

GAO Recommends More Focus on Domestic Maritime Training Needs

On January 31, the U.S. Government Accountability Office released a [report](#) on the training needs of the U.S. maritime workforce. The report, mandated by the Coast Guard and Maritime Transportation Act of 2012, examines:

- The availability of maritime training;
- The availability of financial assistance for maritime training; and,
- The U.S. Maritime Administration’s actions to ensure that mariners meet commerce and defense needs, as well as industry stakeholder views on MARAD’s actions.

AWO provided input to the GAO research team that conducted the study.

The report cites officials from three maritime academies that expressed the need for more information to develop courses to meet the training requirements of the domestic maritime industry. The report also cites several industry stake-

holders that expressed similar concerns about the lack of academy curricula tailored specifically for the domestic maritime sector. U.S. Merchant Marine Academy officials, however, did note that they offer some elective courses in towing.

The report concluded that MARAD should increase its focus on supporting the domestic maritime

industry by collecting and analyzing industry data to determine potential problems. The GAO also recommended that MARAD study and identify potential problems in ensuring that U.S. mariners are adequately trained to meet the needs of the entire maritime industry. For more information on the report, please contact Brian Bennett at (703) 841-9300, extension 279, or bbennett@vesselalliance.com.



Coast Guard Confirms Plans for STCW Public Meeting

The Coast Guard will host a public meeting to discuss the STCW final rule on February 11 from 1:00 to 3:00 p.m. Eastern time. The meeting will take place in the Oklahoma Room at the Department of Transportation Conference Center at 1200 New Jersey Ave. SE in Washington, DC, and will also be available for participation by teleconference at (888) 790-2035, passcode 2251051.

The Coast Guard will present the major areas of change in domestic regulations and discuss implementation of these changes. While STCW does not impact mariners working on domestic inland routes, the final rule does make certain changes to domestic credentials to harmonize them with STCW requirements and create pathways for mariners to receive their STCW

endorsements. The Coast Guard will host a limited question and answer session after the presentations. Participants at the meeting and on the conference bridge can ask questions during this session or may submit questions via email to STCWask@uscg.mil. The presentations will be made available on the National Maritime Center website at <http://www.uscg.mil/nmc/videos/>.



For more information, click [here](#). If you plan to attend the meeting in person, please RSVP by contacting Mr. E.J. Terminella of the U.S. Coast Guard at (202) 372-1239 or Emanuel.J.TerminellaJr@uscg.mil. For questions about the STCW final rule, please contact Brian Vahey at (703) 841-9300, extension 251, or bvahey@vesselalliance.com.

VOLUME 71, No. 3 • FEBRUARY 11, 2014

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AWO ASP and IVSP Sent to Coast Guard for Reapproval

On January 31, AWO submitted the revised AWO Alternative Security Program and International Vessel Security Plan to the U.S. Coast Guard for review and approval. The revisions, which were developed and reviewed by the AWO Security Working Group, incorporate the new security familiarization training requirements for vessels subject to STCW, eliminate references to the Coast Guard's discontinued Homeland Security Advisory System and include a number of administrative edits to clarify member compliance responsibilities.

AWO hopes to have the revised ASP and IVSP approved and ready to circulate to members by early March. The current versions of the ASP and IVSP remain valid until March 31 and April 8, respectively.

For more information, please contact Brian Vahey at (703) 841-9300, extension 251, or bvahey@vesselalliance.com.

Corps Extends GLMRIS Report Comment Period, Adds Two Public Meetings

In response to a request by Sen. David Vitter (R-LA) and comments made by AWO members at public meetings, the U.S. Army Corps of Engineers has extended the Great Lakes and Mississippi River Interbasin Study comment period through March 31.



Due to public requests, the Corps will also hold two additional public meetings, in Portage, IN, on February 11 and in Buffalo, NY, on February 13. For more information, or to register in advance to speak at these meetings, please click [here](#) to visit the GLMRIS Report website.

The GLMRIS Report presents eight alternatives for preventing the transfer of aquatic invasive species, including Asian carp, between the Great Lakes and Mississippi River basins. Four of the alternatives involve the complete or partial hydrologic separation of the basins through the construction of physical barriers at various points in the Chicago Area Waterways System. These options would adversely impact thousands of marine transportation-reliant jobs and businesses throughout the Great Lakes and Mississippi River systems.

For more information, please contact Lynn Muench at (314) 446-6474 or lmuench@vesselalliance.com, or Caitlyn Stewart at (703) 841-9300, extension 262, or cstewart@vesselalliance.com.

