



- ▶ How to get, and maintain, a COI for an operating vessel in 4 steps



How to get, and maintain, a COI for an operating vessel in 4 steps:

These instructions are relevant only to an operating vessel. Those vessels already in operation will be grandfathered into the Subchapter M regulation. This is good news for operators as standards may be relaxed slightly to accommodate vessels with a long service history.

1 Paperwork and Meetings

The inspection process begins by Subchapter Mitting an Application for Inspection, [Coast Guard Form CG-3752](#). This is a simple form that captures essential information regarding the operator and its intentions for the vessel.

Once this form is Subchapter Mitted to the local Officer in Charge, Marine Inspection (OCMI) a meeting should follow to discuss the requirements of meeting minimum standards to receive a COI. The meeting includes a precursory examination of the vessel. Typically, an operator will work with the Coast Guard for several months to ensure the vessel meets the minimum standards required by a COI.

If the vessel is a little older that's ok. Existing, operating vessels won't need to adhere to the same restraints new vessels do, it's best to talk with the OCMI to understand exactly what each vessel needs.

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2 Make the Necessary Changes

A result of consultation with the OCMI will likely reveal a few changes to be made onboard. It could be an additional life raft, a more robust log procedure, or even a new safety management system. Whatever the recommendation the Coast Guard makes, it needs to be done to get that COI.



3 Annual Inspections

Being an inspected towing vessel means it will be subject to an annual inspection. This inspection may take a few hours to a day and typically follows these steps:

- Administrative review of process and logs. This review includes verification of proper vessel documentation as well as each mariner's credentials.
- Physical inspection follows and includes a general inspection of seaworthiness, as well as key operating and safety systems.
- Testing may include operational tests as well as tests of emergency alarms and shutdowns.
- Crew readiness is assessed through staging vessel drills that may involve various man-overboard and firefighting scenarios depending on the type of vessel and composition of the crew.

The Coast Guard also considers the effectiveness of crew communications, planning and executing the response to the emergency, including utilization of emergency gear and equipment, that is consistent with mariner training and qualifications.

4 Drydock Inspections

A periodic drydock inspection supplements the annual inspection, and is an in-depth look at the underwater body of the vessel. The Coast Guard wants to make sure the structure has not deteriorated and the skin of the vessel is in serviceable condition. Drydock inspections also focus on thru-hull valves, where failure could lead to flooding, and on under water running gear such as the propulsion shaft and rudder. Most towing vessels are steel construction, and the Coast Guard typically allows 25% wastage in original steel thickness before renewing is required. This standard may be challenging to apply for vessels that have been in service for decades and for which original design and build specifications are no longer available.

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Coast Guard inspection requirements can be onerous, **but operating an inspected vessel involves more than being prepared for the Coast Guard one day a year.**

Subchapter M shows the Coast Guard is committed to improve the inspection program as a *living program* that operators commit to everyday. Just like safety, compliance is something to address each and every day.

A key component of Subchapter M is having a safety management system (SMS) in place. It's really about establishing repeatable, proactive systems that have a robust feedback loop. Implementing an effective SMS given operators the ability to learn from their mistakes and realize continuous improvement.

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Operating an inspected towing vessel will require a relationship with the Coast Guard. The most successful operators form a partnership with mutual respect and ongoing communication. It is expected that the operator knows the requirements, and having the Coast Guard as a trusted partner can help to ensure continuous compliance. If an operator falls outside the requirements, and is not forthright with the Coast Guard, they may face a monetary penalty, or possibly lose the vessel's COI and their ability to operate.

Resources:

- *Call the local Coast Guard Sector, or visit the [Coast Guard website](#) for general information.*
- *Visit the [Helm Knowledge page](#) for other great Subchapter M resources.*
- *Download a [free SMS template](#).*



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