



## SPECIAL ANNOUNCEMENTS

### CG-FAC Policy & Guidance Library

A complete list of all CG-FAC related policy and guidance is now available on CGPORTAL! The policy and guidance documents are also available at the same site! It's a work in progress, but check it out and let us know if you have questions, comments or suggestions!

Find it all at: <https://cgportal2.uscg.mil/units/cgfac/Documents/Forms/AllItems.aspx>

CG-FAC has scheduled monthly AMSC webinars to discuss current AMSC related topics. We will release a detailed schedule soon that elaborates on various topics and how to link into these webinars. The webinars are intended to foster discussions between the HQ level and field units, and build stronger communication links. Send your proposed meeting topics to: [cale.m.cooper@uscg.mil](mailto:cale.m.cooper@uscg.mil)

# Waves on the Waterfront

CG-FAC, Office of Port and Facility Compliance  
Safety, Security, and Stewardship  
for the Nation's Ports and Facilities

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March 2014

Winter is finally breaking here in the nation's capital, the ice on the Potomac is gone, and I'm pleased to present this latest edition of *Waves on the Waterfront* to our long suffering readers.

A special thank you to LTJG Juan Ramirez of Sector Houston-Galveston for his article on mobile Vapor Control Systems. Vapor control is one of the most complex facility systems regulated by the Coast Guard. While his formal industry training experience certainly helped him understand this and other systems, I encourage all facility inspectors to seek informal training opportunities with facility and port operators. My experience has been that industry welcomes these opportunities, and that both the Coast Guard and the industry organization benefit from the partnership.

Speaking of partnerships, thank to Cody Jones and John Fetterman of the National Association of State Boating Law Administrators for their article on training and credentialing for marine law enforcement organizations. This is a great topic for Area Maritime Security Committees and can help us achieve the unity of effort that we need to meet our many security challenges.

The Coast Guard personifies SAFETY on the water and waterfront, and we have two safety related articles this month. First, we've developed an operational risk management tool that facility and vessel inspectors can use to evaluate the safety hazards for individual jobs, and to identify appropriate risk mitigation measures. The job aid is available on our web site, the article on page 9 of this newsletter.

Second, the Safety and Environmental Health folks tell us that changes are in the works for the OMSEP program, which monitors occupational exposures, such as noise and chemical hazards. See page 9 and contact your local Safety and Environmental Health Officer for more details. Most importantly, remember that your mission as facility inspectors is to keep waterfront workers and the public safe – AND to keep yourself and your crew safe while you are doing that mission.

Finally, check out the cyber security tab on Homeport, and join the cyber security Homeport community for the latest guidance and information on this important topic.

Captain Andrew Tucci, CG-FAC



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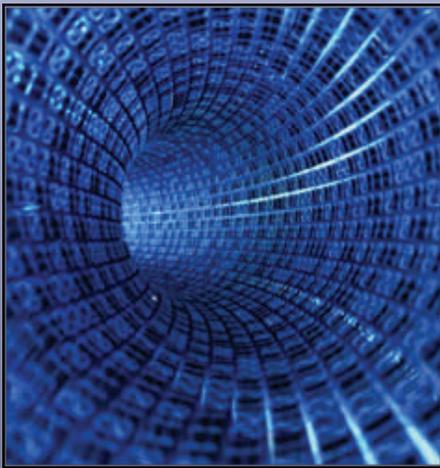
Considering MTSA was not in existence in the year 2000 and that the Coast Guard did not start enforcing TWIC until April 2009, the question of attention to detail when entering TWIC validations needs to be addressed.

When the primary data collection and extraction systems (MISLE and The CUBEs) of the Coast Guard prove to be inaccurate, the question of our performance will soon follow. Once data is questioned it is extremely difficult to defend our performance in enforcing MTSA and the SAFE Port Act. Performance measures are critical in supporting our programs and demonstrating the impact and necessity of current funding.



**A Coast Guard petty officer checks the TWIC of a worker at the Port of Houston on March 17, 2011. Image: Renee Aiello / USCG**

The good news is that field units have taken the initiative to start conducting reviews of MISLE activities to confirm activity correctness and to make sure they are fully populated with detailed inspection results. As important as this step is, it's only half the battle.



