has the authority to bind the company to the terms of these plans. This individual has the overall responsibility to see that the company and its barge fleet conform to all aspects of the TBSIP.

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Correction Report (CR): A document that identifies specific vessel deficiencies and is used by the Company to record their corrective actions. Correction Reports will identify the specific deficiency, the date it was identified, the corrective measure taken, the repair date, and the source/vendor or person making the correction. (see Appendix B of this Guide)

Documented Deficiency: Means a discrepancy that has been documented in a Coast Guard record (CG-835 form), in which the condition of a tank barge, its equipment, or its operation was not in compliance with the federal regulations.

Examination Checklist (EC): A form that lists all the systems and subsystems that must be examined during an annual inspection, and which allows the Company TBSIP Examiner to record whether each item is "O.K." or "Not O.K." This checklist is incorporated in the approved TAP for each tank barge. (see Appendix A of this Guide)

Inspection Criteria Reference (ICR): Forms contained in a TAP that provide detailed guidance on how to inspect each specific item on the tank barge that is required by regulation to be inspected. (see Appendix D of this Guide).

ICRs shall include:

- Specific reference to the relevant CFR cites.
 - Detailed, step-by-step explanation of the inspection criteria and/or performance standards.
 - Outline of the actions to be taken when a deficiency is discovered during an annual inspection.
-

Repair: An action taken by an owner, operator, or other responsible party to restore a damaged barge, or its appurtenances, to full fitness for service, or to correct an observed change in material condition. The damage and/or changes in material condition can include, but are not limited to, wastage, fracturing, puncturing, tearing, and holing of plate, frames, supports, brackets, flanges, or weldment.

Reportable Casualty: A marine casualty or accident that is of a severe enough nature that notice to the Coast Guard is required, per 46 CFR 4.05-1.

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TBSIP Homeport OCMI: The OCMI that enrolls a company and its barge fleet into the TBSIP (i.e., approves the CAP and TAP(s), designates the Company TBSIP Examiners, conducts the operational evaluation, etc).

TBSIP Oversight: The systematic process in which a Coast Guard Marine Inspector reviews the Company's required TBSIP documentation, conducts on-board inspections of random tank barges, and audits the Company TBSIP Examiners. TBSIP Oversight is to focus on how well the Company is complying with the provisions of the TBSIP, and how well their barge fleet is being maintained in a state of regulatory compliance. Detailed guidance on TBSIP Oversight is provided in Section VI of this Guide, and in the Coast Guard TBSIP Oversight Form (a generic example of this form is provided in Appendix C of this Guide).

Tank Barge: A nonself-propelled tank vessel (see the definitions in 46 CFR 30.10-65 and 30.10-69).

Tank Barge Action Plan (TAP): A document that prescribes the procedures for conducting the annual inspection of a tank barge; including procedures for documenting the inspection and correcting any deficiencies noted. This document must be approved by the Coast Guard.

Tank Barge Streamlined Inspection Program (TBSIP): The alternative inspection program described in this guide.

Unmanned Tank Barge: A nonself-propelled tank vessel (see the definitions in 46 CFR 30.10-65 and 30.10-69), that does not transport passengers, crew, "other crew," nor "persons in addition to the crew;" and is not required by the Certificate of Inspection to maintain any primary lifesaving equipment on board for such personnel.

USCG TBSIP Advisor: A Coast Guard Marine Inspector assigned by the Officer in Charge, Marine Inspection (OCMI) to assist the Company in the development and implementation of their TBSIP program. This is the Coast Guard's counterpart to the Company TBSIP Representative.

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Violation:

An incident where a breach of federal law is documented, processed as either a civil or criminal penalty case, and at the conclusion a penalty is assessed. See "Civil Penalty."

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III. ENROLLMENT PROCESS

The following steps must be completed to enroll a company and its barge fleet in the TBSIP program. These steps are explained in detail in this section, and illustrated in the flowchart provided as Figure 1 on page 24.

PHASE ONE - Application

- Step A* Company Self-Evaluation
- Step B* OCMI Evaluation

PHASE TWO - Plan Development

- Step C* Assignment of USCG TBSIP Advisor
- Step D* Development of Company Action Plan (CAP)
- Step E* Development of Tank Barge Action Plan (TAP)
- Step F* Approval of CAP and TAP(s)

PHASE THREE – Program Implementation

- Step G* Training & Designation of “Company TBSIP Examiners”
- Step H* Operational Evaluation of Company’s TBSIP Program

PHASE FOUR - Enrollment

- Step I* Enrollment
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PHASE ONE:
Application

The following criteria will provide the company and the OCMI a means to determine the company's eligibility and readiness to enter into the TBSIP. The company must show they are a proactive, responsible, and well-managed company with a good inspection history and a commitment to safety. While all the criteria below must be met, the degree to which it is met will depend on the company size and the nature of its barge fleet. The company's history of regulatory compliance, the condition of its barges, and its record of violations will all be considered.

**A. Company
Self-Evaluation**

Prior to contacting the Coast Guard to request enrollment in the TBSIP program, the company must perform a self-evaluation and determine that it is in fact a good candidate for this program. The company must be prepared to provide the following information and documentation to the Coast Guard:

*1. Organizational
Commitment*

- A statement signed by the company's senior officer attesting to the company's commitment to enter into an ongoing partnership with the Coast Guard in marine safety.

*2. Responsibility and
Authority*

- An organizational chart of the company.
- Defined, documented, and delineated responsibilities, authorities, and interrelations of all personnel who will manage, perform, and verify any work relating to the tank barge inspection processes.
- Documentation that there is adequate staffing and support for tank barge inspections and maintenance.

*3. Regulatory
Compliance*

- Documentation that the company has been diligent and proactive by conducting pre-inspections on its barges.
- Documentation that the personnel conducting the pre-inspections are empowered to initiate corrective actions.
- Documented tank barge maintenance and equipment records (i.e., servicing records for machinery, safety and, firefighting equipment, etc.).
- Documentation that the company has a tracking system to ensure regulatory compliance (i.e., a tracking system for deficiencies, inspection due dates, etc.).

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4. Application

- After the company has evaluated itself, collected all the pertinent information and documentation, and believes it is ready to enter into the TBSIP, a formal written application must be made to the cognizant OCMI. It is recognized that the company headquarters and business offices may not be located in the same region where the majority of its barges operate. If there is any question as to which OCMI should process the company's application and assist with the TBSIP enrollment process, the Eighth Coast Guard District's Prevention Division, D8(dpi) should be consulted.

B. OCMI Evaluation

The decision of whether or not to enroll a company in the TBSIP will be made by the OCMI after considering the criteria listed below. The OCMI is reminded that the TBSIP is not suitable for every company, and unless it is clear that the company is proactive, responsible, and well managed then it shall not be allowed to enroll and participate in the program. This program is intended for companies, regardless of size, with an absolute commitment to safety and which employ capable and dedicated maintenance and operations personnel.

1. *Operational History*

A satisfactory three-year operational history is required for any company seeking enrollment in the TBSIP. The company should have operated an inspected tank barge or fleet of tank barges for at least three consecutive years.

NOTE: If a company already enrolled in the TBSIP acquires a new tank barge (a new construction or previously owned barge), the new barge may be enrolled in TBSIP as soon as it is issued a new COI.

If a pattern of any of the following deficiencies is revealed when reviewing the operational history of the company's tank barges, the company shall be disqualified from enrollment in the TBSIP:

- Insufficient number of serviceable fire extinguishers as required by the COI,
- Unauthorized modifications of structural arrangements,
- Unauthorized modifications of equipment or structural arrangements that could have resulted in a pollution incident,
- Failure to maintain watertight boundaries,
- Intentional override of any electrical or mechanical safety system or shutdown device, or
- Significant noncompliance with federal requirements not otherwise described, that give the Coast Guard credible concerns about the applicant's commitment to safety.

<p style="text-align: center;">ENROLLMENT PROCESS</p>	<p style="text-align: center;">TBSIP Guide</p>	<p style="text-align: center;">Section: III</p>
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2. Inspection Reports

A review of Marine Information Safety and Law Enforcement (MISLE) cases for the company's tank barge fleet over the past 3 years shall be conducted. Particular attention shall be paid to the inspection narratives to obtain an overall impression of how well the company maintains its tank barges and how responsive it is when deficiencies are found. Interviews with Marine Inspectors who have worked with the company and have been on the barges will also assist in evaluating the suitability of the company for participation in the TBSIP.

*3. Verification of
Company's Safety
Commitment and
Suitability for TBSIP*

The OCMI will make a determination on the company's commitment to safety and suitability for enrollment into the TBSIP after reviewing the company's:

- Administrative records,
- Operational and managerial processes and policies,
- Operational and inspection history, and
- By evaluating the physical condition of the tank barge(s).

When the OCMI is satisfied that the company is qualified to enter the TBSIP, the OCMI will notify the company and assign a USCG TBSIP Advisor to assist the company with the enrollment process.

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PHASE TWO:
Plan Development

Once the Coast Guard has determined the company is eligible for the TBSIP, the company will be permitted to enter the plan development phase. At this time the company must develop a Company Action Plan (CAP) for their organization. They must also develop a Tank Barge Action Plan (TAP) for each barge, although one TAP may be adequate to cover a "class" of similar barges.

**C. Assignment of
USCG TBSIP
Advisor**

Each OCMI shall designate at least one person to be the USCG TBSIP Advisor for their inspection zone. This Advisor shall be a Marine Inspector who is thoroughly familiar with the TBSIP policies and procedures put forth in the Eighth Coast Guard District's policy letter and this Guide. They should be prepared to assist any company seeking enrollment and participation in the TBSIP.

The USCG TBSIP Advisor will assist the company in assembling the requisite action plans, and with all other aspects of developing the company's TBSIP program. The USCG TBSIP Advisor shall hold an initial meeting with the Company TBSIP Representative to discuss the development and implementation of the action plans, and shall be accessible to the Company TBSIP Representative whenever questions on the TBSIP arise.

While the USCG TBSIP Advisor will not create a TBSIP program for the company and will not develop their action plans, it may be appropriate for the USCG TBSIP Advisor to perform an initial review the company's necessary safety, training, and environmental programs. The USCG TBSIP Advisor shall provide oversight and feedback to the Company TBSIP Representative during the development of the Company Action Plan (CAP) and each Tank Barge Action Plan (TAP). Ultimately, the USCG TBSIP Advisor will decide when these plans are acceptable and complete, and will then forward them to the OCMI with a recommendation for approval. Since there is no "universal" TBSIP program that will work for every company, the USCG TBSIP Advisor will need to ensure the company develops and implements a program where the company's inspection and management practices will ensure the barges are maintained in a continual state of regulatory compliance.

If the Company TBSIP Representative is unsatisfied with the service provided by the USCG TBSIP Advisor, they should contact the TBSIP Homeport OCMI to resolve the situation.

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**D. Development of
Company Action
Plan (CAP)**

The CAP is the document that identifies the management policies and practices the company will use to adopt the TBSIP. When developing the CAP, the Company TBSIP Representative is responsible to ensure it contains the following.

