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## TWIC Compliance Deadline Passes; Enforcement Begins April 15

As of April 15, all U.S. ports, all U.S. Coast Guard-credentialed mariners and anyone seeking unescorted access to secure areas of vessels or facilities covered by Coast Guard-approved security plans were required to be in compliance with the Transportation Worker Identification Credential (TWIC) program. The Coast Guard has advised that vessel owners and mariners should expect TWIC compliance enforcement to be a part of any interaction between the Coast Guard and industry on the waterways.

In order to ease the transition into the TWIC program for maritime workers across the country, the Coast Guard has indicated that the agency will adopt a gradual approach to TWIC enforcement and consider instances of non-compliance on a case-by-case basis before determining what disciplinary measures to take. Such measures could potentially include warnings, fines or suspension and revocation proceedings. The Coast Guard has also noted that enforcement approaches could differ depending on the Captain of the Port zone.

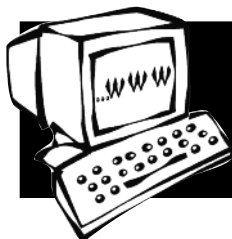
To accommodate mariners who have enrolled for their TWIC but are still waiting to activate the card, the Coast

Guard has released Policy Advisory Council (PAC) decision 05-09. This policy states that any credentialed mariner who registered for a TWIC prior to March 15 and has passed the security threat assessment may receive unescorted access to secure areas of facilities or vessels until May 29. The Coast Guard has also released PAC 03-09, which allows 30-day unescorted access to individuals awaiting receipt of a replacement TWIC. Individuals wishing to check the status of their TWIC may do so online at the Transportation Security Administration (TSA) TWIC Web site.

Additionally, the Coast Guard's National Maritime Center (NMC) has released a policy letter stating that until April 15, 2010, it will issue a Merchant Mariner Credential (MMC) to a qualified mariner once TSA has confirmed that the individual has passed the security threat assessment and is qualified for a TWIC, even if the TWIC has not yet been issued. The NMC advises that any mariner applying for a TWIC after April 15 should explicitly identify themselves as a "merchant mariner" when enrolling.



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AWO Letter is  
sponsored by:**

**Public Meeting  
Location Announced  
for TWIC Card Reader  
ANPRM**

The U.S. Coast Guard has announced the time and location for its planned public meeting on the advance notice of proposed rulemaking (ANPRM) for TWIC card reader requirements. The meeting will be held on Wednesday, May 6 from 9:00 a.m.-5:00 p.m. at the Sheraton Crystal City Hotel, 1800 Jefferson Davis Highway, Arlington, VA 22202. The Coast Guard has reserved space for 400 people for this meeting, and all interested stakeholders are encouraged to attend.



AWO is working with members of its Security Working Group to develop comments for the public meeting. For more information about the meeting, click [here](#). For more information, please contact Jennifer Carpenter or Brian Vahey at (703) 841-9300, extensions 260 and 251, respectively, or [jcarpenter@vesselalliance.com](mailto:jcarpenter@vesselalliance.com) or [bvahey@vesselalliance.com](mailto:bvahey@vesselalliance.com)

If you receive a hard copy of the *AWO Letter* and need to know the exact Web addresses of the hyperlinks in any articles, please contact Mary McCarthy at (703) 841-9300, extension 254, or via email at [mmccarthy@vesselalliance.com](mailto:mmccarthy@vesselalliance.com)



**TWIC Compliance Deadline Passes; Enforcement Begins April 15**

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Doing so will trigger the transmission of the mariner’s data from TSA to the NMC and will help to avoid delays in processing the MMC application.



TSA has announced that as of April 21, 1.13 million out of an estimated 1.2 million affected transportation workers have enrolled for a TWIC.

For more information about TWIC enforcement, please contact Jennifer Carpenter or Brian Vahey at (703) 841-9300, extensions 260 and 251, respectively, or via email at [jcarpenter@vesselalliance.com](mailto:jcarpenter@vesselalliance.com) or [bvahey@vesselalliance.com](mailto:bvahey@vesselalliance.com)

**AWO Supports Widespread Use of AIS, Discourages Expansion of NOAD Requirements in Comments to Coast Guard**

On April 15, AWO submitted comments to the U.S. Coast Guard on the December 16 notice of proposed rulemaking (NPRM) titled “Vessel Requirements for Notices of Arrival and Departure, and Automatic Identification System.” AWO’s comments expressed industry’s strong support for AIS as a safety tool and encouraged the Coast Guard to limit the categories of vessels not required to comply with the final AIS requirements. AWO also urged the Coast Guard to remove Notice of Departure (NOD) requirements from the final rule and encouraged the agency to resolve the bifurcation of inland reporting requirements by allowing vessels to submit Notices of Arrival to a single common authority.

