



## SPECIAL ANNOUNCEMENTS

**Q:** Update on iPad pilot program?

**A:** <https://cgportal2.uscg.mil/units/cgfac2/iPads/SitePages/Home.aspx>

### Bennis Award

The solicitation period for the 2015-2016 Rear Admiral Richard E. Bennis Award applications is now open! See the article in this edition of WoW for more information.

### Feedback

We welcome any suggestions! Please submit comments to Mr. Ryan Owens at:  
[Ryan.F.Owens@uscg.mil](mailto:Ryan.F.Owens@uscg.mil).

# Waves on the Waterfront

CG-FAC, Office of Port and Facility Compliance  
Safety, Security, and Stewardship

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October 2015

## Questions from the Field

Input from the field in the form of practical questions on how to make our enforcement programs work in view of real world challenges at the unit level (where the work of implementing policies that are written here at HQ gets done) is essential to the process of ensuring that regulatory, policy and program guidance is practical, user friendly and meets the needs of our inspection and prevention field personnel.

### TWIC

**Q:** There is technology out there to scan TWIC cards through the use of smart phones and we would like this to be addressed along with the feasibility of this being used at the sector.

**A:** CG-FAC is aware of this. At this time we are sending each unit iPads and are testing scanners that can be attached to the iPads to check TWIC cards. The application is extremely user friendly. You will also be able to download the updated Canceled Card List if WiFi is available upon opening the app.

### Secure Area/Restricted Area

**Q:** Simplified definition of "Secure Area" and "Restricted Area" will be very helpful in avoiding confusion in the field.

**A:** Restricted areas, according to 33 CFR 101.105, means "the infrastructures or locations identified in an area, vessel, or facility security assessment or by the operator that requires limited access and a higher degree of security protection." Restricted areas may be inside or outside of a secure area and must comply with requirements in 33 CFR 105.260. If a designated restricted area is located within a secure area then the TWIC regulations also apply. A secure area means the area on board a vessel or at a facility or outer continental shelf facility over which the owner/operator has implemented security measures for access control in accordance with a Coast Guard approved security plan. Facilities subject to 33 CFR 105, with approval of the Coast Guard, may designate only those portions of their facility that are *directly connected* to maritime transportation or are at risk of being involved in a transportation security incident as their secure areas. All personnel seeking unescorted access to designated secure areas are required to possess a TWIC.

Continued on Page 7

# Solicitation: Rear Admiral Richard E. Bennis Award for excellence in maritime security

By Ryan Owens



The Coast Guard is opening up the solicitation period for nominations of the Rear Admiral Richard E. Bennis Awards for Excellence in Maritime Security. This bi-annual award serves to highlight and recognize outstanding achievements and contributions of the maritime community with regards to implementation of Maritime Transportation Security Act, or MTSA, requirements and other maritime security best practices in safeguarding our nation's maritime transportation system.

The intent is to recognize and encourage organizations demonstrating a true comprehensive culture of security, encourage organizations to assess their overall security program to identify strengths and weaknesses, seek creative solutions for addressing known risks, build a system of continuous improvement and share best practices that would benefit similar organizations.

## Award eligibility

Any marine transportation related organization owning, operating, or otherwise managing vessels, waterfront facilities, fleeting areas, or other entity engaged in maritime operations subject to Coast Guard maritime security regulations is eligible as an award applicant within one of the following categories:

Port Authority of the Year: Geographically located within the United States and engaged in maritime operations

Company of the Year: Offices geographically located within the United States, at least 25 percent of fleet called a U.S. port at least once during the award period, and/or at least 25 percent of its MTSA regulated facilities geographically located within the United States

Facility of the Year: Geographically located within the United States and regulated under MTSA

## Award categories

Port Authority of the Year

Company of the Year - Large Business: 50 or more employees

Company of the Year - Small Business: 49 or fewer employees

Facility of the Year - Large Business: 50 or more employees

Facility of the Year - Small Business: 49 or fewer employees

## Criteria

Applications will be evaluated on the following categories, in no particular order:

**Partnerships:** How the organization leads, develops, promotes and/or engages in maritime leadership and partnership activities to enhance Maritime Domain Awareness and share information with local, state and federal agencies and other commercial entities. Additionally, the organization's ability and efforts to promote supply chain security and contribute to an integrated security system with its customers, vendors and suppliers may be considered. Examples of this include, but are not limited to, participation with the Area Maritime Se-



curity Committees, agreements with local response and law enforcement organizations, sharing of best practices with other port operators and incorporating security into contracts with suppliers, service providers and other business partners.

**People:** How the organization instills a “culture of security” with employees throughout all levels of the organization. In other words, how the organization ensures employees understand the security policies, appreciate their role in the overall security of the facility and incorporate that into their everyday responsibilities. Examples of this include, but are not limited to, training programs for security and non-security related personnel, participation in professional security certification programs, drill and exercise programs and review of procedures and policies following any incidents.

**Process:** How the organization develops, manages, implements the plans, policies and procedures related to security. This also includes an organization’s ability to respond to changing conditions and continuously evaluate and measure the effectiveness of their security program and respond appropriately. Examples of this include, but are not limited to, quality management programs, 3<sup>rd</sup> party audits, use of industry standards or guidelines and adapting to and incorporating new government regulations and policies.

**Physical Security:** This category considers factors such as the organization’s innovation, initiative and integration of physical security measures to meet specific security objectives and address identified vulnerabilities. Examples of this include, but are not limited to, effective use of fencing, cameras, alarms, TWIC and other physical security measures designed to safeguard personnel, prevent unauthorized access to equipment, installations, material and documents and to safeguard them against terrorism, espionage, sabotage, damage and theft.

**Other Security Activities:** This category takes into consideration the spectrum and scope of different security requirements appropriate for the various marine transportation related facilities regulated under MTSA that may not be captured within the other categories. These include but are not limited to such topics as: information and cyber security, promoting seafarers access, balancing security with employee/customer privacy, anti-piracy efforts, and port/facility resiliency and recovery capabilities.

## Application procedures

Applications be submitted via email to [ryan.f.owens@uscg.mil](mailto:ryan.f.owens@uscg.mil) or mailed to: Commandant (CG-FAC) Office of Port and Facility Compliance, ATTN: Rear Admiral Bennis Award, US Coast Guard Stop 7501, 2703 Martin Luther King JR Ave SE, Washington, DC 20593-7501

Applications are limited to 30 pages to include all enclosures/attachments

Applications will be accepted from September 14, 2015 to January 15, 2016



If you have any questions, or comments please contact the Mr. Ryan F. Owens at [ryan.f.owens@uscg.mil](mailto:ryan.f.owens@uscg.mil) or call (202) 372-1108.





# The Word in the Yard

## FY15-16 Scheule

Dec: Houston/Galveston  
 Jan: Honolulu  
 Feb: Charleston  
 Feb/Mar: Hampton Roads  
 Mar: **Oklahoma City**  
 Apr: San Francisco  
 Apr: New Orleans  
 Jun: Boston  
 Jul: Anchorage

TQC: Choose *resident* (500848 MS-542) or road-exportable (502414), and coordinate w/ local Sector.

### Points of interest:

- Distributed in FY15 8200 High Security Seals.
- 53% of FY15 students were E4/E5.
- July: CITAT rcvd 12 calls/emails from the field; 5 of which from DOD.

## ...MISLE Data Mystery...

**According to MISLE.** For the past few years **83%** of containers inspected were export containers. Coast Guard Policy states that both import and export containers should be inspected; however, it is preferred that attention be primarily focused on import containers or at least a more even split.

### What is causing this?

We think there are two potential causes for this:

**1)** The data doesn't lie: Maybe we really are inspecting mostly export containers. Perhaps container inspectors are primarily targeting exports containers for various reasons (i.e. easier to get shipping papers or chose from, more likely to

receive payment in the event of a ticket, located in a port that mostly exports products, etc).