1. A copy of the OCMI's approval letter for the CAP (once the CAP is approved).
2. A statement signed by a corporate officer authorized to commit the company to a partnership with the Coast Guard, assuring safe operation of the company's tank barge(s).
3. A company organization chart that includes the name of the Company TBSIP Representative and any support personnel who will be responsible for implementation and oversight of the approved CAP and TAP(s).
4. A statement describing the responsibilities and authorities of personnel involved in the inspection and maintenance of the tank barge(s) for the company.
5. A description of the method or system used to initiate corrective action when deficiencies are found.
6. A description of the process for periodic review and update of this document.
7. A description of the company's safety program.
 - a. Adequate written safety plan/policy/procedures.
 - b. Designated Safety Officer.
 - c. Procedures for reporting and investigating accidents.
 - d. Established mechanism for corrective actions following reported accidents.
 - e. Strict adherence to drug and alcohol programs:
 - (1) Policy for employees that do not submit to a required test in a timely fashion,
 - (2) Policy/procedures for facilitating and documenting attempts to contact employees by the Medical Review Officer, and
 - (3) Designated person (or organization) with knowledge of the program who maintains an up-to-date file of the applicable regulations.

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8. A description of the company's environmental protection program.
 - a. Strict adherence to all environmental protection programs. Established company policy on reporting, responding to, and preventing prohibited discharges.
 - b. Employee awareness of environmental protection issues.
9. A description of the company's training program, including the method used to track and record training for individual employees, and the training required for the Company TBSIP Examiners to conduct annual inspections.
 - a. Established training infrastructure.
 - b. Designated Training Officer.
 - c. Documented training records.
10. A master list of all TBSIP documents and ICRs that the company intends to use in its TAP(s).
11. A master list indicating which TAP applies to which barge.

E. Development of Tank Barge Action Plan (TAP)

A TAP is the document the Company TBSIP Examiner will use to conduct the annual inspection on a tank barge. There must be one TAP provided for each barge, and each TAP should be specifically tailored for inspecting that particular barge, taking into account how it is constructed, arranged, and equipped. However, one generic TAP may be adequate to cover a "class" of similar barges. Each TAP should include any pertinent inspection information, and shall at a minimum include the following tank barge specific letters, forms, and documents:

1. A copy of the OCMI's approval letter for the TAP (once the TAP is approved).
2. Examination Checklist (EC)
3. Correction Reports (CR)
4. Inspection Criteria Reference (ICR) for a Tank Barge
5. Temporary Repair Report Form

Specific guidance on the required forms and documents for the TAP is provided below:

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1. Exam Checklist (EC):

The EC is the working document used by a Company TBSIP Examiner to conduct the annual inspection of a tank barge and all its systems. The EC lists all of the systems and subsystems that are required to be inspected, and for each one it provides a reference number corresponding to the appropriate procedure in the Inspection Criteria Reference (ICR) for inspecting that system or subsystem. During the inspection, the Company TBSIP Examiner will indicate on this form whether each system is "OK" or "NOT OK."

➔ Examples of a generic EC form, one that is blank and one that is completed, are provided in Appendix A of this Guide.

2. Correction Report (CR):

The Correction Report (CR) is used to document each deficiency that is discovered by a Company TBSIP Examiner during an inspection, regardless of whether it is corrected at that time or remains outstanding.

CRITICAL NOTE:

Corrective action is required prior to placing the barge back in service for any deficiencies that pose a spill potential or hazard to navigation. Other deficiencies, which do not directly affect the safety of the tank barge, **should be corrected as soon as practical but must be corrected within a maximum of 30 days.**

The CR lists:

- The inspection date (date the deficiency is discovered),
- The corresponding ICR number (which can be obtained from the EC or ICR),
- A detailed description of the deficiency,
- The required correction date, in accordance with the ICR or TAP, and
- The corrective action planned, taken, and the date corrected.

Correction Reports become a vital part of the company's TBSIP documentation, and can be instrumental in identifying and correcting recurring problems with the tank barge systems and subsystems. They shall be retained on file by the company for at least 2 years to identify and track trends with barge deficiencies.

➔ Examples of a generic CR form, one that is blank and one that is completed, are provided in Appendix B of this Guide.

3. Inspection Criteria Reference (ICR):

The ICR is the primary reference source for Company TBSIP Examiners when conducting the annual inspections. It provides a detailed description of the specific inspection procedures for each vessel system and subsystem. These procedures are referenced

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on the Examination Checklist using an identification number corresponding to a specific ICR procedure. The ICR shall be kept current with the federal regulations, and should be reviewed annually and revised as necessary.

The ICR is organized by systems and subsystems, and has a table of contents to indicate the identification number for each system and subsystem. Each individual ICR sheet contains:

CRITICAL NOTE:
The ICR enclosures to this Guide should not be assumed to contain all systems required to be examined for every possible tank barge configuration. It is incumbent upon the Company to ensure that their TAP identifies all systems that apply to their tank barge(s).

1. System name,
2. Subsystem name,
3. Person responsible for performing the tests and/or inspections,
4. Applicable references,
5. Required inspection interval (minimum regulatory verification frequency),
6. Specific inspection criteria (step-by-step procedures), and,
7. Required corrective action for when deficiencies are found.

In the course of the company's TBSIP development, should a system be identified that is not covered by an existing ICR, the company must work with the USCG TBSIP Advisor to develop an additional sheet in the ICR for this system.

➔ The ICR for Tank Barges (Subchapter D/O) is provided in Appendix D of this Guide.

NOTE: Whenever a new ICR sheet is developed, a copy shall be forwarded by the USCG TBSIP Advisor to CCGD8(dpi) so it can be included in any updates to the TBSIP Guide.

**F. Approval of
CAP & TAP(s)**

The completed action plans (CAP and TAP(s)) shall be submitted to the OCMI for review. If found satisfactory, the OCMI shall issue an approval letter for the CAP and each TAP, and the Company will then be permitted to enter Phase III, "Program Implementation."

If the CAP or TAP(s) are missing any key elements or need to be modified or revised in any way, they will be returned to the

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company with a letter indicating which specific sections are missing or require revision. Once any deficiencies have been addressed, the action plans shall be re-submitted to the OCMI for approval consideration.

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PHASE THREE:
Program Implementation

The company will implement its TBSIP program and undergo an operational evaluation period to determine if the CAP and TAP(s) are suitable; to ensure that company's designated inspectors can properly perform their inspection duties; and to test the company's management practices and see that the inspections are being satisfactorily completed and all discrepancies are being tracked and promptly corrected in accordance with the TAP.

The company will enter the Program Implementation phase of the TBSIP enrollment process upon receipt of the OCMI's written approval of the Company Action Plan and Tank Barge Action Plan(s). Specific elements of this phase of the enrollment process include:

- Training & Designation of "Company TBSIP Examiners"
- Operational Evaluation of Company's TBSIP Program

**G. Training &
Designation of
"Company TBSIP
Examiners"**

Any properly trained and qualified individual within a barge company who is authorized by the OCMI to conduct the annual inspections and approve temporary repairs shall be designated a "Company TBSIP Examiner." The Company TBSIP Representative can serve as a Company TBSIP Examiner, but others may also be qualified and designated as such. Once the OCMI is satisfied that an individual is properly trained and qualified, the OCMI shall issue a letter to designate them as a Company TBSIP Examiner. To qualify in this capacity, the USCG TBSIP Advisor will conduct testing of potential Company TBSIP Examiners to verify their ability to satisfactorily perform the designated inspection tasks per the CAP and TAP. Also, each Company TBSIP Examiner must either:

- (a) Demonstrate satisfactory completion of appropriate sections of the Coast Guard Barge Inspector (BI) Marine Safety Training and Qualification booklet,
- (b) Demonstrate satisfactory completion of an equivalent qualification booklet, developed by the company and approved by the OCMI, or

NOTE: Companies that employ outside (third-party) contractors to maintain certain barge systems/subsystems need to be able to verify the competency of the contractor to perform the task.

The USCG TBSIP Advisor will evaluate the company's training program to ensure it adequately prepares the responsible personnel to satisfactorily perform their inspection tasks under TBSIP. The USCG TBSIP Advisor will do this by performing the following tasks:

- Review training materials,

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- Attend training sessions, and
- Provide the Company TBSIP Representative with feedback and recommendations on their training program.

H. Operational Evaluation of Company's TBSIP Program

During the Operational Evaluation period the Company's CAP and TAP(s) will be put to use by the Company TBSIP Examiners:

- The tank barge company must operate and be examined under the CAP and TAP for at least one inspection cycle. Representative barges shall be inspected to show that these plans are adequate, and have completed Exam Checklists to document these inspections.
- During this operational evaluation, the Coast Guard TBSIP Advisor will conduct an ongoing evaluation of the tank barge company's operation for compliance with the CAP and TAP. For guidance on monitoring frequency see Section IV, Part D of this Guide.
- The Coast Guard TBSIP Advisor will report periodically to the TBSIP Homeport OCMI and the Company TBSIP Representative on the tank barge's performance, and
- Based on observations, make recommendations for
 - Improvement(s), if needed, or,
 - Enrollment, if satisfactory.

CRITICAL NOTE: Revisions required as a result of the findings during the Operational Evaluation may necessitate additional time under evaluation to determine if the revisions have successfully addressed the problem(s).

All revisions to the CAP or TAP must be satisfactorily addressed prior to enrollment.

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PHASE FOUR:
Enrollment

Once the OCMI is satisfied with the company's TBSIP program, the OCMI will enter an endorsement on the Certificate of Inspection (COI) for each barge to indicate it is enrolled in the TBSIP program.

I. Enrollment

Use Figure 1, page 24, to ensure a successful TBSIP enrollment process has been completed. Following a successful trial period, the local OCMI may authorize full implementation of the TBSIP by endorsing the Certificate of Inspection of participating tank barges as follows:

"THIS TANK BARGE IS PARTICIPATING IN THE EIGHTH COAST GUARD DISTRICT'S TANK BARGE STREAMLINED INSPECTION PROGRAM (TBSIP). INSPECTION ACTIVITIES ABOARD THIS BARGE SHALL BE CONDUCTED IN ACCORDANCE WITH ITS TANK BARGE ACTION PLAN (TAP). INSPECTION ISSUES CONCERNING THIS BARGE SHOULD BE DIRECTED TO [NAME OF TBSIP HOMEPORT OCMI]."

Once enrolled, the company will conduct the annual inspections required by 46 CFR 31.10-17 for all its barges. Details on inspection for barges enrolled in the TBSIP program are provide in Sections V and VI of this Guide.

Phase 1:

Company self
evaluation

Application to
the OCMI

Favorable OCMI
Evaluation of
Application

Phase 2:

OCMI Assignment
of AIP Advisor

Develop CAP
& TAP

OCMI Approval
of CAP & TAP

Phase 3:

Successful
Vessel Training
Period?

Successful
Vessel Trial
Period?

Phase 4:

Begin full TBSIP
Implementation

OCMI Endorses COI

TBSIP Inspection
Cycle

Figure 1: TBSIP Enrollment Process

Company Willing
to revise Plans?

Company Willing
to Conduct Add'l
Training?
(or revise it's CAP
and/or TAPs?)

OCMI Denial
Letter

Inspection Under
Traditional
CG Inspection

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**IV. PROGRAM
ADMINISTRATION**

This section provides an overview of how the TBSIP program is to be administered.

**A. Company
Responsibilities**

The following is a listing of some of the overall responsibilities that the Company shall fulfill to ensure successful implementation and participation in the TBSIP program.

