DEPARTMENT OF HOMELAND SECURITY

UNITED STATES COAST GUARD

OFFICE OF PORT AND FACILITY COMPLIANCE

2018 ANNUAL REPORT

Table of Contents

Throughout this document, various policies, instructions, and strategies are referenced. For a comprehensive list and electronic access to these documents, please see the CG-FAC links at the back. Please note: some of these items may require Coast Guard access to the CG-only web portal.

*Cover photo of Port of Charleston, SC. Image credit: https://www.porttechnology.org/news/charleston_becomes_fastest_growing_us_container_port

EXECUTIVE SUMMARY

The mission of the Office of Port and Facility Compliance (CG-FAC) is to provide safety, security, and environmental stewardship for the nation's ports and facilities. CG-FAC strives to provide clear regulations, policy, and direction to Coast Guard operational commanders and other stakeholders to ensure our port communities are a safe, secure place to do business, live, and work.

The 2018 hurricane/typhoon season was another busy response season concluding with 15 named storms, eight hurricanes, two of which were major hurricanes, and the strongest typhoon to ever hit a U.S. territory. These storms resulted in over $50 billion in damages and impacted ports in Alabama, Florida, Guam, Hawaii, North Carolina, and the Northern Mariana Islands. The excellent communication between all levels of command and the outstanding work by local Marine Transportation System Recovery Units (MTSRUs) ensured senior leaders in the Coast Guard, Federal Emergency Management Agency (FEMA), Department of Homeland Security (DHS), and the Department of Transportation (DOT) were well informed of the status of vital ports and directly attributed to the development of viable alternatives to enable the flow of relief efforts. Ultimately, these efforts facilitated the safe resumption of commercial activity via the nation's critical Marine Transportation System (MTS).

CG-FAC continues to be at the forefront of developing guidance and other resources to address cyber safety, security, and cyber risk management within the MTS. The continually increasing role of cyber systems and the need to ensure the safety and security of ever-evolving technology and systems, for both information technology and operational technology, in the MTS was a strategic priority of FAC's work this past year. The draft cyber Navigation and Vessel Inspection Circular (NVIC) underwent thorough review and updates based on public comments, as well as through Coast Guard legal offices before making its way to DHS. The incorporation of comments and extensive legal review highlighted our commitment to working with stakeholders and ensured the best possible way forward for cyber risk management. CG-FAC also continued efforts to enhance cybersecurity and cyber risk management in the MTS through the development of a "Cyber in the MTS 101" webinar, published pertinent information and available resources for the maritime community on the Coast Guard's *Maritime Commons* blog, and remained actively engaged in key partnerships and working groups.

Most importantly, CG-FAC is extremely proud to support the Coast Guard men and women who, in 2018, completed over 5,400 security compliance inspections required by the SAFE Port Act of 2006[1], over 53,000 visual and electronic inspections of Transportation Worker Identification Credentials[2], and more than 26,000 container inspections[3]. Maintaining a strong operational presence on the waterfront is key to safe and secure ports. In addition, Port Security Specialists oversaw the coordination of 105 events that tested the effectiveness of their respective port-level Area Maritime Security (AMS) plans and supported maritime security preparedness regimes through the engagement of federal, state, local, tribal, and territorial government and private sector stakeholders. We are equally grateful to the many facility operators, port workers, mariners, and other agency personnel whose patriotism and hard work are equally vital to our success.

Captain Ryan D. Manning, USCG

1 As per the MISLE Facility Activities Coast Guard Business Intelligence System.
2 As per the MISLE TWIC Workers Coast Guard Business Intelligence System.
3 As per the MISLE Container inspections Coast Guard Business Intelligence System.

Highlights of 2018

MARINE TRANSPORTATION SYSTEM RECOVERY

For the second year in a row, CG-FAC participated as a valuable member of the Federal Emergency Management Agency's (FEMA) National Response Coordination Center (NRCC) by standing watch in support of Emergency Support Function One (ESF-1; Transportation) during the 2018 hurricane/typhoon season. In this capacity, CG-FAC coordinated efforts with Atlantic Area, Pacific Area, Districts Five, Seven, Eight, and Fourteen, as well as many local Marine Transportation System Recovery Units (MTSRU) via the Coast Guard's Common Assessment and Reporting Tool (CART) to produce up to date, daily snapshots of storm impacts to various States and Territories. This timely and accurate information proved critical to senior level decisions makers and directly attributed to the development of best courses of action to effectively facilitate the flow of relief efforts and ultimately, resumption of port activities.

CG-FAC along with assistance from various Port Security Specialists and Security Specialists (Port/Recovery) developed Navigation and Vessel Inspection Circular (NVIC) 04-18 titled: *Guidelines for Drafting the Marine Transportation System Recovery Plan*. The NVIC provides guidance to field commanders, Marine Transportation System (MTS) Recovery personnel and the maritime community to develop and maintain the critical MTS Recovery Plan and includes an easy to follow, step-by-step template to ensure plan consistency from port to port, but allows flexibility due to variances of ports. Included in the NVIC are two new forms approved by the Office of Management and Budget (OMB). These new forms are designed to allow MTSRUs to acquire additional, needed information from facilities prior to and following an event that impacts the MTS.

