



16711/VPI
D8(m) Policy Ltr 04-2001, CH-1
OCT 29 2002

MEMORANDUM

From: D. F. Ryan, H
CCGD8 (m)

A handwritten signature in black ink, appearing to read "D. F. Ryan", written over the printed name and initials.

To: All Eighth District MSOs and MSUs

Subj: CH-1 TO D8(m) POLICY LTR 04-2001, ENFORCEMENT POLICY FOR INSTALLATION
OF VALVE POSITION INDICATORS ON EXISTING INSPECTED TANK BARGES

Ref: (a) 46 CFR 56.20-9(a)
(b) 46 CFR 56.50-1(g)(2)(iii)

1. PURPOSE.

- a. This policy letter establishes the compliance schedule for the installation of valve position indicators for externally located non-rising stem valves on existing tank barges subject to the Marine Engineering requirements of 46 CFR, Subchapter F.
- b. This change to D8(m) Policy Ltr 04-2001 clarifies which tank barge valves are affected by this policy. Enclosure (1) describes the non-applicability of the valve position indicator requirement for valves located in tanks and operated by reach rods. All changes to this policy are identified by a solid vertical line located in the right margin.

2. BACKGROUND. Generally, valves on inspected tank barges must be of the rising-stem type, preferably with the stem threads external to the valve body. Where operating conditions will not allow such installations, reference (a) permits the use of non-rising stem valves, provided valve position indicators are fitted to clearly show whether the valve is open or closed. Tankermen responsible for conducting transfers of oil and hazardous material from Coast Guard inspected tank barges may readily determine valve alignments by observing the position of the valve stems on rising stem type valves. With the position of the valve readily apparent on rising stem valves, tankermen may insure proper transfer system alignment and thereby prevent accidental cargo discharges. Such is not the case on non-rising stem valves. The position of the valve is not readily apparent on non-rising stem valves. For this reason, reference (a) requires that non-rising stem valves be fitted with a valve position indicator.

3. DISCUSSION.

- a. The requirement to install valve position indicators for externally located non-rising stem valves on inspected tank barges is clear. However, this requirement has an extensive history of having been inconsistently enforced within the Eighth District. As a result, many existing inspected tank barges with non-rising stem valves do not have the valve position indicators required by reference (a).

Subj: CH-1 TO D8(m) POLICY LTR 04-2001, ENFORCEMENT POLICY FOR INSTALLATION OF VALVE POSITION INDICATORS ON EXISTING INSPECTED TANK BARGES

- b. Because of this extended period of inconsistent enforcement, it is appropriate to develop a district-wide compliance schedule that minimizes the impact on affected vessel owners and operators, while ensuring that the required valve position indicators are installed within a reasonable time frame. Since the Cargo Tank Internal Examination (CTIE) is a common gas free period and it occurs at 10-year intervals for most inland tank barges, the next required CTIE should be the upper time limit upon which vessels affected by this policy have to comply with reference (a). If, however, the tank barge or an affected cargo tank is gas freed for other reasons prior to the next scheduled CTIE, the cognizant Officer in Charge Marine Inspection (OCMI) may require that the valve position indicators required by reference (a) be installed at that time.

4. **ACTION.** All tank barges subject to Subchapter F "Marine Engineering" are required to comply with reference (a), which requires non-rising stem valves to be fitted with valve position indicators except those located in tanks and operated by reach rods per reference (b). Eighth District OCMI's may require existing non-compliant barges to install the required valve position indicators at the vessel's next gas freeing but in no case later than the next scheduled Cargo Tank Internal Examination. Eighth District OCMI's should also ensure that new inspected tank barges are built with valve position indicators installed as required by reference (a).

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Encl: (1) G-MSE letter 16711/56.20 of 13JUN01, "Position Indicators for Valves in Tanks Operated by Reach Rods"

Copy: Marine Safety Center



JUN 13 2001
16711/56.20
16711/56.50

From: Commandant (G-MSE)
To: Distribution

Subj: POSITION INDICATORS FOR VALVES IN TANKS OPERATED BY REACH RODS

Ref: (a) G-MCO-2 ltr dtd 2 Nov 95

1. Non-rising stem valves located in tanks and operated by reach rods do not require valve position indicators. Title 46 Code of Federal Regulations (CFR) Part 56.20-9(a) clearly requires valve position indicators for non-rising stem valves. Unfortunately, changes to 46 CFR 56.20-9(a) since 1968 have made the regulation confusing with regards to requirements for valve position indicators for valves located in cargo tanks operated by reach rods.
2. In January 2001, Activities New York asked us for policy guidance on valve position indicators for non-rising stem valves located in tanks that were operated by reach rods. The main reason for their question was due to reference (a), a reply from G-MCO-2 (predecessor to G-MOC) to a barge owner's appeal, that stated that valve position indicators were required on reach rods. Unfortunately, this information was incorrect. Guidance on remote valve control indicator requirements has been in 46 CFR 56.50-1(g)(2) since 1969. It says "*Remote valve controls, except reach rods, must be fitted with indicators that show whether the valves they control are open or closed*". Reference (a) led some MSO's to believe that the policy from Commandant (G-MCO-2) required indicators on all remote valve operators. Our research found that the intent of the regulations is to not require valve position indicators on reach rods.
3. We will be proposing a change to the regulations, where a direct reference to 56.50-1(g)(2)(iii) will be included in the present 56.20-9(a). Hopefully, this will clear the confusion of the past, and improve the regulations for all users. If you have any further questions, please contact LT Ryan Manning at (202) 267-6640.


J. G. LANTZ
By direction

Dist: CG LANTAREA (Am)

All CGD (m)

All MSUs/MSDs

CG PACAREA (Pm)

All MSOs/ACT

MSC

Enclosure (1)