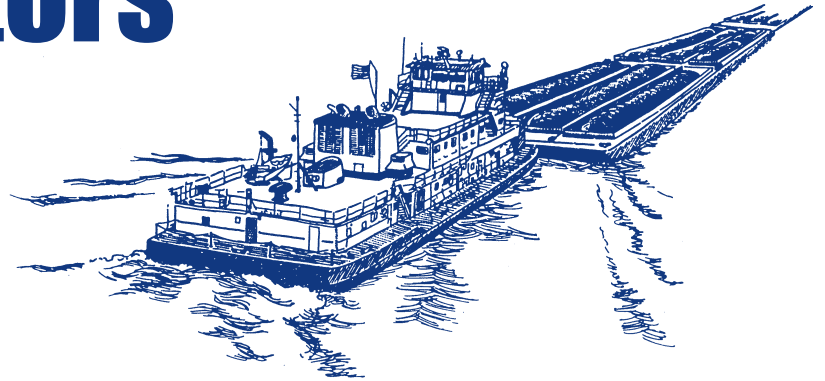
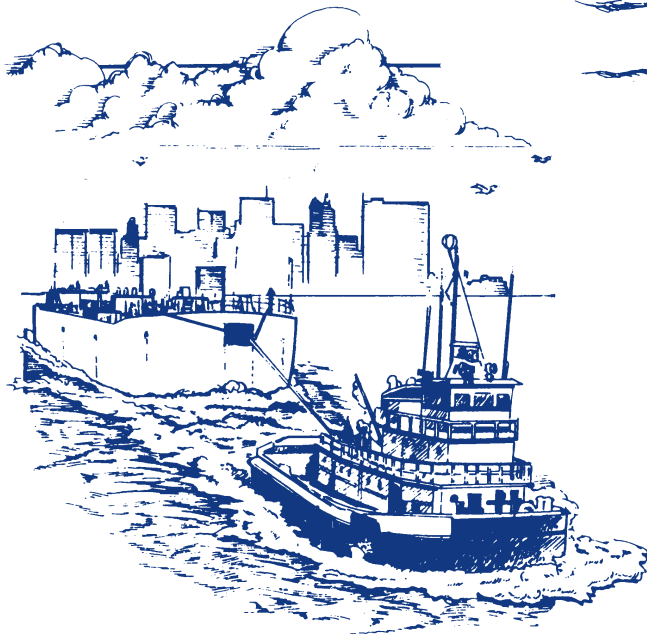


The American Waterways Operators



Responsible Carrier Program 2011

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Disclaimer

The AWO Responsible Carrier Program is intended to improve marine safety and environmental protection in the tugboat, towboat and barge industry. The program aims to accomplish this objective by establishing preferred industry operating principles and practices as voluntary standards of conduct for tugboat and towboat companies. While the standards outlined in the Responsible Carrier Program meet or exceed current governmental standards for the operation of barges and towing vessels, they do not necessarily constitute an exhaustive catalogue of all potential safety practices that any particular company should undertake. Each company must determine for itself its own operational needs and the range of safety measures necessary to protect its employees, the public, and the environment. The program is not intended to supplant any existing safety procedures that a company may have in place in excess of the standards outlined herein. Finally, while the objective of the Responsible Carrier Program is to enhance safety and environmental protection in the tugboat and towboat industry, no program can be considered a panacea that will completely eliminate injuries, accidents or pollution incidents. The pursuit of better, safer operations through continuous improvement must always be the industry's goal.

Note: Changes in this 04/11 edition from the previous edition (06/10) are designated by text in ***bold italics***.

I. Introduction

On December 7, 1994, the Board of Directors of the American Waterways Operators (AWO) unanimously approved the establishment of the AWO Responsible Carrier Program as a code of practice for association member companies. The Board's historic vote marked the culmination of an intensive, eight-month effort to develop the outlines of a new, industry-driven safety program for the tugboat and towboat industry. In voting to adopt the Responsible Carrier Program, however, the Board did more than signal its approval of the code of practice and its endorsement of the process that produced it. Perhaps more significantly, the Board directed that a new process begin to help the newly developed safety program take root in the industry and to ensure that the program's goals of a better, safer, and more responsible industry are realized. To that end, the Board set January 1, 1998, as the target date to bring all AWO member companies into compliance with the Responsible Carrier Program.

Background and Purpose

Development of the Responsible Carrier Program began in April 1994, when the Board of Directors authorized the establishment of a specially-selected task force of senior industry executives. Comprised of 13 members representing a broad cross section of AWO's diverse membership — inland, coastal, and harbor operators; dry and liquid carriers; large and small companies drawn from each of the association's five regions— the working group was tasked with developing a series of "recommended positions, practices, and standards aimed at enhancing the safety of the barge and towing industry." This work stemmed from the directive of the association's newly-approved strategic plan, *AWO 2000*, that AWO "improve industry safety and environmental protection by establishing preferred industry operating principles and practices," and from the process of industry self-examination which began in the wake of the September 1993 derailment of the Amtrak *Sunset Limited*.

Throughout the spring and summer of 1994, the working group labored to fulfill the Board's mandate and to develop the outlines of a new, industry-specific safety program for the tugboat and towboat industry. By late September, the framework of the program had emerged, and a draft document was shared with all AWO members, including shipyard and affiliate members, for review and comment. Throughout the month of October, regional briefing sessions were held in Greenville, Mississippi; New York, New York; St. Louis, Missouri; and Seattle, Washington, to subject the draft program to the critical review of AWO members in all regions of the country. Armed with this feedback, the working group reconvened in early November to consider the input received from the membership, to revise the document as necessary, and to develop final recommendations for consideration by the AWO Executive Committee and Board of Directors. On November 3, the Responsible Carrier Program was approved by the AWO Executive Committee. The Committee-approved changes to the content of the draft program, as well as its recommendations for implementation and use of the new safety program, were shared with all AWO members in mid-November. On December 7, following a final briefing and discussion session on the content of the program held December 6, AWO's Board of Directors voted unanimously to adopt the Responsible Carrier Program as a code of practice for AWO member companies.

The Responsible Carrier Program

The program approved by the Board of Directors has three principal parts □ management and administration, equipment and inspection, and human factors □ reflecting the role that each of these components plays in ensuring safe and efficient vessel operations. The program is intended to serve as a template for AWO member companies to use in developing company-specific safety programs that are consistent with applicable law and regulation, that incorporate sound operating principles and practices not currently required by law or regulation, and that are practical and flexible enough to reflect a company's unique operational needs. The three sections of the program are meant to be used in conjunction with one another; the policies and procedures called for in the management and administration section, for example, should reflect the recommended principles and practices outlined in the equipment and inspection and human factors sections, as well as the variables of a company's trade, area of operations, size and organizational structure.

The Responsible Carrier Program does not attempt to catalogue or to duplicate that which is already required by federal law or regulation. (For clarity, references to applicable law and regulation are included in several areas of the document.) Rather, the program seeks to complement and build upon existing law and regulation and to identify sound operating principles and practices that will enhance the safety of a company's operations, with or without governmental action in these areas. The program is intended to be a practical one. It takes its inspiration not from a government-prescribed standard or from a deep-sea, ship-focused model, but from the experience of the tugboat and towboat industry itself. The practices and principles outlined herein are, in large measure, based on principles of safe and sound operation that many companies in the industry have already voluntarily embraced. This program aims to build upon that foundation by extending those practices and principles throughout the industry as a whole.

It is not the aim of the Responsible Carrier Program to homogenize industry operations, however; the industry is far too diverse for such a simplistic approach. Rather, the program aims to combine a set of common principles and practices that can be observed by a company regardless of its trade or its size, with an emphasis on company-specific policies and procedures which may vary significantly both between and among industry sectors. The policies and procedures developed by a small inland grain carrier will inevitably differ from those of a large coastal oil transporter; indeed, the policies developed by one carrier will likely differ even from those of a similarly situated company. The Responsible Carrier Program is rooted in the premise that common principles of safe operation, and industry practices that are recognized as sound standards industry-wide, can and must coexist with the operational diversity that has long been a hallmark of the U.S. tugboat, towboat and barge industry.