**2)** Faulty MISLE entries: We think that containers that are inspected without shipping papers (i.e. FAK containers or MASFO containers) are being entered into MISLE as originating in the USA (export containers).

### What are the solutions?

To correct for cause #1, try to focus on import containers if possible. If you are having difficulty getting shipping papers from importers please notify CITAT. To correct for cause #2, during each container inspection,

make a concerted effort to determine the country of origin. If shipping papers are not available (MASFO, general cargo), look for package markings, a bill of lading or manifest that indicate where this shipment originated.

Once you determine an accurate country of origin, be sure to accurately record this under the *Quantities and Origins* tab in your MISLE activity.



**Aug 2015 - China Port Explosion:** potential cause, Methyl Ethyl Ketone, Sodium Cyanide, Ammonium & Potassium Nitrates & Calcium Carbide (a class 4.3) in the same warehouse. After the explosion, water and a 4.3, are not good combos!

## 2014 Data Review

Per MISLE, in 2014 US Coast Guard inspected 22,797 containers. A total of 1,762 deficiencies were found.

Of 18,599 exports, 5.7% had errors. Of the 4,198 reported imports, a 17% error rate.

### The leading causes overall:

- 57% placarding/markings;
- 16% structural deficiencies;
- 12% shipping paper documentation.

## Container Sea Stories

Anything new and interesting happen recently in the world of Containers at your Port/MASFO?

Send your stories to us so we can share with the field. Send stories to MST1 Lanno at [daniel.r.lanno@uscg.mil](mailto:daniel.r.lanno@uscg.mil) and we will disseminate and pass on the info in upcoming newsletters and training.

**Next issue:** Look at recent PHM SA changes, such as Marine Pollutant exceptions, vessel storage changes and non-bulk packaging.

## News From CITAT

Transfer season 2015 brought a few new folks to CITAT. LCDR John Bannon replaces LCDR Anthony Migliorini (at the helm since 2012). LCDR Bannon comes with a background of containers at MSO San Diego, MSO/Sector San Francisco, and a year overseas with the RAID Team (2011-12).

New faces also include MSTCS Scott Garcia from Sector San Francisco and MST1 Matt Hutchins from Recruiting Office San Francisco. They join MST1 Jeremy Sherrill, MST1 Daniel Lanno, MST1 Deborah Metzger and YN1 Michael Croll.

# COTP Responsibility for Mobile Facilities

By LTJG Robert Bobuk

Mobile Facilities, why do they move throughout different COTP zones? Program Managers in CG-FAC-2 have received multiple questions regarding Mobile Facilities that operate in multiple COTP zones, and who is responsible for completing the annual compliance exams? Here is Programs recommendations to the question at hand.

FAC-2 suggests that the COTP Zone in which the Owner/Operator's main office is located be considered the Facility's headquarters and all tank trucks conducting Marine Transfer Operations should be considered as individual Facilities. The COTP zone in which the headquarters is located will conduct



the annual 33 CFR 154 facility compliance exam by reviewing the Response Plans, Operations Manuals, and all other required records that need to be kept. Along with this, all tank trucks used for marine transfers located at the headquarters should be examined during the same visit. To allow for the proper tracking of examinations, the COPT zone in which the company is based should enter each individual tank truck into MISLE.



