Director National Vessel Documentation Center 792 T J Jackson Drive Falling Waters, WV 25419 Staff Symbol: NVDC Phone: (304) 271-2506 Christina.G.Washburn@uscg.mil

16713/5/3 April 30, 2025

Scott Robinson Savage Bahia Operations, LLC 2719 Causeway Center Dr Tampa, Florida, 33619

Dear Mr. Robinson:

This is in response to your email of March 7, 2025 requesting a determination pursuant to 46 C.F.R. § 67.177 that certain repairs performed in a Mexican shipyard on the tank barge BAHIA DE TAMPA (O/N 514966) will not adversely affect the coastwise eligibility of the subject vessel under 46 C.F.R. § 67.97.

Pursuant to our review of your submission and consistent with National Vessel Documentation Center ("NVDC") past practice, we requested a review and analysis of your March 7, 2025 determination request and supplemental materials by the Coast Guard's Naval Architecture Division ("NAD").

Upon review, NAD accepted the discounted steel weight of 5,604.85 Ltons, and noted that while the sulfur cargo tanks were not part of the vessel's original construction, they were installed by an American shipyard, and therefore the weight of the tanks is included in the discounted steel weight. NAD remarked, for future reference, that the sulfur cargo tanks are independent and separate from the barge's hull structure, and thus any steelwork performed on the tanks in a foreign shipyard is not subject to the foreign weight limit.

NAD concluded that, based upon the discounted steel weight of 5,604.85 Ltons (5,706.76 Mtons), the 7.5 percent foreign steel weight limit for the BAHA DE TAMPA is 420.36 Ltons (428.00 Mtons), which is the service life total for the vessel. Further, NAD identified the maximum 1.5 percent major component weight limit as being 84.07 Ltons (85.6 Mtons), constant throughout the BAHIA DE TAMPA's service life. Next, NAD observed that the total Mexican steel repairs in 2024 were 74.76 Ltons, and no individual component was more than 5.3 Ltons, within allowable limits. Finally, NAD determined that, with regard to future foreign repairs (if any), the total remaining steel weight margin is 345.60 Ltons (351.88 Mtons).

In light of the foregoing, and based upon the information provided, I confirm that the repairs performed in a Mexican shippard, as noted, will not adversely affect the U.S. build status of, and eligibility to operate in the coastwise trades of the United States upon completion, the BAHIA DE TAMPA.

Sincerely,

Christina G. Washburn

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Director