



Homeland
Security

U.S. COAST GUARD
Sector Upper
Mississippi River



Marine Safety Information Bulletin #09-06

This bulletin is used purely for informational purposes to assist the maritime community within the Marine Safety Office St. Louis Area of Responsibility. Its purpose is to advise relevant parties of emerging information & situations that may impact our Marine Transportation System as well as facilitates cooperation among the involved parties regarding actions that we may be taking and/or that you may need to employ in the interest of safety/security.

Uninspected Towing Vessel Security Verification Program June 2, 2006

1. Under the Maritime Transportation Security Act (MTSA), all towing vessels pushing barges regulated by 33 CFR 104 are required to be operating under an approved Vessel Security Plan (VSP) or Alternative Security Plan (ASP). Each Captain of the Port (COTP), as the designated Federal Maritime Security Coordinator, is charged with verifying that all Uninspected Towing Vessels (UTV) operating in the COTP zone to which these regulations apply are in compliance. Coast Guard policy on the conduct of security inspections is in place to ensure a uniform process throughout all COTP zones. However, each COTP may handle the scheduling of UTV security inspections differently, based on the man power and work load in the specific port. This Marine Safety Information Bulletin (MSIB) outlines the scheduling process and specific program details for the Captain of the Port Upper Mississippi River (UMR) zone, and supersedes any previous MSIB regarding the same.
2. To request an inspection in the COTP UMR zone, the Company Security Officer (CSO) should call the Sector UMR Inspection Department at (314) 269-2500, ext. 2686 between 0700 and 1700, and ask for the MTSA Inspection scheduler no later than 48 hrs prior to requested inspection times. Sector UMR will schedule UTV security verification exams on a first come, first serve basis. CSO's are advised that the obligation to provide any waterborne transportation necessary to access the vessel rests with the company.
3. MTSA verification inspections may be completed in any COTP zone. If a vessel assigned to the COTP UMR fleet of responsibility has a verification exam conducted outside of the UMR zone, the CSO is asked to inform the Sector UMR UTV Security Verification Program Coordinator at 314-269-2562.

4. MTSA verification inspections will be completed during daylight hours at a prearranged, mutually convenient location where the vessel is able to remain moored for the duration of the security exam (approx. 3-4 hrs). The inspection will not be conducted during locking or fleeting operations. The primary focus of the inspection will encompass security compliance issues found in the maritime security regulations. However, vessel owners/operators are advised that the inspection team will also be conducting a safety inspection in accordance with 46 CFR Part 27. VSOs are advised that a security drill will be included as part of the verification exam.
5. Vessels may elect to use an Alternative Security Program rather than a Vessel Security Plan. ASPs must be accompanied by a certification letter from the company to the Coast Guard stating which ASP will be used and that the vessel is in compliance. ASPs may not be altered by the user; however, appendices should be added providing vessel specific information and procedures that meet the intentions of the plan. If written appendices are not provided, the inspector will question the VSO and crewmembers on specific measures which are used aboard the vessel. Since ASPs are approved by the Coast Guard as an alternate to the regulations in 33 CFR 104, inspectors will verify that the vessel and crew are meeting the requirements set forth in the ASP.
6. A Vessel/Facility Security Verification Report will be completed by the inspectors for each examination before leaving the vessel. The original, and a copy for the company, will be left with the VSO. Minor discrepancies will be expected to be corrected on the spot and noted in the report if further correction is needed. For major issues that materially affect the security posture of the vessel, the COTP will issue an order restricting the vessel from conducting any MTSA regulated operations and may opt to pursue further enforcement actions including a Letter of Warning (LOW), Notice of Violation (NOV) or a civil penalty. Major issues include but are not limited to:
 - a. VSP not onboard the vessel, or onboard but not approved;
 - b. Absence of an assigned VSO;
 - c. VSO cannot display an acceptable level of competency in regards to vessel security;
 - d. Crew assigned security responsibilities not familiar with the VSP/ASP and their responsibilities;
 - e. Lack of access control as required in the approved VSP/ASP.
7. Any questions regarding this information bulletin may be addressed to the UTV Security Verification Program Coordinator, ENS Clint Townsen, at (314) 269-2562.