



Marine Safety Information Bulletin

Commandant
U.S. Coast Guard
Office of Design and Engineering Standards
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Tandem Loading Approval Process Update

Purpose

The Marine Vapor Control Systems (VCS) Final Rule (FR 2013-15808) was published on July 16, 2013. Standards for vapor controlled multi-breasted tandem loading can be found in 33CFR154.2022 for facilities and 46CFR39.5000-.5005 for vessels. Because tandem loading is now specifically addressed in the regulations, barge company owners, operators, Certifying Entities (CEs), and company representatives are no longer required to submit tandem loading requests to Commandant. This MSIB informs all pertinent parties (Coast Guard and industry) of the changes in the approval process for multi-breasted tandem loading requests.

Previously, CG-ENG-5 reviewed all vessel and facility documents, and issued an approval letter to the barge company, with copies to the cognizant COTP/OCMI. Now, CG-ENG-5 will no longer generate tandem loading approval letters. Therefore, Coast Guard and industry should not expect to receive them.

New Process

Vessel and facility approval processes for tandem loading with vapor control still occur independently of one another; both are required prior to the cognizant Captain of the Port (COTP)/Officer in Charge, Marine Inspections (OCMI) allowing tandem loading operations. The new process streamlines the approval procedure.

The approval process for facilities is as follows:

- (1) Facilities which desire to conduct tandem loading operations under vapor control are re-certified by a CE for compliance with **33CFR154.2022(e)**.
- (2) The CE sends a letter to CG-ENG-5, with copy to the cognizant COTP, stating that the facility has been re-certified for tandem loading operations.
- (3) CG-ENG-5 maintains the list of facilities that have been re-certified for tandem loading operations and makes this list available on Homeport <https://homeport.uscg.mil> (> Environmental Tab > Hazardous Materials Standards > Marine Vapor Control Systems).

The approval process for barges is as follows:

- (1) Tank Barge VCS plans, calculations and specifications demonstrating compliance with **46CFR39.1017** are sent to the Marine Safety Center (MSC) for review and approval.
- (2) Tank barge owners/operators contact the cognizant OCMI to ensure they are complying with all local requirements for tandem loading operations. Note that barge owners/operators are no longer required to submit a list of approved barges to CG-ENG-5 nor a list of facilities where the vessels will be conducting tandem loading.
- (3) After ensuring compliance with local requirements as prescribed by OCMI, the barges are approved to conduct multi-breasted tandem loading operations under vapor control in accordance with **46CFR39.5000-.5005** with re-certified facilities.

Stakeholder Responsibilities

Coast Guard Facility and Vessel Inspectors should no longer expect to receive tandem loading authorization letters from CG-ENG-5. For new construction vessels, inspectors will verify that the vessel's Certificate of Inspection (COI) has an endorsement for tandem loading. Inspectors can expect to see the following endorsement in the COI:

"In accordance with 46 CFR Part 39.1017 and 39.5000(e) this vessel's VCS has been evaluated and approved for multi-breasted tandem loading with other vessels specifically approved to tandem load with this vessel."

For existing vessels with vapor control systems approved by MSC for dual loading operations, their current COIs may not include the tandem loading endorsement. Upon the owners'/operators' request, the OCMI may add an endorsement to the COI at the next scheduled USCG inspection (Annual/Periodic/or Renewal of the COI). In this case, the OCMI will verify documentation and MSC approval letters supplied by the owner/operator approving the barge for tandem loading operations and may add the endorsement accordingly. Inspectors must also verify that the facility is on the Homeport-published list, "Facilities Certified for Dual Barge Loading Operations." Inspectors should contact ENG-5 if the facility has a CE tandem loading recertification letter but is not included on the Homeport-published list so the list can be updated.

Facilities must keep a copy of the CE's letter stating that the facility has been re-certified, under 33CFR154.2022(e) for multi-breasted barge loading operations. We recommend that facilities also keep a list of MSC approved barges that conduct tandem loading at their facility. Contact CG-ENG-5 if your facility is not included in the master list, "Facilities Certified for Dual Barge Loading Operations," so that ENG-5 may update the master list.

Barge owners and operators no longer have to submit a request letter for their vessels to conduct tandem loading under vapor control to CG-ENG-5. Owners and operators should retain a copy of the MSC letter for those barges with VCSs that have been accepted for dual loading operations. Barge owners and operators should also keep the most updated Homeport-published list, "Facilities Certified for Dual Barge Loading Operations" to identify properly re-certified facilities that can conduct tandem loading. Please be advised that any new construction barges that have MSC approved VCSs for tandem loading will be documented on the vessels' COIs. Existing vessels approved for tandem loading may see an endorsement in their COI by the OCMI. Barge owners and operators must contact the local OCMI to comply with any additional operational requirements imposed.

Certifying Entities will continue to re-certify facilities under 33CFR154.2022(e). To facilitate the new tandem loading process, CEs must ensure that tank barges involved in multi-breasted tandem loading are in compliance with the regulations under 46CFR39.5000-.5005 by witnessing a test tandem loading operation under vapor control, as per Paragraph XIII: Testing of the Certifying Entity Guidelines for Conducting a Review, Certification and Initial Inspection of Waterside Facility Vapor Control Systems Change (1) dated 20 April 1992. In particular, CEs should verify the provisions set forth in 46CFR39.5000-.5005 during the test load observation.

CG-ENG-5 will no longer review and approve tandem loading requests from barge owners, operators, design firms, etc. For approvals, barge companies and owners should contact the cognizant OCMI to ensure compliance with all local requirements. CG-ENG-5 will maintain and post a master list of facilities that have been re-certified for tandem loading operations. This list will be available on <http://cgmix.uscg.mil>, HOMEPORT, and CG-ENG-5's uscg.mil websites for industry and Coast Guard units.

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