CG-FAC has started an aggressive Coast Guard wide review of MISLE activities to assist in correcting questionable accuracies. Recently, CG-FAC worked closely with Areas and Districts to complete and close over 2000 older activities in MISLE that had been open since 1994.

NVIC 03-03 Change 2 is currently being reviewed for updates; new CUBE reports are being developed to help field units track their performance, address Operational Risk Management (ORM), and Force Protection concerns allowing for a more safe work effort for field inspectors. Lastly, CG-FAC is working with the managers of the Facility Inspectors Course at the Coast Guard Training Center at Yorktown to schedule CG-FAC personnel to visit and discuss with students on the importance of security our Nation's ports by enforcing MTSA and SAFE Port Act and the equal importance of properly documenting our inspection efforts.

The Headquarters staff is devoted to assisting field units in meeting and addressing all needs and concerns to create a more transparent working environment. The need for specific and accurate data is a key building block for all personnel to identify any and all shortcomings in procedures, which without we would not be able to advance in the coming years. Our goal is to use the data that is provided to us to create the way forward making us a more prepared organization.

*This article is a report submitted by LT Russell Amacher and Mr. Casey Johnson of CG-FAC-2. For more information regarding this topic, please contact LT Amacher at (202) 372-1131 or [Russell.A.Amacher@uscg.mil](mailto:Russell.A.Amacher@uscg.mil).*

# Moving Forward with Mobile Vapor Collection Systems Port Safety & Security Industry Training (PSSIT) Program — Winter 2013

By: LTJG Juan J. Ramirez Sector Houston-Galveston

In an effort to control vapor emissions of crude oil, gasoline blends, or benzene emitted from a vessel's cargo tanks, 33 Code of Federal Regulations (CFR) 154 Subpart E requires facilities loading these cargoes to use an approved vapor control system (VCS). 33 CFR 154.802 defines a VCS as "an arrangement of piping and equipment used to control vapor emissions collected from a vessel, and includes the vapor collection system and the vapor processing unit". To meet the intent of the regulation, most regulated facilities loading the previously mentioned cargoes on to a vessel operate a fixed VCS. However there is one unique exception, a VCS that is mobile but considered to provide the equivalent level of safety and protection of a fixed system. Mobile generally refers to the mounting of a VCS on a truck or trailer chassis. The only mobile VCS approved for temporary use, operates at a facility within the MSU Texas City area of responsibility. The system has been in operation



Mobile VCS Dock Safety Skid used during loading operations

since August 30, 2013 and handles approximately 5-6 transfers per month. "Approval for the temporary use of this system was not easy, it was the result of many months of hard work and collaboration between CG-FAC and CG-ENG, MSTC Merriman and his team, Certifying Entities, and facility personnel", stated Mr. Hazley, Pipeline Supervisor for the facility which currently operates the mobile VCS.



Restricted Area with 2 mobile Vapor Destruction Units in operation

Since CG-FAC approved the temporary use of the system as an equivalent alternative, the Coast Guard has received several requests from facilities wanting to operate a mobile VCS. According to industry representatives, there are many reasons facilities are interested in using mobile VCS's. For one, temporary use of a VCS would allow a facility to continue transfer operations while awaiting the installation or repair of a fixed system. Another reason is that it would enable loading operations at facilities that, due to the minimal vessel traffic experienced, do not find it cost effective to have a fixed system installed.

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LTJG Ramirez, Port Safety & Security Industry Trainee with Rep. from GEM Mobile Treatment Services, operator of Mobile VCS

To facilitate the Captain of the Port (COTP) alternative compliance approval process for future mobile VCS request, industry representatives approached the Coast Guard regarding a standard for approval. CG-ENG-5 reached out to the Towing Safety Advisory Committee (TSAC) to assist with the development of standards for the design, installation, operation, and certification of a mobile VCS. TSAC assigned a mobile VCS Sub-Committee which has been working with CG-ENG-5 to develop safety standards for the use of mobile VCS at regulated facilities. On December 12, 2013, Chemical Transportation Advisory Committee representatives met with Coast Guard at Headquarters and provided a presentation entitled: "Recommendations for Safety Standards of Portable Facility Vapor Control

Systems Used for Marine Operations". The findings of the TSAC's Hazard Analysis Report as well as industry's recommendations to the mobile VCS Sub-Committee via workgroups, meetings and correspondence will be taken into consideration by CG-ENG before the final draft of the USCG mobile VCS policy letter entitled "Interim Guidance for the Safe Operation of Mobile Vapor Control Systems" is released. This policy letter will provide interim guidance for COTP's when assessing request from regulated facilities to use mobile VCS in lieu of a fixed VCS.



