U.S. Department of Homeland Security

United States Coast Guard

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16732
D8(m) Policy Ltr 02-2000
Revision 01
21 March 2006

From: Commander, Eighth Coast Guard District
To: Distribution

Subj: MARINE CASUALTY REPORTING GUIDANCE FOR INLAND WATERWAYS

Ref: (a) Marine Casualties Natural Work Group Report dated December 9, 1999
(b) Action Items and Agreements Report dated January 13, 2000

1. **Purpose**. This revised letter clarifies policy regarding recommendations developed from (reference (a)).

2. **Background.** On July 9, 1999 members of the marine industry, Coast Guard and American Waterways Operators (AWO) held a conference to address industry concerns that, left unattended, could negatively impact ongoing industry/Coast Guard relations. A Marine Casualties Natural Work Group was established and tasked to review issues related to incident reporting, investigations and enforcement. The Group convened several times between August and November 1999 and developed a report that produced 17 recommendations (reference (b)). The recommendations were discussed at a second conference held on January 13, 2000 and agreed upon in principle by all participants. In March 2005, members of the marine industry, Coast Guard and AWO discussed the intent of "bump and go" grounding reporting. At that time, it was agreed upon by participants that although considered a grounding, a "bump and go" is a non-reportable grounding. The revision to this policy is intended to further clarify what constitutes a "bump and go" grounding, and to clarify the geographical area covered by this policy.

3. **Implementation**. This policy is effective within the boundaries of the Eighth Coast Guard District's inland waterways, which includes the Mississippi River, the Missouri, Illinois, Ohio, Cumberland, Tennessee, Arkansas, and Red Rivers, and the Gulf Intracoastal Waterway.

4. **Action.**

a. Eighth District Coast Guard units shall:

(1) Continue to encourage industry to use the Standard Initial Radio Report (SIRR) form (Enclosure 1) for initial marine casualty reporting. The SIRR meets the reporting requirements of 46 CFR 4.05-1 and 33 CFR 160.215.

(2) Work with respective Sector Commanders and local stakeholders to conduct training and ensure consistent enforcement of this policy. Sector Commanders shall make every effort to educate all companies within their area of responsibility on initial casualty reporting requirements through unit level correspondence.

(3) Exclude the cost of "damage to cargo" from the property damage costs detailed in 46 CFR 4.05-1(a)(7).

(4) Work closely with industry to ensure a complete and accurate CG-2692 submissions on other than "bump and go" groundings. Do not require a CG-2692 written report for "bump and go" groundings when a SIRR notification is made. Note: any damage to the barge or tow that affects seaworthiness requires the CG-2692 reporting under 46 CFR Part 4, and must be reported to the nearest COTP.

(5) Adopt the following definition of "bump and go" groundings and incorporate into unit training for watchstander's familiarization:

"Touching the bottom of the inland waters by uninspected towing vessels and uninspected barges in the navigation channel without damage, pollution, personnel injuries, or unintentional breaking apart of the tow and where the tow maintains motion or is immediately able to regain motion of the tow."

(6) Eliminate use of Local Letters of Warning and Letters/Records of Admonishment as correspondence to mariners. If an OCMI wishes to communicate in writing with mariners concerning errors in judgment below the level of license action (e.g. LOW, S&R, civil penalty), then the subject of that communication shall be called a **Letter of Concern**. This letter shall be signed by the OCMI or Acting OCMI, and used only in situations where the error or casualty is not significant.

(7) Publish, via information bulletins and unit websites, personnel action case statistics that are annotated with a summary of the general circumstances associated with the issuance of the license action (e.g. LOW, S&R, civil penalty). Industry expressed interest in seeing these statistics in professional publications; however, since the numbers are very low (32 license actions in 546 cases for 1999), field units should track statistics in their AORs and make them available on their websites.

b. The following scenarios illustrate the difference between a "bump and go" grounding and a reportable grounding.

(1) <u>Examples of "bump and go" groundings</u>: Note: all examples assume uninspected barges, no damage, pollution, personnel injuries.

(a) The tow pushes over a ridge left behind from another tow and is able to keep going.

(b) The tow pushes through a silt bar that was not previously there and keeps going.

(c) The tow encounters a silt bar and gets across it after a significant reduction in speed over ground and the application of lots of its horsepower.

(d) The towboat Captain is aware of a ridge or silt bar ahead, breaks the tow apart prior to reaching that area and each smaller group of barges is pushed over or through the ridge or silt bar. The tow is reassembled on the other side of the ridge or silt bar.

(e) The tow encounters a silt bar and comes to a complete stop but is immediately able to back off of the bar.

(f) The towboat Captain recognizes a large silt bar ahead, stops forward motion, drifts into the silt bar which stops all motion, but is immediately able to back off of the bar.