Implementation and Use

In approving the establishment of the Responsible Carrier Program, AWO's Board of Directors recognized that developing a comprehensive plan for implementation and use of the new safety program would be critical to achieving the program's objectives. *AWO 2000* directed the association to "improve industry safety and environmental protection by establishing preferred industry operating principles and practices," but the mere development of such a program would

not by itself achieve these crucial goals. To make real gains in marine safety and environmental protection, the Board recognized that the next step for the association must be to put the Responsible Carrier Program in place and to help all AWO members integrate the program into their own companies' operations.

The Board set January 1, 1998, as the target date to bring all AWO member companies into compliance with the Responsible Carrier Program. To assist AWO members in meeting this target, the Board directed that the development of an implementation and assistance program aimed at giving all AWO members the tools they needed to adopt the Responsible Carrier Program commence immediately following Board approval of the program. Development of such a program, which included the identification or development of sample policies and procedures, identification of industry training resources, and a series of regional implementation seminars, then began, and a detailed implementation plan was presented to the AWO membership and Board of Directors at the association's April 1995 Annual Meeting. The Board also recognized the importance of monitoring the implementation process closely to ensure continued progress toward universal member adoption of the program and to identify any difficulties requiring modification, either of the document itself or of the implementation program. To that end, the Board received regular reports on the implementation process at each of its meetings between 1995 and 1998.

Responsible Carrier Program Third-Party Audit

In December 1995, AWO's Board of Directors established the Responsible Carrier Program Audit Task Force. The mission of this member task force was to consider the need for, and value of, an external audit program for the Responsible Carrier Program. In October 1996, the Board approved the recommendation of the Audit Task Force that an audit program be established for the Responsible Carrier Program. The Board concluded that not only would an external audit advance the objectives of marine safety and environmental protection, but that it would significantly increase the external credibility of the Responsible Carrier Program and facilitate the attainment of other important benefits, such as charterer acceptance, recognition from federal and state regulators, and lower insurance premiums. It became increasingly clear to the task force and to the Board of Directors that some form of audit would be required by regulators, shippers, and insurers as a condition of conferring many of the tangible benefits of the RCP on individual members. Given these conclusions, the Board established a Technical Subcommittee to develop the details of a future Responsible Carrier Program audit.

The Responsible Carrier Program Audit Task Force Technical Subcommittee first met in January 1997 and began the challenge of developing an audit program that increases industry safety, provides recognition for responsible operators, generates greater industry credibility in the public forum, and recognizes the diverse needs of AWO's members. In August 1997 the task force recommended that all members of AWO achieve audited compliance with the Responsible Carrier Program by January 1, 2000, or within two years of joining the association, whichever was later. In October 1997, in response to the recommendation by the task force, the AWO Board of Directors voted to approve the establishment of a third-party audit program for the Responsible Carrier Program, including the creation of a Responsible Carrier Program Accreditation Board responsible for the selection, orientation, oversight and recertification of

AWO-certified auditors. The Accreditation Board also plays a role in clarifying or interpreting the audit guidelines and in considering and recommending changes to the audit program as appropriate. The establishment of an audit program was an extraordinarily important step for the Responsible Carrier Program, AWO and the entire industry.

Condition of Membership

In a move that fundamentally changed the face of AWO, in April 1998, the membership voted to change the association's *Constitution and Bylaws* to require carrier members to demonstrate a "good faith commitment" (In 2008, the Board of Directors voted to recommend to the full membership that the "good faith commitment" clause be deleted and to simply require members) to achieve compliance with the AWO Responsible Carrier Program, and undergo an AWO-certified audit of their program by January 1, 2000, or within two years of joining the association, whichever is later. (In 2004, the Board of Directors voted to reduce the timeframe requirement to within one year of joining the association.) No longer was it enough to simply operate a towing company and pay dues to belong to AWO. Now, members had to commit to operating their companies to operate safely and responsibly by implementing the Responsible Carrier Program, and then demonstrate their implementation by undergoing a comprehensive third-party audit conducted by professional, experienced and knowledgeable auditors.

On January 1, 2000, 100 percent of AWO's carrier members were in audited compliance with the Responsible Carrier Program. Thirteen member companies chose not to comply with this condition of membership and thus, their memberships in AWO were terminated.

The members and the Board of Directors recognize that the process of enhancing marine safety and environmental protection is, and must be, a continuum. The Board votes to establish the Responsible Carrier Program and to require participation in the program as a condition of membership in AWO were milestones, not an ending. The members of AWO are committed to making the Responsible Carrier Program a living document and a continuing process: incorporating lessons learned and new technological developments into the program; considering, debating, and adopting suggestions to improve, strengthen, and build upon the program; and maintaining a constant fix on the program's underlying objectives to improve industry safety and environmental protection.

There are many parties with a role to play in building a better, safer tugboat, towboat and barge industry, but the primary responsibility for making industry operations safer unquestionably lies with the industry itself. The AWO Responsible Carrier Program is a tangible manifestation of the association's acceptance of that responsibility, and its deep commitment to carrying it out.

II. Management and Administration

Each towing company should develop and document written policies and procedures covering, at a minimum, those items outlined below. Companies should abide by these policies in conducting their operations and should ensure that their employees are aware of, and trained in, those policies and procedures which affect their job responsibilities. Companies should develop a mission statement expressing their commitment to abide by their established policies and procedures and to ensure employee awareness and knowledge thereof.

All AWO carrier members, as a baseline, should be in compliance with all applicable federal laws and regulations concerning marine safety and environmental protection. All company policies and procedures should be consistent with applicable law and regulation and with the guidelines provided in the Equipment and Inspection and Human Factors sections of the AWO Responsible Carrier Program. Items marked with an asterisk (*) denote recommended practices only. Parenthetical items preceded by "e.g.," (or "for example") may not be applicable in all situations and are intended to serve only as examples of the types of items which company policies and procedures may address.

A. Vessel Operating Policies and Procedures

1. Company-specific vessel operating procedures (will depend on trade)
 - a) Bridge transit procedure
 - b) For companies with operations on coastal routes, voyage planning procedures (33 CFR 164.80)
2. Vessel-specific operating procedures (will depend on vessel size, cargo, trade, etc.)
 - a) Procedures for making horsepower/tow size decisions
3. Procedures to ensure proper and valid documentation carried aboard vessels; list of documentation to be carried (46 CFR 67.161(a))
4. Fuel transfer procedures
5. Vessel maintenance procedures, including:
 - a) Persons responsible for maintenance
 - b) Maintenance schedules
 - c) Qualifications and training requirements for persons responsible for maintenance
 - d) Procedures to correct deficiencies identified during maintenance
 - e) Maintenance record retention program

6. Vessel inspection procedures, including:
 - a) Persons responsible for conducting in-house inspections
 - b) Frequency of inspections
 - c) Qualifications and training requirements for persons responsible for conducting in-house inspections
 - d) Procedures to correct deficiencies identified during inspections
 - e) Inspection record retention program
7. Cargo handling procedures
 - a) Benzene policy
 - b) Vapor control procedures
 - c) Cargoes requiring special handling (e.g., anhydrous ammonia, hydrogen sulfide, etc.)
8. Lightering procedures (where applicable)
9. Procedures for identifying critical stores and supplies

B. Safety Policy and Procedures

- 1) Company safety policy
 - a) Accountability and commitment to safety
 - b) Hearing conservation
- 2) Company safety rules, including:
 - a) Painting in enclosed spaces
 - b) Non-skid surfaces
 - c) Flammable and combustible liquids
- 3) Personal protective equipment policy, including:
 - a) Use (including respiratory protection and fall arrest protection)
 - b) Inspection
 - c) Maintenance
 - d) Replacement
- 4) Reporting of safety deficiencies and/or nonconformities
- 5) Confined space entry

