



Coast Guard Sector Houston-Galveston Marine Safety Information Bulletin 12-22

Date: June 20, 2022
Time: 1147

Certificate of Compliance (COC) Exams Scheduling Business Rules

This Marine Safety Information Bulletin (MSIB) seeks to dispel some common misconceptions regarding Sector Houston-Galveston's (SHG) Certificate of Compliance (COC) exam scheduling. Additionally, this MISB will highlight new business rules which, working in conjunction with our Lone Star Harbor Safety Committee partners, SHG has adopted in order to gain efficiencies in scheduling COCs. And, although there are two separate units responsible for exam activities on the greater Houston-Galveston-Freeport waterway complex, Sector Office at Ellington Field (Hillard Street) and Marine Safety Unit (MSU) Texas City, both answer directly to the same Captain of the Port (COTP) and Officer-in-Charge, Marine Inspection (OCMI) and both are committed to sharing a unified approach to vessel activities, including the scheduling and conduct of COC exams.

- Exam Request Submissions: *All* COC exam requests to SHG (Sector Hillard Street Office or MSU Texas City) shall be made using the COC Exam Request Checklist found on our Homeport page at [SHG COC Exam Request Checklist](#).

Together with the COC Exam Request Checklist, SHG personnel will need copies of the following documents to begin the scheduling process: 1) Continuous Synopsis Record; 2) Vessel Particulars; 3) International Oil Pollution Prevention Certificate Form B; 4) International Certificate of Fitness [*Chemical & Gas Carriers Only*]; 5) Subchapter O Endorsement [*Gas Carriers Only*] and 6) a front and back copy of the ship's most recent COC. Additionally, if the vessel requires either a cargo waiver or Temporary COC, that request needs to be submitted along with the checklist and above documents.

Email the completed checklist and required documents to either houstonpsc@uscg.mil for Sector's Hillard Street Office exams or inspectionmsutexascty@uscg.mil for MSU Texas City exams. The request submitter is strongly urged to include in copy *all interested vessel parties* (ex. owners, charterers, other agents, etc...) to facilitate transparency. SHG personnel will, in turn, include all copied interested vessel parties on subsequent scheduling correspondence (ex. confirmations, cancellations, etc...).

*****Failure to follow the aforementioned process, including additional instructions listed on the checklist and Homeport, will preclude COC exam scheduling and may result in delays. *****

- Exam Request Submitter: Prior to initiating a formal COC exam request, it shall be the responsibility of the entity making the request (generally an agent) to first verify with *all* concerned vessel parties (ex. owners, charterers, etc...) what specific exam dates are desired, tolerable or both. Far too often SHG schedules an exam date at the behest of one party only to have another involved party contact our offices and offer conflicting dates that are purportedly more optimal than what has already been scheduled. This results in a parallel



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scheduling process that complicates matters. To avoid confusion the initial requestor shall remain our sole point of contact (POC) when discussing exam-scheduling issues. Subsequent change requests will only be made when requested in writing by the POC and will be assumed by SHG to be an agreed upon collaborative effort by all interested vessel parties.

- **Exam Prioritization:** SHG will prioritize vessels that are cargo or transit restricted. Specifically if a vessel cannot conduct cargo operations or depart the port due to an expired COC or cargo waiver, SHG will make every effort to assign CG resources to these situations first.
- **Exam Submission Timeline:** SHG strives to remain flexible and accommodating in its approach to scheduling exams. A recent COTP Roundtable event helped us understand that the high level of exam date changes and cancellations correlates directly to our acceptance of early requests (i.e. accepting orders weeks or months in advance). We recognize that numerous factors, many outside the vessel's control (ex. weather, terminal availability, casualties, cargo adjustments, etc...) can create unpredictability in a vessel's intended voyage. These manifest themselves as frequent changes to requested exam dates in a vessel's good faith effort to meet their prearranged schedule. Moving forward, SHG will no longer accept COC exam requests seeking a date more than 10 calendar days in advance. Additionally, SHG will normally not accept new requests made less than 24 hours in advance. Requests that fall within this 24-hour window may still be made by a vessel's representative if they believe that there are unique extenuating circumstances that necessitate such a request. In doing so, the vessel's POC shall submit objective evidence that warrants a case-by-case policy deviation consideration by our office.
- **Exam Cancellations/Scheduling Changes:** SHG recognizes that unplanned vessel events sometimes necessitate changes to scheduled exam dates/times or outright cancellations. Because exam time "slippage" (i.e. last minute changes) is highly disruptive to COC efficiency, vessel POCs are urged to maintain transparent communications with our scheduling desk as early and often as needed. Exam time changes and cancellations should be made using the same process as the initial submission noted above and before 1500 hours the day prior to the scheduled exam. If changes that deviate more than 2 hours from a scheduled exam time are not requested by 1500 the day prior to the scheduled exam, the exam may be subject to outright cancellation by SHG and require vessel POCs to restart the exam request process. Additionally, it is requested that deviations, even those within 2 hours, are communicated to our scheduling desk as early and often as needed so that we can maximize COC scheduling efficiency.