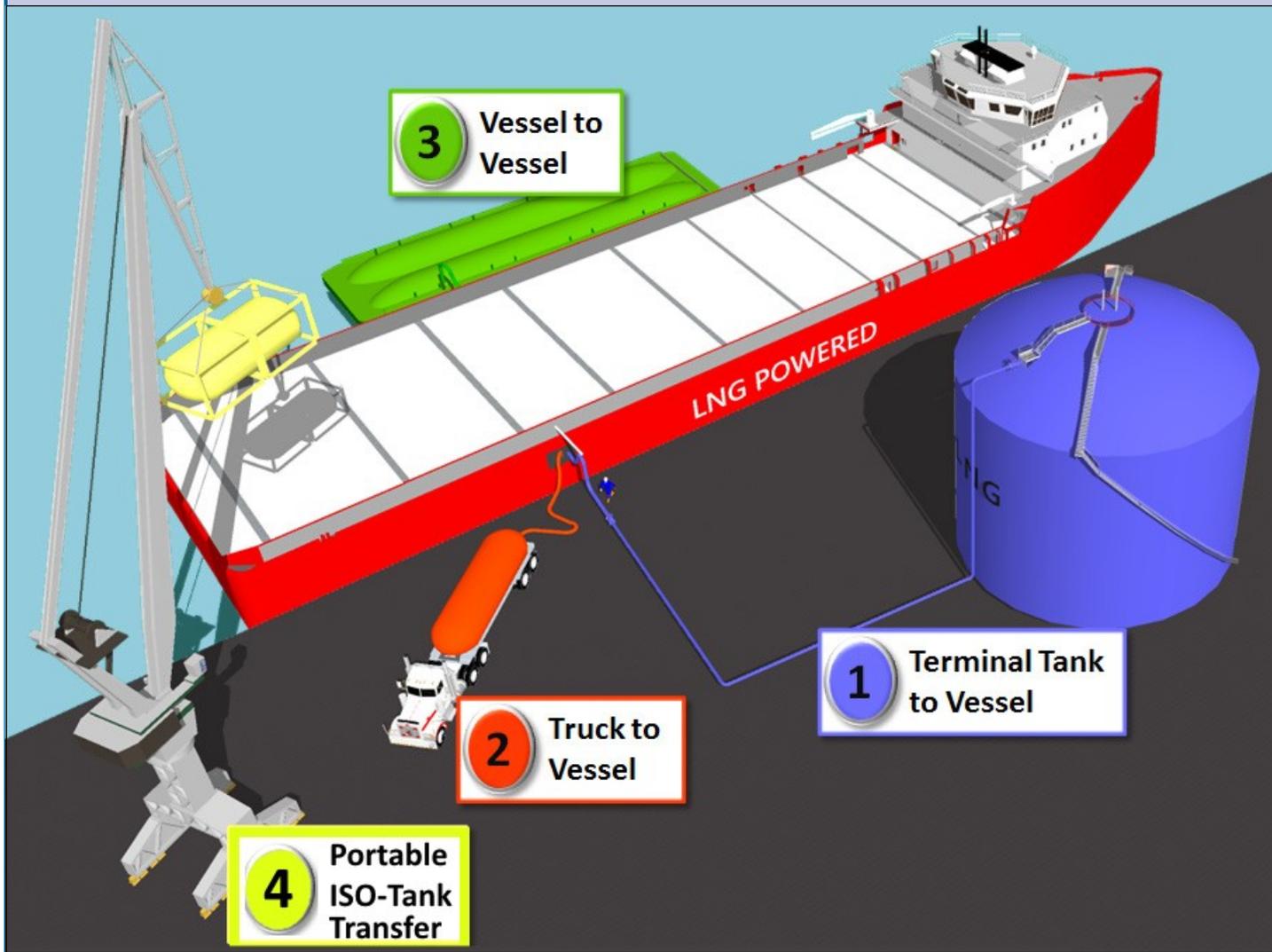
**We recommend using the License Plate Number as the FIN.**

Responsibility for the compliance examinations does not fall solely on the COTP zone with the company headquarters, it is the responsibility of all COTP zones in which trucks operate to know what trucks are operating in their zone and to ensure that Owner/Operators are updating and complying with their response plans and ops manuals as necessary. During transfer monitors and spot checks, inspectors should also examine any truck(s) conducting Marine Transfer Operations within the COTP zone. Special consideration should be given to the location where the transfer is being conducted to ensure adequacy of the FRP and OPS manual for the location of the transfer.