**1. Development of Action
Plans**

- Ensure that the ICR is available and contains applicable criteria for every tank barge system and subsystem required by Coast Guard regulations (international certificates will continue to be administered by the USCG or its authorized issuing organization).
 - Ensure that the Company TBSIP Representative establishes and maintains close communications with the USCG TBSIP Advisor.
 - Submit the CAP and TAP to the OCMI for review and approval.
-

**2. Training of TBSIP
Personnel**

- Develop a company training curriculum which addresses the skills necessary to carry out all TBSIP functions.
 - Provide training to all company personnel involved with TBSIP, based upon their respective positions and responsibilities.
 - Specifically ensure Company TBSIP Examiner(s) are provided the training necessary to carry out all activities associated with ICR and Exam Checklists.
 - Establish training records for each company person involved with TBSIP.
 - The Company TBSIP Representative must ensure that all company personnel involved with TBSIP are afforded the time necessary to conduct and/or participate in training.
 - Adjust the training curriculum as necessary to address problems discovered during examinations or CG inspections, changes in company personnel, or changes in relevant tank barge systems and subsystems.
-

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3. Forms Management

NOTE: All listed forms shall be made available to any Coast Guard representative upon request and during annual Coast Guard oversight exams. Forms should be kept on file for at least **2 years**.

- Exam Checklist: Contained in each TAP, completed by Company TBSIP Examiner(s), and maintained (kept on file for 2 years) as part of the TBSIP documentation by the Company TBSIP Representative.
- Correction Report: Contained in each TAP, completed by Company TBSIP Examiner(s) as necessary, and maintained (kept on file for 2 years) as part of the TBSIP documentation by the Company TBSIP Representative.
- Temporary Repair Report (TRR): Contained in each TAP for reference by the Company TBSIP Examiner(s), and periodically reviewed and updated as necessary by the Company TBSIP Representative.
- Monthly Report to OCMI: The company shall submit a monthly report to the TBSIP Homeport OCMI. The report will include a list of barges whose anniversary date for annual inspections are due within the next 60 days. Additionally, it shall include a list of barges that had an exam completed by the Company TBSIP Examiner(s) within the previous 30 days. This list will be accompanied by a copy of the Exam Checklist for each barge examined. Also a separate report shall be submitted for all barges that were temporary repaired the previous month. This report shall contain the status of permanent repair of all barges that were temporary repaired the previous month.

B. Coast Guard Responsibilities

The following is a listing of some of the overall responsibilities that the Coast Guard shall fulfill to assist companies with implementation and participation in the TBSIP program.

1. TBSIP Homeport OCMI

- Facilitate program knowledge in area of responsibility.
- Act as CAP and TAP approval authority.
- Issue Designation Letters to Company TBSIP Examiners.
- Exercise waiver authority, when waiver request deemed to be valid.
- Ensure that proper process controls and measurement take place to monitor and constantly evaluate the progress and performance of companies participating in the TBSIP.
- Ensure USCG TBSIP Advisors receive appropriate training, time management and empowerment to fulfill their duties.

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- Ensure USCG TBSIP Advisors make the appropriate cultural adjustment to provide proactive customer service.
- Ensure remedial action is taken in a timely manner to keep TBSIP applicants and enrollees on-track.
- Act on USCG TBSIP Advisor recommendations for remedial actions and disenrollment.
- Issue COIs on or before the expiration date of the current COI.
- Collect and enter required inspection activities into the Coast Guard Marine Safety Database (MISLE). This data includes the deficiencies noted by the Company TBSIP Examiner during each annual inspection as noted on the submitted Examination Checklist.
- Coordinate, as circumstances warrant, with District (dpi).

2. USCG TBSIP Advisor

The USCG TBSIP Advisor is the primary Coast Guard point of contact for the company and tank barges. He/she is directly responsible for the administration of the program. The USCG TBSIP Advisor's responsibilities are:

NOTE: The USCG TBSIP Advisor is not a billeted position. Rather, the OCMI will assign this to a Marine Inspector as a collateral duty. A unit may have more than one TBSIP Advisor, depending on the size of its TBSIP fleet.

1. To cooperate with the company, and maintain customer focus.
2. Be a proactive participant in program monitoring, with the frequency and in the spirit outlined in this guide.
3. Provide the necessary feedback to the OCMI on individual company and tank barge TBSIP progress.
4. Identify opportunities for program improvement.
5. Alert the OCMI concerning any remedial actions, possible disenrollments or appeals.
6. Confer with the OCMI to receive any feedback from companies who may have called.
7. Communicate with and coordinate inspections with other OCMI zones, to see that proper TBSIP program oversight is maintained for all enrolled tank barges.

3. Eighth Coast Guard District Prevention Division (dpi)

- Maintain this TBSIP Guide and publish appropriate and timely updates.
- Manage the program at the district level.

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- Analyze program data and implement adjustments.
- Review and take action on appeals regarding TBSIP issues.
- Ensure all OCMI's are provided the necessary training to effectively promote and administer the program.

C. Shared Responsibilities

As an interactive, ongoing program there are any number of responsibilities shared by the company and the Coast Guard.

1. Initial enrollment

Initial enrollment involves the first-time application and screening process for entry of a company and its tank barges into the TBSIP. Particular attention must be given to the development of ICRs necessary to cover tank barge unique systems or subsystems. This process was covered in "Enrollment Process," Section III.

2. Tank barge Reinstatement

A tank barge may be reinstated following disenrollment provided:

1. The tank barge does not change ownership in the interim,
2. The tank barge and company remain, or return to being, eligible for enrollment in TBSIP,

3. Tank barge Re-enrollment

The process of "re-enrollment" applies to scenarios where the ownership of the tank barge has changed. The re-enrollment may involve all or part of the Enrollment Process outlined in Section III.

4. Changes in Ownership Issues

A tank barge may be automatically re-enrolled in TBSIP after a change in ownership, provided:

- (a) The previous owner participated in TBSIP with one or more tank barges;
- (b) At the time of the sale the tank barge was an active TBSIP participant;
- (c) The new owner is an active participant in TBSIP at the time of the sale; and,
- (d) The new owner receives approval from the cognizant OCMI for a revised TAP that is consistent with the new owner's CAP.

NOTE: For changes of ownership, which involve the transfer of a tank barge from a non-TBSIP company to a participating TBSIP company, or acquisition of a newly constructed/ certificated tank barge, the new owner may enroll the tank barge upon approval of the TAP by the cognizant OCMI. **Any other scenarios will necessitate compliance with all provisions of Section III, "Enrollment Process."**

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5. *Appeals of Coast Guard
Decisions/Actions*

**D. Monitoring
Frequency**

“Monitoring” refers to opportunities for Coast Guard and company interaction, above and beyond the specific inspections required by the regulations and the specific activities required for TBSIP Oversight.

The appropriate frequency of monitoring is dependent on a number of factors, including:

1. The stage of a company’s TBSIP development;
2. Assessment of performance indicators which point toward remedial action; and,
3. Any changes in tank barge operations.

It is expected that the most frequent monitoring will occur from the company’s initial application through the trial period.

Monitoring is the opportunity for the USCG TBSIP Advisor to assist the company with the development of its TBSIP. It is not to be taken as reason to initiate a formal Coast Guard vessel inspection or TBSIP Oversight. Therefore, during typical monitoring the USCG inspector should not take any enforcement action unless a major deficiency is discovered. The USCG TBSIP Advisor should seek to correct any deficiencies noted through the mechanism provided in the Company’s action plans (CAP and TAP).

E. Database Entries

ALL inspections conducted by the CG or Company TBSIP Examiner will need to be documented in the Coast Guard’s vessel inspection database to document the inspections and update the vessel inspection status. For annual inspections, temporary repairs to minor damage, and subsequent permanent repairs conducted by the Company TBSIP Examiners, MISLE cases will be entered once the OCMI receives documentation (the Exam Checklist, Temp repair check list, monthly report) that these inspections were completed. The CG TBSIP Advisor shall enter a short narrative statement indicating that the inspection was conducted by the Company TBSIP Examiner and the results of the inspection. The Company TBSIP Examiner’s name shall be included in the narrative. Each deficiency noted on the Exam Checklists shall be entered into the vessel’s deficiency history for that inspection case. For Coast Guard inspections, a MISLE case will be generated to account for the time and provide a brief narrative statement about the scope and findings of the inspection including the name of the Company TBSIP Examiner if an audit

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was conducted on the examiner. Any deficiencies noted during the inspection shall be entered into the vessel's deficiency history.

For companies with barges operating in more than one OCMI inspection zone, each OCMI that conducts an inspection or oversight activity on any of the barges will make an appropriate database entry to document their action. See Section VIII, Part F for additional guidance on barges operating in multiple OCMI zones.

For barges being enrolled in the TBSIP program, it is important that the TBSIP endorsement is entered on the COI precisely as shown in Section III, Part I. The USCG TBSIP Advisor will enter the endorsement on the COI, along with any other relevant information.

**F. TBSIP
Measurement Plan**

It is important that the TBSIP be evaluated to determine its success in achieving program goals, identify any inefficiency that need improvement, and evaluate the level of regulatory compliance for TBSIP tank barges compared to tank barges operating under the traditional inspection program. For this reason, specific measurement criteria of the Program's effectiveness will be developed and reviewed by District Eight.

OCMIs shall ensure the MISLE data entry requirements of the previous section are performed. CCGD8(dpi) shall analyze MISLE data for trends and take appropriate actions based on those findings.

NOTE: The SIP product set in MISLE should be use when entering inspection data.

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V. INSPECTIONS

The following inspection activities shall be conducted by the Coast Guard and the Company TBSIP Examiners, to fulfill the inspection requirements mandated by law and specified in the federal regulations.

A. Introduction

Traditionally, Coast Guard Marine Inspectors performed all inspections. However, under the TBSIP program the Company TBSIP Examiners will now conduct all annual inspections.

The Coast Guard will conduct all other required inspections. These include the Periodic Inspection, Inspections for Certification, Drydock Exams, Internal Structural Exams, Cargo Tank Internal and Security Verification Exams.

A chart summarizing the inspection intervals and general policy for traditional barge inspections vs. the TBSIP program is provided on the following page.

This chart is followed by a description of the specific inspection responsibilities that shall be carried out by the Coast Guard and those that shall be carried out by the Company TBSIP Examiners.

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Inspection Intervals	Per 46 CFR 31.10	<p>Company TBSIP Examiners will conduct annual inspections of 100% of the tank barge fleet, per 46 CFR 31.10-17.</p> <p>A USCG Marine Inspector will conduct all Periodic Inspections, Inspections for Certification, as well as the required DDE, ISE, and CTIE (either 5 or 10 yr interval).</p> <p>A USCG Marine Inspector will annually conduct the following TBSIP Oversight:</p> <p>a) TBSIP administrative review, b) Audits of the OCMI designated Company TBSIP Examiners.</p>
Qualification of USCG Marine Inspectors	USCG Marine Inspector - fully qualified for the type of tank barge involved.	USCG Marine Inspector - fully qualified for the type of tank barge involved.
Type of Inspection:		
Inspection for Certification (46 CFR 31.10-15), Periodic Inspection (46 CFR 31.10-17(b)) and Security Verification Exam (NVIC 4-03 Enclosure (2), Paragraph 3.B.)	<p>Conducted by a USCG Marine Inspector.</p> <p>This is a stem-to-stern inspection to ensure full compliance with the regs.</p>	<p>Conducted by a USCG Marine Inspector.</p> <p>This is a stem-to-stern inspection for compliance with regulations. Ideally, inspection will be conducted in concurrence with the DDE, ISE, and/or CTIE.</p>
Annual Inspection (46 CFR 31.10-17(a))	<p>Conducted by a USCG Marine Inspector.</p> <p>This is less stringent than an Inspection for Certification, but thorough enough to be confident that barge remains in compliance with regs.</p>	<p>Conducted by a Company TBSIP Examiner, they will conduct annual inspection on 100% of tank barge fleet.</p> <p>The company shall submit monthly reports to the TBSIP Homeport OCMI to document which barges had received a satisfactory annual inspection during the previous month, so this info can be entered in the CG's vessel inspection database.</p>
Drydock Exam (46 CFR 31.10-21)	Conducted by a USCG Marine Inspector .	Conducted by a USCG Marine Inspector .
Internal Structural Exam (ISE) & Cargo Tank Internal Exam (CTIE) (46 CFR 31.10-21)	Conducted by a USCG Marine Inspector .	Conducted by a USCG Marine Inspector .