CG-FAC created COMDTINST 16000.28B titled: *Marine Transportation System Recovery Planning and Operation*. The COMDTINST updates policy on MTS recovery planning and operations following a natural or man-made event that significantly disrupts the MTS. The COMDTINST included the requirement for a stand-alone Marine Transportation System Recovery Plan and more national/regional coordination with the Department of Transportation Emergency Support Function – One. Enclosure One to COMDTINST 16000.28B includes the *Use of the Common Assessment and Reporting Tool (CART),* which outlines updates on the use of CART to support the MTSRU.

CG-FAC began work with the Department of Homeland Security (DHS) Science and Technology (S&T) Directorate as the Project Champion for a *Predicative Port Resilience Tool to Assess Regional Impact of Hurricanes*. Florida Atlantic University and Embry Riddle Aeronautical University are leading this effort with the objective of developing a predictive hurricane assessment and planning tool for port resiliency on a regional scale. Research started in July 2018. The team is currently developing baseline data (normal port traffic – both marine and land) for the ports of Miami, Fort Lauderdale, Jacksonville, Savannah, and Charleston. Once the baseline is complete, the team intends to test their results with data from Hurricane Matthew (2016). In addition, they will be testing multiple disruptive events to determine the resilience of these ports and the region.

Highlights of 2018

BIENNIAL FACILITY INSPECTOR AND PORT SECURITY SPECIALIST WORKSHOP

In April, CG-FAC hosted its biennial Facility Inspector and Port Security Specialist Workshop at the National Conference Center in Leesburg, VA. This three-day event was one of the largest Coast Guard conferences hosted in 2018, bringing together more than 150 members representing every Coast Guard Sector. The goal of the workshop was to improve program and field level performance by fostering better communication and consistency between Headquarters, Areas, Districts, and field units in implementing the standards and intent of the Maritime Transportation Security Act (MTSA) of 2002, the Security and Accountability For Every (SAFE) Port Act of 2006, and the Coast Guard Authorization Act of 2010.

The 2018 agenda included the Transportation Worker Identification Credential (TWIC), Maritime Cyber Security, Unmanned Aerial Systems (UAS), and the Area Maritime Security Committee (AMSC) annual reporting forum. These topics have been dynamic over the last several years due to newly issued rules and regulations, technological advances, and the ever-expanding maritime industry. Additionally, program updates and dialogue between attendees and representatives from operational, mission support, legal, the Marine Science Technician (MST) rating force manager as well as key maritime industry presenters were included. Special guest speakers came from DHS's former National Protection and Programs Directorate (NPPD), Transportation Security Agency (TSA), Federal Aviation Agency (FAA), and the National Cargo Bureau. As always, if the field needs any assistance from CG-FAC on policies or procedures please send up a request through the Chain of Command, District, and Area and we will be happy to assist.

Highlights of 2018

COMMITTEE FOR THE MARINE TRANSPORTATION SYSTEM (CMTS) WORKSHOP

CG-FAC-1 participated in a CMTS 2018 Workshop, titled: *Charting a Path Forward to a More Resilient Marine Transportation System*. CG-FAC and representatives from the Seventh and Eighth Districts discussed strategies to make the MTS more resilient in the face of larger and more damaging hurricanes. Over the day and a half workshop, multiple suggestions were made to improve preparedness, resiliency, and recovery. In addition, multiple federal best practices were shared to reconstitute the MTS as safely and efficiently as possible. See report *The 2017 Hurricane Season: Recommendations for a Resilient Path Forward for the Maritime Transportation System*.

COMMON ASSESSMENT AND REPORTING TOOL (CART)

CG-FAC-1 continued to manage, monitor, update, and improve the Coast Guard's Marine Transportation System Recovery (MTSR) Common Assessment and Reporting Tool (CART). The purpose of CART is to capture and facilitate information related to Marine Transportation System disruptions. CART is a critical communication link between impacted operational commanders and senior leaders that provides quick, real-time snapshots of impacted areas to assist in the efficient and effective recovery of port operations to pre-incident conditions. Many improvements to CART were a result of valuable feedback received from subject matter experts in the field during or following real-world incidents. As an example, there were several "just in time" updates made to CART during the 2018 hurricane season to ensure valuable information was captured and disseminated. In addition, lessons learned from the 2017 and 2018 hurricane seasons revealed additional updates were needed and the following updates were incorporated in 2018:

(1) Added "oil refinery" as an independent Essential Element of Information (EEI);
(2) Incorporated a separate reporting tab for senior level comments (e.g. District/Area);
(3) Added an independent text box to the "Port Status" tab to allow for a more detailed port description;
(4) Added a "Requires Assessment" status for EEI status descriptions for more accurate port status reporting; and
(5) Routine formatting issues. CG-FAC-1 is working with CG-6, CG-7, and the Operations Systems Center to continue reviewing lessons learned and user feedback to make necessary updates and changes.

Highlights of 2018

EXPLOSIVE HANDLING SUPERVISOR PROGRAM MANUAL

A multi-year effort culminated in the promulgation of the Coast Guard's first Explosive Handling Supervisor (EHS) Program manual (link found here). This manual compiles applicable sections of Marine Safety Manual (MSM) Volume VI, and numerous policy letters regarding the Coast Guard's role in supervising the handling of certain explosives on vessels and waterfront facilities. The manual provides additional guidance to COTPs on the optional use of quantitative risk-based analysis for permitting explosive handling operations in accordance with established Department of Defense (DOD) policy. The manual also provides clarity and consistency in the supervision of the handling and transportation of explosives on vessels and at waterfront facilities by field personnel. This should result in the enhancement of the Coast Guard's efforts to ensure compliance with hazardous material transportation laws, and serve to further protect people, the port, and the MTS.