FAC-2 would like to stress the importance MISLE will have once all Tank Trucks are entered and have their own FIN. With trucks frequently operating in different zones it is important to track when examinations have been completed, and to examine each truck for compliance. With the standardized tracking of ALL Tank Trucks any COTP zone will be able to conduct a transfer monitor, or complete a spot check on mobile facilities as necessary, thus allowing the headquarters zone to focus mainly on the plans and paperwork instead of each individual truck.

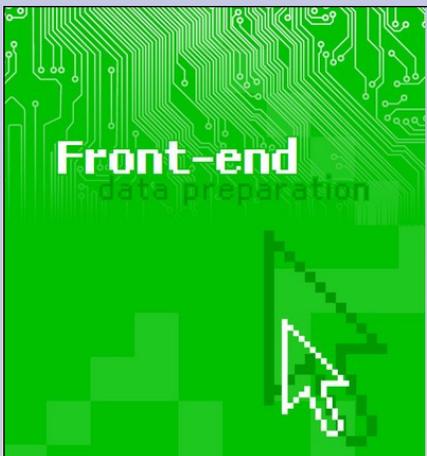
If you need further clarification on this matter you may contact LTJG Robert Bobuk at (202) 372-1114 or MSTC Kevin Collins at (202) 372-1127.



# PSS (Port/Recovery) Front End Analysis & Task Validation Meetings by Robert Reimann

Recently, CG-FAC has taken the lead in ownership of the Port (& Recovery) Security Specialist positions that were created out of and resourced by the MTSA. Since the inception of these civilian positions, these members were physically and organizationally placed within various divisions at the Sector level. Haphazard placement within the Sector organizational construct and the disparity of job descriptions had led to scope creep of job requirements. Last year, CG-FAC along with CG-121 distributed a new standard PD for the GS-12 Security Specialist (Port) positions Coast Guard-Wide. In addition to this effort, CG-FAC is looking to capture the PSS/PSSR jobs and other factors impacting their current world of work, in efforts to provide support the entire community.

At the request of CG-FAC and Force Readiness Command, the Performance Technology Center (PTC) at Yorktown, VA is conducting a New Performance Planning (NPP) Front End Analysis (FEA) for the PSS/PSSR community. This analysis will develop a comprehensive job requirement task list and identify the performance support required for PPS/PSSR personnel to perform at an optimal level within the duties and responsibilities as outlined by their position descriptions (PD). PTC Yorktown is conducting the analysis within current Standard Operating Procedures (SOP) for the Coast Guard's Training System. The analysis is a systematic process for describing new performance; determining inhibitors to competent performance; and recommending the skills and knowledge (S/K), environmental (ENV), motivation/incentive (M/I) and assignment and selection (A/S) interventions that must be put in place to help Coast Guard workers achieve optimum performance.



On 22 June and 27 July, for a five day period, Accomplished Performers (APs) within the respective PSS/PSSR communities were invited to PTC Yorktown to validate job accomplishments, major accomplishments and tasks that are then measured to establish performance interventions. This is accomplished through what's known as a Task Validation Meeting (TVM). Afterwards within the NPP composition, a Job Task Analysis (JTA) will be performed. The data collected on each task is then used in algorithms to make train/no train decision and determine under what circumstances job aided tasks require introductory or extensive training. The outcome of a JTA usually results in the following performance intervention recommendations:

- No training required

- Job aid
- On-the-job training
- Job aid with introductory training
- Job aid with extensive training
- Train to memory

Looking at one's job performance determines what should or should not be included in a training program, how much will be taught, the instructional sequence and what will be evaluated. All deliverables and milestones are on track as promulgated in the agreement CG-FAC has with PTC Yorktown. The FEA is tentatively scheduled for delivery by the end of November and CG-FAC will be passing on status reports as needed.

## Questions from the Field (Continued from Page 1)

### Container Seals

Q: Non-availability of container seals & stickers- do we have a long-term solution?

