

BARGE ASSESSMENT COMPLEMENT

JUNE 2001

Working Together for Safety

**American
Chemistry
Council**
*Good Chemistry
Makes It Possible*



The American Chemistry Council & The American Waterways Operators

Acknowledgements

Along with the American Chemistry Council and the American Waterways Operators, the following companies contributed to the development of this Complement:

American Commercial Barge Lines (and the former National Marine)

Chevron

DuPont

ExxonMobil Chemical Company

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Ingram Barge Company

Sterling Chemicals

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Legal Notice

The American Chemistry Council (ACC) and the American Waterways Operators (AWO) developed this document as a tool to help companies gather information that is relevant to the evaluation of the safety and regulatory compliance of barge carriers, and for providing feedback and suggestions for improvement to the carriers.

While the information obtained from assessments using this document may be used to arrive at decisions concerning carrier safety, any shippers, carriers, or any other people or organizations relying on this document or its results do so at their own risk. Neither ACC, AWO, nor their employees accept responsibility for the accuracy or completeness of the information obtained through the use of this Complement.

In evaluating a barge carrier, it is necessary to rely on the accuracy of information provided by the carrier. The conclusions reached about a carrier by the user of this document could be different if any of this information is determined to be false, incomplete, or inaccurate. It is the responsibility of the user of this document to determine which barge carrier it uses. This determination is not made by ACC or AWO.

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Introduction

Background

Members of the American Chemistry Council (ACC) adopted Responsible Care[®] as an obligation of membership in November 1988. This chemical industry initiative aims to continuously improve health, safety and environmental performance and responsiveness to public concerns about the industry. Six management practice codes cover all segments in the life cycle of chemicals. They define management practices intended to achieve continuous improvement. The Distribution Code calls for shippers to assess their carriers' health, safety and environmental management capability and performance, and to work with them to achieve improvement in their respective practices.

Similarly, members of the American Waterways Operators (AWO) adopted the Responsible Carrier Program (RCP) as an obligation of membership in April 1998. This tugboat, towboat and barge industry initiative is a safety management program that institutes practices beyond those required by federal regulation. The program has three principal parts – management and administration, equipment and inspection, and human factors – reflecting the roles that each of these components plays in ensuring safety and efficient vessel operations.

In an effort to combine resources and reduce redundancy, ACC and AWO worked together to refine and update the ACC Barge Assessment Protocol. The joint team was charged with revisions to shorten the overall length of the protocol, eliminate redundancy and non value-added questions, make the protocol suitable for member companies of all sizes, and to generally simplify the protocol. The result is this “ACC-AWO Barge Assessment Complement.”

Purpose

This Complement is designed to help companies assess the safety and quality performance of a barge carrier transporting chemicals. **It should be used in conjunction with a management system, such as Responsible Care[®], the AWO Responsible Carrier Program or the Coast Guard Cooperative Towing Vessel Examination Program to assess the safety and quality performance of a barge transportation company.** For a copy of the American Waterways Operators' Responsible Carrier Program, call AWO at 703/841-9300. Companies using the Complement may also wish to add appendices to cover additional information needs by the company that are not covered specifically in the Complement.

Assessor Guidance

Differing from typical assessments, the Complement is not an assessment to a specific standard. Some questions in the Complement refer to compliance with regulatory standards and some questions address the effectiveness of the management operation system of the company. Effective systems are the mechanism through which consistent compliance is achieved. Consistent compliance, in turn, produces higher safety and quality performance.

This Complement is intended to evaluate the existence and documents of the management and operations systems of tugboat, towboat and barge companies. This includes policies and procedures

governing safety and quality issues and regulatory compliance. At the headquarters level, all references to policy and procedures require documented evidence.

This Complement is a non-scoring objective assessment to be used as a means of data collection. Most of the questions are to be answered “yes,” “no,” or “not applicable.” Because some questions are designed for the purpose of information gathering, it should be noted that a “no” answer does not necessarily denote nonconformance.