REGULATED BULK LIQUID TRANSFER MONITOR MANUAL

This Regulated Bulk Liquid Transfer Monitor Manual (link found here) expands on the authority and jurisdiction used by Coast Guard personnel to conduct oil and hazardous material transfer monitors and enforce compliance with facility and vessel pollution prevention regulations at facilities regulated by the Coast Guard under 33 CFR §127 and 33 CFR §154. It also sets a performance goal of transfer monitors equal to twenty percent of regulated facilities in each unit's area of responsibility (AOR) per year, while evaluating facility risk to determine where to conduct those transfer monitors.

Highlights of 2018

API 570 POLICY LETTERS

CG-FAC released two policy letters in recognition of an ever evolving industry and numerous facilities requesting letters of alternative compliance throughout the country to use API 570 for in service pipeline testing in lieu of the regulatory mandated annual hydrostatic tests. The first policy letter, CG-FAC Policy Letter No. 18-02 (CG Portal access only) outlines that API 570 may be suitable as an alternative method for the required static liquid pressure test required by 33 CFR 127.1407(a) if all stipulations of API 570 are met. This mirrors the same statement in NVIC 6-17 for bulk oil and hazardous material facilities. The second policy letter, CG-FAC Policy Letter No. 18-03 (CG Portal access only) provides procedures for reviewing alternatives and inspecting facilities using API 570 as an alternative to facility pipeline testing requirements. This second policy letter can be used by Coast Guard personnel on liquid hazardous gas (LHG) facilities or bulk oil/hazardous material facilities proposing to or actually using API 570 to ensure a unified national approach to regulating facilities using this industry consensus standard.

INTERNATIONAL ENGAGEMENT

The Coast Guard is the best in the world in many things we do. From time to time we have the opportunity to share our best practices with other countries as they are building capabilities and helping ensure the safety and security of the global marine transportation system. In this vein, CG-FAC-2 presented to China on our container inspection program in an effort to help ensure the safety of containers arriving to the United States from China, and to Mauretania, Senegal, and Vietnam on our inspection regimes for liquefied natural gas (LNG) facilities. Helping ensure the safety of these facilities in other countries ultimately creates new markets for U.S. sourced natural gas.

ARCTIC WORK ON PREVENTION OF POLLUTION OF THE MARINE ENVIRONMENT

With recent Polar Code amendments that came into force on January 1, 2017, CG-FAC-2 staff has worked closely with a NOAA led U.S. delegation on the Arctic Council Work Group on Protection of the Arctic Marine Environment (PAME). This work group assesses increases in shipping traffic because of climate change and marine transportation infrastructure within Arctic and near Arctic ports including port reception facilities required by The International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978, as amended, (MARPOL). In 2018, CG-FAC-2 staff and international partners submitted proposals for regional waste management plans pertinent to Arctic reception facilities and discharge management of ships transiting through Arctic waters. These draft amendments will be submitted to MEPC 74 with all Arctic countries serving as co-sponsors.

Highlights of 2018

LIQUEFIED NATURAL GAS (LNG) FACILITY SUPPORT

CG-FAC continues to work extensively with other Coast Guard entities and federal agencies in support of policy development and enhancement as the LNG industry in the United States grows and matures. Participating in the Interagency LNG Workgroup and LNG Roundtable, CG-FAC was able to address unique facility proposals and support field units in evaluation of novel facility design and operational proposals.

REPORTING OF INADEQUATE PORT RECEPTION FACILITIES

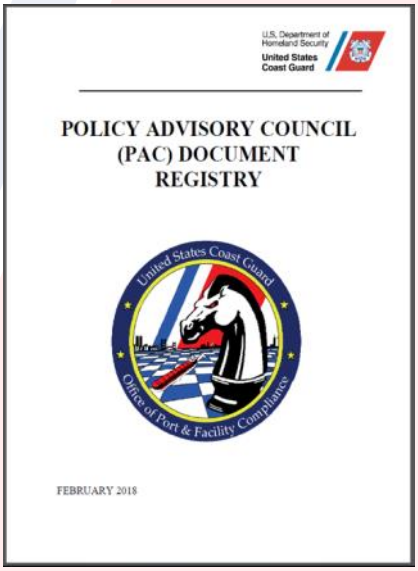
As a party to MARPOL, the U.S. is obligated to ensure the provision of Port Reception Facilities (PRF) at ports and terminals servicing ships on international voyages. Additionally, the U.S. is obligated to report to IMO where PRF are inadequate in meeting the needs of ships using U.S. ports and terminals. Ships may voluntarily report inadequacies, through their own Flag State Authority to the IMO and should inform the respective Port State Authority. Voluntary reporting will assist Port States in addressing inadequacies and meeting their reporting obligation to IMO. In 2018, CG-FAC continued efforts to educate field units and work with other flag states on addressing issues related to reception facilities throughout the country.