***LTJG Juan Ramirez submitted this article following his completion of the PSSIT Program in the Winter of 2013. LTJG Ramirez is currently assigned to the Prevention Department at Sector Houston-Galveston. For more information regarding the PSSIT Program, please contact LCDR Darwin Jensen (202)-372-1130 or Darwin.A.Jensen@uscg.mil***

# **Your Closest Partner on the Water is the One You Train with, to a National Standard**

By: Asst Commander Cody Jones, Texas Parks and Wildlife, Div of Law Enforcement Chairman, NASBLA's Preparedness and Response Committee and John C. Fetterman, National Association of State Boating Law Administrators, Director of Law Enforcement

## **THE PLAN**

The end of 2013 marked the release of the most recent revision to the National Maritime Domain Awareness Plan (NMDAP), consistent with Presidential Policy Directive (PPD-18) and the National Strategy for Maritime Security (NSMS). This global maritime domain plan now provides guidance and foundational principles in understanding the potential and actual maritime threats, while allowing for the legitimate use of the maritime domain, both foreign and domestic. This plan also falls into alignment with domestic response plans and strategies to our national infrastructure recovery, transportation safety and domestic outreach, all studied and relied upon to assure continuity of commerce and security of our nation's ports.

If we fail here at home, maritime domain awareness and security will be compromised and greatly affected globally. To fully understand the threat to our domestic maritime domain, we must exercise and support the small vessel security threat and the Small Vessel Security Strategy Implementation Plan. Aligning this initiative and plan together would greatly reinforce both. Furthermore, integration of these two plans would help complete the full understanding and awareness necessary to protect our nation's ports. No single agency, department, or organization can do this alone. Each of these plans calls for integration of resources, and information, stakeholder interoperability, unity of effort, and partnerships.

## **UNTAPPED CAPABILITIES**

In the first 72 hours of most incidents, nearly all agencies have developed resources and capabilities to function effectively. In all honesty, how many will say they can go it alone? They each depend upon partnerships that they work hard to build and maintain. For years, every jurisdictional level of government has struggled with the question: To what degree of confidence do I have with my partner? The most common call for interagency collaboration comes in the form of a search and rescue case on the water. At the local level the Coast Guard, along with an element of caution and sometimes even a lack of mutual understanding of capabilities, commonality of terms and diminished confidence, find themselves not fully utilizing their partners.

*"Will my partner to the same level as my own? I know the capability of my vessels and their crews. I don't have the same degree of confidence in others, when I don't know the standard to which they have trained."*

The establishment of Area Maritime Security Committees (AMSC) across the country has allowed for partners to participate in the assessment, mitigation and future strategy development in securing the port. The relationships that are built become personal, effective and collaborative, which foster an environment of trust when the call to action comes from the Sector Commander or Response Chief. However, every couple of years members transfer and new positions are filled as the process begins anew. Despite the great effort to maintain these vital relationships, we believe that it is not until we all embrace a single national standard of training will we fill the gap and achieve the unity of effort that the American public expects of us all.

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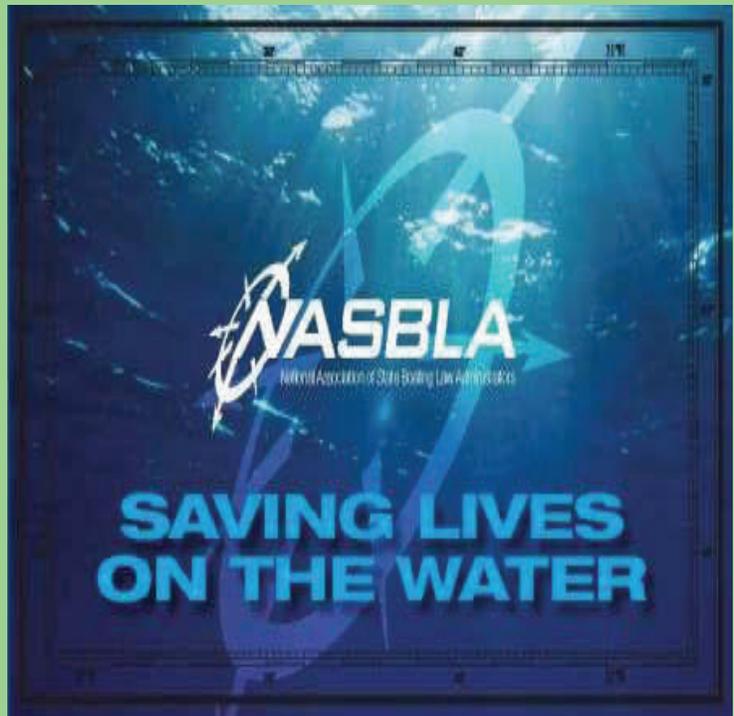
## TRAINING