- 6) Safety training, safety drills and safety meetings (including station bill)
 - a) Topics to be covered (e.g., first aid, CPR, firefighting, emergency boat operation, use of life rafts, survival suits, etc.)
 - b) Frequency
 - 7) Safe use of equipment
 - a) Deck machinery
 - b) Rigging
 - c) Welding and/or cutting equipment
 - d) Hand tools
 - e) Ladders
 - f) Abrasive wheel machinery
 8. Corrective action process
 9. Cargo knowledge (may include material safety data sheets)
 10. Hazard communication procedures (Right to Know) (29 CFR 1910.1200)
 - a) Bloodborne pathogens
 11. Fall overboard prevention
- C. Security Policy and Procedures
1. Company security policy
- D. Environmental Policy and Procedures
1. Company environmental policy
 2. Garbage disposal requirements, procedures and documentation
 3. Handling of waste oil, oily bilge slops, and used filters
 4. Hazardous waste disposal and handling
 5. Sanitary systems and handling of sewage
- E. Incident Reporting Procedures
1. Personal injury
 2. Oil or hazardous substance spill

3. Vessel accident
 4. Bridge, lock, or dock allision
 5. Grounding
- F. Emergency Response Procedures
1. Personal injury response
 2. Spill response plan and/or contingency plan
 3. Vessel accident response
 4. Onboard emergency response training and drill procedures
 - a) Subject matter
 - b) Frequency
 - c) Documentation
 5. Operator incapacitation procedure
- G. Internal Audit and Review Procedures
1. Procedures for conducting annual internal audits, that include, but are not necessarily limited to:
 - a) Method for identifying nonconformities
 - b) Method of tracking corrective action including:
 - (1) Assigned responsibility
 - (2) Management review
 - (3) Follow-up timeframe (e.g., 90 days)
 2. Procedures to ensure compliance with applicable federal laws and regulations concerning marine safety and environmental protection
 3. Personal injury investigation
 4. Spill investigation
 5. Vessel accident investigation
 - 6) Communication procedures for disseminating lessons learned

- 7) Document control, updating, and distribution
- 8) Performance measurement procedures, including number and rate of:
 - a) Manhours
 - b) Fatalities
 - c) Recordable injuries
 - d) Lost time injuries
 - e) Falls overboard

H. Vendor Safety

1. Procedures for evaluation of subcontractors and vendors providing towing and vessel assist services on their ability to provide an acceptable level of safety, including:
 - a) Preference when assigning towing, vessel assist services and/or fleeting services to vendors that have a documented, and third-party audited, safety management system, and,
 - b) For vendors providing towing, vessel assist services and/or fleeting services that maintain a routine and reoccurring business relationship with the member company, but do not participate in an audited safety management system such as the RCP or ISM, procedures to ensure that those vendors maintain an acceptable level of safety through at least one of the following:
 - (1) On-site inspection of vessels and facilities
 - (2) Pre-qualification through interview and completion of a safety assessment checklist with vendor safety/operations personnel

I. Organization and Levels of Authority

1. Depict company organization and document authority and general responsibilities of individuals at different levels, including vessel master and crew
2. Designation of a person(s) ashore having direct access to the highest level of management (Designated Person)

J. Personnel Policies and Procedures

1. Hiring policy
2. Physical exams/or physical standards policy
3. Drug and alcohol policy (46 CFR 16.210)

4. Proficiency evaluation policy
5. Orientation and training policy, including:
 - a) Who is trained
 - b) Subjects in which training is given
 - c) Frequency of training
6. Personnel development program
 - a) Deck personnel
 - b) Tankermen
 - c) Engineers
 - d) Wheelhouse personnel
7. Prescription medication notification policy
8. Personal hygiene
9. Sanitation and safe food handling
10. Disciplinary policy

III. Equipment and Inspection (Inland)

Note: Items marked with an asterisk (*) denote recommended items or practices only.

A. Hull

Documentation of each inspection item listed below should be maintained for reporting or examination by appropriate company or third-party personnel. (Note: annual inspection requirements are not intended to preclude routine walk-through inspections conducted by vessel personnel. Such inspections are an important component of sound vessel maintenance and should be encouraged.)

1. Drydock period (routine hull inspection)
 - a) Recommended as needed; maximum 36 months
2. Watertight closures (doors, hatches, airports, windows, etc.)
 - a) If vessel has watertight closures, they should be inspected annually, with particular attention to main or freeboard deck closures.
3. Other openings (ventilators, air pipes, tank vents, etc.)
 - a) Inspection annually for water or weather tightness and structural integrity
4. Rails, ladders, bulwarks, lighting, walking surfaces, chain guards, and handrails
 - a) Inspection annually for wastage, weakness, and personnel safety considerations
 - b) Safety chains along outboard sides of main deck
5. Emergency walkways and hatchways
 - a) Inspection annually
6. Piping systems and tanks
 - a) Piping diagrams should be kept aboard the vessel and piping systems identified by color-coding, numbering, lettering, etc.
 - b) Inspection annually

7. Freeing ports and scuppers (if applicable)
 - a) Survey and inspection annually while underway to note satisfactory drainage of main deck for seaworthiness

B. Machinery

1. Each company should develop a vessel maintenance program as outlined in the Management and Administration section of the AWO Responsible Carrier Program. At a minimum, this program should cover the following:
 - a) Propulsion system (all major propulsion machinery, including engines, reduction gears, clutches, controls, shafting, bearings, and other items prone to wear)
 - b) Steering system (all components)
 - c) Miscellaneous auxiliary systems
 - d) Electrical systems (should be labeled)
2. Maintenance records should be kept on all systems identified above. Records should contain sufficient information to develop a program for overhauls, repairs, and preventative maintenance, and indicate part replacement dates and test dates. Logs should be kept indicating any maintenance or inspections performed.
3. Company maintenance procedures should include a lock-out/tag-out policy.
4. Guards should be placed around any exposed moving parts (e.g., shafts, belts, pulleys, etc.)
5. Alarms and Gauges
 - a) Alarms

Vessel should have the following alarms or have individuals assigned responsibility to monitor and document the following in accordance with company policy:

 - (1) Main engine water temperature
 - (2) Main engine lube oil pressure
 - (3) Bilge alarm
 - (4) Generator water temperature
 - (5) Generator lube oil pressure
 - (6) Hydraulic steering fluid level

In addition:

- (7) Vessel should have general alarm audible in all compartments. (46 CFR 27.201)
- (8) General alarm shall be tested weekly. Other alarms should be tested quarterly.
- * (9) For unmanned or periodically manned engine room, alarms should have display board in both engine room and wheelhouse.

b) Gauges

Vessel should have the following gauges or have individuals assigned responsibility to monitor and document the following in accordance with company policy:

- (1) Main engine water temperature
- (2) Main engine lube oil pressure
- (3) Generator water temperature
- (4) Generator lube oil pressure
- (5) Main engine tachometer
- (6) Hydraulic steering fluid level (sight glass)
- * (7) Gear oil pressure

C. Firefighting and Lifesaving Equipment

A check-off report should be turned in or a log entry made at least quarterly verifying that the following required firefighting and lifesaving equipment is present and in proper working order:

- 1. Coast Guard-approved life preservers (46 CFR 25.25-5)
- 2. Coast Guard-approved ring buoy (46 CFR 25.25-5(d))
- 3. Coast Guard-approved work vests (46 CFR 26.30-5) (46 CFR 26.30-10)
- 4. Coast Guard-approved hand-portable fire extinguishers and semi-portable fire extinguishing systems (46 CFR 25.30)

Other equipment and items carried (and addressed in check-off report or log entry) should include the following:

- 5. Fire hydrants with hose and nozzle
- 6. Flare kits (if applicable)
- 7. Fire axe

8. First aid kit or trauma kit (properly stocked and maintained)
9. Smoke alarms to protect all accommodation spaces (*and connected to central alarm)
10. Emergency lighting
11. Fire detection system to detect engine room fires (46 CFR 27.203)
12. Remote engine fuel shutoff valve (46 CFR 27.207)
- *13. Heat or flame detector in galley
- *14. Externally activated fire extinguishers in engine room
- *15. Remote manual engine shutdown
- *16. Remote starter for fire pump
- *17. Posted safety notices, placards and warning signs
- *18. Placarded storage area appropriate for flammable products

D. Navigation and Communication Equipment

A check-off report should be turned in or a log entry made at least quarterly verifying that all required navigation and communication equipment is present and in proper working order:

1. Copy of Navigation Rules (33 CFR 88.05)
2. Radiotelephone log (where applicable) (47 CFR 80.405, 80.409(e) and (f))
3. VHF radio (33 CFR 26.03)
4. Valid FCC radio station license (47 CFR 80.25) posted near radio
5. Navigation lights (33 USC 2023(a))
6. Whistle and bell (33 CFR 86.05) (COLREGS Rule 33)
7. Sound signal device (33 USC 2033(b)) (COLREGS Rule 33)

Other equipment and items carried (and addressed in check-off report or log entry) should include the following:

8. Additional VHF radio capable of connection to battery backup
9. Swing meter or magnetic compass, depending on area of operations (33 CFR 164.72(a)(4))
10. Two radars (if only one radar is carried, need documented procedures to address radar failure) (one radar 33 CFR 164.72(a)(1))
11. Navigation charts or maps (33 CFR 164.72(b)(1))
12. Tide and Current Tables (where applicable) (33 CFR 164.72(b)(3))
13. Coast Pilot (where applicable) (33 CFR 164.72(b)(3))
14. Notice to Mariners (33 CFR 164.72(b)(3))
15. Search light (33 CFR 164.72(a)(2))
16. Defroster or de-icer (where applicable)
17. VTS Manual (where applicable)
18. Backup marine radio or telephone communications (33 CFR 164.72(a)(3))
19. Loran or satellite navigation receiver (where applicable) (33 CFR 164.01, 33 CFR 164.41)
- *20. Handheld VHF radio
- *21. Public address system and/or internal communication system
- *22. Windshield wiper (when visibility will be improved by its use)

E. Boat and Barge Rigging

Each company operating inland towing vessels should:

1. Establish documented procedures for safe use of wires, ropes, chains, shackles, ratchets, and winches
2. Identify minimum rigging requirements for each vessel according to service
3. Formulate an inspection and replacement program for rigging

4. Establish minimum specifications for each element of rigging

F. Environmental Controls

The following requirements are prescribed by regulation:

1. Fuel oil and bulk lubricating oil containment (33 CFR 155.320)
2. Bilge slop containment (33 CFR 155.330)
3. Oily water separator equipment (33 CFR 155.380) (where applicable)
4. Placard prohibiting discharge of oil (33 CFR 155.450)
5. MARPOL placard (33 CFR 151.59)
6. Certified marine sanitation device (33 CFR 159.7)
7. Fuel oil transfer procedures (33 CFR 155.720)

In addition, each towing vessel should have the following:

8. Oil spill contingency plan outlining procedures to be followed in the event of a fuel spill from the towing vessel
9. Containment around fueling stations
10. Spill kit
- *11. Closable scuppers or other containment method (where applicable)

IV. Equipment and Inspection (Coastal)

Note: Items marked with an asterisk (*) denote recommended items or practices only.

A. Hull

Documentation of each inspection item listed below should be maintained for reporting or examination by appropriate company or third-party personnel. (Note: Annual inspection requirements are not intended to preclude routine walk-through inspections conducted by vessel personnel. Such inspections are an important component of sound vessel maintenance and should be encouraged.)

1. Drydock period (routine hull inspection)
 - a) Recommended twice every five years; maximum 36 months
 - b) Vessels operating exclusively in coastal harbor services (i.e., not beyond the boundary line); recommended as needed; minimum once every five years with a mid-term underwater inspection between the 24th and 36th months
2. Hull gaugings and ballast tank inspections
 - a) Maximum 36 months for ballast tanks and voids; Maximum five years for hull gaugings
3. Watertight closures (doors, hatches, airports, windows, etc.)
 - a) If vessel has watertight closures, they should be inspected annually, with particular attention to main or freeboard deck closures.
4. Other openings (ventilators, air pipes, tank vents, etc.)
 - a) Inspection annually for water or weather tightness and structural integrity
5. Rails, ladders, bulwarks, lighting, walking surfaces, chain guards, and handrails
 - a) Inspection annually for wastage, weakness, and personnel safety considerations
6. Emergency walkways and hatchways
 - a) Inspection annually

7. Freeing ports and scuppers
 - a) Survey and inspection annually while at sea to note satisfactory drainage of main deck for seaworthiness
8. Piping systems and tanks
 - a) Piping diagrams should be kept aboard the vessel and piping systems identified by color-coding, numbering, lettering, etc.
 - b) Inspection annually

B. Machinery

1. Each company should develop a vessel maintenance program as outlined in the Management and Administration section of the AWO Responsible Carrier Program. At a minimum, this program should cover the following:
 - a) Propulsion system (all major propulsion machinery, including engines, reduction gears, clutches, controls, shafting, bearings, and other items prone to wear)
 - b) Steering system (all components)
 - c) Miscellaneous auxiliary systems
 - d) Electrical systems (should be labeled)
2. Maintenance records should be kept on all systems identified above. Records should contain sufficient information to develop a program for overhauls, repairs, and preventative maintenance, and indicate part replacement dates and test dates. Logs should be kept indicating any maintenance or inspections performed.
3. Company maintenance procedures should include a lock-out/tag-out policy.
4. Guards should be placed around any exposed moving parts (e.g., shafts, belts, pulleys, etc.).
5. Alarms and Gauges
 - a) Alarms

Vessel should have the following alarms or have individuals assigned responsibility to monitor and document the following in accordance with company policy:

 - (1) Main engine water temperature
 - (2) Main engine lube oil pressure
 - (3) Bilge alarm
 - (4) Generator water temperature

- (5) Generator lube oil pressure
- (6) Hydraulic steering fluid level

In addition:

- (7) Vessel should have general alarm audible in all compartments (46 CFR 27.201)
- (8) General alarm shall be tested weekly. Other alarms should be tested quarterly.
- * (9) For unmanned or periodically manned engine room, alarms should have display board in both engine room and wheelhouse

b) Gauges

Vessel should have the following gauges or have individuals assigned responsibility to monitor and document the following in accordance with company policy:

- (1) Main engine water temperature
- (2) Main engine lube oil pressure
- (3) Generator water temperature
- (4) Generator lube oil pressure
- (5) Main engine tachometer
- (6) Hydraulic steering fluid level (sight glass)
- * (7) Gear oil pressure

C. Firefighting and Lifesaving Equipment

A check-off report should be turned in or a log entry made at least quarterly verifying that the following required firefighting and lifesaving equipment is present and in proper working order:

- 1. Coast Guard-approved life preservers (46 CFR 25.25-5)
- 2. Coast Guard-approved ring buoy (46 CFR 25.25-5(d))
- 3. Coast Guard-approved work vests (46 CFR 26.30-5) (46 CFR 26.30-10)
- 4. Coast Guard-approved hand-portable fire extinguishers and semi-portable fire extinguishing systems (46 CFR 25.30)

Other equipment and items carried (and addressed in check-off report or log entry) should include the following:

- 5. Inflatable life raft

6. Fire hydrants with hose and nozzle
7. Flare kits
8. Fire axe
9. First aid kit or trauma kit (properly stocked and maintained)
10. Smoke alarms installed to protect all accommodation spaces (*and connected to central alarm)
11. Emergency lighting
12. Survival suits for each person on board (where applicable)
13. Fire detection system to detect engine room fires (46 CFR 27.203)
14. Remote engine fuel shutoff valve (46 CFR 27.207)
- *15. Heat or flame detector in galley
- *16. Remote manual engine shutdown
- *17. Remote starter for fire pump
- *18. Posted safety notices, placards and warning signs
- *19. Placarded storage area appropriate for flammable products
- *20. Externally activated fire extinguishers in engine room

D. Navigation and Communication Equipment

A check-off report should be turned in or a log entry made at least quarterly verifying that all required navigation and communication equipment is present and in proper working order:

1. Copy of navigation rules (33 CFR 88.05)
2. Radiotelephone log (47 CFR 80.405, 80.409(e) and (f))
3. VHF radio (33 CFR 26.03)
4. Valid FCC radio station license (47 CFR 80.25) posted near radio
5. Navigation lights (33 USC 2023(a))

6. Whistle and bell (33 CFR 86.05) (COLREGS Rule 33)
7. Sound signal device (33 USC 2033(b)) (COLREGS Rule 33)
8. Emergency position indicating radio beacon (EPIRB) (46 CFR 25.26)

Other equipment/items carried (and addressed in check-off report or log entry) should include the following:

9. Additional VHF radio capable of connection to battery backup
10. Magnetic compass and backup means of determining course and direction (*gyrocompass for oceangoing tugs) (33 CFR 164.72(a)(4))
11. Two radars (if only one radar is carried, need documented procedures to address radar failure) (one radar 33 CFR 164.72(a)(1))
12. Fathometer
13. LORAN or GPS (33 CFR 164.72(a)(6))
14. Navigation charts (33 CFR 164.72(b)(1))
15. Tide and Current Tables (33 CFR 164.72(b)(3))
16. Coast Pilot (33 CFR 164.72(b)(3))
17. Light List
18. Notice to Mariners (33 CFR 164.72(b)(3))
19. Search light (33 CFR 164.72(a)(2))
20. Rudder angle indicator
21. Defroster or de-icer (where applicable)
22. VTS Manual (where applicable)
23. Backup marine radio or telephone communications (33 CFR 164.72(a)(3))
- *24. Handheld VHF radio
- *25. Autopilot

*26. Public address system and/or internal communication system

*27. Windshield wiper (when visibility will be improved by its use)

E. Towing Gear

1. Tow wire and towing hawser

a) General guidelines for sizing tow wires/towing hawsers

(1) The minimum nominal breaking strength of the tow wire/towing hawser should be 2.5 times the certified or calculated bollard pull of the tug. The static bollard pull of the tug should be determined by a static bollard pull test certified by the American Bureau of Shipping or other competent organization, or calculated using the engine manufacturer's rated brake horsepower (BHP) at the maximum engine rpm times the factor 27.5 pounds per BHP.

(2) The following minimum size tow wire/towing hawser is recommended for use with tugs of the horsepower indicated. (Note: the horsepower and diameter ranges listed are intended to serve as ranges only. A tug at the low end of a given horsepower range does not necessarily require a towing hawser sized at the low end of the diameter range, nor does a vessel at the high end of a given horsepower range necessarily require a towing hawser sized at the high end of the diameter range.)

(a) <1000 hp: 1" diameter; breaking strength 35 tons

(b) 1000-1500 hp: 1"-1.125" diameter; breaking strength 46 tons

(c) 1500-2000 hp: 1"-1.25" diameter; breaking strength 68 tons

(d) 2000-2500 hp: 1.25"-1.50" diameter; breaking strength 86 tons

(e) 2500-3000 hp: 1.50"-1.75" diameter; breaking strength 103 tons

(f) 3000-4000 hp: 1.75"-2" diameter; breaking strength 137 tons

(g) 4000-5000 hp: 2"-2.25" diameter; breaking strength 172 tons

(h) 5000-7000 hp: 2.125"-2.50" diameter; breaking strength 245 tons

(i) 7000-10,000 hp: Special consideration (e.g., certified bollard pull/tow wire match or dual tow wire arrangement)

b) Specifications

- (1) Tow wires should have independent wire rope cores (IWRC).
- (2) Tow wires should be of improved plow steel or extra improved plow steel.
- (3) Tow wires should be heavy lubricated or galvanized at the time of manufacture.
- (4) Tow wires should be 6 x 19 or larger (more flexible).
- (5) Soft lines used in ocean towing should be rated at 2.5 times the certified or calculated bollard pull of the tug.
- (6) The breaking strength of the wire rope or towing hawser should be certified by the manufacturer by pull-testing to destruction a portion of wire from the mill run from which it originated.

c) Terminations

The towing end of the tow wire should terminate in a spelter or thermo-set resin poured socket, or a spliced eye with thimble, and should be sized to exceed the breaking strength of the tow wire.

2. Bridles and surge gear (if used)

a) Bridles for ocean towing

- (1) Connections to the barge should be by a two-legged bridle.
- (2) The breaking strength of each leg should be at least 1.3 times that of the minimum required breaking strength of the main towing hawser.
- (3) Bridles should be Grade 2 or higher welded or forged integral stud link chain or IWRC wire rope.

b) Surge gear (if used)

- (1) Surge chains should be Grade 2 or higher welded or forged integral stud link chain.
- (2) Surge chains should be of the same grade and type and at least as large as that in the towing bridle.
- (3) Each end of the chain may have an end link or one studless link.
- (4) A synthetic shockline may be used as surge gear if rated at 1.3 times the breaking strength specified for the primary tow wire or towing hawser [see item 1.a)(1) above].

3. Associated towing gear

All associated towing gear (e.g., shackles, flounder and/or fish plates, shock hawser, and pennant) should be sufficiently sized for its intended use and should have a breaking strength of not less than 1.3 times the breaking strength specified for the primary tow line [see item 1.a)(1) above].

4. Chafing protection

- a) Protection from chafing should be provided at points where the wire rope hawser passes over the stern bulrail or around a surface that may cause wear on the hawser during normal towing operations.
- b) Any wear points on the vessel or associated equipment contacted by wire rope as it travels during operation should be kept ground smooth. Sources of sharp bending by deformation of the surface should be eliminated or not introduced.

5. Emergency towing gear

All components of the emergency towing system should be rated with a breaking strength equal to 1.5 times the rated bollard pull of the towing vessel. Each tug or barge should be equipped with an emergency recovery system.

(Note: 33 CFR 155.230 requires that all offshore [i.e., coastal or ocean] oil barges carry an emergency tow wire or tow line, rigged and ready for use. The emergency tow wire or tow line must have the same towing characteristics, but not necessarily the same physical characteristics, as the primary tow wire or tow line. The Coast Guard has advised AWO that tow line features such as size, breaking strength, etc., are considered physical, not towing, characteristics. Hence, according to the Coast Guard, carrying an emergency tow line with a breaking strength equal to 1.5 times the rated bollard pull of the towing vessel, while the breaking strength of the primary tow line is equal to 2.5 times the rated bollard pull, as specified in item 1.a)(1) above, is not inconsistent with the requirements of 33 CFR 155.230.)

6. Wire rope records, inspection, and maintenance

Each company should develop a program to address inspection, maintenance, and replacement criteria for wire rope and synthetic hawsers used in the tow line assembly. As a minimum, the wire rope program should be consistent with the recommendations outlined in Coast Guard Navigation and Vessel Inspection Circular (NVIC) 5-92.

F. Environmental Controls

The following requirements are prescribed by regulation:

1. Fuel oil and bulk lubricating oil containment (33 CFR 155.320)
2. Bilge slop containment (33 CFR 155.330)
3. Oily water separator equipment (33 CFR 155.380)
4. Placard prohibiting discharge of oil (33 CFR 155.450)
5. MARPOL placard (33 CFR 151.59)
6. Certified marine sanitation device (33 CFR 159.7)
7. Fuel oil transfer procedures (33 CFR 155.720)

In addition, each towing vessel should have the following:

8. Oil spill contingency plan outlining procedures to be followed in the event of a fuel spill from the towing vessel
9. Containment around fueling stations
10. Spill kit
- *11. Closable scuppers or other containment method

V. Human Factors

A. Manning

1. All towing companies should man their vessels for safe operation, taking into account the following criteria:
 - a) Applicable law and regulation
 - b) Number, size, and type of barges to be towed
 - c) Towing route
 - d) Safety of personnel, equipment, environment
 - e) Service in which tow is engaged
 - f) Functional duties required of crew in addition to standard navigation
 - g) Configuration of vessel superstructure and deck and engine room
 - h) Extent of automation
 - i) Size and power of equipment used
 - j) Environmental and climatic conditions (e.g., icing)
 - k) Experience of crew
2. Except in an emergency, at least one qualified wheelhouse person and one additional crewmember should be on duty at all times while the vessel is underway.

B. Watchstanding and Work Hours

Except as otherwise provided [such as 46 USC 8104(c)] (46 USC 8104(h)) provides that "an individual licensed to operate a towing vessel may not work for more than 12 hours in a consecutive 24-hour period except in an emergency."

All other crewmembers on a towing vessel should not be permitted to work more than 15 hours in any 24-hour period or more than 42 hours in a 72-hour period, except in an emergency or drill.

C. Training

Towing vessel crewmembers should receive initial training and periodic refresher training in the following subjects. Refresher training should be conducted in accordance with company policy, but no less frequently than once every five years.