A: Not a simple solution. We are working on a long term answer. We ordered 2,000 HOLD stickers and CITAT has them in hand. Units can contact CITAT and they will send them out. We will be ordering another 3,000 stickers soon.

## CG-FAC WORKING WITH OUR INTERNATIONAL PARTNERS ON MANAGEMENT OF MARPOL WASTES AT US PORTS AND TERMINALS

CG-FAC manages the Coast Guard's Certificate of Adequacy (COA) which implements important international regulations and ensures U.S. compliance with MARPOL (the International Convention for the Prevention of Pollution from Ships) at U.S. ports and facilities. CG-FAC Safety Branch staff recently attended the annual meeting of the Subcommittee on Ships and marine technology-Marine environment protection (SC2) of the International Organization for Standardization (ISO/TC8/SC2) in Hamburg Germany.

While CG-FAC supports other offices within the Coast Guard and its interagency partners on a wide range of issues related to marine environmental protection and enforcement, in the past several years it has taken a lead role in the development of international standards for ensuring MARPOL compliance. ISO Standards are not mandatory but are universally recognized guidance on best practices, latest available technologies, and technical operating guidance for use by both Government experts and the regulated shipping community. ISO committees are made up of experts from around the world representing their national standards organization with membership and voting rights at ISO which is based in Geneva. The Coast Guard and the Maritime Administration have typically taken the lead in representing the American National Standards Institute (ANSI) for the US Delegation to Annual meetings of SC2 and the ISO Technical Committee (TC8).

ISO standards often fill the gap between acceptance of international regulations that impose treaty obligations (like those found in MARPOL and its Annexes) and implementing and enforcement legislation enacted by states party to the Convention, a sometimes lengthy process. This is especially true when Amendments to MARPOL Annexes are adopted at IMO and can come into force in as little as a year. In the past several years, these Amendments to MARPOL have included a major shift in how ship's waste is managed aboard ship, and how port states operate port reception facilities in compliance with MARPOL.

With CG-FAC taking a leadership role chairing an ISO/TC8/SC2 Work Group, ISO took up the task of completing an ISO standard in 2009 (ISO 21070) on Ship's Waste Management and in 2011 published ISO 16304, on operating and management of port reception facilities. Both of these standards are being updated with new editions incorporating the most recent Amendments to MARPOL Annexes and the Coast Guard continues in its leadership role, working closely with its international partners. The agenda in Hamburg this past month included a complete review for the new editions and a new project proposal for a technical standard on shipboard incinerators which includes previous work completed by CG-ENG. Working with ISO on such standards helps ensure that international standards, and subsequent legislation and enforcement policy, harmonizes with existing U.S. regulatory schemes, and helps maintain key relationships and promotes essential collaboration with our international partners.



ISO/TC8/SC2 Delegates in Hamburg Germany in July included national standards organization representatives from Germany, Norway, Denmark, Netherlands, Japan, Korea, China, United States, the European Maritime Safety Agency, and Observers from the shipping industry and the waste management industry and classification societies.

# Office of Port and Facilities Compliance Contact List

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Mr. Robert Reimann 202-372-1146

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## Facility Safety (explosive handling, containers, COAs)

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Mr. Casey Johnson 202-372-1134  
Ms. Betty McMenemy 202-372-1122

## TWIC Implementation

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## Security Standards (Regulation Development)

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## USCG TWIC Help Desk

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[TWIC.HQ@uscg.mil](mailto:TWIC.HQ@uscg.mil)

## CG-FAC Links

www: <http://www.uscg.mil/hq/cg5/cg544/default.asp>  
Portal: <https://cgportal2.uscg.mil/units/cgfac2/SitePages/Home.aspx>  
Homeport: [Homeport](#)> [Mission](#)> [Maritime Security](#) or [Ports and Waterways](#)  
TWIC (Portal): <https://cgportal2.uscg.mil/communities/twic-discussion/SitePages/Home.aspx>