B. Company Responsibilities

Annual inspections will be conducted by the Company TBSIP Examiners who are designated in writing by the TBSIP Homeport OCMI. The Company TBSIP Examiners are authorized to initial the Certificate of Inspection upon satisfactory completion of the annual inspection.

The Company shall notify their TBSIP Homeport OCMI each time they complete an annual inspection on a TBSIP barge by

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submitting the Exam Checklist for that tank barge. These Exam Checklists shall be submitted via the required monthly report per Section IV.A.3. of this Guide. The OCMI will then make appropriate entries into the Coast Guard's vessel inspection database to document these inspections and any deficiencies noted.

The Company is not required to conduct an annual inspection the year when the Periodic Inspection is due or COI expires, since the Coast Guard will conduct these inspections. The Periodic Inspection shall be scheduled at least thirty (30) days before or after the second or third anniversary of the date of the COI. The COI shall be scheduled at least thirty (30) days prior to the expiration date of the COI the company shall submit an Application for Inspection to the cognizant OCMI. Ideally this shall be the TBSIP Homeport OCMI, but if the barge is operating in a different inspection zone then the application shall be submitted to the local OCMI for that zone. The local OCMI may carry out the inspection. Upon receipt of the application, the OCMI will contact the company to schedule an Inspection for Certification by a Coast Guard Marine Inspector.

C. Coast Guard Responsibilities

The Periodic Inspection, Inspection for Certification, as well as the DDE, ISE, CTIE and Security Verification Exam, shall be conducted by a Coast Guard Marine Inspector. The COI inspection, which is on a 5 year inspection cycle, should whenever possible be conducted concurrent with the barge's DDE, ISE, and/or CTIE, which are typically on either a 5 or 10 year inspection cycle. The inspections shall be carried out per 46 CFR 31.10-15 and 31.10-21.

These inspections shall be scheduled and documented in the Coast Guard's vessel inspection database, the same as an inspection done under the traditional inspection program. The Coast Guard shall make an appropriate entry in the vessel inspection database whenever notification is received that the company has satisfactorily completed an annual inspection on one of its TBSIP barges. See Section IV, Part E of this Guide for further guidance on database entries.

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VI. OVERSIGHT

The following oversight activities shall be conducted by the Coast Guard, with the assistance of the Company TBSIP Representative, to ensure the Company is complying with the provisions of the TBSIP and maintaining all their barges in a safe condition in compliance with the regulations.

A. Introduction

The TBSIP Homeport OCMI will conduct an annual administrative review of the company's TBSIP-related forms and paperwork, and will audit each Company TBSIP Examiner to ensure they are properly carrying out their inspection duties. Additionally, the Coast Guard will perform oversight on the company's temporary repair practices, as discussed in Section VII, Part C of this guide.

TBSIP oversight is the systematic process in which a Coast Guard Marine Inspector reviews the Company's required TBSIP documentation, and conducts performance evaluations of the Company TBSIP Examiners. During oversight emphasis shall be placed on ensuring the Company is complying with their approved CAP and TAP(s). Specific emphasis shall be focused on the training, inspection knowledge, and skills of the Company TBSIP Examiners; and how well they are documenting the annual inspections including deficiency documentation and resolution. The Coast Guard will conduct random oversight of TBSIP personnel performing inspections on representative systems and subsystems; and also conduct any relevant third-party verification to see that the equipment and systems being serviced by these outside contractors are in satisfactory condition. The full scope of TBSIP Oversight is prescribed by the Coast Guard TBSIP Oversight Form, an example of which is provided in Appendix C of this Guide.

The scope of the TBSIP Oversight will be determined by the USCG Marine Inspector based upon his/her observations, and may be expanded to the level necessary to determine the level of company compliance with the regulations and with their approved CAP and TAP. Nothing precludes the Marine Inspector from expanding the scope of the inspection should there become doubt about the company's compliance with the regulations or their approved CAP and/or TAP.

The success of the TBSIP is dependent on an ongoing interactive process between the Coast Guard and a company's responsible TBSIP personnel. The TBSIP Oversight process ensures this interaction will take place.

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B. Coast Guard Responsibilities

The Coast Guard will perform the following oversight activities, which shall be completed annually by the anniversary of the date the company was enrolled in TBSIP:

- (a) Conduct an administrative review of the company's TBSIP program – reviewing all of the company's TBSIP-related files and paperwork,
- (b) Conduct a performance review (audit) on each designated Company TBSIP Examiner to see that they are properly carrying out their inspection duties, and to provide them with any updates on inspection policies, regulations and laws.

When conducting TBSIP Oversight, Coast Guard Marine Inspectors shall focus on such things as:

- Whether the CAP and TAPs are adequate,
- How well the Company is adhering to their approved CAP and TAPs,
- Evaluation of personnel training and qualification records,
- Inspection knowledge and skills of the Company TBSIP Examiners,
- Deficiency documentation and resolution, including confirmation that noted corrective actions have been properly documented and performed,
- Random oversight of TBSIP personnel conducting inspection procedures on representative systems/ subsystems, to see that they are properly carrying out their inspection duties in accordance with the CAP and TAP, and
- Third-party verification, to ensure outside contractors are properly servicing specific equipment and systems.

TBSIP Oversight provides a necessary feedback loop for both the Coast Guard and the company. Oversight of the company's TBSIP program involves evaluating four general categories of performance indicators:

1. **Breakdowns with TBSIP Process,**
2. **Materiel Deficiencies,**
3. **Operational Changes, and**

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4. **External Indicators** (marine casualty, civil penalty proceedings, changes to regulations, etc).

The TBSIP Oversight will lead to one of three conclusions about the company's TBSIP program, based upon these performance indicators:

1. **SATISFACTORY – NO ACTION NEEDED:** The TBSIP program is functioning properly and the desired level of safety is being maintained without Coast Guard intervention.
2. **UNSATISFACTORY - REMEDIAL ACTION:** Deficiencies in one or more of the performance indicators signal that remedial action is needed (see page 38 for "Causes for Remedial Action"). This may call for revisions in TBSIP forms, training for the Company TBSIP Examiners, or closer adherence to the defined TBSIP program, any of which warrant increased Coast Guard and company interaction.
3. **UNSATISFACTORY – DISENROLLMENT:** Deficiencies in the performance indicators are of such a serious, persistent, or widespread nature that the tank barge and/or the company should be disenrolled from the program (see page 39 for "Causes for Automatic Disenrollment").

The second and third conclusions will require immediate follow-up action. The determination of whether remedial action or automatic disenrollment is appropriate will be dictated by the severity of the deficiencies as per the four performance indicators. For worst cases, remedial action will lead to disenrollment.

If DISENROLLMENT is appropriate, the Coast Guard will amend the tank barge's COI to remove the TBSIP endorsement. The company must then decide whether to seek reinstatement or operate that barge under the traditional inspection program. The barge cannot be reinstated until the successful completion of a minimum of two successful Coast Guard annual exams. Authority to disenroll the company and its entire fleet of barges from the program rests with the District Commander, and shall be considered upon recommendation of the TBSIP Homeport OCMI.

1. Character of USCG TBSIP Oversight Inspections

The focus of the Coast Guard oversight inspections is on observing TBSIP performance indicators; actual verification that the TBSIP is being administered properly and that it is achieving its intended results.

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2. A New Dynamic Takes Place in How Inspections are Managed

The dynamic that takes place during oversight of a TBSIP inspection changes from one where the Coast Guard marine inspector directs the activities, to one where the Company TBSIP Examiners demonstrate their performance of the company's TBSIP program verified by the Coast Guard marine inspector. Under TBSIP, the company has agreed to conduct its tank barge operations in compliance with the approved CAP and TAP. Examples of non-compliance represent a possible breakdown in the TBSIP and may suggest expansion of the Coast Guard marine inspector's inspection. Under TBSIP, it is incumbent upon the company to verify compliance with the approved Plans.

3. Causes for Remedial Action

The breakdown in any of the four general categories of performance indicators will result in remedial actions appropriate for the severity of the breakdown. Such actions include, but are not limited to: (1) Further development or revision of the Company's Action Plan; (2) Further training of company personnel; (3) More frequent TBSIP Oversight inspections by the Coast Guard; or (4) More frequent reports by company personnel. All remedial actions should result in increased verbal and written communications between the Company TBSIP Representative, USCG TBSIP Advisor, and OCMI. Remedial action may be considered by the TBSIP Homeport OCMI for the following:

1. **Breakdowns with TBSIP Process:**

- a. Failure to follow TAP or CAP (including, but not limited to, reporting procedures, training/safety programs, or drug and alcohol programs);
- b. TBSIP Inspection deficiencies noted by the Coast Guard;
- c. Failure to update TAP in response to minor changes to tank barge arrangement or equipment.

2. **Operational Changes:**

- a. Any change in responsible TBSIP personnel or company management;
- b. Change in tank barge service; or,
- c. The lay-up of the tank barge.

3. **External Indicators:**

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- a. A monetary assessment or letter of warning against the company under Coast Guard civil penalty procedures;
- b. A reportable marine casualty;
- c. A change in applicable regulations.

NOTE: Remedial actions for Material Deficiencies are not applicable. Such deficiencies are indicative of process breakdown and should be addressed accordingly.

4. Causes for Automatic Disenrollment

The breakdown in any of the four general categories of performance indicators result in the automatic disenrollment of the tank barge, depending on the severity of the breakdown. The following items, arranged under their respective performance indicators, **will** result in the automatic disenrollment of the tank barge.

CRITICAL NOTE:
Failure to report either item #1 or #3 indicates a company's lack of good faith in carrying out the company's TBSIP responsibilities.

- 1. **Breakdowns with TBSIP Process:** Unreported material casualties that impaired the tank barge's seaworthiness, or resulted in damage to the tank barge or other property in excess of \$25,000 or unreported temporary repairs.
- 2. **Material Deficiencies:** (if such deficiencies were obviously existent while the tank barge remained in operation in other than an emergency situation):
 - a. Missing required fire extinguishers;
 - b. Unauthorized modifications of structural arrangements;
 - c. Unauthorized modifications of equipment or structural arrangements which resulted in a prohibited discharge;
 - d. Failure to maintain required watertight boundaries;
 - e. Intentional override of any electrical or mechanical safety device or shutdown;
 - f. Significant noncompliance with federal requirements not otherwise described that give credible concerns on the part of the Coast Guard about the applicant's commitment to safety.

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3. **Operational Changes:**
 - a. Operation of the tank barge outside the scope of its COI; or
 - b. Sale of the tank barge, that is, any selling of a tank barge from one company/organization to another, without notification to the Coast Guard.
4. **External Indicators:** Automatic disenrollment actions for External Indicators (civil penalty proceedings, reportable marine casualties, or changes to regulations) are not applicable. Such deficiencies are indicative of remedial actions and should be addressed accordingly.

C. Company Responsibilities

The Company TBSIP Representative shall assist the Coast Guard in scheduling and conducting annual oversight activities.

