

TOWING VESSEL OPERATIONS

For the purpose of the Harbor Safety Plan, the Harbor Safety Committee notes that the American Waterways Operator's (AWO) Responsible Carrier Program (RCP) contains the standards of care that responsible towing vessel operators follow in the Puget Sound region.

The Responsible Carrier Program (RCP) has three principal parts –

- Management and administration
- Equipment and inspection
- Human factors

Each part reflects the role that each of these components plays in ensuring safe and efficient vessel operations. The program is intended to serve as a template for AWO member companies and other towing companies to use in developing company specific safety programs that are consistent with applicable law and regulation, that incorporate sound operating principles and practices not currently required by law or regulation, and that are practical and flexible enough to reflect a company's unique operational needs. The three sections of the program are meant to be used in conjunction with one another; the policies and procedures called for in the management and administration section, for example, should reflect the recommended principles and practices outlined in the equipment and inspection and human factors sections, as well as the variables of a company's trade, area of operations, size and organizational structure, and the like.

A. MANAGEMENT AND ADMINISTRATION

The management and administration section, the first section of the program, requires companies to look at nine principal aspects of their operations and to develop written company policies and procedures for each. These nine aspects are:

- Vessel operating policies/procedures
- Safety policy/procedures
- Environmental policy/procedures
- Incident reporting procedures
- Emergency response procedures
- Internal audit/review procedures
- Vendor safety
- Organization/levels of authority
- Personnel policies.

B. EQUIPMENT AND INSPECTION

The second section of the program contains guidelines for vessel equipment and inspection, and it's divided into two parts: one for inland towing vessels and one for coastal towing vessels. In most respects, the two sets of guidelines are identical, but

there are some differences that reflect the significant differences in the inland and coastal operating environments. This section of the program addresses six major areas:

- Hull,
- Machinery
- Firefighting and lifesaving equipment
- Navigation and communication equipment
- Rigging or towing gear
- Environmental controls

C. **HUMAN FACTORS**

The last section of the program deals with human factors: manning, watchstanding and work hours, and training. The program outlines a set of comprehensive criteria to be taken into account by companies in establishing safe manning levels for their vessels. It establishes maximum work hour limits for all towing vessel personnel. And, it focuses heavily on training, requiring that all vessel crewmembers receive initial and periodic refresher training in a specified list of subjects.

Training requirements are based on the position an individual holds aboard a towing vessel, not the Coast Guard license he or she happens to hold, and these requirements cover everyone, from the captain and mate to the engineer, tankermen, and deckhands - both experienced and entry-level.

The practices and principles outlined in the RCP are, in large measure, based on principles of safe and sound operation that many companies in our industry have already voluntarily embraced. This program aims to build upon that foundation by extending those practices and principles throughout the industry as a whole.