



H S E C T O R N O L U L U

Prevention Newsletter Spring 2022

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Greetings from CDR Jarrod DeWitz



Aloha Hawaii Maritime Stakeholders! It is with pleasure and disappointment that we send this newsletter to you in place of holding our 2021 Industry Day. Disappointment because every fall the Sector Commander, Captain Alex Avanni, and I look forward to visiting the island chain, but the global pandemic continues to complicate that tradition.

During the precipice of COVID-19 mitigation efforts in 2020, our supervisors (LT Stevens on Big Island, LT Gamble on Maui, CWO Keeman) did a great job holding a virtual town hall. We hope this 2021 newsletter can reach a broader audience and spark additional conversations.

With that said, it is with pleasure that I congratulate all of the small passenger vessel operators for making it through the inaugural year of the Small Passenger Vessel Risk Based Inspection Program. Many of you were informed that your vessels had been categorized as a Tier 1, 2, or 3, which required varying degrees of compliance oversight. The goal of this program was to provide the most appropriately qualified Marine Inspector, to maximize our limited resources and assign based on a particular vessel's risk profile. I'm happy to report that we were able to achieve 100% of fully qualified inspectors to meet that expectation. This was a challenge unique to Hawaii because of our geographic make-up. By doing so, we found safety improvements on many of your vessels and worked with operators to rectify and ultimately make our waters a little safer. So great job all around!

We hope to resume in-person industry days in the fall of 2022, please stay tuned. Without further ado, I would like to share a few articles prepared by my staff. I encourage you to provide feedback so that we can improve this product in the future. Mahalo!



Vessel Inspection

Scheduling Requirements

Vessels maintaining a Certificate of Inspection (COI) must meet the required inspection timelines outlined in the applicable Code of Federal Regulations (CFR). There have been instances in Sector Honolulu's inspection zone where vessels have failed to meet inspection timelines. This can result in an unplanned drydock, inability to carry passengers, or deactivation of a vessel's COI. To simplify this process, all mandatory inspection timelines are documented on the vessel's COI. Important administrative steps in the inspection process include scheduling inspections in a timely manner, understanding inspection due dates, and properly requesting extensions.

Early submittal of inspection requests to Sector Honolulu's Inspection Division allow us to balance the needs of all inspected vessels in our fleet of responsibility. To renew a COI, the CFR requires vessels to submit Form CG-3752: Application for Inspection of a U. S. Vessel, at least 30 days before the expiration of the previous COI. While Sector Honolulu does not require Form CG-3752 for Annual Inspections, Drydocks, and Internal Structural Examinations (ISEs), we do ask that you submit your inspection requests at least 30 days in advance to allow our office to better accommodate your inspection timelines. If inspection requests are received with shorter notification, we will do our best to accommodate the vessel's schedule, but prior obligations may prevent us from meeting your requested inspection date.

Understanding the inspection dates listed on your vessel's COI is critical to meeting inspection deadlines. Inspection dates typically fall within two categories:

Window dates – the window dates must be scheduled within the 3 months before or after the anniversary date, based on COI expiration date. This includes Annual Inspections and Periodic Inspections.

Drop dead dates – once the date listed on the COI passes, your vessel can no longer operate until the requisite inspection or exam is completed. This includes COI Renewals, Drydock Examinations, and ISEs.

Please do not confuse Annual and Periodic “window” dates with COI Renewal “drop dead” dates!

Extensions to Drydock and ISE due dates may be requested from the Officer in Charge, Marine Inspection. Depending on your vessel type, extension requests may need to be routed through the Office of Commercial Vessel Compliance (CVC) in Washington, D.C. USCG Marine Safety Manual Vol. II states that Drydock extensions should only be granted “in the most unusual circumstances. Examples of unusual circumstances are the sudden unavailability of Drydock space (e.g., due to high river stage, weather damage to facilities, or of the scheduled Drydock facility going out of business), the employment of the vessel where it cannot be replaced without risk, or circumstances clearly beyond the owner's control. Financial hardship alone is not a valid reason for granting a Drydock extension.” Sector Honolulu will require evidence of communications (e.g. emails) with all Drydock facilities in the area to confirm there are no Drydocks available. Please understand that your requests for Drydock availability should be conducted well in advance of your vessel's Drydock due date (i.e. requesting Drydock availability two weeks in advance of your vessel's Drydock due date will not be viewed as advanced planning).