Also, the Company TBSIP Representative shall track all temporary repairs made to inland barges and summarize these repairs in an annual report that is submitted to the TBSIP Homeport OCMI. More details about this report are provided in Section VII, Part D of this Guide.

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VII. TEMPORARY REPAIRS

The following policy and procedures for temporary repairs apply to **inland tank barges ONLY**. For tank barges with an offshore route, the Coast Guard shall be contacted immediately if damage occurs and must approve all repairs, regardless of whether they are temporary or permanent in nature.

A. Introduction

One of the streamlining measures provided by the TBSIP is a provision allowing barge companies to make temporary repairs for minor damage on INLAND TANK BARGES ONLY prior to obtaining Coast Guard approval. This is particularly beneficial when damage occurs in the middle of the night or in a remote region.

The nature of inland barge operations often results in frequent yet relatively minor damage to the tank barge. The rubbing of barges against one another, low energy impacts against lock walls, towboats and other barges can cause hull plating to be inset, fracture or wear thin in localized areas (especially side plating against frames and stiffeners; barge corners, ends and knuckles), while the majority of the hull plating remains in good condition. Failure of coating systems, plate defects, and improper welds may also result in the need for unanticipated repairs.

When temporary repairs are made to damage as a result of an occurrence not meeting the criteria of a reportable marine casualty, the company is required to notify the homeport OCMI as soon as practical but within a maximum of **24 hours** of whenever the damage occurs, provide documentation on the damage and temporary repairs. The guidance on temporary repairs that is provided in this Section is intended to:

- a. Promote uniform and consistent policy for temporary repairs to be conducted by TBSIP companies; and,
- b. Assist TBSIP companies in determining the scope and nature of temporary repairs that are permitted.

This policy does not limit the cognizant OCMI or other U.S. Coast Guard authorities from exercising the authorities granted to them in statute and regulation to exercise control over tank barges to assure the safety of life, property, and the marine environment. The extent of the repairs necessary to ensure a tank barge can operate safely is dependent upon a multitude of factors, including the precise nature of the damage, overall condition of the barge, what cargo it is carrying, and other risk factors.

Communication and trust between the Coast Guard and the companies enrolled in the TBSIP are the keys to success with

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temporary repairs. The Eighth Coast Guard District with input from the OCMI's will continue to monitor the effectiveness of temporary repairs and may make modifications to this policy as necessary.

B. Policy & Procedures

For inland barges enrolled in TBSIP, the company will not need to obtain Coast Guard approval prior to making temporary repairs if the damage is:

- (a) **To the outer hull plating, including fractures and holes not to exceed 12 inches X ¼ inch or 3 square inches;**
- (b) **Limited to no more than 1 temporary repair per void and 3 temporary repairs total on a barge; and**
- (c) **Does not involve a cargo tank.**

Otherwise, the Coast Guard shall be contacted immediately and must approve any repairs. All temporary repairs made under the TBSIP shall conform to the procedures and restrictions listed below. Each company should standardize their repair procedures, but a Company TBSIP Examiner must respond on scene and provide specific approval for a temporary repair.

When temporary repairs are made, the company must notify the TBSIP Homeport OCMI as soon as practical but within a maximum of 24 hours of when the damage occurred. This will allow the TBSIP Homeport OCMI to ensure repairs are documented in MISLE.

Permanent repairs shall be completed at the first opportunity for the company but no later than **45 days** after the damage has occurred. The company is required to monitor the temporary repairs, and if there is any evidence of failure, they shall immediately notify the Coast Guard and effect permanent repairs.

The company shall comply with the following procedures and restrictions when carrying out temporary repairs:

1. Notification
2. Documentation
3. Prohibited Areas for Temporary Repairs
4. Barge to be made Water & Cargo Tight
5. Use of Repair Materials that are Incompatible with Water
6. Non-Use of Repair Materials that Produce Heat
7. Use of Repair Materials Not Compatible with the Cargo
8. Cargo Prohibited if Not Compatible with Repair Materials

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9. Temporary Repairs to Cargo Tanks

1. Notification

Proper notification shall be made to the U.S. Coast Guard (the TBSIP Homeport OCMI) as soon as practical but within a maximum of **24 hours** of when the damage occurs. Notification shall accurately reflect the condition of the barge and all related circumstances, and shall include the following information:

- a. The name, Official Number, owner and operator, and contact point for the barge,
- b. The location of the barge,
- c. A description of the damage,
- d. The fact that the damage is minor in nature,
- e. The fact that this tank barge is enrolled in the Eighth Coast Guard District's Tank Barge Streamlined Inspection Program (TBSIP),
- f. The fact that temporary repairs will be (or have been) completed in accordance with the TBSIP Program,

If the damage is beyond the "minor damage", the **local OCMI** must be notified prior to any work being conducted and must grant approval for the repairs. The local OCMI should consult with the TBSIP Homeport OCMI as necessary when notified of such damage.

Nothing in this Policy Letter shall be construed as effecting the requirement of 46 CFR 4.05-1 to immediately notify the nearest Coast Guard office of a marine casualty.

2. Documentation

A Temporary Repair Form and/or photographic documentation (shall be provided to the TBSIP Homeport OCMI with in 48 hours by the owner or operator of the barge to fully detail the nature and scope of the damage and the temporary repairs that were completed. Photos are particularly useful, and digital photos are encouraged because they are easy to transmit electronically. This damage and temporary repair report shall include, but not be limited to, the following information: **When photographic equipment is not used, a detailed drawing or sketch of the temporary repair is required.**

- a. Extent and dimensional characteristics of the damage and repairs,

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- b. Materials and methods used for the repairs,
- c. Location(s) on the vessel where such repairs were conducted,
- d. Name of the company personnel who supervised the repairs, and
- e. The form shall be signed by the TBSIP Examiner attesting that the repairs were satisfactorily completed and tested in accordance with the provisions of the TBSIP.

3. Prohibited Areas for Temporary Repairs

Temporary repairs shall **not** be made to the following systems and equipment unless specific permission is received from the local OCMI:

- a. Machinery Installations,
- b. Electrical Systems,
- c. Pressure Vessels,
- d. Valves,
- e. Alarms or overfill systems,
- f. Cargo hoses,
- g. Cargo pumps, piping and related appurtenances,
- h. Cargo gauging systems, and
- i. Cargo monitoring equipment.

4. Barge to be made Water & Cargo Tight

Upon completing of the temporary repairs the barge must be watertight and must be reasonably expected to remain watertight under all reasonable foreseeable weather and operating conditions for the duration of the temporary repairs.

5. Temporary Repairs At or Below the Waterline

If temporary repairs are made to void spaces such as rakes, double bottoms, wing voids in locations within twelve inches or below the actual waterline, then sufficient de-watering equipment shall be available on-scene to allow for de-watering of the barge in the event of complete failure of the temporary repair. De-watering equipment shall be constructed of such materials and design that it can safely be used in the presence of the cargo, cargo residues and vapor that it may encounter if the nature of the temporary repair is such that its failure would result in the de-watering equipment being exposed to same.

For the purpose of this guidance, de-watering equipment is considered to be on scene if it is located aboard an attending

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towboat (including dedicated fleeting area towboats) or located aboard a barge that is part of the same tow. If the barge is compartmentalized such that the failure of the temporary repair would not result in the barge's sinking or significantly adversely affect the barge's stability, structural integrity or handling, then no additional de-watering equipment beyond existing regulatory requirements is deemed necessary.

6. Use of Repair Materials that are Incompatible with Water

Repair materials subject to rapid deterioration in the presence of water shall not be used in any location where such repair material may reasonably be exposed to water.

7. Use of Repair Materials that Produce Heat

Repair material that create an exothermic (heat creating) reaction in the presence of any cargo, cargo residues or vapors, other repair material, water or during curing shall not be used unless the exothermic reaction created is at least 100 degrees Fahrenheit lower than the lowest potential auto-ignition temperature for the cargo that the temporary material may be exposed to. Under the provisions of the Chemical Data Guide for Bulk Shipment by Water (CIM 16616.6A) auto-ignition temperature is defined as the minimum temperature required to ignite gas or vapor without a spark or flame being present. Auto-ignition Temperatures for cargoes are only approximate and may change substantially with changes in geometry, gas or vapor concentrations, presence of catalysts, and other factors. The use of repair materials creating exothermic reactions, though not expressly prohibited, is discouraged if other practical means are available to affect repairs.

8. Use of Repair Materials that are Not Compatible with the Cargo

Repair materials subject to rapid deterioration in the presence of cargo, cargo residues and/or cargo vapors shall not be used in any location where such repair materials may reasonable be exposed to such cargo, cargo residues and/or cargo vapors. For the purposes of making temporary repairs, repair materials not known through laboratory testing or documented field usage to exhibit satisfactory resiliency to deterioration from the specific cargo residues and/or cargo vapors shall be presumed to be unsatisfactory.

9. Cargo Prohibited if it is Not Compatible with Repair Materials

If temporary repairs are made with any material subject to rapid deterioration in the presence of any cargo, cargo residues and/or cargo vapors that the barge may carry or come into proximity with, then cargo that may deteriorate the temporary repair material shall not be loaded or handled by the barges until such time that repair material is replaced with a material not subject to rapid

TEMPORARY REPAIRS (inland tank barges)	TBSIP Guide	Section: VII
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deterioration. For the purposes of making temporary repairs, repair materials not known through laboratory testing or documented field usage to exhibit satisfactory resiliency to deterioration from the specific cargo residues and/or cargo vapors shall be presumed to be unsatisfactory.

**C. Follow-up Action
& Permanent Repairs**

It is the responsibility of the owner, operator, or other responsible party to conduct periodic monitoring of the temporary repairs, and if there is any evidence of failure they shall immediately notify the Coast Guard and effect permanent repairs. The local OCMI shall be immediately notified if:

- a. The temporary repair fails or evidence of potential failure is discovered. Permanent repairs shall be completed prior to loading cargo, if the barge is empty; or at the end of the voyage, if the barge is loaded;
- b. The damage requiring the temporary repair spreads beyond its original boundaries. For example, if a crack that is temporarily repaired propagates beyond its original dimensions; or

D. Monthly Report

A written report shall be submitted to the TBSIP advisor for all barges repaired the previous months in order to facilitate clearing repairs in the MISLE data base. The report shall include following information:

- a. A summary for each barge for which temporary repairs were conducted. The summary should include: name of barge, official number, date of temporary repair, date of permanent repair, description of permanent repair and methodology.
- b. For each barge whose temporary repairs have failed or shown evidence of potential failure prior to the expiration of the temporary repair authorization, the summary should also include the cause of the failure and the means by which future failures can be prevented.

EXAM CHECKLIST	TBSIP GUIDE	Appendix A Page: Instruction
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The **Examination Checklist (EC)** is the working document used by a Company TBSIP Examiner to conduct an annual inspection of a tank barge and all its systems. Use of the specific form provided here is optional - companies may design their own checklists. Once completed, these forms should be maintained in the company's TBSIP vessel records for 2 yrs, and made available to the Coast Guard upon request.

In order to prepare the EC form and use it while conducting the annual inspections, the Company TBSIP Examiner will:

- Blackout completely those line-items (specific systems and subsystems, each of which has an ICR number associated with it) that do not apply to the vessel in question. This can be done in advance, and the form can be customized to only list the relevant inspection items.
- Note whether or not the item was found satisfactory in the appropriate column (OK/NOT OK)
- Make comments on the inspected item in the "Comments" column. Comments must be made for items marked NOT OK describing the issue. Extended comments may be made on additional paper, another journal, or some other record; and if so this fact shall be noted on the EC.
- Items found unsatisfactory (NOT OK) may require a Correction Report (CR) to be filed.