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- Exam Hours: SHG understands that exam hour limitations interfere with planned vessel and facility operations and can result in delays. SHG will make every effort to accommodate COC exam start times for any of the intervening hours between predicted sunrise and two hours prior to sunset.
- Dock Side Exams: To improve port efficiency, exams are best scheduled for the berth at which the vessel intends to conduct cargo operations. SHG recognizes, however, that some waterfront facilities still preclude vessels without valid COCs from calling on their terminal.** When a vessel intends to conduct cargo operations at a facility that has made this type of business decision, there will be obstacles to scheduling exams and increased risk to the port as a result of the additional transits needed to overcome this impediment. In the ten years between 2011 and 2021, SHG conducted 12,260 port state control, including COC, exams. Only 90 (less than 0.75%) resulted in detentions, most of which did not impact cargo operations and all of which were allowed to be moved to an alternate lay berth when requested. Every SHG COTP since 2011 has repeatedly affirmed the position that SHG will consider all reasonable options to move a vessel should terminal operations be potentially impacted. If a facility does preclude the conduct of a COC exam alongside, or because of additional costs a vessel makes its own business decision to seek alternative mooring arrangements, SHG is willing to accommodate exams at a lay by berth.
- Non-dock Side Exams: Exams conducted at anchorage do not support SHG's COC efficiency efforts. In fact they accomplish the opposite. If exams are allowed at anchorage, COC teams that may have been used for multiple activities are now relegated to conducting a singular exam due to the added transit time. Additionally, experience demonstrates that for exams at anchor, weather plays a more prominent role in dictating whether or not the exam gets conducted as scheduled and will more often than not result in delays to a scheduled COC exam. SHG does acknowledge, however, that some exams at anchorage may be necessary on a very limited case-by-case basis for certain draft-restricted vessels or following prolonged disruptions to port operations. Should this be the case, the vessel POC is urged to communicate with the scheduling desk as early as possible to inquire what logistics and objective evidence is needed to consider potential exams at anchorage.
- Cargo restricted vessels awaiting COC exam: If a vessel is cargo restricted and awaiting the arrival of Coast Guard COC exam personnel, SHG has no objections to vessel and terminal/facility crew initiating required piping/hose connections in anticipation of receiving a favorable COC exam. The vessel is prohibited, however, from initiating any loading or discharging of cargo or product until it receives a favorable COC exam or otherwise receives authorization from the attending COC exam crew.



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As mentioned above, SHG actively participates in the many committees, sub-committees, and working groups organized by the [Lone Star Harbor Safety Committee's \(LSHSC\)](#). Through this industry-led organization, SHG and others are able to better understand the needs of the maritime industry in order to ensure a safe, secure, clean and efficient port. Of note, SHG very much appreciates the information sharing and collaborative discussion regarding challenges related to COC scheduling through the LSHSC COC Working Group. Those interested in engaging in this discussion further, are encouraged to reach out to the Working Group Chair, Jeffrey Milstein at JJM@Vitol.com.

For more information or clarifications regarding this MSIB, please email either the Sector Hillard Street Office at HoustonPSC@uscg.mil or MSU Texas City at inspectionmsutexas@uscg.mil.

A handwritten signature in blue ink, appearing to read "J. E. SMITH".

J. E. SMITH
Captain, United States Coast Guard
Captain of the Port

**As a reminder, chapter 37 of title 46 U.S. Code makes it a felony for any person to prohibit a Coast Guard member from boarding a vessel, or entering a shore area, place, or premise in order to conduct their statutory duties, including COC exams.