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The National Association of State Boating Law Administrators<sup>3</sup> (NASBLA) has represented the recreational boating program in all 50 states and six territories for over 50 years. Each member agency is appointed by the state's governor to manage vessel numbering and titling, enforce state boating laws and regulations, and provide boating education access to recreational boaters. NASBLA functions as a not-for-profit association. For the first 50 years NASBLA maintained a close partnership with the United States Coast Guard's Division of Auxiliary and Boating Safety.

In 2010, after almost 10 years of policy committee discussion, NASBLA embarked on developing training and credentialing for marine law enforcement and emergency rescue personnel in full compliance with the Coast Guard's own training and qualification standards as set by the Office of Boat Forces (OBF). NASBLA's connectivity with the USCG evolved, matured and expanded through its relationship with OBF. Over the course of the next two years close to 6,000 state, county and local marine patrol officers were trained under the NASBLA banner in both safety and security related operational and skill based courses covering the spectrum, to list but a few: Officer Water Survival, Boating Under the Influence, Accident Investigation, Boat Operator Search and Rescue, Boat Crew and Tactical Operator Course. Over 1500 "Tactical Coxswains" are now trained and qualified to the NASBLA national standard, which is the United States Coast Guard Standard. Those officers and emergency rescue personnel's training records are maintained in a national database accessible to every Coast Guard Sector in the country<sup>4</sup>. Those officers were not simply issued a certificate; they were also handed a mandate. NASBLA requires that to maintain that credential, the officers must exercise those skills and do so with their area partners. The result is that graduates of the NASBLA Boat Operations and Training (BOAT) program are set on a path in building a true force multiplier, not just for the Coast Guard but for them as well.

On May 11, 2012, the Deputy Commandant of Operations (DCO) VADM Brian Salerno signed an MOU<sup>5</sup> with NASBLA which identified NASBLA as the holder of the national training and credentialing standards for state and local marine law enforcement and emergency rescue personnel. This in no way gives NASBLA the exclusive use of those standards. Other entities that meet the same standard of delivery, oversight and credentialing are also eligible. NASBLA welcomes those partners and is taking aggressive steps to help others replicate the NASBLA model.



## EXPAND THE MODEL

NASBLA uses an exportable training model which deploys credentialed NASBLA Instructors to the students. This allows students to train in their own vessels, within their area of responsibility (AOR) and, in a perfect setting, with the partners they work with every day. Many NASBLA classes delivered over the last three years have been populated by Coast Guard, state and local students, all in the same class, training to the same standard. With just over 100 instructors delivering close to 60 classes per year, we strive to maintain a ratio of 1 instructor for every 4 students, especially in classes that have an on-water component.

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Simple math tells us we can't reach the estimated 18,000 state marine patrol officers, let alone the county, local and emergency rescue personnel who, by most estimates, triple the number of state officers on the water alone. The solution:

Franchises are a familiar concept to many Americans. Look around each day and you will see a Starbucks, McDonalds, or even a KFC on most any street corner around the country and even the world. What makes these restaurant chains so successful is their consistency through the franchise model. In the business world the franchise model's benefits include a higher success than in a sole proprietorship, shorter time to opening, and ongoing support. Transversely, in the training world this model provides higher success through a national standard of training, quicker implementation with already developed and vetted training curriculum, and continued support from a national organization. Expanding the use of this highly effective model, NASBLA has expanded its capabilities by accrediting<sup>6</sup> partner organizations and training them to replicate the NASBLA administrative delivery model of training and requiring utilization of the national training curriculum. Accredited agencies are building internal training capabilities by developing their instructors who are credentialed by NASBLA under the National Instructor Credentialing Program<sup>7</sup> (NICP). These accredited agencies are exponentially increasing the national training initiatives by training their own personnel on a large scale as well as their local partners, and doing so for a fraction of the cost of receiving direct training from NASBLA.

