

Welcome!

An Introduction

By Jamie Bigbie, LCDR
Supervisor, MSD Cape Cod

Greetings from MSD Cape Cod! Welcome to the first (of hopefully many) edition of the MSD Cape Cod Newsletter. I'm Jamie Bigbie, supervisor of the field office responsible for conducting inspections on small passenger vessels (SPVs) on the Cape and Islands. I've either met or spoken with most of you over the phone, and was hoping to start a small avenue to pass information that we think you will find useful in maintaining safety on your inspected vessel(s).

At the end of this Newsletter, you will be introduced to the members of MSD Cape Cod; you'll probably recognize a few names. Also, we'll cover some items that we've come across this last season during annual inspections, COI renewals, drydocks, or other visits to your vessel. Again, this information will hopefully give you insight to some of the things we've noticed during our inspections that was not clear to everyone, or new information coming out regarding SPV inspections or regulation.*

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Fire Fighting Systems

Portable or Semiportable Extinguishers as an Alternative to Fixed Fire Extinguishing Systems

By Bill Gasperetti

During the 2009 vessel inspection season, we came across multiple vessels that did not have the required fire detection as per 46 CFR 181.400. Specifically, this was discovered on the launches due to the small size of their engine spaces.

It is important to remember that fire protection equipment applies to everyone. Vessels that were certificated before March 10, 1996 are not grandfathered over, so you must meet the requirements of 46 Code Federal Regulations (CFR) 181.

The regulations for a portable or semiportable extinguisher as an alternative state:

"Where the amount of carbon dioxide gas required in a fixed fire extinguishing system can be supplied by one portable extinguisher or semiportable extinguisher, such an extinguisher may be used subject to the following:

1. The cylinder shall be installed in a fixed position outside the space protected;
2. The applicator shall be installed in a fixed position outside the space protected;
3. Controls shall be installed in an accessible location outside the space protected."

Though a portable or semiportable extinguisher is a fine alternative to installing a fixed fire extinguishing system, you must additionally meet the requirements for fire detection as per the regulations:

"The following spaces must be equipped with a fire detecting system of an approved type that is installed in accordance with 46 CFR 76.27 in subchapter H, except when a fixed gas fire extinguishing system that is capable of automatic discharge upon heat detection is installed or when the space is manned:

1. A space containing propulsion machinery
2. A space containing an internal combustion engine of more than 50 hp;

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Lifefloats and How To Stow Them

By: Jamie Bigbie

Lifesaving equipment is an item you can always expect your Coast Guard Inspector to pay close attention to during any inspection. It provides the equipment that hopefully you never need to use, but is there should the worse happen. During this past season of inspections, we noticed that several vessels lifesaving arrangements were not stowed or maintained as stipulated in regulations. In particular, there seemed to be some confusion regarding how the lifefloat is to be attached to the vessel. In order to “demystify” this sometimes misunderstood regulation, I’ve attached a schematic and Navigation and Vessel Inspection Circular (NVIC) that you should reference when checking to ensure your lifefloat is installed properly. The schematic and NVIC also details attachments, such as pendants, waterlights, and the grabline. In this article, we’re going to discuss attachment of the lifefloat to the vessel.

On your vessel, you may have one or many lifefloats, depending on how many persons you are authorized to carry and your route. Let’s discuss a typical setup you should expect to find on a vessel required to carry one lifefloat.

First, the lifefloat must be secured to the vessel with a painter that is at least 100 ft long. The painter must be attached to the VESSEL by a weak link. The weak link attachment at the vessel must be a strong connection – if any break occurs between lifefloat and vessel, you want it to be at the weak link itself. An appropriate attachment of the weak link to the vessel could be a shackle that goes through the weak link and around an eyebolt on the vessel. The other end of the painter must be attached to the lifefloat. The line is to be attached directly to the lifefloat; many lifefloats have an attachment fitting that you can attach the painter directly to, otherwise attaching the painter around the body of the lifefloat is acceptable.