“It will be the rare exception that vessels that meet the MTSA 2002 criteria for AIS coverage do not cross commercially navigable waterways where they will encounter other AIS-equipped vessels,” wrote AWO Senior Vice

President - National Advocacy Jennifer Carpenter, addressing the Coast Guard’s proposal to exempt certain vessels operating in confined areas from compliance with AIS requirements. AWO proposed that owners or operators of vessels operating in confined areas should be eligible to request an exemption from their local Captain of the Port only if the vessel does not operate in waterways marked and/or maintained by the Coast Guard (such as dead-end canals or slips off marked channels), and that such a waiver should be valid for a period of two years instead of the Coast Guard’s proposed one-year waiver.

Additionally, AWO recommended that the Coast Guard allow only limited use of the less expensive Class B AIS systems after members indicated that such systems lack many of the capabilities that are essential to safe navigation. “Given the technical limitations of Class B AIS, we recommend that any towing vessel moving a barge on the

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## AWO Supports Widespread Use of AIS, Discourages Expansion of NOAD Requirements in Comments to Coast Guard

(continued from page 2)

inland or intracoastal waterways, on the Great Lakes, or on the coasts be required to install a Class A AIS system,” AWO wrote. However, owners or operators of towing vessels that operate exclusively within a geographical area of 25 miles or less should be permitted to seek a waiver from the Captain of the Port authorizing the use of Class B AIS, AWO proposed.

On Notices of Arrival and Departure requirements, AWO commented that “the extension of NOD requirements to U.S.-flag vessels operating between U.S. ports will impose an excessive administrative burden on vessel operators without significant offsetting security benefits.” Under the NPRM, a Notice of Departure would be required for any voyage on which a Notice of Arrival is required. In addition to vessels making international voyages, NOD requirements would apply to U.S.-flag vessels traveling from the U.S. mainland to Hawaii, traveling from one U.S. port to another via the Panama

Canal, or carrying Certain Dangerous Cargoes (CDC) between U.S. ports, even if these vessels never call at a foreign port.

Finally, AWO took the opportunity of this NPRM to address the long-standing industry frustration with the continued presence of duplicative, but not identical, reporting mechanisms for inland towing vessels and barges that routinely operate north and south of Baton Rouge. AWO recommended that any barge or towing vessel that operates on the inland and intracoastal waterways above or below mile 235 of the Lower Mississippi River be classified as inland and be required to report exclusively to the Inland River Vessel Movement Center.

AWO’s comments can be accessed [here](#). For more information, please contact Brian Vahey or Robert McCaw at (703) 841-9300, extensions 251 and 279, respectively, or via email at [bvahey@vesselalliance.com](mailto:bvahey@vesselalliance.com) or [rmccaw@vesselalliance.com](mailto:rmccaw@vesselalliance.com).

## TSAC to Meet May 6-7

On May 6 and 7, the Towing Safety Advisory Committee (TSAC) will hold a meeting at the American Maritime Officers STAR Center in Dania Beach, FL. Two TSAC working groups and the full TSAC will meet within this time period.

On May 6, the Licensing Working Group will meet to discuss needed revisions to Navigation and Vessel Inspection Circular (NVIC) 04-01, U.S. Coast Guard guidance for the implementation of the towing vessel officer licensing regulations. A second working group will discuss clarifications needed to ensure consistent industry understanding of the licensing regulations pertaining to Apprentice Mates (Steersmen), and recommend best practices for Apprentice Mates/Steersmen training programs.

The full TSAC will meet May 7 to discuss these issues and others, including an update on the towing vessel inspection rulemaking; commercial/recreational boating interface; National Maritime Center activities; and, the Transportation Worker Identification Credential.

For a copy of the meeting notice, please click [here](#). For more information, please contact Jennifer Carpenter or Benjamin Rogers at (703) 841-9300, extensions 260 or 264, respectively, or via email at [jcarpenter@vesselalliance.com](mailto:jcarpenter@vesselalliance.com) or [brogers@vesselalliance.com](mailto:brogers@vesselalliance.com).