EPA Announces Upcoming VGP Webinar on EALs

The U.S. Environmental Protection Agency has announced it will hold a webinar on the subject of environmentally acceptable lubricants, or EALs, on February 14 at 10:00 a.m. Eastern for the owners and operators of vessels covered by the 2013 Vessel General Permit. To register for the webinar, please click [here](#).

The 2013 VGP requires vessels covered under the permit to use EALs in all oil-to-sea interfaces unless it is technically infeasible to do so. The definition of EALs, the circumstances under which EPA will consider them technically infeasible to use, and related recordkeeping and reporting requirements can be found in Part 2.2.9 of the VGP.



For more information, please contact Caitlyn Stewart at (703) 841-9300, extension 262, or cstewart@vesselalliance.com.

EPA Revises List of Certified Marine Engine Remanufacture Kits

The U.S. Environmental Protection Agency approved 12 remanufacture kits for 31 engine models used on tugboats and towboats in the month of December 2013. To download the list of approved kits, please click [here](#).

The kits were approved under the remanufacture provision in EPA's Tier 3 and Tier 4 emissions regulations for Category 1 and Category 2 marine diesel engines, promulgated in 2008. The provision applies to engines over 800 horsepower built between 1973 and 2012, and requires owners of vessels equipped with such engines who replace all of the engine's power assemblies (either at once or over a five-year period) to use an EPA-approved remanufacture kit, if such a



kit is available. Kits are considered available 120 days after their approval by EPA. Vessel owners with less than \$5 million in annual revenues fleet-wide are exempt from the provision.

Two of the recently certified remanufacture kits are for Caterpillar engines and 10 are for EMD engines. With the exception of two of the EMD kits, all were considered available beginning January 1. The 120-day delay did not apply for these kits because they are for engines for which remanufacture kits have already been approved and were certified by EPA based on "carryover data" from previous manufacturer tests. The remaining two EMD kits do not have availability dates because,

although they are certified, they are not required to be used when a compatible engine model is remanufactured. In addition, a kit manufactured by OceanAir Environmental for EMD engines was approved on November 26, 2013, and will be considered available on March 21.

EPA has developed an electronic mailing list to notify the public when an engine remanufacture kit is approved. To sign up to receive these notifications, and to see a complete list of engine remanufacture kits that EPA has certified, click [here](#). AWO will continue to notify members of future kit approvals through the *AWO Letter*.

For more information, please contact Caitlyn Stewart at (703) 841-9300, extension 262, or cstewart@vesselalliance.com.

Merchant Marine Personnel Advisory Committee to Meet March 11-12 in Florida

The Merchant Marine Personnel Advisory Committee will meet in Dania Beach, FL, March 11-12. The Federal Register notice and agenda for the meeting can be viewed [here](#). MERPAC working groups will meet March 11 and present updates on their work to the full committee on March 12. Subjects of MERPAC working group activity include:

- Implementation of the Maritime Labor Convention;
- Development of competency requirements for mariners on vessels working in Polar regions;
- Crew training requirements for personnel on natural gas-fueled vessels;
- Utilizing military education, training and assessment to meet STCW and Coast Guard

certification requirements; and,

- STCW competency requirements for chief engineers on high horsepower, limited tonnage vessels.

A sizable number of oceangoing towing vessels fall into the high horsepower, limited tonnage category, and AWO has worked closely with members and the Coast Guard to ensure that chief engineers on these vessels are not subjected to the same regulations as their counterparts on large deep draft vessels. The MERPAC work on this issue will be used as the basis of the U.S. position in upcoming IMO proceedings where the delegation will work to ensure that chief engineers on towing vessels have their own separate competency table in the STCW regulations. Similarly, the work of the MERPAC working group on

requirements for mariners working on vessels in Polar regions will help form the basis of the U.S. position at the February 17 meeting of the IMO Subcommittee on Human Element, Training and Watchkeeping that will take up portions of the draft Polar Code. MERPAC and AWO will be represented at that meeting by Ira Douglas of Crowley Maritime Corporation.

MERPAC is a federal advisory committee that makes recommendations to the Coast Guard regarding training, credentialing and fitness standards for U.S. merchant mariners. For information on the upcoming meeting please contact Kevin Dowling at (703) 841-9300, extension 264, or kdowling@vesselalliance.com.

AWO Promotes Industry Efforts to Reduce Air Emissions

On January 12, AWO participated in a panel discussion titled “Reducing Evaporative Emissions in Marine Transportation” held at the Transportation Research Board’s 93rd Annual Meeting in Washington, DC. The purpose of the panel was to promote the efforts that the tank barge industry and numerous state agencies have made to reduce inadvertent emissions from tank barges. AWO Government Affairs Manager Brian Vahey was joined on the panel by representatives from the Environmental Defense Fund, the International Council on Clean Transportation, and the Eastern Research Group, Inc. To view AWO’s presentation, click [here](#).