MARINE INFORMATION FOR SAFETY AND LAW ENFORECEMENT (MISLE) ENHANCEMENTS

At the request of CG-FAC, MISLE enhancements were completed in 2018 in order to align management of facility safety inspection programs with that of security. These enhancements included updating transfer monitor, container inspection activities, along with associated updates to Coast Guard Business Intelligence (CGBI), which allow facility and container inspection shops to capture more relevant data for transfer monitors and container inspections. They also assisted by providing District, Area, and Headquarters more detailed information on the great work being completed in the field to make better policy and resource decisions.

Highlights of 2018

POLICY ADVISORY COUNCIL (PAC) DOCUMENT REGISTRY



Policy Advisory Council (PAC) Document Registry is a collection of decision documents known as "PACs" that provide interpretation of regulations covered under the Maritime Transportation Security Act (MTSA) of 2002. PACs are a valuable tool for explaining maritime security regulations and aiding Coast Guard field units and the maritime industry.

PACs began in 2003 with their last publication dated March of 2011. Revisions and cancellations of PACs over the years may have caused varying confusion. Previously, revised or rescinded PACs were not always effectively communicated to the field or maritime industry. Additionally, several PACs incorrectly stated procedures for the approval process for waiver requests which required clarification and minor updates.

In order to correct these issues, CG-FAC-2 completed a comprehensive 2017 review of all PACs. All active PACs were compiled into a single Adobe document that is indexed and keyword searchable. PACs deemed "no longer required" were rescinded and those incorporated into other policy documents were noted in the registry. The new registry was published on Feb 6, 2018, replacing the individual PAC files previously posted on Coast Guard's Homeport website. The registry will be reviewed by CG-FAC-2 on an annual basis, where updates and changes will be tracked, noted in the registry, and communicated to port stakeholders through Homeport. For more details regarding the PAC Document Registry, please view the registry by accessing the following website: https://homeport.uscg.mil (Select the "Missions" tab, navigate into "Maritime Security", and select "FAQs" link). Or, click this link. Questions or comments with respect to the registry can be e-mailed to: CGFAC@uscg.mil.

Highlights of 2018

NATIONAL MARITIME SECURITY ADVISORY COMMITTEE

The National Maritime Security Advisory Committee (NMSAC) provides broad-based input on national maritime security issues impacting maritime commerce and the marine transportation system, both domestically and internationally.

In 2018 the Coast Guard welcomed four new members to the committee:

- Mr. William Sullivan, Donjon Marine – Representing Vessel Owners/Operators
- Captain Angel Montanez, Mass Maritime Marine – Representing Maritime Industry
- Dr. Hady Salloum, Stevens Institute of Technology – Representing the Academic Community
- Mr. Hans Olson, Assistant Undersecretary for Homeland Security, Commonwealth of Massachusetts – Representing State and Local Governments

At NMSAC's public meeting held last March in Oakland, California, members provided the Coast Guard with three recommendations pertaining to regulatory reforms. The committee recommended the repeal of Title 33 Code of Federal Regulation (CFR) 125.09-.57, at the regulatory level, related to the Port Security Card which has been replaced by the TWIC program or other Government-issued ID requiring a background check. The committee also recommended reducing security drills as required in Title 33 CFR Part 105.220, from four times a year to twice a year and matching the escort requirements for secure and restricted areas at a ratio of one escort to 10 visitors. These recommendations are currently under review by the Coast Guard Regulatory Review Task Force.

During their November public meeting held in Houston, Texas, the Coast Guard awarded outgoing members Mr. Larry Laverriere, Mr. Joseph Lawless, and Mr. Paul Londynsky the Coast Guard's Public Service Commendation for their outstanding service to the committee. Mr. John Crowley (Rear Admiral, USCG, retired) was awarded the Coast Guard's Meritorious Public Service Award for his service as the chairman of the NMSAC committee from 2016-2018. Each outgoing member's dedication and leadership were critical to the success of NMSAC and ensured the committee provided effective advice and recommendations to the Coast Guard and Department of Homeland Security, enhancing the security of the nation's critical MTS.

Cyber Risk Management

CYBERSECURITY AND MTSA FACILITIES

Since the signing of the USCG Cyber Strategy, CG-FAC has been a driving force in implementing the "Protecting Infrastructure" goal of the aforementioned strategy. CG-FAC continued efforts to develop the draft Cyber Navigation and Vessel Inspection Circular (NVIC) that was released via the Federal Register in July of 2017, link here. CG-FAC worked closely with Coast Guard legal offices to adjudicate over 200 comments, ensuring the best possible tool for the maritime community. The intent of the Cyber NVIC is to call industry's attention to MTSA regulations that require "radio and telecommunication systems, including computer systems and networks" to be addressed in facility security assessments. While the draft Cyber NVIC is going through review, units are encouraged to engage in conversations with facility owners, operators, and security officers about facilities' cybersecurity/cyber risk management programs and how to begin incorporating cyber into FSAs and FSPs. The Cyber NVIC itself is an awareness tool to inform industry of the requirement to include cyber and provides examples of how cyber might relate to cites within 33 CFR 105 and 106. The NVIC itself is not a template for a Facility Security Plan (FSP) update, addendum, or otherwise example, and therefore addressing cyber risks should not pend on its publication.

CG-FAC also continued efforts to increase cybersecurity/cyber risk management awareness in the MTS through a cyber awareness webinar, developed in conjunction with ABS Group. This training, though meant for the Area Maritime Security Committees, was recommended to all members of the maritime community, including Coast Guard members. The webinar provides a "101" level awareness of cybersecurity/cyber risk management, terminology, systems, etc. that participants might encounter in their day-to-day work in the MTS.