Unless required as a condition of licensure or otherwise prescribed by regulation, training courses need not be Coast Guard-approved.

The training identified below is intended to apply to any individual serving in the listed capacity aboard a towing vessel, regardless of license held. Training required as a condition of licensure (e.g., firefighting) may be used to satisfy the training specifications listed below.

1. Master (captain), relief captain, mate (pilot)
 - a) Radar training
 - b) Navigation and boat handling training or proficiency evaluation; Rules of the Road refresher training
 - c) Company policy and procedure orientation, including review of federal requirements and company policies
 - d) Marine firefighting and fire prevention
 - e) Personal safety, including:
 - (1) First aid and CPR awareness
 - (2) Confined space hazard awareness
 - (3) Injury prevention, including back training and slip, trip and fall prevention
 - (4) Fall overboard prevention
 - f) For tank barge tows:
 - (1) First responder, spill mitigation and emergency response orientation (may include HAZWOPER training)
 - (2) Benzene awareness training
 - g) Cargo knowledge and hazard awareness
 - h) Responsibility and authority of master; supervisory skills training
2. Engineer
 - a) Marine diesel school or in-house training, including equipment and process updates
 - b) Company policy and procedure orientation, including review of federal requirements and company policies
 - c) Marine firefighting and fire prevention
 - d) Personal safety, including:
 - (1) First aid and CPR awareness
 - (2) Confined space hazard awareness
 - (3) Injury prevention, including back training and slip, trip and fall prevention
 - (4) Fall overboard prevention
 - (5) Lock-out/tag-out procedures
 - e) For tank barge tows:
 - (1) First responder and spill mitigation training
3. Tankerman
 - a) Tank barge safety training

- (1) Loading and discharging operations
- (2) Safety practices
- (3) Environmental protection and loading procedures
- (4) Federal regulation review and training
- (5) First responder, spill mitigation and emergency response orientation (may include HAZWOPER training)
- (6) Vapor recovery operations
- b) Company policy and procedure orientation, including review of federal requirements and company policies
- c) Marine firefighting and fire prevention
- d) Personal safety, including:
 - (1) First aid and CPR awareness
 - (2) Confined space hazard awareness
 - (3) Injury prevention, including back training and slip, trip and fall prevention
 - (4) Fall overboard prevention
 - (5) Cargo-specific training
- e) Vessel communications system and procedures

4. Deck crew

(Note: Experienced deckhands new to a particular company should receive, or have received, the training identified below.)

- a) Deck operations and safety training
- b) Company policy and procedure orientation, including review of federal requirements and company policies
- c) Vessel firefighting and fire prevention
- d) Personal safety, including:
 - (1) First aid and CPR awareness
 - (2) Confined space hazard awareness
 - (3) Injury prevention, including back training and slip, trip and fall prevention
 - (4) Fall overboard prevention
 - (5) Lock-out/tag-out procedures
- e) For tank barge tows:
 - (1) First responder and spill mitigation training

5. Entry-level personnel

(Note: "Entry-level" refers to individuals new to the barge and towing industry.)

- a) Company orientation, including:
 - (1) Drug and alcohol policy
 - (2) Safety as a condition of employment
 - (3) Vessel layout and deck operations

- (4) Required safety gear
- (5) Job responsibilities
- b)* Emergency procedures orientation
 - (1) Fire
 - (2) Collision or allision
 - (3) Sinking
 - (4) Grounding
 - (5) Man overboard
 - (6) Personal injury
- c)* Confined space hazard awareness
- d)* Fall overboard prevention
- e)* Injury prevention, including back training and slip, trip and fall prevention

VI. Introduction to Addenda

The following addenda section has been created to assist member companies, auditors and others by providing a comprehensive resource that contains relevant information on the significant policies, procedures and clarifications that govern the Responsible Carrier Program (RCP), Responsible Carrier Program Accreditation Board and the Responsible Carrier Program third-party audit.

The addenda are organized into six parts:

- A. Dispute Resolution Policy
- B. Audit Recertification Protocol
- C. Audit Issues
- D. Auditor Issues
- E. Accreditation Board Issues
- F. Auditor Disciplinary Procedure

Changes effective 5/1/11 are noted in ***Bold Italics*** and ~~strike-through~~.

Addendum A. Dispute Resolution Policy

- A. The AWO member or AWO-certified auditor requesting a dispute resolution shall notify the AWO Vice President – Safety, in writing, within 30-days of the details of the dispute as soon as it becomes clear that agreement between the parties cannot be reached.
 - 1. Upon receipt of a dispute resolution request, the AWO Vice President – Safety will contact the party requesting the dispute resolution and ensure it submits a written description of the facts and understands the dispute resolution process, including their right to communicate directly to the Accreditation Board in writing or in person at its next meeting.
 - 2. Upon receipt of all relevant paperwork, AWO will forward copies to all members of the Accreditation Board.
- B. The Accreditation Board will meet by conference call or in person to discuss the issue(s) in dispute, interview all the parties involved and make a decision based on its best judgment.
- C. The AWO Vice President – Safety will notify in writing the party requesting the dispute resolution, notifying them of the Accreditation Board’s decision and advise them that they may appeal the Board’s decision to the AWO Executive Committee.
- D. Any party wishing to appeal a decision of the Accreditation Board must notify the AWO Vice President – Safety of its request to appeal within 15 days of receiving notification of the Accreditation Board’s ruling.
 - 1. The Vice President – Safety will provide the Executive Committee with all background materials relating to the request for dispute resolution and the Accreditation Board’s decision in the matter in the Executive Committee packet prior to its next meeting.
 - 2. At its first meeting following receipt of an appeal, the AWO Executive Committee will discuss the dispute and render a decision.
 - 3. The Vice President – Safety will notify all parties involved of the Executive Committee’s decision.
 - 4. The party originally submitting the request for a dispute resolution may accept the Executive Committee’s decision or proceed to the Board of Directors for a final resolution.

- E. Any party wishing to proceed to the AWO Board of Directors for a final resolution will notify the Vice President – Safety within seven days of notification of the Executive Committee’s decision.
1. The Vice President – Safety will provide the AWO Board of Directors all background materials relating to the request for dispute resolution and the Executive Committee’s decision in the Board packet prior to its next meeting.
 2. At its first meeting following receipt of an appeal, the AWO Board of Directors will hear from all parties involved, discuss the dispute, and render a final decision.

Changes effective 5/1/11 are noted in ***Bold Italics*** and ~~strike-through~~.

Addendum B. Audit Recertification Protocol

1. Responsible Carrier Program (RCP) certification/recertification audits are due on the anniversary date of the acceptance of the company's new member application, or for companies joining AWO prior to January 1, 2000, the anniversary date of the completion of its initial audit.
 - a) Seasonal operators, whose equipment does not operate for a portion of the year, may request an adjustment of their audit due date to allow for the completion of its audit at a time when the equipment is manned and active. A request for seasonal adjustment of the audit due date must be made during the initial application process.
 - b) Any change to the audit due date for established AWO members will be on a one-time basis as determined by operational necessity such as a change in operating area or business profile. All requests for a change in audit due date must be made in writing and approved by the Responsible Carrier Program Accreditation Board at least 90-days prior to the existing audit due date.
2. Companies joining AWO after November 1, 2008, that cannot show documentary evidence of full compliance with a recognized safety management system for at least 12 months prior to their new member application must complete an AWO-certified Responsible Carrier Program (RCP) audit no later than the first anniversary of the acceptance of the company's application, and two additional AWO-certified RCP audits by the second and third anniversaries of membership. A company will remain in provisional status until the completion of its second RCP audit during this initial three-year cycle. Members that fail to complete any of the required audits by their due date will have their membership terminated.
3. A company that presents documentary evidence of full compliance with a recognized safety management system for at least 12 months prior to its new member application may undergo an AWO-certified Responsible Carrier Program audit at any time during its first year of membership, but no later than the first anniversary of acceptance of its application for membership. Upon successful completion of this audit, the company will no longer be in provisional status.
4. Effective May 1, 2009, all companies reapplying for AWO membership must show evidence of having completed an AWO-certified audit prior to submitting its membership application. To complete this audit, companies will be required to show 90 days of documentary evidence of compliance with the requirements of the RCP.
5. Once a member company has completed the first audit cycle as discussed in items 1 or 2 above, AWO-certified Responsible Carrier Program recertification audits are due every three years on the anniversary date of the completion of its recertification audit. AWO will notify member companies 180, 90, and 30 days prior to the due date for their recertification audit.