## Important Dates and Reminders

..... at a glance

*For more information, please contact Hermoine Wellman at (703) 841-9300, extension 291, unless otherwise noted.*

**April 29-30:** AWO Interregion Safety Meeting, Chicago, IL

**June 10-11:** AWO Coastal Safety Committee Meeting, Las Vegas, NV

**July 15-16:** AWO Interregion Safety Committee Meeting, St. Louis, MO

**July 23-24:** AWO Southern Region Meeting, Houston, TX

**August 5-6:** AWO Executive Committee Meeting, Arlington, VA

**August 19-20:** AWO Midwest and Ohio Valley Regions Joint Meeting, St. Louis, MO

**August 26-27:** AWO Atlantic Region Meeting, Norfolk, VA

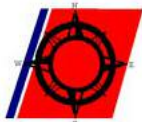
**September 3:** Pacific Region Summer Meeting, Seattle, WA

**October 13-16:** AWO Fall Convention, New Orleans, LA

**December 2-3:** AWO Executive Committee Meeting, Arlington, VA

## NMC Reports 20 Percent Decrease in Credential Processing Time

On April 8, the U.S. Coast Guard's National Maritime Center (NMC) announced major improvements in the speed of its processing of mariner credentials. According to the NMC, it has "issued 22,158 credentials with 50 percent of those credentials issued in 40 calendar days or less" since January 1. Additionally, the NMC reported a decrease in the total average processing time for all credentials from 54 to 43 calendar days during the first quarter of 2009. This translates into a reduction of 20 percent.

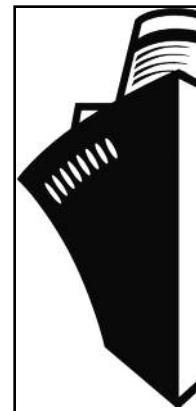


In February, AWO Senior Vice President - National Advocacy Jennifer Carpenter led a delegation of AWO members to Martinsburg, WV, to discuss with NMC Commanding Officer CAPT David Stalfort the industry's serious concerns with widespread and significant delays in the medical evaluation process for the issuance and renewal of mariner credentials. Later that month, the NMC announced a new strategy to address the problem, including the introduction of revised risk-based process changes and the acquisition of additional medical resources. The NMC estimates that its medical staff has increased by 63 percent over the past two months. The NMC also announced that it "will continue to look for and employ further process refinements and is moving swiftly to acquire additional permanent civilian medical resources."

AWO will continue to work with the Coast Guard to ensure continued progress on this very important issue. If you have any questions, please contact Jennifer Carpenter or Benjamin Rogers at (703) 841-9300, extensions 260 or 264, respectively, or via email at [jcarpenter@vesselalliance.com](mailto:jcarpenter@vesselalliance.com) or [brogers@vesselalliance.com](mailto:brogers@vesselalliance.com).

## National Maritime Security Advisory Committee to Meet May 4

On May 4, the National Maritime Security Advisory Committee (NMSAC) will meet at U.S. Coast Guard headquarters in Washington, D.C. Agenda items include the Transportation Worker Identification Credential, seafarers' access to shore leave, the upcoming five-year review of the International Ship and Port Facility Security (ISPS) Code, the eNOAD process for electronic submission of notice of arrival and departure reports, and the classification of regulated facilities into security tiers. The first part of the meeting, which will begin at 9:00 a.m., will be open to the public; the committee will then meet in closed session in the afternoon.



The public portion of the meeting will also be conducted in an online format. To participate via the internet, please click [here](#) and follow the online instructions to register for the NMSAC meeting.

For a copy of the meeting notice, please click [here](#). Members of the public wishing to attend the meeting in person should register no later than April 29 with Mr. Ryan Owens of the Coast Guard at (202) 372-1108 or via email at [ryan.f.owens@uscg.mil](mailto:ryan.f.owens@uscg.mil).

## CEMS Training Opportunities

The Crew Endurance Management System (CEMS) is a system for managing risk factors in maritime work environments that can lead to human error and performance slumps. The Coast Guard and AWO have been working together to help companies implement the principles of CEMS. In this space, AWO will publish details of CEMS training opportunities around the country. For further information on CEMS training opportunities, please contact Pik Kwan Rivera, U.S. Coast Guard, at (202) 372-1354.

DATE	LOCATION	CONTACT
April 26-27	Salyers Solutions, LLC Fairbanks, AK	Jo Ann Salyers (Instructor) (504) 236-4962 <a href="mailto:salyers_solutions@hughes.net">salyers_solutions@hughes.net</a>
May 6-7	Salyers Solutions, LLC Seattle, WA	Jo Ann Salyers (Instructor) (504) 236-4962 <a href="mailto:salyers_solutions@hughes.net">salyers_solutions@hughes.net</a>
TBA	Salyers Solutions, LLC Houston, TX	Jo Ann Salyers (Instructor) (504) 236-4962 <a href="mailto:salyers_solutions@hughes.net">salyers_solutions@hughes.net</a>

## Ten AWO Members Complete RCP Audits

Ten AWO member companies have completed certification or recertification of their Responsible Carrier Program (RCP) audit. Congratulations to these companies on their successful participation in the program! The RCP is the award-winning safety management program of the tugboat, towboat and barge industry. Members are required to undergo a certification audit by an AWO-certified third-party auditor within one year of joining AWO and to undergo regular recertification audits to verify their compliance with the RCP.