Objective evidence should be collected to support “yes” and “no” answers to questions. This evidence may be collected through interviews, examination of documents, and observation of activities and conditions in the areas of concern. Information gathered through interviews should be tested by acquiring the same information from other independent sources, such as records and physical observations.

These assessments, unlike others, require no formal report. Therefore, it is of particular importance that the assessor use judgment to answer each question in a manner that will provide the user with information equivalent to a formal report. In situations where the actual response is not fully “yes” or fully “no,” the assessor should select “no” as the answer. If the carrier wants to make comments about a new program that is not fully implemented, the carrier may include those comments in the comment section of the Complement.

These assessment results indicate the present-time status (or “snapshot”) of the company. However, through periodic assessment, it may be possible to determine existing or developing trends within a company’s system. This information gives shippers insight into the scope and effectiveness of the carrier’s corporate system, its policies on safety and quality matters, and its performance on regulatory compliance. It is desirable for carriers to improve on a continual basis.

The purpose ACC and AWO hold in putting forth this document is the desire for continuous improvement addressing safety, environmental and quality performance. Therefore, the assessor should keep in mind that this should be a very proactive assessment and add value to the safety and quality processes by sharing professional/technical knowledge, if questioned, with the carrier during the assessment.

Name of Assessor: _____
Company being Assessed: _____
Date of Assessment: _____

Part 1. General Company Information

Assessment Date: _____

Last Assessment Date: _____

Barge Carrier Name: _____

Headquarters address: _____

Phone and Fax Numbers/email: Telephone: _____
Fax: _____
E-mail: _____

Is the carrier a subsidiary of another company? Yes No

If yes, provide parent company name, address and telephone numbers:

Telephone: _____
Fax: _____
E-mail: _____

Number of years company in operation: _____ Years

Equipment: Total boats owned by company _____
Total boats chartered/leased by company _____
Total barges owned by company _____

Attach an equipment list, including estimate of short-term equipment acquired from outside vendors.

Number of Company Crewmembers: Union _____ Non-Union _____

Is your company a Responsible Care[®] Partner Company? Yes No

List Trade Association Memberships: _____

Assessor(s) (name/company): _____

Persons Interviewed during
this assessment (name and title): _____

Name of Assessor: _____
 Company being Assessed: _____
 Date of Assessment: _____

Part 2. Management Policy and Procedure Assessment

I. Quality Program

	<u>QUESTION</u>	<u>YES</u>	<u>NO</u>	<u>N/A</u>
1.	Is there a formal quality program in place at your company?	_____	_____	_____
1.1	ISO? Date Certified: _____	_____	_____	_____
1.2	ISM? Date Certified: _____	_____	_____	_____
1.3	Responsible Carrier Program (American Waterways Operators)? Date Certified: _____	_____	_____	_____
1.4	Responsible Care® Partner (American Chemistry Council)? Date Joined: _____	_____	_____	_____
1.5	Is (are) the system(s) well known and understood by employees?	_____	_____	_____
2.	Who administers the quality program at your company?			
	Name: _____			
	Title: _____			
2.1	Is this a full time position?	_____	_____	_____
2.2	If no, what percent of time is spent on the quality program? _____%	_____	_____	_____
3.	Is there a statement of the company quality policy?	_____	_____	_____
3.1	Is it posted in the office and onboard your vessels?	_____	_____	_____
4.	Is there a quality manual available describing the company's quality program?	_____	_____	_____
4.1	Is the quality manual a subset of another manual or publication?	_____	_____	_____
4.2	Is there a copy onboard each boat?	_____	_____	_____
4.3	Is the quality manual easily available to any employee?	_____	_____	_____
4.4	Does the quality manual reflect current practices and technology? Date of last revision: _____	_____	_____	_____

Name of Assessor: _____
 Company being Assessed: _____
 Date of Assessment: _____