- a) In lieu of the required annual and three-year recertification audits, for companies complying with both ISM and the RCP, after an initial AWO-certified RCP audit completed within one year of the acceptance of a company's new member application, recertification audits may be conducted every five years, provided said audits are conducted by an ABS joint RCP/ISM certified auditor, the ISM annual external surveillance assessment of management and the intermediate external assessment of vessels (conducted between the second and third anniversary dates) are completed, and the RCP Management and Vessel Checklists are completed at least every five years (effective as of the company's next ISM audit).
 - b) For companies participating in ISM whose entire fleet is not required to maintain Safety Management Certificates, 10 percent of those vessels without a Safety Management Certificate must undergo an AWO-certified RCP vessel audit using the appropriate RCP vessel audit checklist at least once every three years.
6. Failure of a company to complete its required RCP audit within the time allowed immediately removes the company's certification of RCP compliance and will result in termination of membership.
 7. An RCP-certified company completing a required recertification audit up to 180 days prior to its audit due date will retain that due date even if it results in more than three years between audits.
 8. An AWO-Provisional member that completes its initial audit before the date of its first anniversary of membership will have the recertification audit due date, for all future recertification audits, adjusted to the first audit completion date rather than on the on the date of its anniversary of membership. For example: If a company joins AWO on March 1 and completes its first audit on July 1 of the same year, then the audit due date for future recertification audits will be July 1 rather than March 1, the anniversary date.
 9. When a company has completed a Responsible Carrier Program audit (that is, when an approved auditor has determined that the company is in full compliance with the Responsible Carrier Program), the auditor should immediately send a letter to the AWO Vice President – Safety (as described in Addendum C paragraph 16) certifying that the company is in full compliance with the Responsible Carrier Program (RCP) as of the time and date the audit was completed. Upon receipt of notification of completion of a member's annual or recertification audit, AWO will issue a new audit certificate valid for the appropriate time period.

10. The Responsible Carrier Program Accreditation Board may grant a limited extension of time beyond a company's audit due date only to allow the member company to correct equipment deficiencies necessary to complete its RCP audit, or in certain extraordinary circumstances such as weather, earthquake, or other acts of God, provided that AWO:
 - a) Receives a written request not less than two weeks prior to the audit due date from the member company's CEO or chief operating officer, explaining in detail the circumstances surrounding the request.
 - b) Receives written confirmation from the company's AWO-certified auditor that the audit has been conducted and the company will be able to complete the outstanding issues immediately.

Changes effective 5/1/11 are noted in ***Bold Italics*** and ~~strike through~~.

Addendum C. Audit Issues

1. AWO members required to participate in the Responsible Carrier Program, and any AWO affiliate members participating in the RCP, will have their membership status and RCP audit due date posted on the AWO Web site. Membership status will be classified as follows:
 - a. Provisional Member – Companies that have been members of AWO for less than two years and have not yet completed their first two AWO-certified RCP audits. A new member that presents documentary evidence of full compliance with a recognized safety management system for at least 12 months prior to its new member application will be considered a provisional member until completion of its first AWO-certified RCP audit.
 - b. RCP-certified Member – Companies that have successfully completed a current AWO-certified Responsible Carrier Program audit.
2. Any AWO carrier member company that resigns its membership or has its membership withdrawn after April 1, 1998 must, before rejoining the association, show satisfactory documentary evidence of having completed an AWO-certified third-party audit no more than 30 days prior to the date of its Carrier Member application for reinstatement.
3. For companies seeking to rejoin AWO that resigned or had their membership terminated after April 1, 1998, AWO-certified auditors may conduct and complete, at the company's request, a full RCP audit that includes documentary evidence of 90 days of RCP compliance and certify that fact directly to AWO for its use in considering the new member application. Notification of completion of the audit should be sent to the AWO Safety Department.
4. Annual internal audits required under RCP G1 shall include a management audit of the company's Responsible Carrier Program every year and vessel audits of the company's entire fleet during the course of the three-year certification cycle.
5. An RCP third-party recertification audit cannot be used to fulfill the requirement for an annual internal audit required under RCP G. 1.
6. An AWO-certified auditor hired, consulted, or otherwise engaged by an AWO member company to develop its Responsible Carrier Program shall not perform the initial certification of that member's Responsible Carrier Program. Subsequent recertification audits may be performed by AWO-certified auditors without regard to any previous development role.
7. If a company does not operate any towing vessels (but only barges), it must complete all applicable sections of the management section of the Responsible Carrier Program.

8. If a company's equipment is bareboat-chartered to another company, there is no requirement for the owning company to comply with any of the provisions of the Responsible Carrier Program for the bareboat chartered equipment.
9. If a company does not own or operate any equipment, but recognizes the Responsible Carrier Program in its vetting program, that company itself is not a Responsible Carrier. The Responsible Carrier Program is a set of policies and procedures for companies that own and/or operate marine equipment, except as otherwise noted.
10. AWO Affiliate members that provide tankermen and/or vessel crewmembers to Responsible Carrier Program-certified AWO carrier members are eligible for certification as Responsible Carriers, provided that those tankermen and/or crewmembers, and the company, meet all the training requirements and other applicable sections of the Responsible Carrier Program.
11. The shoreside management audit should be conducted first, and vessel audits should be conducted within 30 days of the management audit. (Relocated from item 4 above)
12. Ten percent of a company's fleet is subject to a vessel audit. For a fleet of 10 boats or less, one boat would be audited; for a fleet of 11 - 20 boats, two boats would be audited, etc., up to a maximum of 10 boats. This approach is not meant to preclude an auditor from going aboard other available company vessels to spot-check specific equipment items or systems.
13. In order to ensure that vessel audits capture a representative sample of a company's fleet but are performed in a cost-effective manner with minimal disruption to the company's operations, vessel availability, area of operations, and other scheduling considerations should be considered in determining which vessels are to be audited. The auditor should select the boat(s) to be audited, taking into account the above considerations and the need to ensure that the sample selected is representative of the company's fleet and scope of operations.
14. Auditors must ascertain that all of a company's policies and procedures are supported by records that contain sufficient information to determine the means by which the company meets the requirements of the RCP. Auditors should also look for evidence that reflects a company's ongoing commitment to complying with the letter and the spirit of the RCP. The required documentary evidence that auditors will be looking for may include, but is not necessarily limited to, maintenance records, crew safety meeting records, vessel inspection checklists, and personnel training records.
15. The Responsible Carrier Program requires that all crewmembers be trained. Training programs do not have to be Coast Guard-approved, but must be formal and well-documented.

16. Masters, mates (pilots), engineers; and tankermen are required to receive training in marine firefighting and fire prevention. Deck crews are required to be trained in vessel firefighting and fire prevention. Using these broad guidelines, it is up to the company to determine the content of the training. It should be noted that the difference between marine firefighting and vessel firefighting is chiefly one of focus. Vessel firefighting should concentrate to a large degree on hands-on firefighting techniques, skills that will be necessary for the individuals who will have the primary responsibility for the actual fighting of the fire. Marine firefighting is broader, it includes greater detail and focuses on the overall firefighting response. These are skills that are essential for individuals in supervisory positions who will direct the firefighting effort. Subjects should include theory, firefighting tactics, and overarching issues such as vessel stability, personnel safety, and emergency communications. This difference recognizes the role that each crewmember must fulfill in the event of an actual emergency. Fire prevention training is required for all positions. This training can be as simple as proper storage of flammable materials, eliminating sources of ignition, and good housekeeping, especially in the galley and engine room.
17. When a company has completed a Responsible Carrier Program audit (that is, when an approved auditor has determined that the company is in full compliance with the Responsible Carrier Program), the auditor should immediately send a letter to the AWO Vice President – Safety certifying that the company is in full compliance with the Responsible Carrier Program (RCP) as of the time and date the audit was completed. Auditors must use the following template for their certification letter:

THIS IS TO CERTIFY that on (date), the undersigned AWO-certified Responsible Carrier Program Auditor, at the request of (AWO member), without prejudice and for interested parties, did carry out the AWO Responsible Carrier Program management and vessel audit of (company name) ***using the current version of the RCP and RCP Checklist dated _____ and _____ respectively.***

I am pleased to certify that (company name) was found to be in compliance with all applicable elements of the AWO Responsible Carrier Program as of the times and dates of the audit.

