



## **TOP 10 OFFSHORE SUPPLY VESSEL (SUBCHAPTERS L & I) DEFICIENCIES**

We conducted an analysis of all deficiencies recorded by CG Marine Inspectors while inspecting certificated Offshore Supply Vessels. The purpose of this analysis was to identify the ten most common deficiencies to share with OSV Owners so they can take corrective actions onboard their vessels, ensure continual compliance with safety and environmental requirements, and so that problems can be rectified prior to scheduling the next Coast Guard examination.

The top ten deficiencies, including a brief explanation of the deficiency, applicable regulation, and potential correction methods are provided below. These deficiencies are not listed in any specific order.

1. Oily Water Separator (33 CFR 151.10) Recordkeeping is a concern. The documentation of routine preventive maintenance (by a contracted third party) is not always available to the inspector. The periodicity of such service should be clearly stated in the vessel's Safety Management System. Likewise, documentation which would attest to the calibration of the OWS is not always onboard. Owners/operators need to ensure that an appropriate crewmember is available to demonstrate proper operation of the OWS for the inspector.



2. Hull Plating (46 CFR 126.140, USCG NVIC 7-68) While inspecting older vessels, inspectors will typically find breaches (holes and cracks) in the hull plating, as well as wastage of structural members. "Navigation and Vessel Inspection Circular No. 7-68" has provided the guidance for "Inspection and Repair of Steel Hulls" for four decades and is available on Homeport.USCG.mil. Where temporary repairs had previously been made, it is recommended that owners/operators make arrangements for permanent repairs before scheduling the examination. Occasionally, an inspector notices a temporary repair that had not been previously documented.



3. Watertight Doors (46 CFR 174.210) A very common finding is that hinges and dogs are in need of lubrication and adjustment. In some extreme cases, the door is badly warped to the point that replacement is required. Another common finding is deteriorated gaskets. Additionally, 46 CFR 131.893 requires that these doors be clearly marked in two-inch upper-case letters on both sides: WATERTIGHT DOOR – KEEP CLOSED EXCEPT FOR PASSAGE. Occasionally, the inspector finds that someone has recently painted over the stenciling.

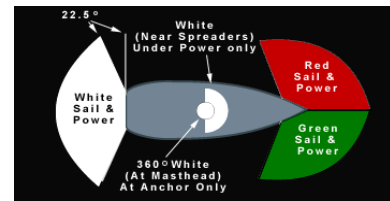


4. EPIRB (46 CFR 133.60(a)) All offshore supply vessels must have a (Category 1) 406 MHz Emergency Position Indicating Radiobeacon (EPIRB) installed in a float free system on board the vessel. Vessel owners/operators should inspect their EPIRBs before leaving port to ensure that they will operate properly. In addition to the simple transmitter test (turning the switch to the "Test" position) this includes inspecting the hydrostatic release mechanism. Operators should occasionally remove the EPIRB from its bracket in order to exercise the hydrostatic release. Ensure that the EPIRB is switched "Off" before manually releasing the bracket to inspect the mechanism. It was discovered that a number of OSV operators failed to replace the hydrostatic release prior to its expiration date. The hydrostatic release unit for the EPIRB must be replaced prior to expiration to



ensure that it will successfully release the EPIRB should the vessel sink. The expiration date of the release mechanism is usually different from the expiration date of the battery. Most noteworthy is the number of unregistered EPIRBs. Owners/operators who are uncertain as to the status of their registration may call NOAA at (888) 212-SAVE or go to [BeaconRegistration.NOAA.gov](http://BeaconRegistration.NOAA.gov).

5. Running Lights (Masthead, Side and Stern) Inoperable or Defective (46 CFR 129.430) All vessels must have navigation lights in accordance with the International and Inland Navigation Rules. During safety examinations, many vessels are found to have inoperable stern, mast, and sidelights. In some instances the installation of these lights was also found to conflict with the International and Inland Navigation Rules, the most common of which is the “matte black” painting of the light screens. Vessels of 65 feet or more in length or 100 gross tons or more in size must also have navigation lights that are compliant with UL 1104 standards, as specified in the Electrical Regulations, Subchapter “J”: 46 CFR 111.75-17(d). Vessel owners/operators should test their navigational lights prior to each voyage to ensure proper operation. Periodically, operators should inspect their running lights, paying particular attention to the condition of the lenses and the wattage & focal height of the light bulbs.



6. A. Light Guards Missing or Broken (46 CFR 129.410) All light fixtures that may be subject to damage must have a guard or be made of high strength material. Light fixtures on the open weather deck, engine room, or other machinery space must be protected with guards. Lights in accommodation spaces are normally exempted from this requirement because they are not subject to damage. The majority of deficiencies related to light fixtures are due to the guard. Additionally, 30% of the deficiencies are due to either a missing or damaged fixture. A “missing fixture” could be defined as an area of insufficient light.



B. Guards for Exposed Hazards (46 CFR 127.330) Missing guards for moving machinery are the most common finding in this category. Additionally, (hot surface) guards are sometimes missing from cooking appliances in the galley. Insulation missing from diesel engine exhaust piping is also a common finding during the inspection.



7. . Battery Operated Lanterns (46 CFR 129.440 & 129.450) A determination that the “emergency lighting” (required by 129.440) is operational can be made by pressing “test” on the individual lanterns. It might be a good idea for operators to carry spare batteries for these lanterns. Inspectors occasionally discover that either the portable lantern for the pilothouse or the one at the access to the engine room (required by 129.450) is missing. Battery condition is a concern for these two lanterns, as well.



8. Fire Control Plan (46 CFR 131.945) Also properly known as the vessel’s “General Arrangement Plan” and commonly known among mariners as the “Fire Safety Plan,” it is often found to be in need of revision. Any alteration made to either the vessel or its required equipment is cause for revision. In that case, it is strongly recommended that the owner/operator submit three copies of the plan to the OCMI for approval before scheduling the examination. Additionally, the Plan is sometimes not properly posted or missing altogether.



9. Junction Boxes (Electrical Regulations: 46 CFR 111.81) The most common deficiency of a junction box is a missing cover. Inspectors also observe, occasionally, that junction boxes are insecurely mounted. Wires must be properly spliced and connected securely.



10. General Alarm (46 CFR 131.805 & 131.810) A missing label (placard) is a more common deficiency than an inoperable bell on an OSV. The switch has to be clearly labeled "General Alarm" and each bell has to be labeled in half-inch upper-case letters: "GENERAL ALARM – WHEN BELL RINGS GO TO YOUR STATION". The batteries and their charging system must meet the requirements of the Electrical Regulations: 46 CFR 111.15 and 112.55. Owners/operators can easily inspect the (emergency) power supply for the general alarm and see to it that all bells ring prior to scheduling the inspection.



For more information about Offshore Supply Vessel inspections and how you can prevent these common deficiencies, including performing your own self inspection, please contact your local Coast Guard Sector/Inspections Division. For a listing of local Sector Offices, click on "Sector Directory" on Homeport: <http://homeport.uscg.mil>



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