## CONCLUSION

The most successful strategy in securing our maritime domain rests in the hands and tools present and vigilant on our nation's waterways in the form of the local, county, state and tribal maritime law enforcement officer. We can apply the latest technology to enhance our abilities to patrol, enforce and monitor our borders, but it's the concept of functioning as ONE that assures our security – every American, every enforcement jurisdiction, every new partnership we build within a single national standard, makes us both strong and secure.

More than boats and equipment, our national assets and personnel currently in place must have the knowledge and training to effectively work together on the nation's waterways in securing our borders and ports. As each USCG Station Commanding Officer trains and readies his/her crews, we offer the opportunity to train and maintain qualifications with those nationally trained partners. Allow and encourage station personnel to train and qualify within your port to a single national standard with your port partners. As the number of NASBLA accredited agencies grows, so will the opportunities for us all.

***This article is a summarized version from the full article submitted by NASBLA. For more information regarding the NASBLA, please contact Mr. John Fetterman at: [John.Fetterman@nasbla.org](mailto:John.Fetterman@nasbla.org)***

Below are some links that pertain to the NASBLA:

<sup>1</sup> *DHS Small Vessel Security Strategy Implementation Plan*

<http://www.dhs.gov/small-vessel-security-strategy-implementation-plan>

<sup>2</sup> *A Brief History of the Revenue Marine Service: Lt. Worth G. Gross, USRM. Harper's new monthly magazine volume 73, issue 438, November 1886*

[http://www.uscg.mil/history/articles/USRM\\_HistoryHarpers](http://www.uscg.mil/history/articles/USRM_HistoryHarpers).

<sup>3</sup> *The National Association of State Boating Law Administrators*

<http://nasbla.org/i4a/pages/index.cfm?pageid=3285>

<sup>4</sup> *Access to NASBLA's database is assessable by application to the NASBLA BOAT Program Director, [mark.dupont@nasbla.org](mailto:mark.dupont@nasbla.org)*

<sup>5</sup> *USCG / NASBLA Memorandum of Understanding on national training standards:*

<http://www.nasbla.org/files/public/BOAT/NASBLA%20CG%20MOU.pdf>

<sup>6</sup> *NASBLA Accreditation Program*

<http://nasbla.org/i4a/pages/index.cfm?pageid=4278>

<sup>7</sup> *National Instructor Credentialing Program (NICP)*

<http://nasbla.org/i4a/pages/index.cfm?pageid=4279>

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# Operational Risk Management Job Aid for Facility and Vessel Examinations

According to the Operational Risk Management COMDTINST 3500.3, all Marine Safety Officers are required to use Operational Risk Management (ORM) basic concepts when performing Marine Safety mission operations. This practice of utilizing ORM for examinations has been overlooked amongst the prevention community for many years. In order to retract from this notion, CG-FAC spent a great deal of time developing an ORM job aid for all Marine Safety Officers alike that will help walk them through the seven step ORM process when assessing risk. Along with the seven step ORM process, the job aid also provides a more insightful explanation for the Green Amber Red (GAR) model as an additional ORM tool that helps teams evaluate systematic risks.

When we think about ORM in the Coast Guard, most people will immediately think about law enforcement and safety boardings, flight operations, or small boat operations. These operations get all of the attention and focus for ORM. However, the prevention community is quite often overlooked for risk management. Most individuals see the Marine Safety world as a controlled environment that works side by side with industry to ensure compliance with international and federal regulations. These perceptions are true, but many people forget about all the dangers associated with carrying out a Marine Safety examination. The prevention community is frequently exposed to extremely hazardous chemicals and materials while conducting an examination amidst massively large moving equipment that could end anyone's life in a blink of an eye if not using proper situational awareness. This job aid is an essential tool for all Marine Safety Officers when assessing risk and will help all examination teams avoid complacency if followed properly every time an examination is performed.