I. Quality Program cont.

<u>QUESTION</u>	<u>YES</u>	<u>NO</u>	<u>N/A</u>
5. Does the company have a system for investigation and follow up with customer complaints?	_____	_____	_____
5.1 Is there a nominated person responsible for investigation and follow up of customer complaints?	_____	_____	_____
6. Does the company track shipper claims?	_____	_____	_____
6.1 If yes, what is the definition of a shipper claim? _____ _____ _____			
6.2 What was the number of shipper claims in the past 12 months? _____ claims			
7. Does the carrier have procedures to assure sub-contractors comply with the carrier's company standards?	_____	_____	_____

Name of Assessor: _____
 Company being Assessed: _____
 Date of Assessment: _____

II. Personnel

<u>QUESTION</u>	<u>YES</u>	<u>NO</u>	<u>N/A</u>
A. Employees			
1. Does the company track employment longevity?	_____	_____	_____
1.1 What is the average employment longevity in the following positions:			
1.1.1 Tankermen? _____ years			
1.1.2 Wheelhouse personnel? _____ years			
1.1.3 Engineer? _____ years			
2. Does the company track employee turnover? (Turnover is defined as _____)	_____	_____	_____
2.1 If so, what is the turnover rate for the following positions:			
2.1.1 Tankermen _____ per year			
2.1.2 Wheelhouse personnel _____ per year			
2.1.3 Engineers _____ per year			
2.1.4 Deckhands _____ per year			

B. Training			
1. Does the company provide an organized training program for new and existing personnel relating to the following topics:	_____	_____	_____
1.1 Industrial hygiene program (Freq/Mos. _____)			
1.2 Toxic Substance Control Act (TSCA) (Freq/Mos. _____)			
1.3 Customer requirements (Freq/Mos. _____)			
1.4 Customer site safety rules (Freq/Mos. _____)			

Name of Assessor: _____
 Company being Assessed: _____
 Date of Assessment: _____

II. Personnel cont.

<u>QUESTION</u>		<u>YES</u>	<u>NO</u>	<u>N/A</u>
B. Training cont.				
2.	Does the company document individual employee training?	_____	_____	_____
3.	Is there an evaluation of:			
3.1	Pilot house personnel?	_____	_____	_____
3.2	Wheelhouse personnel?	_____	_____	_____
3.3	Engineer?	_____	_____	_____
3.4	Tankermen?	_____	_____	_____
3.5	Deck crew?	_____	_____	_____
C. Safety				
1.	Do written safety procedures cover job hazard (safety) analysis as part of the safety program?	_____	_____	_____
2.	Is safety a part of an individual performance evaluation?	_____	_____	_____
3.	Who is responsible for your safety program? Name: _____ Title: _____			
3.1	What percentage of their time is devoted to safety? _____%			
4.	Does the company have documented procedures for ensuring that others (inspectors/regulatory personnel/shipper employees) use PPE?	_____	_____	_____
5.	Is there a behavior based safety program?	_____	_____	_____
6.	Do written safety procedures cover unsafe acts committed by employees?	_____	_____	_____
7.	Are tankerman permitted to work more than 12 hours in any one day?	_____	_____	_____
7.1	If yes, what is the total allowed over 12 hours? _____			

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III. Operations

<u>QUESTION</u>		<u>YES</u>	<u>NO</u>	<u>N/A</u>
A. Procedures				
1.	Does the company have a written procedure for:			
1.1	Handling a new product?	_____	_____	_____
1.2	Visiting a new facility?	_____	_____	_____
1.3	Visiting a new dock or terminal?	_____	_____	_____
1.4	Taking a new route?	_____	_____	_____
2.	Does the company have written standards for cargo hoses based on cargo characteristics?	_____	_____	_____
3.	Does the company have a cargo hose inspection and testing procedure?	_____	_____	_____
4.	Does the company have a cargo hose retirement program?	_____	_____	_____
5.	Are written operation procedures and instructions in place which cover:			
5.1	Unsafe loading/unloading reporting?	_____	_____	_____
5.2	Notifying the cargo owner of unsafe conditions?	_____	_____	_____
6.	Does the company participate in the Coast Guard Streamlined Inspection Program (SIP)?	_____	_____	_____
7.	Does the company sub-contract towing?	_____	_____	_____
8.	Does the company sub-contract tankermen services?	_____	_____	_____
9.	Does the company sub-contract fleeting services?	_____	_____	_____
10.	Does the company have a policy for towage horsepower/tonnage-length ratio?	_____	_____	_____
11.	Does the company have a policy of taking hull gauges?	_____	_____	_____
11.1	If yes, what is the frequency of taking such gauges? _____			
11.2	If yes, at what interval along the barge hulls are they taken? _____			