CYBERSECURITY REPORTING AND INFORMATION SHARING

CG-FAC emphasized the importance of incident reporting and information sharing throughout the MTS as being critical to cyber risk management efforts. CG-FAC developed an MTS Cyber Incident Quick Response Card (QRC), which was distributed to Areas/Districts/Sectors for use in Command Centers. Additionally, CG-FAC provided significant input into the National Command Center's QRC. CG-FAC's efforts improved alignment between the various QRC's and highlighted the areas of importance when reporting and responding to a cyber incident.

Unmanned Aerial Systems (UAS)

IDENTIFYING AUTHORIZED UAS ACTIVITIES FROM UNAUTHORIZED FLIGHTS

The maritime industry, Coast Guard, and the Federal Aviation Administration are working on solutions to reduce the threat of increasing use of unmanned aerial systems (UAS), specifically unauthorized flights. The Area Maritime Security Committees (AMSC) in New Orleans and Baton Rouge, which serves the ports of St. Bernard, South Louisiana, New Orleans, and Plaquemines have currently developed a method which has, according to members from Coast Guard Sector New Orleans, reduced the number of reported erroneous unauthorized UAS flights by approximately 90%. The idea is to focus on tracking authorized UAS flights rather than trying to determine unauthorized flights.

In 2017, Sector New Orleans published a Marine Safety Information Bulletin (MSIB Vol. XVII Issue: 002) in an effort to reduce the number of unidentified UAS flights. The MSIB recommended that the facility intending to conduct UAS operations notify the adjacent facilities of the operation 24-48 hours in advance along with providing a "24-Hour Advance Notice of UAS Operation" announcement (via email or phone call) to the Sector New Orleans Facility Compliance Branch. In response, the AMSCs subcommittee Facility Security Officer (FSO) Working Group took the effort a step further by establishing a port wide communication network to track all UAS flights. The network is managed by the New Orleans' Marine Safety Operation Center (MSOC) which has the authority to make the notice mandatory. The communication network has successfully grown to more than 1,000 participants and because of the involvement, identifying and reporting unauthorized UAS flights has become extremely reliable.

In an effort to support this established novel practice, CG-FAC is working with the Coast Guard Operations Systems Center (OSC) to develop a *voluntary* "Notice of UAS Operations" submissions tool on Homeport. The objective is to develop a communications network similar to New Orleans'. CG-FAC is also working on a policy letter to provide guidance on the procedure for reporting unauthorized UAS flights to include the FAA reporting guidelines.

Once again, the collaboration of our maritime partners and field development of best practices are vital to reducing current and developing threats to our nation's ports.

2018 Statistics

There are 3,144 facilities subject to the MTSA, those of which 2,403 require Facility Security Plans (FSP). Approximately 150 additional facilities have a valid approval letter for an Alternative Security Program (ASP). In 2018, the Coast Guard completed 5,469 security-related MTSA annual and spot check examinations and recorded 161 enforcement actions against MTSA-regulated facility owners or operators for noncompliance with MTSA regulations. In some cases, examinations of a previously inspected facility were not conducted due to the facility closing or changing their operations, thus removing them from Coast Guard oversight. The 161 enforcement actions in 2018 took place at "105 MTSA-regulated facilities" to include Notices of Violation, Letters of Warning, or administrative civil penalties.

Citation	Citation Title	Enforcement Activities Executed
33 C.F.R. § 101.305	Reporting, Breach of Security	**11**
33 C.F.R. § 105.125	Noncompliance	**2**
33 C.F.R. § 105.140	Alternative Security Program	**6**
33 C.F.R. § 105.200	Owner or Operator Requirements	**22**
33 C.F.R. § 105.205	Facility Security Officer Requirements	**10**
33 C.F.R. § 105.210	Facility Personnel with Security Duties	**8**
33 C.F.R. § 105.220	Drill and Exercise Requirements	**12**
33 C.F.R. § 105.225	Facility Recordkeeping Requirements	**6**
33 C.F.R. § 105.255	Security Measures for Access Control	**57**
33 C.F.R. § 105.260	Security Measures for Restricted Areas	**11**
33 C.F.R. § 105.275	Security Measures for Monitoring	**1**
33 C.F.R. § 105.400	Facility Security Plans – General	**3**
33 C.F.R. § 105.410	Facility Security Plans – Submission and Approval	**5**
33 C.F.R. § 105.415	Facility Security Plans – Amendment and Audit	**7**
Total		**161**