(2) Examples of non "bump and go" groundings:

(a) The tow encounters a silt bar that stops all motion and the tow cannot immediately back off of the bar.

(b) The tow encounters a silt bar that stops all forward motion. The towboat gets some assistance from a nearby towboat and together they get the intact tow across the bar.

(c) The tow encounters a silt bar that stops all forward motion. It requires assistance from another tug to help back it off of the bar before it proceeds around the bar.

(d) The tow encounters a silt bar that stops all forward motion. It tries to back itself off but is unsuccessful until it breaks the tow apart.

(e) The tow encounters a silt bar that stops all forward motion. It is unable to get off the bar, but a rising river stage enables the tow to refloat without outside assistance.

(f) The tow touches bottom, causing one or more barges to become separated from the tow or nearly separated to the extent that the tow must immediately be moved to a dock or nosed into the bank to regain control of the barge(s).

d. Appendix 7 of reference (a) offers marine casualty response guidance for watchstanders on the Western Rivers. D8 does not concur with two points: (1) "Towboat machinery casualties are routine and generally not threatening to safety" and (2) "All efforts should be made to use company resources...as primary means to respond to a marine casualty." That notwithstanding, D8 supports Appendix 7 being used by field commanders to augment/support their units' marine casualty response guidance in order to promote consistency throughout the district.

e. Reference (a) also recommends that field units consider use of industry experts for determining adequacy of barge repairs (Recommendation 10) and as a resource for CG Investigating Officers during marine casualty investigations (Recommendation 13). Sector Commanders are encouraged to choose the best forum for your port to improve cooperation and minimize misperceptions between the Coast Guard and Industry.

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5. This policy is effective upon receipt.

R. W. BRANCH
Captain, U.S. Coast Guard
Chief, Prevention Division
By direction of the Commander,
Eighth Coast Guard District

Enclosures: (1) Standard Initial Radio Report Form

Dist: Eighth District Sectors

Copy: Commandant (G-PCA)
D9p

STANDARD INITIAL RADIO REPORT

Date:	Time:

PART I - GENERAL INFORMATION

Name of Vessel(s):

Nature of the Incident (all applicable):

☐ Hard Aground ☐ Adrift ☐ Collision ☐ Explosion ☐ Fire ☐ Pollution

☐ "Touch and Go" Grounding ☐ Sinking ☐ Man Overboard ☐ Personal Injury

Location (mile point, RDB/LDB, Etc.):	Date/Time Occurred:

Is any Coast Guard assistance required? ☐ Yes ☐ No Type requested:

Weather	Wind	Visibility	Temperature (Air)	Current Speed

Reported by:	Telephone: ( )
Company Name:	Telephone: ( )

PART II - INCIDENT SPECIFICS

PERSONNEL INCIDENT (INJURY or MAN OVERBOARD)

Name of Person:	Type of Injury (if applicable)
Location of Overboard:	PFD Worn? ☐ Unknown ☐ Yes ☐ No
Description (Clothing worn, etc.):	Swimmer? ☐ Unknown ☐ Yes ☐ No

GROUNDING/COLLISION/FIRE/EXPLOSION/SINKING

Channel Blocked? ☐ Yes ☐ No	Navigation Hazard? (Yes/No, Nature of hazard):

Number of Barges:	Number of TANK Barges:	Single Skin/Double Skin:

Number AGROUND:	Draft of Grounded Barge(s):	Number DAMAGED:	Number LEAKING:

BULK LIQUID Cargoes:

Vessels Assisting:

POLLUTION INCIDENT

Name of Spilled Product:	How much spilled?
National Response Center (NRC) Notified at 1-800-424-8802? ☐ Yes ☐ No	Company "Qualified Individual" Notified? ☐ Yes ☐ No

What action was taken?

PART III - FOLLOW-UP ACTIONS

What is the Immediate Plan of Action?

Time of next contact:	Contact method: Radio channel_____ Telephone # ( )

Enclosure (1)

PART IV - GENERAL FOLLOW-UP INFORMATION

(FOR COAST GUARD USE)

This part can be used for more detailed or general follow-up information needed to complete reports or close out incident cases. Information provided for this part is to be obtained during follow-up contacts with the vessel. Remember, the initial report is intended to capture only essential information.

NAMES OF COMPANIES OR CONTACTS

Company Qualified Individual (Spills only)	Telephone: ( )
Company/Contact	Telephone: ( )
Company/Contact	Telephone: ( )
Company/Contact	Telephone: ( )

FUTURE PLANS

FINAL CASE DISPOSITION

CG-2692

Submitted by:	Submitted to:
Date:	Telephone: ( )

ADDITIONAL REMARKS