



16711/835 Policy  
D8(dp) Policy Ltr 01-09  
FEB - 9 2009

**MEMORANDUM**

From: *V. B. Gifford Jr.*  
V. B. GIFFORD, JR.  
CCGD8 (dp)

To: Distribution

Subj: USE OF CG-835 TO ALLOW CERTIFICATED INLAND TANK BARGES HAVING  
MINOR HULL DAMAGE TO OPERATE ACROSS MARINE INSPECTION ZONES

Ref: (a) E-mail between CAPT Close CGD8 (dw) and CGD8 OCMI's of 16 Dec 2005  
(b) D8 Tank Barge Streamlined Inspection Program (TBSIP), D8 (dp) Policy  
Letter 01-2007, dated 5 Mar 07

**1. PURPOSE:**

- a. The purpose of this policy letter is to allow the use of a Notice of Merchant Marine Inspection Requirements (Form CG-835) instead of a Permit to Proceed to Another Port for Repairs (Form CG-948) when inland tank barges (Lakes, Bays and Sounds or lesser route) with minor hull damage transit across D8 OCMI boundaries. When the intended route of a barge with minor hull damage will carry it outside of D8, the choice between an 835 or a PTP shall conform to the policy or preference of the receiving District or OCMI.
- b. Ref (b) allows for a 45-day maximum for which an inland tank barge may operate with temporarily repaired minor hull damage. After 45 days, permanent repairs must be undertaken, or the barge must be removed from service. This letter extends that TBSIP policy to all inland tank barges.
- c. This policy is also intended to clarify the broad regulatory authority currently found in 46 U.S.C. 3313 (*Compliance with certificate of inspection*) and 46 CFR 31.10-35 (*Permit to proceed to another port for repair*). Where circumstances and judgment justify, an Eighth District OCMI may deviate from this policy.
- d. Tank barges enrolled in D8's TBSIP are exempt from this policy.

**2. DIRECTIVES AFFECTED: None.**

**3. BACKGROUND:**

- a. Ref (a) required the use of a PTP for each transit of a damaged inland tank barge across a marine inspection zone boundary; an 835 was only allowed when a damaged inland tank barge moved within a single zone. However, barges enrolled in the Tank Barge

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Streamlined Inspection Program or its precursor, D8's Tank Barge Alternate Inspection Protocol, were exempted from this requirement. Since January 2001, enrolled barges with minor hull damage and temporary repairs could continue to operate across marine inspection zones without immediately notifying the Coast Guard. Currently, about 1,400 tank barges are enrolled in TBSIP. This figure represents 28% of the D8 fleet, and nearly 1-in-5 tank barges of the U.S. fleet.

4. **DISCUSSION:**

- a. Ref (a) had the unintended consequence of allowing qualified Coast Guard marine inspectors less discretion than TBSIP company examiners. Under ref (a), if separate barges with the same temporarily repaired minor hull damage wished to cross marine inspection zones, the non-TBSIP barge, in spite of what the attending Coast Guard marine inspector thought possible, had to receive a PTP. This meant a one-way trip ending in immediate repair or removal from service; whereas, a company examiner could clear the TBSIP barge for up to 45 days' further operation.
- b. Also, after following ref (a) for over three years, we realize that, for minor damage, the PTP's greater administrative overhead (verses an 835) does not afford any measurable increase in safety. Therefore, for damaged tank barges where that damage is "minor damage" per ref (b), you may use an 835.
- c. Per ref (b), "minor damage" is defined as follows:
  - (1) Damage to the outer hull plating, either above or below the waterline, that does not exceed either 12 inches X ¼ inch or 3 square inches, located either above or below the waterline; and
  - (2) Damage that does not result in a cumulative total of more than 1 temporary repair per void or 3 temporary repairs on a barge; and
  - (3) Damage that does not involve a cargo tank.
- d. Temporary repairs shall be placed on all minor damage and shall conform to the guidance offered in ref (b), enclosure (1), section VII, paragraphs 3 - 9.
- e. Permanent repairs shall be commenced at the first opportunity, but not later than 45 days after the minor damage is discovered; the 835 for those permanent repairs shall reflect this 45-day maximum.

5. **ACTION:** This policy is effective immediately.

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Dist: All Eighth District Sectors, MSUs and MSDs

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