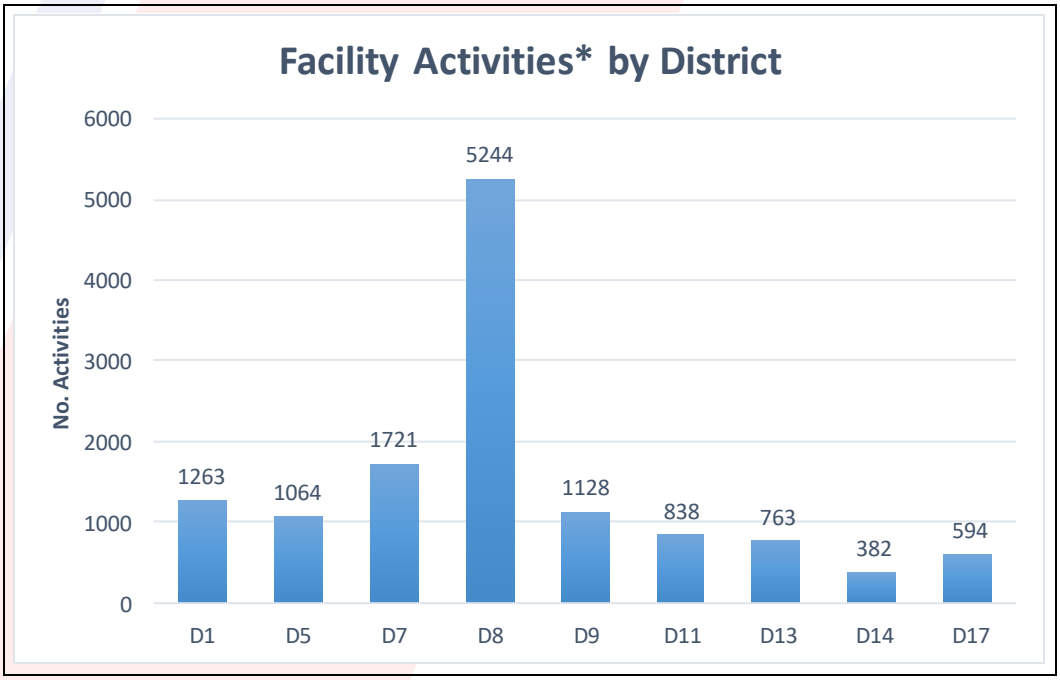
Official 2018 CY Data Numbers

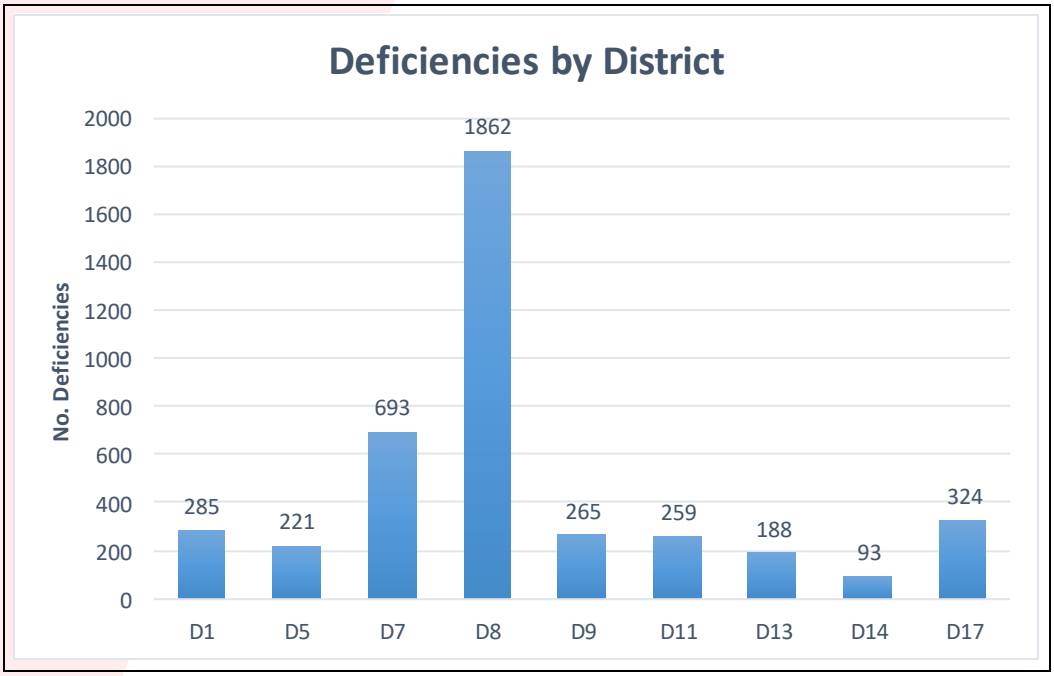
Description	2017 Data (# Reported)	2018 Data (# Reported)
All types of facilities documented in MISLE	45,244	45,608
All inspections completed at USCG regulated facilities	16,393	17,472
Total waterfront facilities documented in MISLE	8,517	8,621
Total MTSA regulated facilities	3,494	3,144
Total MTSA regulated facilities that require an active FSP	2,470	2,403
Enforcement Actions that took place at MTSA Regulated Facilities	190	161
Total security related inspections as per the SAFE Port enforcement requirements conducted during a facility inspection	5,951	5,469
Total transfer monitors activities conducted	724	767
Total number of container inspections conducted	23,445	26,646
Facilities that have a valid approval letter to belong to an ASP	N/A	150
Total number of visual and electronic inspections of TWICs	58,319	53,286
Total operational controls (COTP Order)	36	51

Op Control Type	No.	Top Category
Safety	26	Identified hazardous/ Unsafe condition
Security	14	FSP/ASP not approved or in compliance
Environmental Protection	11	Environmental Protection

*Data source: CGBI CUBEs accessed on January 2019
** Numbers are subject to change as time moves forward and backlogs are accounted

Breakdown by CG District





The above chart depicts total deficiencies in 2018 sorted by Coast Guard Districts (total 4190). Of all deficiencies, over half stemmed from improper documentation (2128 deficiencies). The top three sub-systems were logging and records (605), safety and response plans (501), and security and/or alternate security programs (486). The second highest system for identified deficiencies was in operations/management. The majority categorized within security sub-systems (715 deficiencies) and the top three pertaining to security measures-access control (236), restricted areas (146), and drills and exercises (83).

