

2-000

Will the Coast Guard annual inspection (aka user) fee be applicable to a vessel that operates using a non-Coast Guard option to comply with Sub M?

Yes. Each vessel required to have a Certificate of Inspection in accordance with 46 CFR 2.10-01 is subject to the annual inspection fee.

Received Aug 2016

Answered Nov 2016

2-001

2.01-15 points readers to appropriate inspection subchapters for guidance on reporting alterations or repairs to the OCMI. Inspection subchapters then have specific language (31.10-25 for example) about the requirement to have modifications approved prior to making the modifications. There is no language directing operators/masters to notify TPOs or OCMI's when modifications are made, although modifications are identified at the annual inspections/surveys. Is this the intended posture - a review of changes after the modifications?

No. Any repair that is not a major conversion or replacement in kind will need to be reported to either the TPO or Coast Guard dependent upon the inspection path chosen. As per 46 CFR 144.145 Procedures for Verification of Compliance with Design Standards and Table 144.140, only a registered professional engineer (P.E.), an authorized Classification Society, or the U.S. Coast Guard can verify compliance with major conversions and non-replacement in kind. . Also refer to other FAQs on modifications:

136-002

What is the extent of modifications to the vessel that operators must describe? (136.210(a)(2)(ii))
136-003, 136-004, 136-005, 136-008, 136-024, 136-025, 136-026

What constitutes a Major Conversion and what is the process for making a determination?
137-009

Surveyor knowledge of unapproved modifications.

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Answered 11 Apr 2017

2-002

Exception for workboats operating within a worksite. Our company operates a coal loading facility and two power plants along the Ohio River. The three only handle coal loading and unloading. Each has a tug operating exclusively within their worksite. All three have a robust set of company policies and procedures, but not ISM or RCP. They also submit to the Coast Guard UTV exams every year. The company also has a line boat operation that is an AWO member and has been RCP compliant since its inception. Do I advise the three to pursue getting letters of exemption from their local OCMI or toss out their current policies and procedures and begin following our RCP (TSMS)?

Although the situation you describe does not seem to meet the definition of “worksite” provided in 46 CFR 136.110, you are permitted to submit to your local OCMI a letter requesting consideration for the exception described in 46 CFR 136.105(a)(3).

The definition of “worksite” includes “shipyards, owner’s yards, or lay-down areas used by marine construction projects.”

For more information on worksite determinations, see FAQ 136-007.

Received 7 Sep 2016

Answered 11 Apr 2017

15-001

Does the requirement for towing vessels 8 meters or more in length to be under the direction and control of a person holding an MMC endorsed as master or mate (pilot) of towing vessels or as master or mate of vessels greater than 200 gross register tons, holding a completed TOAR, apply to vessels operating exclusively within a worksite?

No, a vessel operating exclusively within a worksite is exempt from the requirements of Subchapter M unless that vessel is pushing, pulling, or hauling a barge that is carrying oil or hazardous material in bulk, as per 46 CFR 136.105(a)(1). FAQ 136-007 discusses worksite determinations.

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Answered 11 May 2017, updated 14 May 2018

15-002

Is there a rule change planned for manning since towing vessel manning was covered under uninspected vessels?

Towing vessel manning is incorporated into Subchapter M and discussed in § 15.535. Manning is also discussed at length on pages 40008-40010 of the preamble to the regulation.

Received 28 Jul 2016

Answered 28 Dec 2016

15-003

Will there be a discussion on expanding the AB manning exclusion on the inland rivers to include operations on other waters?

There are no current plans to change the statutory language of 46 U.S.C. 8702 which exempts vessels operating only on rivers and lakes (except the Great Lakes) from the Able Seaman requirements of 46 CFR 15.840.

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Answered 21 June 2017