→ An example of a completed EC form is provided on the next page.

CAVEAT: Under no circumstances is the list contained here to be considered complete for all vessels that may be enrolled in TBSIP. It is provided as a template only. The EC should be modified as necessary to include all vessel systems and subsystems required to be inspected. This includes relevant sections of Titles 33, 46, and 49 Code of Federal Regulations (CFR), and amplifying policy or regulations such as IMO Conventions, Treaties, Navigation and Vessel Inspection Circulars (NVIC), the Marine Safety Manual, and official Coast Guard policy letters. The ECs should be reviewed periodically for currency and revised to reflect any relevant changes in the underlying regulations, treaties or policy.

Company TBSIP Examiner: John Doe Bailey

VESSEL NAME: M/V TAIP EC EXAMPLE

O.N.: D123456

DATE: 25 JAN 01

A. PAPERWORK—INCLUDING FORMS, NOTICES, PUBLICATIONS & CREW REQUIREMENTS	OK	NOT OK	DATE	COMMENTS
01. Ensure the following certificates are on board and valid				
a) Certificate of Inspection				
b) FCC Certificate/license				
c) COFR				
d) Certificate of Documentation				
e) Stability Letter				
f) Officers License				
g) Vessel Action Plan available				
02. Verify the following publications are on board				
a) Navigation Rules				
b) Coast Pilot				
c) 46CFR166-109				
03. SC				<ul style="list-style-type: none"> In this example, only ICR Items A.07 and A.08 are being reviewed at this time. The Company TBSIP Examiner initials the appropriate box ("OK" or "NOT OK"), fills in the date of the inspection, and notes any applicable amplifying information in the "Comments" column. If a Correction Report (CR) is written on the item, it should be mentioned in the "Comment" column. This record will not typically be removed by the USCG Marine Inspector, although an Inspector may ask to review the documentation in order to ascertain that the annual inspections are being properly recorded. A copy of the EC should be maintained in the company vessel records for 2 yrs.
a)				
b)				
c)				
04. F				
a)				
b)				
05. C				
a)				
b)				
c)				
d)				
e)				
f) CG 3372: Oil Pollution				
g) Stability Letter				
06. Vessel manning				
a) Number of officers and unlicensed crew required				
b) Licenses valid, endorsed, posted				
07. Obtain the following	JB		17Oct2005	
a) Fire extinguishing service report	JB		17Oct2005	
b) Liferaft servicing report	JB		17Oct2005	
08. Placards, Notices, and Markings		JB	17Oct2005	
a) Passenger notices	JB		17Oct2005	
b) Markings: Conspicuous and legible		JB	17Oct2005	PFD Lockers' markings obscured. CR issued.

Company TBSIP Examiner:

VESSEL NAME:

O.N.:

DATE:

	OK	NOT OK	DATE	COMMENTS
A. PAPERWORK - INCLUDING FORMS, NOTICES, PUBLICATIONS & CREW REQUIREMENTS				
01 Ensure the following certificates are on board and valid				
a) Certificate of Inspection				
b) OPA 90 approval letter				
c) COFR				
d) Certificate of Documentation				
e) Stability Letter				
f) Transfer Procedures				
g) Vapor Control System procedures				
h) Benzene Monitoring program				
i. Pipeline hydrostatic test				
j) Vessel Action Plan available				
k) Letters of Alternate Compliance				
02 Following on board:				
a) Pollution/Marpol Placard				
03 Notices, and Markings				
a) Markings: Conspicuous and legible				
b) Warning Signs in place				
c) Red Flag/Light visible				
d) White Safety Stripe clearly marked				
e) MSDS sheets available				
B. FIRE PROTECTION EQUIPMENT				
01 Portable Fire Fighting Equipment				
C. NAVIGATION EQUIPMENT				
01 Navigation Lights				
D. GROUND TACKLE				
01 Inspect mooring system				
a) Bitts, cleats, fairleads & winches sound				
E. HULL, DECKS, FITTINGS & WATERTIGHT INTEGRITY.				
01 Inspect Void Spaces				
a) Gaskets in hatches in seviceable condition				
b) Rakes and void spaces free of excess water				
c) No known fractures in hull				
02 Ensure markings are legible				
03 Ensure Loadline is visible				
F. ELECTRICAL SYSTEMS				
01 Inspect switchboards and confirm the following installations conform to regulations:				
a) Nonconductive mat on deck in front of board				
b) Nonconductive rails on board face				
c) Dripshield on board's top, unless board is watertight				

Company TBSIP Examiner:

VESSEL NAME:

O.N.:

DATE:

	OK	NOT OK	DATE	COMMENTS
F. ELECTRICAL SYSTEMS - CONTINUED				
d) Ground detection indicators working with no grounds indicated				
e) Meters calibrated and working				
f) Synchronizing controls working				
g) Identification for controls and meters				
h) Area dry and clean				
i) Working space is provided iaw regulations				
j) Overcurrent protection properly labeled				
02 Inspect distribution panels and determine:				
a) Is circuit directory provided				
b) Are the amperage ratings of the protective devices iaw the required circuit directory				
c) Are panel board blanks installed where necessary				
03 Inspect electrical installations in hazardous locations to ensure compliance with D8 Policy Letter 02-2005				
G. POLLUTION PREVENTION				
01 Check condition of Oil Containment pans and rails				
02 Conduct inspection of Oil Transfer Procedures				
03 Conduct inventory/inspection of Pollution Response Equipment				
04 Inspect Oil Transfer Hose				
H. CARGO TRANSFER SYSTEM				
01 Inspect Cargo Pump Engine, Spark Arrester, and Fuel System				
02 Inspect Thermal Fluid Heater				
03 Inspect Piping and Valves				
04 Inspect Cargo Tank Tops and Pressure Vessels				

CORRECTION REPORT	TBSIP GUIDE	Appendix B Page: Instruction
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The **Correction Report (CR)** form is relatively self-explanatory. One is to be filled-out anytime a deficiency is found on a vessel or one of its systems that is required to be inspected in accordance with the Tank Barge Action Plan (TAP). A CR is to be completed whether or not the item is repaired on the spot or remains outstanding. The completed forms shall be retained on file for **2 years**, and made available to the Coast Guard during its TBSIP Oversight Inspections.

In order to prepare the form, the Company TBSIP Examiner will fill in all of the blanks on the form with the appropriate information.

Any "show stopper" type items (major safety discrepancies) that become apparent to the Company TBSIP Examiner or that are specifically identified as such in the TAP, will require immediate Coast Guard notification. In these cases appropriate corrective actions shall be completed before the vessel goes back into service.

Tank Barge Streamlined Inspection Program (TBSIP)

CORRECTION REPORT

Vessel Name: M/V TBSIP CR EXAMPLE **Official Number:** D123456

Company: TBSIP EXAMPLE LINES **Phone Number:** (123) 456-7890
Company TBSIP Examiner: *Mr. Joe Smithson*

DEFICIENCY

ICR Number: I.12

Description: Draft marks have become worn and cannot be easily read.

Date Discovered: 23/Mar/2005 **Date correction required:** 28/Mar/2005

Individual initiating Correction Report: *Captain J. Bruer*

Corrective Action: Re-painted draft marks.

Date corrected: 28/Mar/2005

Individual correcting Correction Report: *Captain J. Bruer*

TBSIP Oversight Inspection Form	TBSIP GUIDE	Appendix C Page: 1
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Date: _____

MISLE CASE#: _____

PARTICULARS

TANK BARGE NAME: _____ VIN: _____

GEOGRAPHIC LOCATION (City, State): _____

PHYSICAL LOCATION (Berth, Pier): _____

COMPANY TBSIP EXAMINER: _____

COAST GUARD MARINE INSPECTOR: _____

OTHERS ATTENDEES: _____

INSTRUCTIONS

This TBSIP Oversight Inspection is to be performed by a Coast Guard Marine Inspector. It will involve:

- (a) Examination of the company's TBSIP documents for the tank barge,
- (b) Security Verification Exam,
- (c) Spot checks on the conditions aboard the tank barge, to verify it is being maintained in a state of regulatory compliance, its condition has been properly documented in accordance with the TAP, and discrepancies have been properly documented and corrective actions have been taken in a timely manner,
- (d) Performance evaluation (audit) of the Company TBSIP Examiner.

Oversight of the TBSIP involves addressing four general categories of performance indicators:

- 1. Breakdowns in the TBSIP process,
- 2. Materiel deficiencies,
- 3. Changes in operational parameters, and
- 4. External indicators.

By keeping these indicators in mind during the TBSIP Oversight Inspection, a proper evaluation of the condition of the company's TBSIP program will be made. A review of the "Causes for Remedial Action " and "Causes for Automatic Disenrollment" (found in Section VI, Part B of the TBSIP Guide) may be helpful.

This Coast Guard TBSIP Oversight Inspection Form is broken down into the following four categories. Instructions on how to fill it out are provided in each section.

- Administrative review,
- Materiel review,
- Performance review, and
- Conclusions/Recommendations.

A copy of this Coast Guard TBSIP Oversight Inspection Form should be provided to the Company TBSIP Examiner upon completion of the inspection.

ADMINISTRATIVE REVIEW

1. Review and verify contents of Tank Barge Action Plan (TAP):
 - a. OCMI Approval Letter,
 - b. Exam Checklist (EC) that is tailored to the barge,
 - c. Correction Reports (CRs). and
 - d. Inspection Criteria Reference (ICR) that is tailored to the barge.

2. Review and examine third party certifications:
 - a. Fire Extinguisher service reports
 - b. Machinery service reports
 - c. Other reports not listed: _____

3. Comments:

MATERIEL REVIEW & SECURITY VERIFICATION EXAM

1. Conduct a walk-through of the tank barge with the Company TBSIP Examiner to determine the tank barge's general condition and security.

2. Inspect at least three subsystems. Preferably these are ones that had deficiencies noted on a recent EC or CR. Request the Company TBSIP Examiner explain why the subsystem item needed correction and the method used to correct the item. Compare the actual state of the item against the CR entry.

Items examined were:

ICR Number: ___ ___

ICR Number: ___ ___

ICR Number: ___ ___

3. Comments:

PERFORMANCE REVIEW

1. Discuss TBSIP procedures with the Company TBSIP Examiner. Determine if their knowledge of the TBSIP is current and remains adequate.
2. Discuss the implementation of the TBSIP on this tank barge. Have there been deterrents or hindrances? Is the TAP sufficient to ensure the safety of the tank barge and crew? Have there been recurring problems or deficiencies? Discuss the methods used to overcome these problems.
3. Discuss with the Company TBSIP Examiner whether the ICRs being used on this tank barge are sufficient for the equipped systems and subsystems.
4. Review ECs and CRs from the previous 2 years. Note contradictions between forms or incorrect form completion.
5. Comments: _____

CONCLUSIONS / RECOMMENDATIONS

1. The tank barge has been **satisfactorily** maintained at the required level of safety. _____
2. There are deficiencies which require **remedial action**, such as revisions in the TAP or other TBSIP forms, training for the Company TBSIP Examiners, and/or closer adherence to the defined program, any of which may warrant additional Coast Guard and company interaction. _____
3. There are deficiencies that require **disenrollment** from the program. _____

COAST GUARD MARINE INSPECTOR: _____
(Printed name & Signature)

COMPANY TBSIP EXAMINER: _____
(Printed name & Signature)

Inspection Criteria Reference	TBSIP GUIDE	Appendix D Page: Instruction
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Inspection Criteria Reference (ICR) for Tank Barges (Subchapters D & O)

The **Inspection Criteria Reference (ICR)** is the primary reference source for a Company TBSIP Examiner when conducting an annual inspection. It provides a detailed description of the specific inspection procedures for each vessel system and subsystem, and uses standardized forms that are grouped by system. Each ICR procedure sheet has four sections.

