



Letters of Deviation (LODs)

Reference: Title 33 Code of Federal Regulations
part 164

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Objectives

- Understand definition of a “Letter of Deviation”
- Identify the regulations for letters of deviation
- Understand the applicability
- Recognize which equipment must be reported
- Know how to request a letter of deviation
- Identify procedures for post-arrival and unusual situations

Definition

- Letter of Deviation
 - Correspondence issued by the Captain of the Port (COTP) that authorizes a deviation from the navigation rules in 33 CFR part 164.
 - Deviation from the requirement cannot impair safe navigation or result in a violation of the rules for preventing collisions at sea.

Applicability

- Self propelled vessel > 1600 gross tons
- Operating on the navigable waters of the U.S.
- Ref. 33 CFR 164.01



Non-operating equipment

- Radar
- Radio Navigation Receivers
- Gyrocompass
- Echo Depth Sounder
- Primary Steering Gear

Ref. 33 CFR 164.53

Requesting a LOD

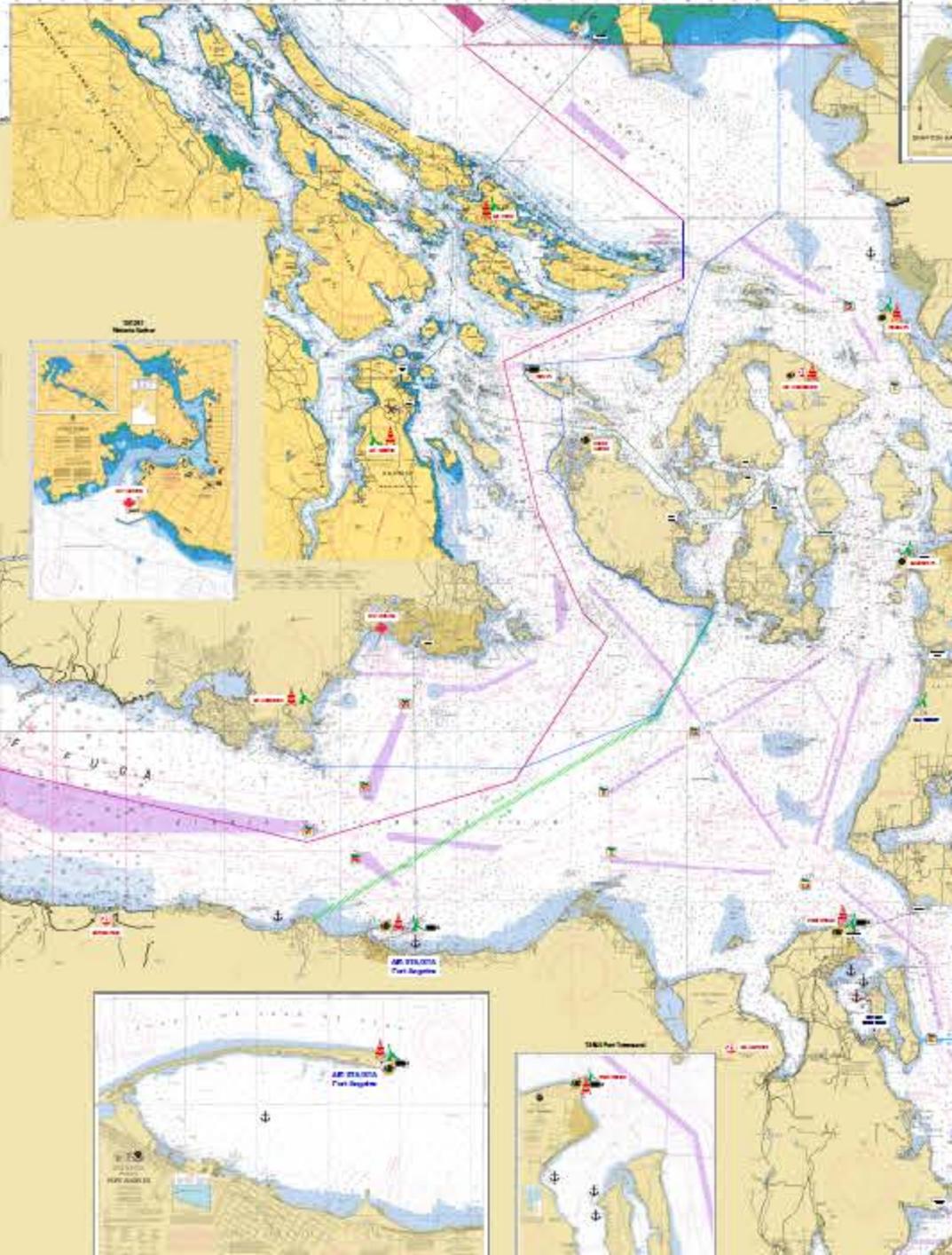
- Letters of Deviation should be requested before transit into port
- Call Sector Puget Sound Command Center (JHOC)
206-217-6001
- Supply vessel info (name, IMO #, type, class society, flag state, size, etc)
- Supply information on nonfunctioning equipment
- Describe any other navigational systems affected by nonfunctioning equipment (e.g. gyro, ARPA, etc)



Sector Puget Sound



- | | | | |
|-----------------|------------------|-----------------------|--------------------|
| Radar Sites | Regulatory Buoys | International Sponder | Sector Boundary |
| VHF Radio Sites | OS Pathways | Area to Be Avoided | Ferry Routes |
| AIS Sites | Anchorages | Ch. 5A/14 Line | CVTS Exchange Line |
| Rescue 21 Sites | CCTV Sites | Ch. 16/13 Line | |