AWO’s presentation provided background on the tugboat, towboat and barge industry’s commitment to the environment by focusing on AWO’s best management practices to

reduce inadvertent emissions from tank barges and its work with state agencies to measure the effects of these emissions on the environment. AWO noted that since 2005, separate studies in Louisiana, Texas and Tennessee have demonstrated that inadvertent emissions from tank barges do not have a significant impact on the environment. Despite this, the tank barge industry has taken steps to further improve the BMPs: three years after the guidance document was initially developed in 2006, AWO’s Inland Liquid Sector Committee voted to further revise the recommended practices. This work has been supported by state environmental agencies, the Coast Guard and the Chemical Transportation Advisory Committee.

During the TRB panel, AWO cited the positive results of recent emissions studies as evidence that the BMPs and

multiple industry-agency partnerships have been effective in reducing regional emissions issues. A Houston Ship Channel monitoring study in Texas in 2007, undertaken in conjunction with the Texas Commission on Environmental Quality and the Coast Guard, found that less than 10 percent of emissions triggers on the Channel were possibly attributable to tank barges. In 2009, the Carville Air Monitoring Study in Louisiana, done in conjunction with the Louisiana Department of Environmental Quality, found that less than 2 percent of emissions triggers could be attributed to tank barges. Most recently, in 2011, a joint effort between the Texas Waterway Operators Association, the East Harris County Air Partnership and the Environmental Defense Fund found that only one tank barge out of 250 monitored underway was observed to have inadvertent emissions.

Environmental representatives on the panel agreed that there was strong anecdotal evidence that the BMPs have been successful in reducing emissions from barges and praised the industry for its proactive work on this issue. Panelists agreed that moving forward, public outreach will be key in promoting the successful industry-agency work on barge emissions, even as they acknowledged that states have recently begun to look to other possible emissions sources.

The TRB Annual Meeting is attended by nearly 12,000 transportation professionals every year, including researchers and policy makers. AWO is committed to using this and other forums to promote the environmental stewardship of the tugboat, towboat and barge industry. For more information, please contact Brian Vahey at (703) 841-9300, extension 251, or bvahey@vesselalliance.com.

TSAC to Hold Conference Call on AIS Encoding



On February 25, the Towing Safety Advisory Committee will hold a conference call to discuss a report from its working group on recommendations to improve AIS encoding for towing vessels. TSAC voted to accept this tasking in January 2013, in response to January 2012 guidance from the Coast Guard asking operators to input four-digit destination codes into their AIS to indicate the origin and destination of their voyage. At the time the guidance was published, AWO expressed concern that the complex coding structure, which includes unique identifiers for 39,000 different locations in the United States, was time consuming, distracting and could be detrimental to maritime safety. TSAC was asked to make recommendations for improving the efficiency and clarity of AIS reporting.

For more information, please click [here](#). While the call is open to the public, the Coast Guard is asking interested participants to RSVP so the agency can ensure that it has a conference bridge large enough to accommodate all interested stakeholders. To RSVP, please contact Mr. Ken Doyle, TSAC Alternate Designated Federal Officer, at Kenneth.J.Doyle@uscg.mil.

Atlantic Region

Atlantic Region Annual Meeting Takes Place in Baltimore

AWO Atlantic Region members gathered in Baltimore on January 29-30 for their Annual Meeting. In addition to the Annual Meeting, the Atlantic Regional Quality Steering Committee of the Coast Guard-AWO Safety Partnership held an industry-only meeting to discuss its Quality Action Team on port coordination. (Coast Guard members of the RQSC had to cancel plans to attend the meeting due to weather-related travel problems.)

The Annual Meeting began with a discussion session on January 29 led by Atlantic Region Chairman Stephen Dann, Dann Ocean Towing, Inc. Mr. Dann gave brief remarks and introduced the day's speakers including Tom Allegretti, AWO President & CEO, who discussed AWO's 2014 focus and game plan, including an update on the implementation of the recommendations of the Task Force on Future Missions and Capacity. Members also heard updates from John Harms, Manager – Atlantic Region, on the organization's progress toward achieving its Board-approved PAC goals and from Ann McCulloch, Director – Public Affairs & Communications, on AWO's strategic plan to grow its public affairs program. Brian Vahey, Government Affairs Manager, then updated members on international requirements and how they are impacting AWO's coastal operators. Jennifer Carpenter, Executive Vice President, presented the proposed 2014 national priorities for member discussion. A motion was made to accept the national priorities and, after review at the Pacific Region annual meetings, the proposed national priorities will be presented to the AWO Board of Directors for approval at its April meeting.