Sector Honolulu looks forward to collaborating with all of you! Understanding the information above will help all of us work together to achieve that goal. Please submit all correspondence regarding inspected vessels to honoinpections@uscg.mil.



Proper Disposal of EPIRBs



Recently, the Coast Guard has received multiple Search and Rescue Satellite-Aided Tracking (SARSAT) activations that are false alert or non-distress situations. Inadvertent activation of an EPIRB can occur through improper storage, handling, or care. False activations cause expensive disruptions to search and rescue services by diverting our limited Search and Rescue (SAR) resources, and endanger the lives of rescuers.

It is paramount for operators to properly handle and dispose of their EPIRBs. In 2021, there were a total of 192 activations; 11 of these were actual distress conditions. For the remaining 181 activations, 123 were false alarms, and 58 were unknown or inconclusive. Several false activations have been caused by EPIRBs being incorrectly placed in their cradle, and there have also been reports of beacons going off in dumpsters and landfills. In some instances, false activations are never identified due to the battery dying before the beacon can be found, leaving the case incapable of being resolved, resulting in it being “suspended” instead of closed.

Therefore, when your 406 MHz beacon’s valuable life has come to an end, please ensure you dispose of it properly. To do so, follow the manufacturer’s guidance. Most manufacturers recommend removing the beacon’s battery to prevent false activations.

Our friends at NOAA would like to remind you that once your beacon has been permanently disabled, the remaining parts (including the battery and electronics) should be disposed of in a manner that does not present a threat to the environment. In addition to containing traces of lithium, distress beacons may contain lead and brominated flame retardants, both in the housing material and circuit boards. Please review local laws and procedures for disposal of electronics and batteries or contact your beacon manufacturer for further guidance.

After carefully disposing of your beacon, ensure you update your NOAA Beacon Registration, and indicate the change in status. You can contact SARSAT Beacon Registration Database Team for assistance at (888) 212-7283, or beacon.registration@noaa.gov.



Illegal Charters

Sector Honolulu has continued to focus their efforts on the illegal charters that have been a constant thorn in the side of the small passenger vessel industry. Numerous Coast Guard divisions, including Investigations, Enforcement, Station Honolulu, Coast Guard Investigative Services, and the Coast Guard cutters, have been on the lookout for any vessels which raise concern and are committed to conducting boardings to check the legitimacy of the operation.

The Coast Guard has conducted multiple surge operations that have spanned the entire Hawaiian Island Chain, both ashore and at sea, and have terminated multiple voyages as a result of violations found. In each instance where an illegal charter has been found, the Coast Guard has taken an aggressive enforcement stance through monetary fines or suspension of licenses (if the mariner is credentialed). All of the calls that you have made to the Sector Honolulu Command Center were passed to our law enforcement assets on water and to the investigators. When we get the calls, we launch an investigation into the vessel, associated parties and the operation.

Sector Honolulu continues to cast a wide net, but we are asking you to be our eyes and ears out there as a force multiplier. You are out there every day and will know if something is not right. If you have any suspected illegal charters, please share it with the Sector Honolulu Command Center. Provide as much information as possible (vessel name, marina/harbor they are leaving, number of passengers, etc...) and take a picture if you can.

