

2-000

Will the Coast Guard annual inspection (aka user) fee be applicable to a vessel that operates using a non-Coast Guard option to comply with Sub M?

Yes. Each vessel required to have a Certificate of Inspection in accordance with 46 CFR 2.10-01 is subject to the annual inspection fee.

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Answered Nov 2016

2-001

2.01-15 points readers to appropriate inspection subchapters for guidance on reporting alterations or repairs to the OCMI. Inspection subchapters then have specific language (31.10-25 for example) about the requirement to have modifications approved prior to making the modifications. There is no language directing operators/masters to notify TPOs or OCMI's when modifications are made, although modifications are identified at the annual inspections/surveys. Is this the intended posture - a review of changes after the modifications?

No. Any repair that is not a major conversion or replacement in kind will need to be reported to either the TPO or Coast Guard dependent upon the inspection path chosen. As per 46 CFR [§144.145](#) Procedures for Verification of Compliance with Design Standards and [Table 144.140](#), only a registered professional engineer (P.E.), an authorized Classification Society, or the U.S. Coast Guard can verify compliance with major conversions and non-replacement in kind. .

Also refer to other FAQs on modifications: 136-002

What is the extent of modifications to the vessel that operators must describe?

([§136.210\(a\)\(2\)\(ii\)](#))

FAQs 136-003, 136-004, 136-005, 136-008, 136-024, 136-025, 136-026

What constitutes a Major Conversion and what is the process for making a determination?

FAQ 137-009

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Answered 11 Apr 2017, updated 06 October 2020

2-002

Exception for workboats operating within a worksite. Our company operates a coal loading facility and two power plants along the Ohio River. The three only handle coal loading and unloading. Each has a tug operating exclusively within their worksite. All three have a robust set of company policies and procedures, but not ISM or RCP. They also submit to the Coast Guard UTV exams every year. The company also has a line boat operation that is an AWO member and has been RCP compliant since its inception. Do I advise the three to pursue getting letters of exemption from their local OCMI or toss out their current policies and procedures and begin following our RCP (TSMS)?

Although the situation you describe does not seem to meet the definition of “worksite” provided in 46 CFR [§136.110](#), you are permitted to submit to your local OCMI a letter requesting consideration for the exception described in 46 CFR [§136.105\(a\)\(3\)](#).

The definition of “worksite” includes “shipyards, owner’s yards, or lay-down areas used by marine construction projects.”

For more information on worksite determinations, see FAQ 136-007.

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15-001

Does the requirement for towing vessels 8 meters or more in length to be under the direction and control of a person holding an MMC endorsed as master or mate (pilot) of towing vessels or as master or mate of vessels greater than 200 gross register tons, holding a completed TOAR, apply to vessels operating exclusively within a worksite?

No, a vessel operating exclusively within a worksite is exempt from the requirements of Subchapter M unless that vessel is pushing, pulling, or hauling a barge that is carrying oil or hazardous material in bulk, as per 46 CFR [§136.105\(a\)\(1\)](#). FAQ 136-007 discusses worksite determinations.

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Answered 11 May 2017, updated 14 May 2018, updated 06 October 2020

15-002

Is there a rule change planned for manning since towing vessel manning was covered under uninspected vessels?

Towing vessel manning is incorporated into Subchapter M and discussed in 46 CFR [§15.535](#). Manning is also discussed at length on pages [40008-40010](#) of the preamble to the regulation.

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Answered 28 Dec 2016, updated 06 October 2020

15-003

Will there be a discussion on expanding the AB manning exclusion on the inland rivers to include operations on other waters?

There are no current plans to change the statutory language of [46 U.S.C. §8702](#) which exempts vessels operating only on rivers and lakes (except the Great Lakes) from the Able Seaman requirements of 46 CFR [§15.840](#).

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15-004

Does a towing vessel operating exclusively within a worksite that pushes fuel barges require an officer endorsement or license?

Yes. All towing vessels, including vessels less than 26 feet pushing, pulling, or hauling a barge that is carrying oil or hazardous material in bulk is subject to inspection under Subchapter M regardless of the location of the operation (e.g. worksite). Per 46 CFR [§15.515\(c\)](#), towing vessels subject to inspection under Subchapter M will be required to have an individual who holds an appropriate license or officer endorsement on their MMC operating the vessel if they are pushing, pulling, or hauling a barge that is carrying oil or hazardous material in bulk while operating within a worksite. Unless the barge has been gas-freed, it is considered to still be carrying cargo.

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