

Henceforth the USCG will conduct COC Inspections while the STBL and SS are married together provided that the risks highlighted in the attached Risk Assessment are taken in to account and mitigated appropriately. These include but are not limited to:

- Ensuring that Mooring Operations are concluded prior to the COC.
- Ensuring, basis available information that the weather will allow the ships to remain anchored for the duration of the COC.
- Ensuring Cargo Operations are stopped during the Inspection as directed by the attending USCG Inspector.
- Ensuring maximum number of ship's crew are available and rested for the COC Inspection.
- Requesting permission to conduct Cargo Operations provided that the COC Midterm or Biennial is not more than 90 days overdue.

The same practices that govern Cargo Operations before and during a COC in port will now also apply offshore. Please ensure that all ships and personnel are apprised of this new Policy.

To put it simply, going forward whenever a ship involved in a Lightering Operation requires a COC Inspection, the mooring together of those two ships does not have to wait for the conclusion of the Inspection providing the weather will allow the ships to remain together for the duration of the Inspection. Further, if the COC expiration date is within the 90 day grace period, cargo operations may commence prior to the Inspection and just have to be suspended during the Inspection.

Risk Assessment – Additional risk to Coast Guard Personnel if conducting a COC inspection with the Service vessel alongside.

Introduction

This qualitative risk assessment has been carried out to determine any additional risks faced by USCG personnel if conducting a COC inspection while the service vessel is alongside. It did not consider any risks that would also be faced if conducting a COC inspection without the service vessel alongside.

Additional Hazards

1. On the starboard side of the ship there would be mooring lines deployed from both the STBL and the service vessel, these could present the risk of injury due to tripping or due to parting while someone is in the snapback zone.
2. Distraction / pressure of both the Crew and the Coast Guard due to commercial pressure being brought to bear with regard to commencing cargo. Causing shortcuts to be taken during the inspection.
3. Fatigue of the accompanying Crewmembers due to lack of sleep after mooring operations.
4. Weather conditions deteriorating requiring the vessel to raise her anchor and steam or to conduct an unmooring operation.
5. Service vessel conducting ballast operations in readiness for loading, causing significant rolling which may result in moorings parting and an emergency unmooring or require the SBTL to raise anchor and steam.
6. Water standing on deck due to fire line tests while the scuppers were secured.

Risk Factor

Hazard No	Likelihood	Severity	Risk
1	2	2	4
2	3	2	6
3	2	2	4
4	2	1	2
5	3	2	6
6	3	1	3

See risk matrix

Controls

1. Ensure the mooring lines are suitably marked and /or barriers in place. Use the Portside for access. All CG personnel will be briefed on the snapback zones. All CG personnel will be escorted by a ships officer.
2. Suspend all operations during the inspection (including gauging). Ensure that a minimum of six hours is set aside for the inspection. Ensure all parties are briefed that the inspection is taking place and agreement reached. Shipboard personnel and service vessel personnel briefed as to nature of inspection.
3. If vessel anticipates arrival at the lightering area may require an inspection with the service vessel alongside, plan rest hours accordingly or request additional personnel. Once mooring is completed ensure personnel required for the inspection are allowed to rest.
4. Weather forecasts should be able to indicate whether bad weather is expected. If weather deteriorates and requires weighing the anchor or unmooring, suspend the inspection until the operation is complete.
5. Written notification to the service vessel that the inspection will be carried out, followed by a written acknowledgement from the service vessel that no operations will be carried out during the inspection. The Mooring Master / OOW will monitor the service vessel for compliance. The presence of USCG personnel onboard would be expected to act as a moderating influence on any commercial pressures from the service vessel.
6. If water build-up on deck is a problem, monitor and drain as required.

Residual Risk

Hazard No	Likelihood	Severity	Risk
1	1	2	2
2	2	2	4
3	1	2	2
4	1	1	1
5	1	2	2
6	1	1	1

See Risk Matrix

Conclusion

Given that the control measures are implemented and monitored all identified additional risks can be reduced to acceptable levels.

Risk Matrix (Likelihood x Severity = Risk)

Likelihood	Severity	Slightly Harmful (1)	Harmful (2)	Extremely Harmful (3)
Highly Unlikely (1)		Slight (1)	Minor (2)	Medium (3)
Unlikely (2)		Minor (2)	Medium (4)	Major (6)
Likely (3)		Medium (3)	Major (6)	Extreme (9)

Risk Assessment Categories and Control Measures Required For Each

Risk	Action and Time Scale
Slight (1)	No action is required.
Minor (2)	No additional control measures are required. Monitoring is required to ensure controls are maintained.
Medium (3-4)	Efforts should be made to reduce the risk. Risk reduction measures should be implemented within a defined time period. When a medium risk is associated with extremely harmful consequences, further assessment may be necessary to establish more precisely the likelihood for harm as a basis for determining the need for improved control measures. <u>If residual risk remains medium (3-4) proceed with caution.</u>
Major (6)	Work should not be started until the risk has been reduced. Consider available resources, which may have to be allocated, to reduce the risk. When the risk involves work in progress, urgent action should be taken.
Extreme (9)	Work should not be started or continued until the risk has been reduced. If it is not possible to reduce the risk even with unlimited resources, work has to remain prohibited.