Name of Assessor: _____
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III. Operations cont.

<u>QUESTION</u>		<u>YES</u>	<u>NO</u>	<u>N/A</u>
B. Inspections				
1.	Does the company have pre-voyage inspection requirements?	_____	_____	_____
2.	Is there a policy requiring pre-voyage inspection of the following boat and barge items:			
2.1	Broken windows? (boat & barge)	_____	_____	_____
2.2	Bitts (boat & barge) for cracks and proper maintenance?	_____	_____	_____
2.3	Portable electrical equipment (boat and barge)?	_____	_____	_____
2.4	Housekeeping (boat and barge)?	_____	_____	_____
2.5	Flame screens (boat and barge)?	_____	_____	_____
2.6	Mooring lines (boat and barge)?	_____	_____	_____
2.7	Engine exhaust (boat and barge)?	_____	_____	_____
3.	Are these inspections documented?	_____	_____	_____
4.	Does the company comply with ISGOTT requirements for controlling static accumulation hazards during:			
4.1	Loading?	_____	_____	_____
4.2	Sampling?	_____	_____	_____
4.3	Gauging?	_____	_____	_____
5.	Is there a written procedure for static precautions?	_____	_____	_____
5.1	If yes, where is it written/located? _____			
6.	Do the barges have spill rails?	_____	_____	_____
6.1	If yes, what type of coverage? _____			
7.	Do the barges have high level alarms?	_____	_____	_____
7.1	If yes, what type? _____			

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IV. Risk Management and Assessment

<u>QUESTION</u>	<u>YES</u>	<u>NO</u>	<u>N/A</u>
A. Accident/Incident Reports			
1. Does the company track lost-time injuries?	_____	_____	_____
2. How does your company track man-hours? (check one) _____ 12-hour days _____ 24-hour days			
Occupational lost-time injuries per 200,000 man-hours:			
2.1 Current year (20____): _____			
2.2 Previous year (20____): _____			
2.3 Two years previous (20____): _____			
3. How does your company define a spill? _____ _____ _____			
3.1 Does your company track spills to the deck that do not go to the water?	_____	_____	_____
4. What are/were the total number of USCG reportable spills and releases during:			
4.1 Current year (20____): _____			
4.2 Previous year (20____): _____			
4.3 Two years previous (20____): _____			
5. How many cargo transfers performed during: (A transfer is defined as _____)			
5.1 Current year (20____): _____			
5.2 Previous year (20____): _____			
5.3 Two years previous (20____): _____			

Name of Assessor: _____
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IV. Risk Management and Assessment cont.

<u>QUESTION</u>		<u>YES</u>	<u>NO</u>	<u>N/A</u>
A. Accident/Incident Reports cont.				
6.	Are USCG reporting requirements reviewed with crewmembers?	_____	_____	_____
6.1	In classroom?	_____	_____	_____
6.2	Crewmember training?	_____	_____	_____
6.3	Crewmember read regulations only?	_____	_____	_____
6.4	Other? _____	_____	_____	_____
7.	Are collection packages given to crewmembers who gather immediate information on accidents or injuries?	_____	_____	_____
8.	Does the company conduct a marine distribution qualitative risk assessment?	_____	_____	_____
9.	Does the company conduct a marine distribution quantitative risk assessment?	_____	_____	_____
B. Emergency Response				
1.	Does the company use outside services for emergency response? Company Name(s): _____	_____	_____	_____
2.	Does the company conduct tabletop emergency response drills?	_____	_____	_____
2.1	Are vessels included in the drills?	_____	_____	_____
2.2	Are drill results reviewed with vessel crews?	_____	_____	_____
3.	Does carrier conduct shore side emergency response drills?	_____	_____	_____
3.1	Are vessels involved?	_____	_____	_____
3.2	Are results reviewed with crews?	_____	_____	_____
4.	Does carrier have access to air dispersion modeling capability?	_____	_____	_____