Aids to Navigation



The waters of the State of Hawaii are home to a variety of Federal Aids to Navigation (ATON) and Private Aids to Navigation (PATON), all of which are administered by the Coast Guard and are designed to promote safe navigation. Occasionally, these ATON fail to display their designed signal: buoys might be sinking or off-station, lights may be extinguished or sound signals may operate continuously or not at all. In general, these problems are referred to as “discrepancies.” **Hawaii mariners can report ATON discrepancies by contacting Coast Guard Sector Honolulu Command Center via VHF radio or by telephone at 808-842-2600.** Not sure whether an ATON is working properly? Compare on scene information with data found on a specific [Nautical Chart](#) and in the most recent Light List for a particular area. When the Coast Guard is notified of a potential ATON discrepancy, the information will then be made available to the public via periodic VHF radio broadcasts or by publication in the Local Notice to Mariners until such time as the problem can be corrected.

Are you new to the area? Is this your first time traveling to a harbor or has it been a while? A good practice for any responsible mariner is to do research on where you plan to navigate your vessel. Here are some essential resources:

Broadcast Notice to Mariners: These broadcasts are over VHF Channel 16. These Broadcasts are very important messages from the Coast Guard including certain ATON discrepancies, Marine Events, and other important activities in the area at that time.

Local Notice to Mariners: This notice is published each week with great information about the local area. The basics are: known ATON discrepancies, dredging in the area, upcoming Marine Events Etc. Basically it is your one stop shop for important information on where you are traveling.

Light List: This gives you a list of all the ATON in the area and a brief instruction on how to use these Aids to navigate.

Marine Safety Information Bulletin: These bulletins have information such as: change in port condition, and important information on safety and security in the area.

Questions about Waterways Management, or activities on the waterways? Submit queries to SecHonoWaterways@uscg.mil.

Facilities Updates

1) Operations Manual Regulation Update:

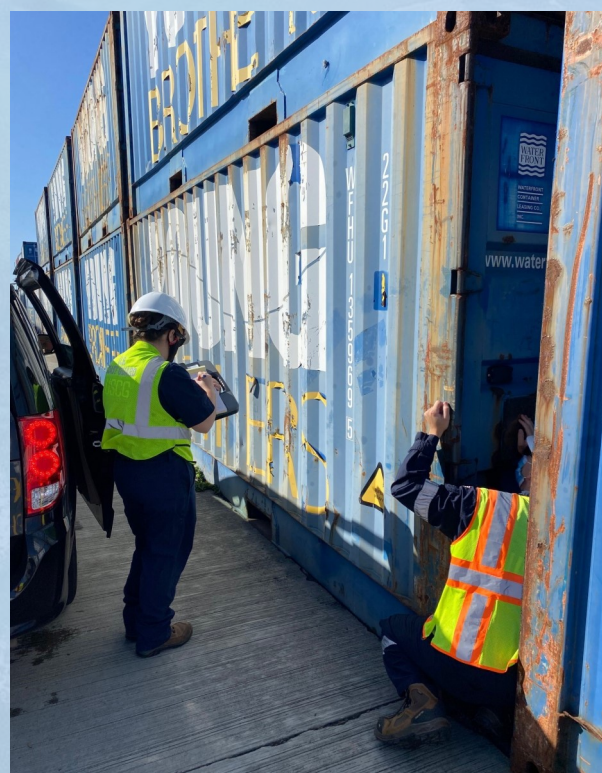
Please remember that any Operations Manual submitted after September 10, 2021, includes a date, revision date, or other revision-specific identifying information, as per 33 CFR 154.320. Be sure to note recent changes to amendments.

2) Security Spot Checks and Cargo Transfer Monitors:

In review of our areas of highest risk, it was determined that most security breaches occur after hours. Due to this, the Honolulu Facility Inspection team will begin conducting Unannounced Facility Security Spot-checks and Transfer Monitors on a 24 hour basis.

3) TWIC Checks:

After reviewing the results of 2021 TWIC inspections, it was concluded that the most non-compliant TWICs was due to truck drivers visiting facilities, versus the facility security personnel. For Facility Inspections in 2022, a Coast Guard member may join your security personnel at the front gate and check the TWICs of persons entering the facility for the duration of the exam.