For these companies, this achievement is tangible proof of their commitment to continued safety and environmental protection. AWO is proud of their accomplishment. For information on the RCP or the audit, please contact Bob Clinton at (703) 841-9300, extension 253, or via email at [bcClinton@vesselalliance.com](mailto:bcClinton@vesselalliance.com).

**The following companies have achieved audited certification:**

**Equipment Chartering**

Baton Rouge, LA  
 Audit date: 04/24/09  
 Reaudit due: 04/24/10

**Highland Marine, LLC**

Metairie, LA  
 Audit date: 04/04/09  
 Reaudit date: 04/04/12

**Henry Marine Service, Inc.**

Spanish Fort, AL  
 Audit date: 05/11/09  
 Reaudit date: 05/11/10

**Marine Express, Inc.**

Alameda, CA  
 Audit date: 03/29/09  
 Reaudit date: 03/29/12

**Wood Towing, LLC**

Avondale, LA  
 Audit date: 04/14/09  
 Reaudit date: 04/14/12

**Superior Marine Ways, Inc.**

South Point, OH  
 Audit date: 05/12/09  
 Reaudit due: 05/12/10

**Bisso Marine Co., Inc.**

Houston, TX  
 Audit date: 05/14/09  
 Reaudit due: 05/14/12

**Seabulk International, Inc.**

Tampa, FL  
 Audit date: 04/23/09  
 Reaudit due: 04/23/12

**Great White Towing, LLC**

Amelia, LA  
 Audit Date: 04/28/09  
 Reaudit due: 04/28/12

**Kudzu Marine, Inc.**

Spanish Fort, AL  
 Audit date: 03/11/09  
 Reaudit due: 03/11/10

## Accreditation Board to Clarify Annual Internal Audit Policy

During its October 2008 meeting, the AWO Board of Directors approved a change to Section G of the Responsible Carrier Program (RCP), adding the word “annual” to the requirement for companies to develop procedures for conducting internal audits. The RCP does not mandate what is audited because that is company-specific and determined by the company based on its individual operational needs. However, it became apparent that there is some confusion on this subject among members when the subject of internal audits was raised at the April 2009 Board of Directors meeting, especially about the scope



and percentage of vessels subject to the new annual internal audit requirement.

To address this issue and provide clear guidance to members, the Board asked that the RCP Accreditation Board, at its meeting later this year, develop a guidance document that will provide additional information to members to assist

them in developing an annual internal audit program that improves safety and fulfills the requirements of the RCP.

Internal audits have been a requirement of the RCP since the program was first



**“SAFETY PAGES”**

introduced in October 1995 and will be an integral part of the forthcoming rules on towing vessel inspection regulation. Internal audits, arguably one of the most important elements of

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## Accreditation Board to Clarify Annual Internal Audit Policy

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the RCP; simply requires participants to regularly look at their operations from within to determine how well they are complying with their own policies and procedures and what effect these actions are having on their overall safety performance. Internal audits are the method by which all levels of company personnel, from the vessel captain and crew to the CEO, can ensure that the actions mandated by company policies and procedures are being completed.

If you have any questions, please contact Bob Clinton at (703) 841-9300, extension 253, or via email at [bclinton@vesselalliance.com](mailto:bclinton@vesselalliance.com)



## Atlantic Region

# AWO Meets With Sector Southeastern New England

On April 20, AWO members Alan Bish and Jason Reinauer, Reinauer Transportation Company; Scott Jason, Constellation Maritime; Buckley McAllister and Brian Fournier, McAllister Towing; and, Gary Oliviera, Providence Steamboat, and AWO held a productive meeting with CAPT Ray Perry, U.S. Coast Guard Sector Commander, and his staff on a variety of issues. AWO members expressed their concern over the emergency regulations governing tug and barge transits of Buzzards Bay recently put in place by the Massachusetts Department of Environmental Protection. They encouraged CAPT Perry and his staff to more proactively engage the local elected officials and stakeholders to educate them on the Coast Guard's role regulating the industry in the area.

The group also discussed the impending towing vessel inspection regulation and the efforts of the Coast Guard and industry to work together to smooth the transition to the new regime.