*Activities includes all facility inspection activities and transfer monitors
**Data source: CGBI CUBEs accessed on March 2019
***Numbers are subject to change as time moves forward and backlogs are accounted

Container Updates

The Coast Guard conducts three types of container inspections: Declared, General and Structural. "Declared" inspection refers to containers with declared hazardous materials (HAZMAT) and includes aspects such as verifying paperwork and packaging requirements. "General" inspections contribute to identifying shipments of un-declared HAZMAT or other deficiencies with a container. "Structural" inspections occur during every container inspection to help ensure the structural serviceability of containers. Containers with structural damage can cause or contribute to significant safety risks of vessels, facilities, and personnel working with or around them.

Higher national compliance rates in declared HAZMAT shipments led to a shift in inspections rates of declared HAZMAT and general cargo container shipments. Half of Coast Guard container inspections should be on HAZMAT containers, and the other half on general cargo containers. The purpose of inspections on general cargo containers is to see if HAZMAT is being shipping undeclared, and therefore posing a risk to the MTS. In 2018, 58% of Coast Guard container inspections were conducted on HAZMAT containers.

CG-FAC will continue to monitor inspection results and data to update the program and the field as needed. Input from the field is always welcomed and appreciated as we continue to improve the National Container Inspection Program (NCIP) to reduce risk and improve safety, both at sea and ashore.

Rulemakings

TRANSPORTATION WORKER IDENTIFICATION CREDENTIAL (TWIC)

The TWIC reader rule requires owners and operators of certain MTSA regulated vessels and facilities to use electronic readers designed to work with TWIC cards as an access control measure.

On August 2, 2018, the Transportation Worker Identification Credential (TWIC) Accountability Act (Public Law No: 115-230) was passed which prohibited the Coast Guard from: (1) implementing the rule titled "Transportation Worker Identification Card (TWIC)-Reader Requirements," and (2) proposing or issuing a notice of proposed rulemaking for a rule that would require the use of biometric readers for biometric transportation security cards. The Homeland Security Operation Analysis Center (HSOAC) together with RAND Corporation, a nonprofit institution that helps improve policy and decision making through research and analysis, started the assessment of how effective the transportation security card program is at enhancing security and reducing security risks for regulated maritime facilities and vessels as required by Public Law No: 114-278.

Once completed (estimated June 2019 by HSOAC/RAND), the Coast Guard will review the results of the assessment and move forward with the TWIC Reader Rule implementation process, taking into consideration any changes resulting from the assessment, coordination with the Transportation Security Administration (TSA) and the Screening Coordination Office (SCO), and any possible Congressional feedback concerning the assessment.

CONSOLIDATED CRUISE SHIP REGULATIONS

The Coast Guard issued a final rule to eliminate outdated regulations that imposed unnecessary screening requirements on cruise ships and cruise ship terminals. This final rule replaced outdated regulations with simpler, consolidated regulations that provide efficient and clear requirements for the screening of baggage, personal items, and persons on a cruise ship. This final rule enhances the security of cruise ship terminals and allows terminal operations to use effective screening mechanisms with minimal impact to business operations. This final rule published on March 19, 2018 with an effective date of April 18, 2019 (Document Citation: 83 FR 12086). Please refer to the Federal Register publication, found here, for details.

Rulemakings

ELECTRONIC OPERATIONS MANUAL

Advances in technology, communications, and overall digitalization has become the main platform to conduct business. Electronic means of exchange has reduced the need for paper via emails, shared/cloud drives, or otherwise digital storage. Regulation changes should allow for such electronic means of operation that align with our current digital era.

The Coast Guard is working on updating rules regarding the submission of facility operations manuals for Coast Guard regulated waterfront facility operators to allow electronic maintenance and submission of operations manuals.

SEAFARER'S ACCESS

This rule sets clear regulatory requirements for each facility owner or operator to provide seafarers associated with a vessel moored at the facility (pilot, other representatives of seaman's welfare, and labor organizations) access between the vessel and facility gate without unreasonable delay, and at no cost to the seafarer or other individual. The rule was published April 1, 2019. See here.

Training

In 2018, Training Center (TRACEN) Yorktown graduated 29 students from the Facility Inspection Course and 49 students from the Explosive Handling Supervisor (EHS) course. Additionally, the Container Inspection Training and Assistance Team (CITAT) graduated 150 Coast Guard and 17 personnel from other government agencies from the Container Inspection Course.

While CITAT is not a CG-FAC entity, they do serve as an exceptional force multiplier for CG-FAC in advancing the National Container Inspection Program. In this capacity, they assisted six units on Multi Agency Strike Force Operations (MASFO) where they conducted 602 container inspections. They also assisted in teaching one Defense Transportation Assistance Course and eight DOD deployments, effectively training 83 personnel, advising on proper shipment of 329 pieces of rolling stock, and inspecting 305 shipping containers. Without this assistance, vital DOD supplies could have been detained in ports around the world and negatively impacted DOD mission execution.

Finally, CITAT conducted training for 50 international students at the World Maritime University in Malmo, Sweden, June of 2018. This effort educated students from 21 countries, allowing international adoption of Coast Guard best practices and augmentation of cargo safety around the world.