Inherent Stability Determinations

The characteristics of a vessel establish the baseline for calculations used to assess its stability and applicable requirements. There are various assessments that have been used in the past to determine the stability of certificated vessels in Hawaii, such as a deadweight survey, a full inclining experiment (which includes a deadweight survey), a simplified stability test (SST), and an inherent stability determinations. The method used to determine a vessel's stability is noted in its stability letter.

Any changes made to a vessel, such as the addition, removal, or relocation of equipment, could significantly affect a vessel's stability. If a new stability assessment is required, that could be a significant financial burden for the operator. For vessels for which the lightship characteristics have been estimated, meaning those vessels whose stability letters were based on inclining experiments or deadweight surveys, any weight changes must be submitted to the Marine Safety Center to be documented. When those weight changes are less than two percent in aggregate, new calculations can be performed without performing a new stability assessment. When the total aggregate weight of all vessel changes is more than two percent, a new deadweight survey will typically required, and depending on the results, it may not be possible to maintain the vessel's passenger count without performing an inclining experiment. The more precisely the weight changes and their centers of gravity can be documented, the better your chances are of not needing to do a new deadweight survey.

Marine Inspectors frequently discover errors in determining the aggregate weight change. To be clear, aggregate weight is defined as total change in weight. For example, if one were to replace their current outboard gasoline engine, weighing 600 lbs, with a new outboard, weighing 700 lbs, the total aggregate weight change would be 1,300 lbs. Although it was only a 100 lb difference, the aggregate weight change could significantly affect calculations.

For vessels whose stability was determined using an SST, if modifications change the vessel's weight by more than two percent, a new SST will be required. If the total weight of the vessel is not known, and the weight change is borderline, the burden will be on the owner to demonstrate that it does not exceed two percent.

Vessels with Inherent Stability Determinations must take extra precaution! Such determinations were made based on estimates provided by the manufacturer, with no assessment of the vessel's lightship characteristics or empirical testing. Sector Honolulu no longer issues new stability letters based on inherent stability determinations. Any modifications made to a vessel with an inherent stability determination will need to be validated with a different verification method, regardless of the percentage of the aggregate weight change. Here in Sector Honolulu, we commonly see this with our Rigid Hull Inflatable Boats (RHIBs).

Ultimately, a seemingly small change to your vessel could in turn result in a larger undertaking, such as a full stability test. The Marine Safety Center has some resources available online to help better understand these processes, [here](#) and [here](#). Minimizing the adverse effects of weight changes is a key element in preserving confidence in a vessel's stability analysis. Before making any changes, call us at Sector Honolulu before proceeding. This could save you a tremendous amount of time and money down the road!



COI Routes and Conditions

New Endorsement Updates

Sector Honolulu's Officer in Charge Marine Inspection (OCMI) Zone utilizes standardized endorsements to better clarify routes and conditions of operation, making them more specific to local conditions. These are documented in our local instruction, referred to as "Work Instruction 2." In order to improve governance and transparency, this document has recently been re-reviewed and amended as necessary, and it is now posted online for public viewing, at [this link](#). The endorsements in the work instruction contain stock language that provide more detailed parameters for vessel operations. You will likely see this standard verbiage under the "Route Permitted and Conditions of Operation" section of your Certificate of Inspection (COI).



The type of water assigned to a vessel is dependent upon the vessel's structures, stability, and outfitting. There are terms in the regulations, like "harbor of safe refuge" and "partially protected waters," that are defined in the regulations as being determined at the discretion of the OCMI. Work Instruction 2 delineates the determinations made by the OCMI for all waters in Sector Honolulu's area of operation. For instance, Mamala Bay is defined as, "shoreward of a line drawn from Barbers Point Light to Diamond Head Light."