The sector is receiving new inspectors shortly and will be ramping up its uninspected towing vessel inspection program. AWO encourages our members to undergo the uninspected towing vessel exam as those decals will mitigate other risk-based Coast Guard inspections. AWO members also offered to be a resource to the sector in training and educating the new inspectors.

CAPT Perry's staff requested assistance from AWO and its membership in disseminating information and serving as a communications link in the Marine Transportation System's (MTS) Recovery plans for the sector and district. AWO and the Coast Guard will develop a communication outreach plan similar to the hurricane outreach plan for the Atlantic Region. For more information, please contact Nicole deSibour at (703) 841-9300, extension 292, or via email at [ndesibour@vesselalliance.com](mailto:ndesibour@vesselalliance.com)

## Advertising Opportunities Important Now! 2009 AWO Letter Sponsorships Still Available!

In the current economic climate, advertising and marketing become even more important to a company's health. AWO is currently accepting sponsorship applications for the 2009 *AWO Letter*. Each great advertising opportunity costs \$500, which includes a front-page "sponsorship block" featuring your company's name, location, logo, and Web site address. AWO still has the following issues available:

Sponsorship forms can be found by visiting the AWO Web site, or by clicking [here](#). If you have any questions, please contact Susan Miller at (703) 841-9300, extension 262, or via email at [smiller@vesselalliance.com](mailto:smiller@vesselalliance.com)



- |             |                |
|-------------|----------------|
| ■ May 8     | ■ September 11 |
| ■ May 22    | ■ September 25 |
| ■ June 5    | ■ October 9    |
| ■ June 19   | ■ October 23   |
| ■ July 3    | ■ November 6   |
| ■ July 17   | ■ November 20  |
| ■ July 31   | ■ December 4   |
| ■ August 14 | ■ December 18  |
| ■ August 28 |                |

# BARGES ARE BEAUTIFUL ON EARTH DAY AND EVERY DAY

## A message from The American Waterways Operators

The American Waterways Operators (AWO) is the trade association for the American tugboat, towboat and barge industry. The industry and its more than 30,000 vessel crewmembers are proud to join millions of others around the world in celebrating Earth Day. The towing industry takes seriously its responsibility to operate safely and protect the precious resources that are America's waterways. Waterways transportation is essential to America's economy, environment, and quality of life. Without barges, freight traffic on the highways would increase by 1,160 trucks per day per lane on a typical interstate highway.

We who work on the waterways respect them as a shared resource for all purposes -- commerce, agriculture, recreation, utilities and habitat -- and are committed to doing our part to keep the waterways clean and vital for future generations. Already, 85 percent of our members' barges are double-hulled to protect the environment, well ahead of the federally mandated deadline of 2015. We are also taking steps to improve air quality and reduce our industry's carbon footprint, while efficiently delivering the commodities like grain, coal, sand, salt and petroleum on which our economy depends.

The towing industry has the fewest emissions of any commercial transportation mode (see chart at bottom of the page).\* Building on our commitment to environmental stewardship, we have partnered with the U.S. Environmental Protection Agency to develop tough new standards for the next generation of towing vessel engines that are quieter, burn less fuel, and dramatically reduce emissions of nitrogen oxides, carbon monoxide and particulate matter.

All AWO members have committed to operate according to the AWO Responsible Carrier Program (RCP), a safety and environmental protection program. The RCP is a safety management system of best industry practices. Members must pass an independent audit every three years to ensure compliance with the RCP and retain membership in AWO. In addition, AWO has joined with the U.S. Coast Guard to develop a new towing vessel

**Barges are Beautiful...**

**For the Environment.**

This towboat pushing a 24-barge tow moves the same amount of grain as 384 rail cars or 1,680 highway trucks, reducing pollution in our air and congestion on our roads. We get 576 miles to the gallon...while pushing a ton of freight.

**THE AMERICAN WATERWAYS OPERATORS**  
America's Tugboat, Towboat & Barge Industry

*"Our Compass Always Points to Safety"*  
[www.americanwaterways.com](http://www.americanwaterways.com)

inspection program, a historic step for the industry that will ensure even safer operations and enhanced environmental stewardship.

Join with the American tugboat, towboat and barge industry on Earth Day in pledging your commitment to a cleaner environment and economically sound America. Thank you.

\* For more information, please see the Texas Transportation Institute's multi-modal study commissioned by the U.S. Maritime Administration and the National Waterways Foundation [here](#) or check out the AWO Web site at [www.americanwaterways.com](http://www.americanwaterways.com).