Following the business session, AWO members and Coast Guard officials gathered for a reception sponsored by Water Quality Insurance Syndicate.

The annual meeting continued on January 30 with a breakfast sponsored by Dann Marine LC followed by a business session sponsored by Lyon Shipyard, Inc. and led by Mr. Dann. In his chairman's report, AWO Chairman Buckley McAllister, McAllister Towing, emphasized the importance of ensuring that AWO continues to provide high value to its members. CAPT Kevin Kiefer, Commander, U.S. Coast Guard Sector Baltimore, summarized some of the initiatives underway in his area of responsibility, including the successful Towing Vessel Bridging Program. Mr. Harms presented the proposed 2014 priorities for the Atlantic Region, which included a new priority on ensuring that standards for safe manning documents are applied consistently and expediently across all sectors in the Atlantic Region. The priorities were unanimously approved and can be read by clicking [here](#).

Emile Benard of Booz Allen Hamilton, who has been supporting the Coast Guard Atlantic Area as the Project Manager for the Atlantic Coast Port Access Route Study for the last three years, discussed the status of ACPARS and recent developments surrounding several offshore wind energy projects that could impact AWO members. AWO's Holly Riestler, Director – Safety and Environmental Stewardship, updated members on the 2013 achievements and 2014 goals of the safety and environmental program.

Members also approved the slate of Atlantic Region directors presented by

the Atlantic Region nominating committee, which will be presented for approval at the Annual AWO Membership Meeting in April. Croft Register, Express Marine, Inc.; Jeff Parker, Kirby Offshore Marine, LLC; Rick Iulucci, The Vane Brothers Company; and Hugh McCrory, Norfolk Tug Company, were nominated to the Board. Linda Marra, Greater NY Marine Transportation, LLC, was nominated as the alternate. J.C. Dann, Dann Marine LC, and Ted Tregurtha, Moran Towing Corporation, were nominated to serve two-year terms as Atlantic Region Chairman and Vice Chairman, respectively.

Following the conclusion of the annual meeting, the industry members of the Atlantic RQSC held a meeting to discuss the draft final report of the Port Coordination QAT. Steve Kress, McAllister Towing, Mr. Stephen Dann, Mr. Parker, and Mr. Harms, who were the industry members on the QAT, discussed the QAT's recommendations to improve communication and coordination between the Coast Guard and the towing industry during severe weather and security events. The industry members of the RQSC voted unanimously to approve the substance of the draft final report. The report will now go to the full RQSC for approval before it is considered and endorsed by the National QSC.

All meeting packets and presentations are available [here](#). For more information about the Atlantic Region annual meeting, please contact John Harms at (703) 841-9300, extension 292, or jharms@vesselalliance.com.



Atlantic Region

AWO Submits Comments Urging Chicago to Change Petcoke Rule; Illinois EPA Rulemaking Still Pending

On February 7, AWO submitted comments to the City of Chicago Department of Public Health on a proposed rule regulating petroleum coke (petcoke), coal, and other bulk materials. In its comments, AWO articulated that barge transportation is the nation’s most environmentally friendly mode of transportation and reiterated the industry’s commitment to environmental stewardship.

AWO’s comments described the Chicago Area Waterways as highly trafficked federal waterway regulated by the federal government including the U.S. Coast Guard and U.S. Environmental Protection Agency. The comments continued to illustrate the negative impacts that could occur if the city put operational requirements on barges moving on federal waterways.

The comments also highlighted several concerns, including the following:

- Definitions in the proposed regulation could be interpreted to apply to a wide range of commodities outside the regulation’s stated purpose;
- The stated objective of the rule doesn’t match the actual risks as petcoke has been found non-toxic and non-hazardous in a study conducted by the EPA;
- The requirements for barges loading and unloading in enclosed spaces are impractical for operations and could cause more damage to other infrastructure; and,
- Requiring tarps on hopper barges would make transport cost prohibitive and would cause serious safety issues on vessels.

AWO urged the city to withdraw the rule or amend it to prevent unintentionally harming ancillary business interests and remove the requirements for tarps and for enclosed loading/unloading areas.

As discussed in the January 28 *AWO Letter*, the Illinois Environmental Protection Agency has proposed a similar rule that was rejected as an emergency rulemaking, but will proceed under the general rulemaking process. A timeline to submit public comments on that rule is not known at this time.

For more information, please contact Lynn Muench at (314) 446-6474 or lmuench@vesselalliance.com or Brian Bennett at (703) 841-9300, extension 279, or bbennett@vesselalliance.com

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