Additionally, performance-based improvements to both CITAT and Facility Inspector Course agendas were completed in 2018 and CG-FAC anticipates formal FORCECOM approval of the course criteria updates in 2019.

Area Maritime Security Committees (AMSCs)

AMSC SUPPORT

Area Maritime Security Committees (AMSCs) are a vital partnership forum to ensure the security of the marine transportation system. Under the Area Maritime Security Training and Exercise Program (AMSTEP), Federal Maritime Security Coordinators and their AMSCs tested the effectiveness of their respective port-level AMS Plans and supported maritime security preparedness regimes through the engagement of federal, state, local, tribal, and territorial government and private sector stakeholders. In 2018, 105 events were held, including nine seminars, 19 workshops, 26 table-top exercises, eight functional exercises, 17 full-scale exercises, 20 area maritime security drills, and six maritime security operations during real events receiving exercise credit. Each event generated remedial actions for improving maritime security and identified best practices that were shared with the AMSCs.

ANNUAL AMSC CONSOLIDATED REPORT

CG-FAC published the AMSC consolidated annual report on the status and work completed by each of the 43 AMSCs last July. The annual report is an important tool used to compile and share information pertaining to AMSC issues such as committee organization, training events, challenges, accomplishments, best practices, and recommendations. The report assists CG-FAC in devising national strategies to address common problems, emerging threats, validate port specific data, track AMSC activities nationwide, and measure AMSCs alignment with national preparedness goals. The 2018 FI/PSS Workshop held in Leesburg, VA, provided a forum to review and discuss the implications of the consolidated report and present program updates.

Area Maritime Security Committees (AMSCs)

AMSC OF THE YEAR

In July 2018, Charleston AMSC was recognized as the AMSC of the Year.

Charleston AMSC advanced mutual public safety and security goals while expanding partnerships and increased operation efficiency through intelligence and information sharing across the Captain of the Port zone. Charleston AMSC also implemented its Area Maritime Security Plan's (AMSP) Radiological/Nuclear (RAD/NUC) detection and response annex due to a real world incident. AMSC members, along with other agency representatives quickly reported to the Interagency Operating Center (IOC). Partners initiated joint operational planning and intelligence/information sharing fostering the successful deployment of RAD/NUC capable agencies to create a land/waterside safety zone, evacuate a terminal, and establish a forward operating base to assess and mitigate the threat.

Additionally, Charleston's AMSC cyber subcommittee collaborated with members from the White House National Security Council, Army Cyber Command, National Cyber Center of Excellence, and the U.S. Coast Guard Cyber Command to assist in efforts related to cyber prevention, protection, response, recovery, and resilience within the maritime domain. The cyber subcommittee led efforts in leveraging Port Security Grant Program (PSGP) funds to establish a maritime-based cyber information-sharing portal.

Pictured left to right: CAPT John Reed, Sector Charleston; Mark Keel, South Carolina Law Enforcement Division, Heather Holmquest, Maritime Association of South Carolina, and RADM John Nadeau, Assistant Commandant for Prevention Policy

Charleston AMSC communication subcommittee collaborated with the local County Consolidated Dispatch and 911 Center to leverage PSGP funds for a new system that delivers real-time situational awareness, through analytic and predictive modeling capabilities that is shared with the AMSC and other port partners.

Charleston AMSC exemplified the strategic importance in providing a regional forum for the effective collaboration of stakeholders to provide a layered security approach necessary to protect the vitality of the Marine Transportation System.

On the Horizon for 2019

CG-FAC is working to address Coast Guard specific tasking within the recent FAA Reauthorization Act, which directs the Coast Guard, in coordination with other stakeholders, to establish a cyber risk assessment model for the marine transportation system. This cyber risk assessment tool will follow the National Institute of Standards and Technology's Cybersecurity Framework, similar to CG-FAC's work on Cybersecurity Framework Profiles (CFP).

CG-FAC continues to identify the need for additional CFPs in order to provide cyber risk management tools requested by maritime stakeholders. CG-FAC has identified a need for a profile focusing on navigation and automation onboard vessels and facilities.

CG-FAC-1 continues to work on initiatives related to MTS Recovery that include:

- Tactics, Techniques, and Procedures for the Security Specialist (Port/Recovery) Program
- Recapitalizing laptop computers for all MTSRUs
- Predictive tool to analyze regional port resiliency due to major disruptions of the MTS

CG-FAC-1 intends to complete initiatives related to AMSP updates and validation cycle that include:

- NVIC 09-02 Change 5, titled, "Guidelines for the Area Maritime Security Committees and Area Maritime Security Plans Required for U.S. Ports."
- Updated AMSP and AMS Assessment Development and Maintenance Process (COMDTINST 16601.28 (series))

CG-FAC-2 Safety Branch is working on numerous projects to update existing and create new policies. Keep an eye on the message board, FAC Notes, and your email for ways you can help shape these policies, and release of information when updates are completed.

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CG-FAC Links

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Portal:	https://cgportal2.uscg.mil/units/cgfac/Documents/Forms/AllItems.aspx
Homeport:	Homeport> Mission> Maritime Security or Ports and Waterways
TWIC (Portal):	https://cgportal2.uscg.mil/communities/twic-discussion/SitePages/Home.aspx