Unusual circumstances

- Case-by-case basis
- LODs may be allowed with additional safety precautions (e.g. extra lookouts, day time transit only, specific weather conditions, etc)

Post Arrival Procedures

- Have repairs done in port
- Send repair report (technician report) and classification society report to Coast Guard
- Report should indicate the cause of the failure



Marine Casualty



To Report, or Not to Report

46 CFR 4.05-1 Notice of Marine Casualty

- 1) Unintended grounding, or bridge allision
- 2) Intended grounding, or bridge allision causing a hazard to navigation, the environment, safety of a vessel
- 3) Loss of main propulsion, primary steering, or any system that reduces the maneuverability of the vessel
- 4) An occurrence that affects vessels seaworthiness or fitness for service (aux power generating equip, fixed FF equip, fire, flooding, life saving equip)
- 5) Loss of Life
- 6) Injuries requiring medical treatment beyond first aid
- 7) Property damage in excess of \$25,000
- 8) An occurrence involving significant harm to the environment



Serious Marine Incident

- One or more deaths
- Injury requiring treatment beyond first aid or unfit to perform duties
- Property damage in excess of \$100K
- Actual or constructive total loss of an inspected vessel or uninspected over 100 GT
- Oil discharge over 10K gallons
- Discharge of hazardous substance – reportable

Serious Marine Incident (cont.)

- Alcohol testing within 2 hours
- Drug testing within 32 hours, CG-2692B
- Injury requiring treatment beyond first aid or unfit to perform duties
- Property damage in excess of \$100K
- Actual or constructive total loss of an inspected vessel or uninspected over 100 GT
- Oil discharge over 10K gallons
- Discharge of hazardous substance – reportable

Notification – We Want to Know!

- Immediate

- Seattle Traffic (206) 217-6151
- Sector Puget Sound Command Center
(206)217-6200; 6201;

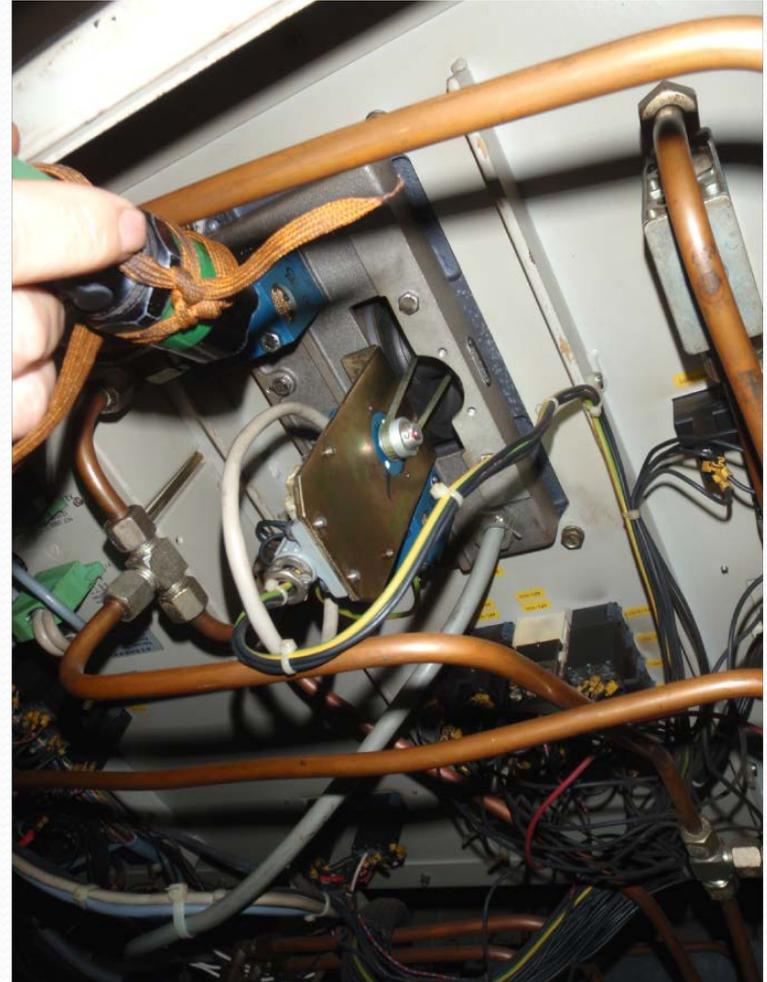
- Follow Up

- CG-2692 faxed, emailed, mailed to the Investigations Division within 5 days.
- Email: pugetsoundIO@uscg.mil
- Fax: 206-217-6213

Why?

- To identify latent unsafe conditions (LUC) and make recommendations to prevent reoccurrence.
- To identify LUC's that impact an entire fleet and publish safety alerts
- To spot dangerous trends and propose solutions to reverse those trends (Reg changes).
- To ensure owner/operator, company, mariner compliance.

A Perfect Example...



Key Take-Away Items

- Know what's reportable
- Immediate notification
- Know what a Serious Marine Incident is and what's required
- CG-2692 submitted within 5 days
 - We may investigate if casualty warrants it
 - COTP vessel has delegated authority to the state

Drug & Alcohol Testing Program



Questions