The ORM job aid also has a few other sections that pertain to: Coast Guard safety policies relating to Marine Safety, safety/occupational health, Marine Safety PPE/workplace needs, and also a list of required and authorized PPE. Please take the time to view this job aid and use it while out in the field conducting facility and vessel examinations. The following link will direct you to the CG-FAC .mil website where you can reference this job aid or download it for future risk assessments: <http://www.uscg.mil/hq/cg5/cg544/Safety.asp>

## **OPERATIONAL RISK MANAGEMENT IS A CONTINUOUS PROCESS**

## **The Future of OMSEP**

The OMSEP program is a tool to help monitor short/long term occupational exposures. Currently, medical corpsmen complete the OMSEP physicals, but it is up to the local unit coordinator to put the dates/data into OMSEP, not the HS. This has been the number one issue with all units because of this misunderstanding. If you do not know who your local Safety/Env Health Officer (SEHO) is, please go to the following link: <https://cgportal2.uscg.mil/units/hswlsc/SafeEvHealth/Safety%20%20Environmental%20Health%20Library/HSWL%20SEH%20Detached%20Offices%20Phone%20List.pdf>

The future OMSEP/EPIC process will be beta tested this summer in hopes to implement CG wide soon after. The future process will align the OMSEP program with member's annual PHA and continually track members as they transfer to non-operational billets. The new PHA process will capture the need for occupational monitoring, removing the need for unit level coordinator in the future. HS's will ask members a series of questions regarding occupational exposure, results from survey will assist HS determine exposure monitoring protocols that are established within the medical manual. Keep attentive to any proposed changes that may occur sometime later this year.

## **Facilities Receiving Vehicles From RO/RO Vessels Being Regulated Under 33 CFR 126**

For the longest time, facility inspectors have asked the question, “do vehicles from RO/RO vessels need be regulated as Handling of Dangerous Cargo at Waterfront Facilities.” According to the hazardous materials table listed in 49 CFR 172.101 under the “101 table”, vehicles are classified as hazard class 9, which is defined as miscellaneous hazards. The table goes on to give a detailed description of the type of vehicles this rule applies to and also the packaging requirements for shipping vehicles, such as draining of the fuel tanks and prevention of battery leakages. We can infer from this passage that 33 CFR 126 applies to waterfront facilities handling packaged and bulk-solid dangerous cargo and to vessels at those facilities.

Currently, after taking an informal field survey of various RO/RO facilities around the country at different COTP areas, CG-FAC has found a lack standardization from unit to unit. Many marine safety inspectors will argue that vehicles are a very low risk dangerous cargo and this only creates more work for us. This argument may hold some validity to it, however, the regulations are pretty clear and cut that vehicles are classified as dangerous cargo. A COTP has the discretion to waive compliance with any provisions contained in 126.15 and 126.16, if the COTP finds that the application of such provisions is not necessary to the safety or security of the port and vessels and waterfront facility. The owner/operator of the facility may request the COTP to allow the use of an alternative method of compliance with specific requirements of Part 126. Therefore, facilities receiving vehicles from RO/RO vessels must be regulated under 33 CFR 126, unless it is documented by the COTP that they are authorized to deviate from this provision.

*You can view this policy letter at the following link: <http://www.uscg.mil/hq/cg5/cg544/facilities.asp>*

### **Save the Date!** (Events on the Horizon)

#### **Facility Inspector/Port Security Specialist Work Shop April 22-24 (Location TBD)**

Currently this workshop is still tentative but look out for information in the up coming weeks to further details on this.

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#### **Joint Area Maritime Security Committee/Harbor Safety Committee National Conference August 25-27 (Philadelphia, PA)**

CG-FAC is in the process of ironing out details for the AMSC/HSC conference that will be taking place this summer. CG-FAC will provide more details on this conference once all the details are finalized.

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## **CG-FAC Links**

www: <http://www.uscg.mil/hq/cg5/cg544/default.asp>

Portal: <https://cgportal2.uscg.mil/units/cgfac2/SitePages/Home.aspx>

Homeport: [Homeport](#)> [Mission](#)> [Maritime Security](#) or [Ports and Waterways](#)

TWIC (Portal): <https://cgportal2.uscg.mil/communities/twic-discussion/SitePages/Home.aspx>