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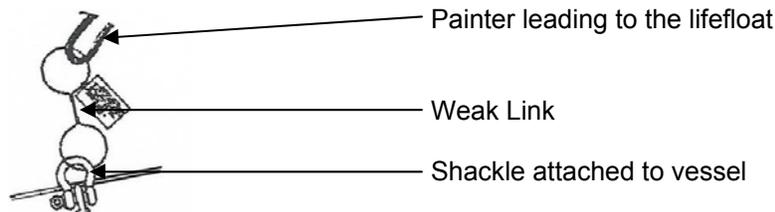
So what happens if you have more than one lifefloat? You have a few options. First, you can have a separate painter and weak link for each lifefloat. You may choose to use one painter and weak link and attach each lifefloat in tandem, or you may have one painter and weak link and have separate lines from the painter to each individual lifefloat. In the last two options, you must ensure that the lifefloats will not “stack up” on each other as they deploy.

Lastly, for the stowage, the entire apparatus must be “float free”. That is, if the vessel were to sink, the lifefloat should be able to float away from its stowed position and be available for passengers. You should pay particular attention to the area above the lifefloats. Overhangs from deck houses, masts, rigging, etc, could adversely affect the apparatus’ ability to float free.

As always, we are available to answer any questions you may have regarding this or any other inspection subject.

A weekly check of survival craft to ensure its readiness for use is required. During these checks, you should ensure the attachment of the lifefloat to the vessel is correct. Remember, the time to realize the equipment is not going to deploy as intended is now, not when you need it!*

Proper Lifefloat Setup



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3. A space containing an oil fire boiler;
4. A space containing machinery powered by gasoline or any other fuels having a flash point of 110 degrees F or lower; and
5. A space containing a fuel tank for gasoline or any other fuel having a flash point of 110 degrees F or lower.”

The other alternative to a portable or semiportable extinguisher, of course, is a fixed CO2 system in your engine compartment. There are multiple marine certified companies who will assist you in its installation.

Keep in mind with the 2010 season starting; these regulations may apply to you. Those vessel owners/operators who do not fulfill this requirement are non-compliant and run the risk of delay to your season. Please become familiar with these regulations. Fire detection regulations are extremely important as they serve to help protect the lives of passengers should a fire break out in an engine space.*

Crew Training and Log Book Entries

By Mick Fincham

Regulatory requirements can only go so far to ensure vessel crew's are properly prepared for shipboard emergencies. To be properly prepared for emergencies there is no substitute for QUALITY training and hands-on knowledge of safety and emergency equipment.

During my inspections, I focus quite heavily on crew CG proficiency and knowledge of emergency procedures and equipment. I ask questions of all crew members and hopefully establish at least a working knowledge of all emergency equipment. I may ask the most inexperienced crew member to explain how to pump bilges, operate the fire pump or even use distress signals. During an actual emergency is not the time to find out you do not know where or how to use emergency equipment.

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Certificate of Inspection Exams

By Allison Miller

A Certificate of Inspection (COI) is valid for five years from date of issuance. Once issued a Certificate, the vessel must operate in full compliance with the terms of the COI and the applicable subparts of 46 Code of Federal Regulations (CFR) when any passengers are onboard. One of these terms is inspections; both annual and renewal.

In accordance with 46 CFR 176.500, an annual exam is required to be conducted within three months before or after each anniversary date. The anniversary date is the date in which the COI was initially issued. This means you have a six month window to have your annual inspection scheduled and conducted.

A renewal exam, unlike an annual exam, does not have a window past the anniversary date of the Certificate of Inspection. Once the date of expiration of the COI has passed, your certificate is no longer valid and you are committing a violation that could result in enforcement action against you. In accordance with 46 CFR 176.404, you must submit your written application for renewal of your COI at least 30 days prior to the expiration date.