- **Section One** identifies the System, Subsystem, and the ICR Number to identify the specific inspection item being addressed.
- **Section Two** provides Authorization info for the specific inspection item: who is the authorized examiner, what specific CFR cites apply, and what is the inspection frequency for the item.
- **Section Three** provides the Inspection Criteria; that is, the specific procedures to follow when inspecting this specific item (including how to determine if the item is in compliance).
- **Section Four** identifies Deficiency Action: what actions are required if the item is found deficient.

In order to prepare the form, the Company TBSIP Representative will:

- Delete those ICR items that do not apply to the tank barge in question.
- Add ICR procedure sheets for any of the tank barge systems that are required to be inspected but are not already included in this “generic” ICR.
- Note all changes on the Record of Changes page.

CAVEAT: Under no circumstances is the list contained here to be considered complete for all tank barges that may be enrolled in the TBSIP. It is provided as a template only. ICR procedures are to be provided for all tank barge systems that are required to be inspected. These systems are identified in relevant sections of Titles 33, 46 (particularly Subchapters D and O), and 49 of the Code of Federal Regulations (CFR). Additional inspection requirements may be applicable in sources such as IMO Conventions, Treaties, Navigation and Inspection Circulars (NVICs), the Marine Safety Manual, and official Coast Guard policy letters. The ICR should be reviewed periodically for currency and revised to reflect any relevant changes in the underlying regulations, treaties, or policy.

INSPECTION CRITERIA REFERENCE
(ICR)

for U.S. flag Tank Barges

(Subchapter D/O)

TABLE OF CONTENTS

Record of Changes

INSPECTION CRITERIA REFERENCES:

A. DOCUMENTS & PAPERWORK

- 01 Required Documents
- 02 Pollution/MARPOL
- 03 Notices & Markings

B. FIREFIGHTING EQUIPMENT

- 01 Portable Fire Extinguishers

C. NAVIGATION EQUIPMENT

- 01 Navigation Lights, Dayshapes, and Navigation Light Stands

D. GROUND TACKLE & DECK MACHINERY

- 01 Bitts, Cleats, Chocks, Winches, Deck and Sideshell

E. HULL & DECK FITTINGS

- 01 Void Spaces
- 02 Proper Hull Markings
- 03 Loadline (if required)

F. ELECTRICAL

- 01 Generator & Generator Electrical Set
- 02 Distribution Panel Boards & Controllers
- 03 Electrical Installations in Hazardous Locations

G. POLLUTION PREVENTION

- 01 Cargo Oil Containment (Drip Pans and Controllers)
- 02 Oil Transfer Procedures
- 03 Pollution Response Equipment
- 04 Oil Transfer Hose

H. CARGO TRANSFER SYSTEM

- 01 Cargo Pump, Engine, Spark Arrestor, and Fuel System
- 02 Thermal Fluid Heater
- 03 Pipes & Valves
- 04 Tank Tops & Pressure Vessels

SYSTEM: Documents & Paperwork
SUBSYSTEM: Required Documents

ICR NUMBER: A
01

AUTHORIZATION

AUTHORIZED INSPECTOR: Company TBSIP Examiner
REFERENCES: VARIOUS
REGULATORY INSPECTION FREQUENCY: Annual

INSPECTION CRITERIA

Verify that the following documents are on board and current:

- a. Certificate of Inspection
 - b. OPA 90 approval letter and emergency notification procedures
 - c. Approval letter for Vessel Security Plan or Alternative Security Program
 - d. Certificate of Financial Responsibility
 - e. Certificate of Documentation (If required)
 - f. Stability Letter (If required)
 - g. Transfer Procedures
 - h. Vapor control system procedures (if applicable)
 - i. Benzene monitoring program (if applicable)
 - j. Pipeline, relief valve, pressure gauge hydrostatic test affidavit
-

DEFICIENCY ACTION

Obtain current document and place onboard prior to operation.

SYSTEM: Documents & Paperwork
SUBSYSTEM: Pollution/MARPOL

ICR NUMBER: A
02

AUTHORIZATION

AUTHORIZED INSPECTOR: Company TBSIP Examiner
REFERENCES: 46 CFR 121.702, 33 CFR 155.450, MARPOL 73/781
REGULATORY INSPECTION FREQUENCY: Annual

INSPECTION CRITERIA

The following applies to a tank barge that is 26' or more in length:

Verify the legibility of the MARPOL Annex I -"DISCHARGE OF OIL PROHIBITED" placard, as displayed in the machinery space or bilge and ballast pump control station.

DEFICIENCY ACTION

Provide placard onboard.

SYSTEM: Documents & Paperwork
SUBSYSTEM: Notices & Markings

ICR NUMBER: A
03

AUTHORIZATION

AUTHORIZED INSPECTOR: Company TBSIP Examiner
REFERENCES: 46 CFR 35.30-1
REGULATORY INSPECTION FREQUENCY: Annual

INSPECTION CRITERIA

Visually inspect all warning signs and ensure they are legible:

- a. Expansion domes and slop tank openings are properly marked "Danger Keep Out"
 - b. Warning signs in place with required information
 - c. Red flag in place and painted, red light operable
 - d. White safety stripe on deck perimeter is clearly marked
 - e. Cargo Information Cards or Material Safety Data Sheets for cargoes carried are onboard or posted
-

DEFICIENCY ACTION

Take appropriate action to ensure compliance.

SYSTEM: Firefighting Equipment
SUBSYSTEM: Portable Fire Extinguishers

ICR NUMBER: B
01

AUTHORIZATION

AUTHORIZED INSPECTOR: Company TBSIP Examiner
REFERENCES: 46 CFR 31.10-18(B)
REGULATORY INSPECTION FREQUENCY: Annual

INSPECTION CRITERIA

Verify the following:

- a. Ensure pressure gauge is in the operating range
 - b. Ensure proper size and type required onboard as required by COI
 - c. Ensure USCG or UL approved
 - d. Properly serviced and tested IAW 46 CFR Table 31.10-18(b)
 - e. Check inspection tag for current service date
 - f. Ensure seal is intact
 - g. Check general condition of unit including hoses/nozzles
 - h. Check for proper hydro date (If applicable)
 - i. Check stations for brackets, markings, accessibility
-

DEFICIENCY ACTION

Recharge or replace portable extinguisher.

SYSTEM: Hull & Deck Fittings
SUBSYSTEM: Navigation Lights, Dayshapes, and
Navigation Light Stands

ICR NUMBER: C
01

AUTHORIZATION

AUTHORIZED INSPECTOR: Company TBSIP Examiner
REFERENCES: 46 CFR 31
REGULATORY INSPECTION FREQUENCY: Annual

INSPECTION CRITERIA

Visually verify:

- a. Configuration of navigation lights or dayshapes is correct.
 - b. Navigation light stands are not missing or bent.
 - c. Interiors of stands are painted flat black.
 - d. Lights burn brightly when energized.
-

DEFICIENCY ACTION

Repair/replace deficient items.

SYSTEM: Ground Tackle & Deck Machinery
SUBSYSTEM: Bitts, Cleats, Chocks, Winches,
Deck and Sideshell

ICR NUMBER: D
01

AUTHORIZATION

AUTHORIZED INSPECTOR: Company TBSIP Examiner
REFERENCES: 46 CFR 31.10-17
REGULATORY INSPECTION FREQUENCY: Annual

INSPECTION CRITERIA

Visually verify:

- a. Winches are in serviceable condition
 - b. No safety hazards on deck
 - c. Bitts, cleats, and chocks are in serviceable condition
 - d. Ladders, rails guards, and lifelines are in good condition
-

DEFICIENCY ACTION

Repair/replace deficient items.

SYSTEM: Hull & Deck Fittings
SUBSYSTEM: Void Spaces

ICR NUMBER: E
01

AUTHORIZATION

AUTHORIZED INSPECTOR: Company TBSIP Examiner
REFERENCES: 46 CFR 32.20-5, 39.20-11
REGULATORY INSPECTION FREQUENCY: Annual

INSPECTION CRITERIA

Visually inspect:

- a. Hatches to ensure that gaskets are in serviceable condition and secure
 - b. Rakes and void spaces checked to ensure they are free of excess water (3 inches or less) or any product
 - c. Deck structure and side shell are free of cracks/fractures
 - d. Hull has no visible or known holes/fractures
-

DEFICIENCY ACTION

Conduct appropriate maintenance (if hull repairs are required, Coast Guard approval must be obtained prior to making repairs).

SYSTEM: Hull & Deck Fittings
SUBSYSTEM: Proper Hull Markings

ICR NUMBER: E
02

AUTHORIZATION

AUTHORIZED INSPECTOR: Company TBSIP Examiner
REFERENCES: 46 CFR 31.25-1, 32.05-1, 42.13-40, and 67.123
REGULATORY INSPECTION FREQUENCY: Annual

INSPECTION CRITERIA

Visually inspect all hull markings and ensure they are painted and legible:

- a. Draft marks port/starboard, bow/stern
 - b. Barge name/number, port/starboard side of barge in contrasting color
 - c. Loadline markings permanently marked port/starboard side of barge and painted contrasting color
 - d. Hailing port painted on stern
-

DEFICIENCY ACTION

Repaint faded or worn markings.

SYSTEM: Hull & Deck Fittings
SUBSYSTEM: Loadline

ICR NUMBER: E
03

AUTHORIZATION

AUTHORIZED INSPECTOR: Company TBSIP Examiner
REFERENCES: 46 CFR 42
REGULATORY INSPECTION FREQUENCY: Annual

INSPECTION CRITERIA

Visually verify:

- a. Loadline is permanently affixed.
 - b. All marks are easily visible.
 - c. Copy of loadline certificate carried aboard.
-

DEFICIENCY ACTION

Repair/replace deficient items.

SYSTEM: Electrical
SUBSYSTEM: Generator & Generator Electrical Set

ICR NUMBER: F
01

AUTHORIZATION

AUTHORIZED INSPECTOR: Company TBSIP Examiner
REFERENCES: 46CFR 110.30-5, Part 111
REGULATORY INSPECTION FREQUENCY: Annual

INSPECTION CRITERIA

- A. EACH INDIVIDUAL GENERATOR
1. Ensure the location of the generator is receiving adequate ventilation and is as dry as possible.
 2. Verify the operation of the voltmeter and ammeter for each generator rated at 50 volts or more.
 3. Verify the operation of the frequency measuring device for each AC generator.
 4. Verify a nameplate containing the information required by Article 445 or Article 430 of the NEC is attached.
 5. Verify each generator is protected by an overcurrent device with a set value not exceeding 115% of full load rating.
-

DEFICIENCY ACTION

Repair/replace deficient items. Ensure it is operating properly.

