



**UNITED STATES COAST GUARD**  
U.S. Department of Homeland Security

## **MARINE SAFETY ALERT**

### **Inspections & Compliance Directorate**

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Safety Alert 15-25

## **THE IMPORTANCE OF EFFECTIVE COMMUNICATION WHEN COMPLETING A DECLARATION OF INSPECTION**

A recent oil spill on the Delaware River starkly underscored the critical need for effective communication when completing the required Declaration of Inspection (DOI) prior to an oil transfer in accordance with Title 33, Code of Federal Regulations (CFR), §156.120 ([33 CFR](#)



Barge deck post-incident.

[156.120](#)). Prior to the incident, the facility person in charge (PIC) filled out their section of the DOI and sent the checklist in a bucket hoist to the barge PIC who subsequently completed their portion. Notably, the two PICs never met in person nor exchanged any words throughout the DOI preparation process. The investigation revealed that a significant causative factor to the cargo tank overfill and subsequent discharge of at least 100 barrels (4,200 gallons) of oil into the Delaware River was the lack of direct communication between the PICs.

To reduce risk and potential environmental harm when transferring hazardous liquids, 33 CFR §156.120(w) lists critical items that must be reviewed and addressed prior to cargo operations. The pre-transfer conference required by these regulations allows the vessel and facility representatives to share and validate information. As a best practice, these conferences should be conducted face-to-face (in-person or virtual), ensuring that PICs agree about the information being exchanged and the procedures to be followed.

As result of this incident the Coast Guard ***strongly recommends*** the following:

- Vessel and Facility Operators conduct a safety standdown with their PICs to review the requirements and emphasize the necessity of effective communication when completing the DOI prior to commencing all transfers.
- Vessel and Facility Safety Officers conduct unannounced visits to transfer evolutions to observe and validate compliance with 33 CFR Subchapter O requirements.

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