Although it is required in the regulations for you to submit a written application for a renewal exam, the good folks at Marine Safety Detachment Cape Cod will be able to conduct your renewal exam as long as you call to schedule it at least thirty days in advance. However, it is recommended that since the beginning of the season fills up quickly, you should schedule your inspection longer than thirty days in advance.*

Pre-Inspection Items

By Bill Gasperetti

Vessel owners/operators who contact the office to schedule an annual inspection typically ask,

“What do I need to do to be ready for the inspection?”

To assist in answering this question, the following is a simple list of things to have ready the day of your inspection to help it run smoothly:

- 1) All lifejackets out of stowage compartment or from overhead;

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The following is a review of CG requirements as listed in 46 CFR Subchapter T:

- (1) 46 CFR185.420: Requires Masters or Managing Operators instruct each crew member the duties that the crew member is expected to perform in an emergency.
 - a. Upon first being employed & prior to getting underway for first time and then once every three months.
- (2) 46 CFR185.520: The Master shall conduct sufficient drills and give sufficient instruction to make sure that all crewmembers are familiar with their duties during emergencies that necessitate abandoning ship or the recovery of persons who have fallen overboard.
- (3) 46 CFR185.524: The Master shall conduct sufficient drills and give sufficient instruction to make sure that all crewmembers are familiar with their duties in case of a fire

Each of the above listed drills shall be properly logged.

Emergency instructions must be designed to address the particular equipment, arrangement, and operation for individual vessels and should contain at least the applicable portions of the "Emergency Instructions" listed in 46 CFR 185.512*



- 2) All publications & documentation out for viewing;
- 3) Containers for first aid and emergency signals available;
- 4) Below spaces cleared of debris for easy access; and
- 5) All crew on site for emergency drills to be conducted.

These are just a few items that will assist in making an inspection run a little smoother. The better prepared you are for an inspection, the quicker an inspector can be on and off your vessel and not interfere with your daily business routine.*

Post -Inspection Items

By Bill Gasperetti

A CG-835 is our way of documenting deficiencies that are found during an inspection. There are two time frames inspectors use as due dates for the deficiencies that were found during an inspection. Inspectors either give:

- 1.) a "prior to carriage of passengers." "Prior to carriage of passengers" means that prior to the vessel going back into service, you must clear the deficiency.
- 2.) a specific due date. This due date is not a suggestion, but rather the exact date that the deficiency must be cleared by. If you exceed the due date, this may (depending on the severity of the deficiency) become a "prior to carriage of passengers." If you need an extension past the due date, please contact the marine inspector as soon as possible, but prior to the due date expiring. Contacting the inspector for an extension early on will help resolve deficiency issues quicker thus making your next inspection run smoother.

A friendly reminder: It is not the job of the marine inspector to make sure deficiencies are cleared; it is the vessel's owner/operator.*

Who We Are

Your Friendly Neighborhood Marine Inspectors

Jamie Bigbie, LCDR – Supervisor MSD Cape Cod

Qualified T and K Boat Inspector

Qualified Barge Inspector

Phone: 508-968-6605

Email: Jamie.r.bigbie@uscg.mil

Bill Gasperetti, LTJG – Qualified T Boat Inspector

Phone: 508-968-6556

Email: William.n.gasperetti@uscg.mil

Mick Fincham, MSSE4 – Qualified in a lot of stuff

Phone: 508-968-6558

Email: Michael.r.fincham@uscg.mil

MST1 **Allison Miller** – Lead Petty Officer

Qualified Pollution Investigator, Facility Inspector

Marine Inspector-In-Training

Phone: 508-968-6655

Email: Allison.m.miller@uscg.mil

Contact us!

MSD Cape Cod now has a general email address to answer all your questions.

D01-SMB-MSD-CapeCod@uscg.mil

Visit our website!

www.uscg.mil/d1/MsdCapeCod

Office Address:

3162 Herbert Road

Air Station Cape Cod, MA 02542

Fax: 508-968-6550