SYSTEM: Electrical
SUBSYSTEM: Generator & Generator Electrical Set

ICR NUMBER: F
01

AUTHORIZATION

AUTHORIZED INSPECTOR: Company TBSIP Examiner
REFERENCES: 46CFR 110.30-5, Part 111
REGULATORY INSPECTION FREQUENCY: Annual

INSPECTION CRITERIA (continued)

B. MULTIPLE GENERATOR INSTALLATIONS

1. For non-parallel systems; verify the operation of the interlock which prevents simultaneous connection to the switchboard.
2. For parallel systems;
 - a. test the operation of the reverse-power or reverse-current trips,
 - b. verify the operation of the switchboard speed control for each prime mover,
 - c. verify the operation of the wattmeter for each generator, and
 - d. verify the operation of the synchroscope and synchronizing lamp that has a selector switch to show synchronization for paralleling generators.

C. DUAL VOTAGE GENERATORS

1. Verify the neutral of the voltage system is solidly connected to the switchboard's neutral bus.
 2. Verify the neutral bus is connected to ground.
 3. Verify ground detection;
 - a. For AC systems verify the ammeter indicates the current in the ground connection and has a scale that accurately measures in the 0 to 10 ampere range, and verify the ammeter switch is of the spring return-to-on type.
 - b. For DC systems verify that the zero center ammeter is in the ground connection, has a scale range of 150% of the neutral current rating and has the polarity of the ground marked.
-

DEFICIENCY ACTION

Repair/replace deficient items. Ensure it is operating properly.

SYSTEM: Electrical
SUBSYSTEM: Generator & Generator Electrical Set

ICR NUMBER: F
01

AUTHORIZATION

AUTHORIZED INSPECTOR: Company TBSIP Examiner
REFERENCES: 46CFR 110.30-5, Part 111
REGULATORY INSPECTION FREQUENCY: Annual

INSPECTION CRITERIA (continued)

D. SWITCHBOARDS

1. General overview of the physical condition should be given to the entire switchboard.
 2. Ensure there is a non-conductive mat or non-conducting grating in each working area in front of and behind each board.
 3. Non-conducting handrails and guard rails shall be present on the board face.
 4. Dripshields shall be present and in good physical condition.
 5. All ground detection lights shall be in working order and no grounds should be indicated.
 6. All instrumentation (meters) shall be in good working order and recently calibrated. All controls and meters should be clearly and accurately identified.
 7. Where the generators can be paralleled all synchronizing controls and associated equipment for synchronizing generators should be functioning properly
 8. Overcurrent devices should be clearly and accurately identified.
 9. All openings where equipment has been removed are covered with blanks.
 10. Test operation of all bus transfer switches.
-

DEFICIENCY ACTION

Repair/replace deficient items. Ensure it is operating properly.

SYSTEM: Electrical
SUBSYSTEM: Distribution Panel Boards
& Controllers

ICR NUMBER: F
02

AUTHORIZATION

AUTHORIZED INSPECTOR: Company TBSIP Examiner
REFERENCES: 46 CFR 111.05-21, 111.12, 111.30, 111.40, 111.54, 111.70
REGULATORY INSPECTION FREQUENCY: Annual

INSPECTION CRITERIA

- A. DISTRIBUTION PANELS
1. Ensure each distribution panel is adequately ventilated and protected from falling debris and dripping or splashing water.
 2. Verify each panel board has circuit directory containing circuit designation, load of each circuit, rating of each breaker.
- B. CONTROLLERS
1. Verify each controller is watertight or weathertight depending on location.
 2. Verify interlock equipment functions properly cutting power when controller is opened.
 3. Verify each controller contains a circuit diagram.
-

DEFICIENCY ACTION

Repair/replace deficient items.

SYSTEM: Electrical

CR NUMBER: F

SUBSYSTEM: Electrical Installations in Hazardous Locations

03

AUTHORIZATION

AUTHORIZED INSPECTOR: Company TBSIP Examiner

REFERENCES: 46 CFR 111.105-31(l); Eighth District Policy Letter 2-2005

REGULATORY INSPECTION FREQUENCY: Annual

INSPECTION CRITERIA

Visually inspect & ensure equipment on the electronically controlled prime mover engine for cargo pump is approved for installation in hazardous locations:

- a. Control Panel
 - b. Notification light
 - c. Alternator
 - d. Batteries
 - e. ECM computer
 - f. Associated wiring on the engine for the sensors
-

DEFICIENCY ACTION

Make appropriate repairs / replacements.

SYSTEM: Pollution Prevention
SUBSYSTEM: Cargo Oil Containment
(Drip Pans, Spill Rails)

ICR NUMBER: G
01

AUTHORIZATION

AUTHORIZED INSPECTOR: Company TBSIP Examiner
REFERENCES: 33 CFR 155.310
REGULATORY INSPECTION FREQUENCY: Annual

INSPECTION CRITERIA

Visually inspect:

- a. Condition: No cracks, missing plugs, or build up of trash within containment
 - b. Remove any build up of product/water within containment area
 - c. Ensure discharge containment equipment is leak free and fitted with proper closure devices (valves/plugs)
-

DEFICIENCY ACTION

Make appropriate repairs.

SYSTEM: Pollution Prevention
SUBSYSTEM: Oil Transfer Procedures

ICR NUMBER: G
02

AUTHORIZATION

AUTHORIZED INSPECTOR: Company TBSIP Examiner
REFERENCES: 33 CFR 155.750
REGULATORY INSPECTION FREQUENCY: Annual

INSPECTION CRITERIA

Visual inspection of:

- a. Transfer procedures accurately depict the system on barge and contain up to date emergency notification telephone numbers.
-

DEFICIENCY ACTION

Replace or update transfer procedures.

AUTHORIZATION

AUTHORIZED INSPECTOR: Company TBSIP Examiner
REFERENCES: 33 CFR 155.205, 155.210, and 155.215
REGULATORY INSPECTION FREQUENCY: Annual

INSPECTION CRITERIA

Visually verify:

- a. Each tank barge must carry appropriate equipment and supplies for the containment and removal of on deck oil cargo spills of the amount listed in row A.:

	Offshore > 400 feet	Offshore < 400 feet	Inland
A	12 barrels	7 barrels	1 barrel
B	Sorbents	Sorbents	Sorbents
C	Non-sparking hand scoops, shovels and buckets	Non-sparking hand scoops, shovels and buckets	Non-sparking hand scoops, shovels and buckets
D	Containers for holding waste	Containers for holding waste	Containers for holding waste
E	Emulsifiers for deck cleaning	Emulsifiers for deck cleaning	Emulsifiers for deck cleaning
F	Protective clothing	Protective clothing	Protective clothing
G	Non sparking pump w/hoses	Non sparking pump w/hoses	
H	Scupper plugs	Scupper plugs	

- b. Disposable boom is connected together for fast response to a spill
- c. The area where the equipment is maintained is clear of any other non-spill related equipment

NOTE: Inland oil barges may rely on equipment available at the transfer facility provided prior arrangements have been made.

DEFICIENCY ACTION

Replace missing boom and/or pads. Connect disposable boom.

SYSTEM: Pollution Prevention
SUBSYSTEM: Oil Transfer Hose

ICR NUMBER: G
04

AUTHORIZATION

AUTHORIZED INSPECTOR: Company TBSIP Examiner
REFERENCES: 33 CFR 156.170(G)(1)
REGULATORY INSPECTION FREQUENCY: Annual

INSPECTION CRITERIA

Verify that:

- a. Cargo transfer hose has no kinks, bulges soft spots or any other defect that would permit the discharge of cargo through the hose material
 - b. The test date and MAWP are legibly stenciled/stamped on one end of the hose and that the annual test date is current
 - c. The hose is properly blanked when not in use
-

DEFICIENCY ACTION

Replace/test hose if necessary, re-stencil MAWP and annual test date.

SYSTEM: Cargo Transfer System
SUBSYSTEM: Cargo Pump, Engine, Spark
Arrestor and Fuel System

ICR NUMBER: H
01

AUTHORIZATION

AUTHORIZED INSPECTOR: Company TBSIP Examiner
REFERENCES: 46 CFR 32.02; 32.50-35; and 33 CFR 155.780
REGULATORY INSPECTION FREQUENCY: Annual

INSPECTION CRITERIA

Verify the following:

- a. Ensure all machinery guards are secured and in good condition
- b. Check remote manual shutdown (emergency shutdown) for the cargo pump engine for freedom of movement and the ability to shutdown the engine
- c. Check oil and antifreeze pump engine levels
- d. Check pump angle drive lube oil and seal
- e. Ensure spark arrester is secured to engine, and no cracks are located around muffler
- f. Ensure pollution placard prominently located onboard barge
- g. Check engine fuel system:
 1. Conduct visual inspection of operating machinery and piping for fuel/oil leaks and/or other unusual characteristics
 2. Ensure word "diesel" is painted / stenciled on each side of tank
 3. Check condition of tank vent pipe flame screen

DEFICIENCY ACTION

Make appropriate repairs or alterations.

SYSTEM: Cargo Transfer System
SUBSYSTEM: Thermal Fluid Heater

ICS NUMBER: H
02

AUTHORIZATION

AUTHORIZED INSPECTOR: Company TBSIP Examiner ER
REFERENCES: 46 CFR 52.25-15, 61.30-20, 63.25-5
REGULATORY INSPECTION FREQUENCY: Annual

INSPECTION CRITERIA

Visual/Operational inspection to include:

- a. Proper pre-purge
 - b. Burner ignition sequence checks, combustion control operation, fluid flow controls, limit controls high temperature controls, post-purge controls, safety relief valves, and verification of flame safeguard
 - c. Visual inspection of exhaust stack, and associated pumps and piping to check for rust, physical deterioration.
-

DEFICIENCY ACTION

Make any necessary repairs.

SYSTEM: Cargo Transfer System
SUBSYSTEM: Piping & Valves

ICR NUMBER: H
03

AUTHORIZATION

AUTHORIZED INSPECTOR: Company TBSIP Examiner
REFERENCES: 46 CFR 31.10-17, 32.50-15, 39; AND 33 CFR 156.170(3)
REGULATORY INSPECTION FREQUENCY: Annual

INSPECTION CRITERIA

Visually inspect:

- a. Controls; loading discharge and suction valves for freedom of movement and that packing is tight
- b. Gauges; the gauge used for the pump pressure is working and full of fluid
- c. No signs of leaks on the above deck cargo piping
- d. Vapor control system (if applicable) is in good repair, stenciled "Vapor System" and Vapor header properly indicated with red and yellow bands
- e. Vapor header flange stud properly installed, aligned and marked

Check to ensure:

- a. High level alarms and / or shutdowns engage at proper levels
 - b. Overfill spill valves react in accordance with approved plans
-

DEFICIENCY ACTION

Initiate proper repairs.

SYSTEM: Cargo Transfer System
SUBSYSTEM: Tank Tops & Pressure Vessels

ICR NUMBER: H
04

AUTHORIZATION

AUTHORIZED INSPECTOR: Company TBSIP Examiner
REFERENCES: 46 CFR 31.10-17, 30.10-25; 33 CFR 155.815
REGULATORY INSPECTION FREQUENCY: Annual

INSPECTION CRITERIA

Visually inspect:

- a. Trunks are free of cracks/fractures and cleaned of spilled product
 - b. Cargo and ullage hatches in good condition, gaskets in place and dogs are free moving
 - c. Verify that PV valves are USCG approved and materials are compatible for cargoes listed on COI
 - d. Ensure valves are clean and in good working order by tearing down, cleaning, reassembling and where applicable, bench testing
 - e. Flame screens clean properly fitted with no tears, properly installation all PV's and goosenecks (30x30 mesh screen or 20x20 double mesh screen).
 - f. Cargo valve material appropriate (Dangerous Cargoes)
-

DEFICIENCY ACTION

Make appropriate repairs.