Recently, Work Instruction 2 has been updated to more accurately and clearly define endorsements. You may notice some changes in verbiage on your COI after its next issuance. Some words may be modified as we review all COIs to reflect our updated standard verbiage. If you see additional verbiage included, this information could be from an already existing Marine Safety Center (MSC) approval letter for your vessel. An example of this would be significant wave height and maximum speed restriction tables. Some changes, however, grant vessels more flexibility than before— for example, some dive vessels had their stability tests done in such a way that they can add a certain amount of dive equipment before they have to start reducing their passenger count, and the new language now reflects that. Every vessel is unique, and Work Instruction 2 addresses only the more common circumstances. In some instances, due to the unique particulars of a vessel's arrangements or operations, the existing verbiage must also be modified, or entirely different endorsements must be added specific to each vessel.

Work Instruction 2 maintains consistency for all certificated vessels and removes ambiguity allowing for operators to understand transparent verbiage and ensure compliance. If you have any questions or concerns regarding any changes to your COI, please feel free to reach out to our office and a Marine Inspector can assist you.

In-Water Activities

Many inspected passenger vessels that engage in diving/snorkeling excursions have been granted an endorsement on the Certificate of Inspection (COI) allowing the required deckhand(s) to enter the water during in-water passenger activities as long as the provisions of Sector Honolulu Work Instruction 31 have been met. Recent marine casualty investigations and routine vessel inspections have shown that owners/operators are not implementing all of the provisions for this reduced manning endorsement, contributing to unnecessary passenger injuries and/or violations of law.

Each vessel that has been granted the reduced manning endorsement must continually demonstrate that an equivalent level of safety is maintained with the deckhand(s). This includes the following areas: 1) Mooring Arrangement, 2) Environmental Considerations, 3) Watch Keeping, 4) Vessel Configuration, 5) Rendering of First Aid, 6) Vessel Maneuverability, and 7) Written Policies and Procedures. As a result of recent marine casualties, Work Instruction 31 is currently under revision. As with Work Instruction 2, Work Instruction 31 is now posted online for ease of public viewing. It can be found [here](#).

Owners/operators are responsible for the implementation of all additional safety measures to receive/maintain the endorsement. They must become familiar with the requirements of Work Instruction 31 and be prepared to demonstrate compliance during scheduled inspections and/or marine casualty investigations. Failure to demonstrate compliance can result in the removal of the endorsement from the vessel's COI, and potential enforcement action. Contact the Sector Honolulu Inspections Division if you have any questions and/or request a copy of Sector Honolulu Work Instruction 31.

Gasoline Fuel Tanks

Gasoline vapors are extremely flammable due to their low flashpoint of -7°C (20°F). Due to the inherent danger posed by gasoline's flammable vapors, the use of internal gasoline tanks onboard vessels requires several safeguards to mitigate hazards. Below is a visual reference guide pertaining the requirements for an enclosed space with machinery powered by, or fuel tanks for, gasoline:

1. The space must have at least two natural ventilation supply ducts located at one end of the space and that extend to the lowest part of the space or to the bilge on each side of the space. (See Figure 1).
2. There must be a mechanical exhaust system consisting of at least two ventilation exhaust ducts located at the end of the space opposite from where the supply ducts are fitted, which extend to the lowest part of the bilge of the space on each side of the space, and which are led to one or more powered exhaust blowers. Ensure sure the fan is rated for continuous use and ignition protected. (See Figure 2).
3. An exhaust blower motor may not be installed in a duct, and if mounted in any space required to be ventilated by this section, must be located as high above the bilge as practicable. Blower blades must be non-sparking with reference to their housings. No in line blowers like the example below. (See Figure 3).
4. Exhaust blower switches must be located outside of any space required to be ventilated by this section, and must be of the type interlocked with the starting switch and the ignition switch so that the blowers are started before the engine starter motor circuit or the engine ignition is energized. (See Figure 4). Also, a red warning sign at the switch must state that the blowers shall be operated for the time sufficient to ensure that at least one complete air change is completed in the space served prior to starting the engines.
5. A duct must be of rigid permanent construction, which does not allow any appreciable vapor flow except through normal openings, and made of the same material as the hull or of noncombustible material. The duct must lead as directly as possible from its intake opening to its terminus and be securely fastened and supported. Collapsible ducts are not acceptable. (See Figure 5).

