

SUBCHAPTER M: SAFETY FOR YOUR VESSEL AND YOUR CREW

Improper fuel valve placement, broken fire suppression system, outdated machinery or structure; are any of these problems on your vessel? This could mean the difference between working and not working! Subchapter M is near and could be trouble for you and your business unless you're prepared.



In 2004, the United States Coast Guard, announced plans to create a set of rules for uninspected towing vessels using community input. Some 12 years later the Coast Guard published these rules with the intention to protect not only the waterways and vessels to ensure flow of commerce and operability, but to also ensure the wellbeing of crews and the environment.

The rules apply as follows:

- Any vessel of 26 feet or above that are engaged in towing, pushing, or hauling of any kind are required to comply excluding Subchapter I certified vessels.
- Vessels smaller than 26 feet need not comply unless handling oil or any kind of hazardous material (i.e. combustible), so if you're a recreational boat or only engaged in marina work, you're good!

The Coast Guard has given 2 options to obtaining the certification for inspection (COI), both methods involve inspections of Professional Engineer stamped and approved machinery, construction, and fire protection drawings to name a few. Which method you choose is entirely up to you, but suggestions and summaries are given below:

- The Coast Guard can inspect your vessel periodically or annually. The vessel would be inspected every 5 years annually, or every 3 months before or after 2nd or 3rd anniversary of COI periodically. The Coast Guard requires that the applicant's entire fleet be inspected by 6 years after the new laws come into effect. This method is recommended for small companies of 2 or less vessels
- A certified third party may also be used such as ANSI, ISO, or others that have the Coast Guards approval. Unlike the Coast Guard they will only inspect the vessel annually every 5 years. Also, the fleet owner must have an approved Towing Safety Management System (TSMS) within two years and every vessel certified by the end of 6 years if using an approved third party.



With 5000 plus vessels to inspect, the Coast Guard has made it known that they would prefer the use of third parties, and no, they will not be allowing the grandfather clause.

Now that the rules have been completely implemented, it is estimated that the inland fleet will save up to 25.8 million annually from accidents lost time. So be prepared, be ready, see the benefits sooner, and make the changes now, before Subchapter M takes effect.