If the audit reveals nonconformities that must be corrected before the auditor can attest that the company is in full compliance with the RCP, the company should work with the auditor to correct those deficiencies fleetwide.

18. If an auditor finds discrepancies on a boat(s) that preclude issuance of a letter of certification, the company should be expected to correct those nonconformities throughout its fleet, not just on the vessels on which the discrepancies were found. The auditor should satisfy him/herself that the nonconformities have been corrected fleetwide and should not be limited to checking the same vessels if he/she returns for a follow-up visit to verify that the discrepancies have been corrected.

19. Upon receipt of a properly executed audit certification letter from an AWO-certified RCP auditor attesting to the AWO member's full compliance with the Responsible Carrier Program, AWO will issue a certificate of compliance valid for the appropriate time period. AWO will not receive a copy of the completed audit tool or other details on the status of a member's compliance.
20. AWO's certification of a member's Responsible Carrier Program is contingent on that company remaining a member in good standing of the association.
21. If different auditors (audit companies) conduct a company's management and vessel audits, the company will need to provide letters of compliance from both auditors in order to receive a certificate of compliance from AWO.
22. The audited company "owns" the completed audit, and both the company and the auditor should retain copies of the document. Copies of the audit are provided to third parties only by the audited company or by the auditor at the audited company's request. The auditor should be available to discuss the audit results with a company's customer(s) at the audited company's request.
23. A company is permitted to use an AWO-certified auditor to conduct an RCP audit in conjunction with another audit (e.g., ISM), effectively undergoing both audits at the same time and minimizing attendant financial costs and staff time.

Changes effective 5/1/11 are noted in ***Bold Italics*** and ~~strike-through~~.

Addendum D. Auditor Issues

1. An AWO member company employee who meets the specified qualifications is permitted to apply for certification to conduct RCP audits of other AWO member companies, such as company vendors or outside towers, as a cost-effective way to provide smaller companies with access to the benefits of a third-party audit. To ensure the credibility of the program, “reciprocal” audits are not permitted; that is, a qualified employee of Company A could not conduct an audit of Company B if an employee of Company B had audited Company A. In addition, a company employee is not permitted to audit his own company or a parent or subsidiary thereof.
2. AWO-certified auditors are prohibited from making any reference to AWO, the RCP, or to the auditor’s status as being certified by AWO in connection with work performed for non-AWO members, including in certification letters, opinion letters, and/or public statements. (Relocated from addendum C)
3. Qualifications:

Auditors must show satisfactory evidence of ALL the following:

1. High school graduation or GED.
2. Barge and towing industry, or other qualifying experience.
3. Successful completion of a recognized, in person, lead auditor training course and auditing experience of at least two years.

AND:

- Experience that includes AT LEAST TWO FROM a.), b.), and c.):
- a.) Vessel inspection or surveying experience (e.g. employment as a Coast Guard inspector, classification society surveyor, etc.);
 - b.) Sailing experience in a licensed capacity;
 - c.) Direct responsibility for vessel maintenance, repair, operations, etc.

OR:

At least five (5) years of acceptable professional safety practice with the following:

- Primary function with responsibility for the prevention of harm to people, property and the environment.
- Hazard recognition, evaluation and analysis, and development and implementation of controls.

Recommendations - A letter of recommendation is required from two AWO member companies in a position to evaluate applicant's suitability to conduct Responsible Carrier Program audits. If an applicant is an employee of an AWO member company, a letter of recommendation from said AWO member company is not acceptable.

This application must be completed. A resume alone will not be accepted in lieu of this application's satisfactory completion. (Use additional sheets if necessary.)

Certification - To achieve certification as an AWO-Certified Responsible Carrier Auditor, all auditors will be required to attend an orientation class and periodic recertification training presented by AWO covering the content and administration of the Responsible Carrier Program, the Responsible Carrier Audit and the use of the Responsible Carrier Program audit instrument.

All orientation/recertification classes are held in the greater Washington, D.C. Area.

4. Unanimous agreement of the voting members of the Accreditation Board is required for approval of an auditor.
5. Certified auditors will be notified by AWO in writing when a Board-approved change to the Responsible Carrier Program is made, along with guidance as to how the change is to be addressed in future Responsible Carrier Program audits.

Addendum E. Accreditation Board

1. The Accreditation Board must include one AWO member representing each of the four industry sectors – Coastal, Inland Liquid, Inland Dry, and Harbor Services – and two shipper members, preferably one liquid and one dry cargo shipper. The AWO Vice President – Safety will serve as an *ex officio*, nonvoting member of the board.
2. Members will serve two-year terms and may be reappointed.
3. The role of the Accreditation Board extends beyond the oversight and certification of Responsible Carrier Program auditors to include a role in clarifying or interpreting the audit guidelines and in considering and recommending changes to the audit program as appropriate.

Addendum F. Auditor Disciplinary Procedure

As a condition of certification, all AWO-certified Responsible Carrier Program third-party auditors are required to sign and adhere to a code of ethics that promises the following:

AWO auditors must:

- Issue a letter of RCP compliance certification only to AWO member companies that, in the best professional judgment of the auditor, meet the requirements of the Responsible Carrier Program;
- Always act in a strictly trustworthy and unbiased manner in relation to the company being audited and to AWO;
- Not disclose the findings, or any part of an audit, to any third party without the express permission of the company audited;
- Always act in a manner that promotes the highest professional standards and enhances the reputation of the Responsible Carrier Program and the American Waterways Operators.

Any violation of this code of ethics may result in disciplinary action against the auditor up to and including the loss of AWO certification.

Disciplinary Process

- A. Upon receiving notification, or becoming aware of any violation of the above code of ethics, the AWO Vice President – Safety, as soon as practical, will:
 1. Notify the AWO-certified auditor concerned, in writing, of the allegation(s) against him/her;
 2. Notify the Chairman of the Responsible Carrier Program Accreditation Board of the allegation and the individuals involved;
 3. Conduct an investigation into the details of the alleged violations including details of the incident, companies, individuals and equipment involved;
 4. Report to the Responsible Carrier Program Accreditation Board the results of the investigation.
- B. The Accreditation Board, at its first opportunity, will discuss the allegation(s), interview the parties involved and make a decision based on its best judgment.
 1. If the complaint is deemed to be invalid or unsubstantiated, the Accreditation Board need take no further action.

2. If the complaint is deemed to be valid, the Accreditation Board may:
 - a. Issue a letter of warning, or other appropriate sanction to the AWO-certified auditor involved;
 - b. Suspend the AWO-certified auditor's certification for up to one year;
or,
 - c. Revoke the auditor's RCP auditor certification.

- C. The AWO Vice President – Safety will contact the parties involved in the allegation, notifying them of the Accreditation Board's decision and advise them that they may appeal the Accreditation Board's decision to the AWO Executive Committee.

- D. If, during the course of the investigation, an AWO member company is found to have colluded with the auditor in the unethical behavior, the member company will be subject to action under the *AWO Constitution and Bylaws*.

- E. Any party wishing to appeal a decision of the AWO Responsible Carrier Program Accreditation Board must notify the AWO Vice President – Safety of its request to appeal within 15 days of receiving notification of the Accreditation Board's decision. Note: auditors subject to suspension or revocation of their AWO-certification will be ineligible to perform audits during the appeal process.
 1. The Vice President – Safety will provide the Executive Committee with all background materials relating to the allegation(s) of the auditor's misconduct and the Accreditation Board's decision in the matter in the Executive Committee packet prior to its next meeting.
 2. At the first opportunity following receipt of an appeal, the AWO Executive Committee will discuss the alleged misconduct and render a final decision.
 3. The Vice President – Safety will notify all parties involved of the Executive Committee's decision.



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