To help ensure the protection of vessel operators, crew, and their passengers, Sector Honolulu has compiled the below list of deficiencies that are frequently discovered onboard vessels equipped with internal gasoline fuel tanks. The top three common deficiencies identified by Marine Inspectors are inoperable interlock systems, incorrect exhaust fan blower type, and unprotected electrical equipment in the fuel tank space.

For exhaust blower switches, the first turn of the key should only turn on the fan. The interlocked ignition system prevents gasoline vapors from igniting by energizing the fans that extract the vapors before the engine(s) are started. Marine Inspectors commonly discover missing interlocks, and even manual activation of blowers. The interlocked system eliminates the potential human error of a person failing to properly ventilate the space prior to starting an engine. Energizing an engine in a space with gasoline vapors present could cause an explosion.

Incorrect exhaust blower fans are another common problem. Again, blower blades must be non-sparking, and the blower cannot be located in the duct itself. Approved exhaust blowers fans remove the potential as an ignition source in a flammable environment.

Another common issue found is the use of unprotected electrical equipment. This is not an issue specific to tanks, but applies to all spaces containing machinery powered by, or fuel tanks for, gasoline or other fuels having a flashpoint of 43.3°C (110°F). According to 46 CFR 183.350, these spaces require the use of equipment that is explosion-proof or ignition-protected, or is part of an intrinsically safe system. Similar to incorrect exhaust blower fans, electrical equipment that doesn't meet the above requirements could also act as an ignition source. Hence, there cannot be unprotected electrical wiring, such as exposed or dead-end wires, in the same space as your gasoline fuel tank.

Figure (1)

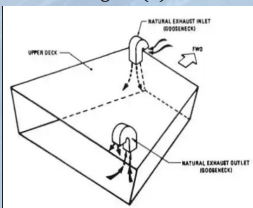


Figure (2)



Figure (3)



Figure (4)



Figure (5)



Sector Honolulu Contact Info

Sector Honolulu, Prevention:

Address: 433 Ala Moana Blvd (Pier 4), Honolulu, HI, 96813

Domestic Inspection Branch: E-mail: HonoInspections@uscg.mil

Phone: 1 (808) 522-8274

24-Hour Command Center: 1 (808) 842-2606 (Emergency Use Only)

Honolulu Regional Exam Center:

Phone: 1 (808) 522-8258

National Maritime Center: https://www.dco.uscg.mil/national_maritime_center/

National Vessel Documentation Center:

E-mail: nvdc.pdf.filing@uscg.mil Phone: (800) 799-8362 or (304) 271-2400

USCG Finance Center (User Fees):

E-mail: FIN-DG-COIUSERFEES@uscg.mil Phone: (800) 941-3337 or (757) 523-6958

<https://www.fincen.uscg.mil/>

Marine Safety Alerts: [https://www.dco.uscg.mil/Our-Organization/Assistant-Commandant-for-Prevention-Policy -CG-5P/Inspections-Compliance-CG-5PC-/Office-of-Investigations-Casualty-Analysis/Safety-Alerts/](https://www.dco.uscg.mil/Our-Organization/Assistant-Commandant-for-Prevention-Policy-CG-5P/Inspections-Compliance-CG-5PC-/Office-of-Investigations-Casualty-Analysis/Safety-Alerts/)

Marine Safety Information Bulletins (MSIB): <https://www.dco.uscg.mil/Featured-Content/Mariners/Marine-Safety-Information-Bulletins-MSIB/>

Findings of Concern Announcements: <https://www.dco.uscg.mil/Our-Organization/Assistant-Commandant-for-Prevention-Policy-CG-5P/Inspections-Compliance-CG-5PC-/Office-of-Investigations-Casualty-Analysis/Findings-of-Concern/>