Name of Assessor: _____
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IV. Risk Management and Assessment cont.

<u>QUESTION</u>		<u>YES</u>	<u>NO</u>	<u>N/A</u>
B. Emergency Response cont.				
5.	How are vapor levels measured (draeger tubes, etc.)? _____ _____			
6.	Does carrier have a Coast Guard-approved response plan for:			
6.1	Oil?	_____	_____	_____
6.2	Hazardous substances?	_____	_____	_____
6.3	OPA 90?	_____	_____	_____
7.	Does the company have a way to ensure constant communication with a vessel in the event of an emergency?	_____	_____	_____
8.	Do the company's emergency procedures require contact with the cargo owner?	_____	_____	_____
C. Marine Survey and Safety Audits				
1.	Does the company have the following available if requested by a customer:			
1.1	An internal audit program?	_____	_____	_____
1.2	Vendor audits of:			
1.2.1	Shipyard?	_____	_____	_____
1.2.2	Tankerman services?	_____	_____	_____
1.2.3	Towing companies?	_____	_____	_____
1.2.4	Other. _____	_____	_____	_____
2.	Does carrier have insurance coverage (attach certificate of insurance or release)?	_____	_____	_____
	Liability limits: _____			
	Deductible: _____			

IV. Risk Management and Assessment cont.

<u>QUESTION</u>		<u>YES</u>	<u>NO</u>	<u>N/A</u>
D. Product Stewardship (Cleaning Facilities)				
1.	Does the company use cleaning facilities that:			
1.1	Ship waste products to off-site facilities on a regular basis?	_____	_____	_____
1.2	Audit the transport storage disposal facilities (TSDF) they use?	_____	_____	_____
2.	Does the carrier:			
2.1	Audit its barge cleaning facilities for regulatory compliance?	_____	_____	_____
2.2	Audit its barge cleaning facilities for safe work practices?	_____	_____	_____
2.3	Audit its barge cleaning facilities to ensure EPA transporter and disposal site ID numbers are up to date?	_____	_____	_____
2.4	Audit its barge cleaning facilities to determine the types of wastes generated?	_____	_____	_____
2.5	Audit its barge cleaning facilities to ensure adequate storage capacity for the wastes generated?	_____	_____	_____
2.6	Require its cleaning facilities to comply with "Safety Guidelines for Tank Vessel Facilities," published by the American Waterways Operators (June 17, 1992)?	_____	_____	_____
2.6.1	Require its cleaning facilities to comply with other recognized safety guidelines? Please list: _____ _____	_____	_____	_____
2.7	Assure that the wastes generated in cleaning vessels are disposed of in accordance with federal, state, and local requirements?	_____	_____	_____
2.8	Examine the procedures employed by its cleaning facilities for the disposal or sale of cargo residue from barge tanks?	_____	_____	_____
2.9	Use facilities which maintain up-to-date NPDES (National Pollutant Discharge Elimination System) permits for waste and air?	_____	_____	_____

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Part 3. Appendix

The ACC member or Partner should add to the appendix any additional questions that are not covered in this Complement that the company believes are necessary to ask of a carrier. These might include product-specific questions, business-related questions, etc. These questions should be provided to the carrier at the same time the carrier is requested to fill out this Complement. (For a copy of the AWO Responsible Carrier Program, call AWO at (703) 841-9300.)

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Part 4. Comments

The assessor may include any additional comments here.