

## DEAD SHIP TOW PLANS

### A. GENERAL INFORMATION

1. The tow of a dead ship – a ship lacking sufficient means of self-propulsion or with a malfunctioning steering gear – may be a hazardous condition and requires advance planning, additional towing resources and special attention to prevent vessel traffic accidents. While many towing companies engage in dead ship tows on an almost daily basis, some dead ship tows are exceptional in nature (e.g., long distance (over 100 miles) haul of a dead ship, moving a derelict or salvaged vessel of questionable integrity, towing of a vessel of unusual proportion or size relative to the towing vessel), and warrant additional safety measures as encouraged by this Standard of Care (SOC). The specifics of this SOC are not intended for towing companies involved in their normal day-to-day operations for which other industry and company standards likely already apply.
2. This SOC establishes good marine practice for conducting dead ship tows that are exceptional in nature and is designed to mitigate associated safety risks. Conversely, such dead ship tows that have not employed this SOC may have not adequately addressed potential dangers and may be subject to a Captain of the Port (COTP) Order halting, preventing, or otherwise controlling the towing operations if there are demonstrated risks to safety of life, property and/or navigation. The COTP will consider all relevant available information to evaluate those risks, including information provided by vessel operators.

**ACTION:** Individuals/companies intending to conduct planned (non-emergency) dead ship tows of an exceptional nature should submit copies of their tow plans to the USCG Sector Puget Sound Waterways Management Division (D13-PF-SectorPSWWM@uscg.mil) for review generally at least five (5) days in advance of the desired dead ship tow operation. Tow plans should be submitted on dead ship tows of vessels generally greater than 20 meters in length overall when the towed vessel is operating at less than 50 percent of its designed main propulsion output, with a malfunctioning primary steering gear or is of questionable structural integrity.

3. Nothing in this Standard of Care relinquishes the vessel owner or agent from any of the requirements regarding vessel safety and the protection of the environment specified in the applicable sections of 46 CFR “Shipping” and 33 CFR “Navigation.” Depending on the particulars of the vessel being towed (age, extended layup status, vessel condition, etc.), the COTP may require that additional safety precautions be established before the tow is authorized. This may include requirements such as obtaining a marine surveyor’s report attesting to the vessel’s seaworthiness for the desired tow, or allowing a representative from USCG Sector Puget Sound to examine the vessel to verify seaworthiness, pollution potential, and the adequacy of the towing arrangement.

## **B. SPECIFIC STANDARDS OF CARE**

1. Vessel Representative Responsibilities:
  - a. Fully review the specifics of the vessel to be towed.
  - b. Verify the vessel's seaworthiness and watertight integrity. Items to verify, if applicable, include, but are not limited to, the following:
    - All compartments have been entered and inspected.
    - All tanks have been sounded, their contents identified and measured, and their integrity verified.
    - Sea valves are closed/secured or wired shut if vessel is blacked out.
    - Bilges are free of oil and water.
    - All moveable equipment is appropriately secured in place.
    - The rudders are locked by using structural steel of acceptable size and quantity (NOTE: the lock should transfer the rudder load from the yoke to structural members of the tow's hull).
    - Fixed propeller shafts are locked, CPPs and thrusters are feathered.
    - Vents to tanks and other closed spaces should be covered to prevent water entry, but not plugged so as to prevent the escape of air or gas
    - All hatches, scuttles, doors, and other watertight closures are secured shut.
    - Necessary reinforcement for ocean operation performed.
  - c. If the towing operation is exceptional in nature, complete a Dead Ship Tow Plan to ensure a safe and efficient route that follows applicable traffic separation schemes, accommodates navigational clearances, takes into account tides/currents, marine projects, and other vessel traffic. The tow plan should include but is not limited to the following:
    - Vessel Name
    - Vessel Type
    - Official Number (if applicable)
    - LOA
    - Draft
    - Air Draft
    - Beam
    - Freeboard
    - Location and date/time of vessel's port of departure
    - Location and date/time of vessel's port of destination
    - Transit route
    - Allowable Weather, Sea and Visibility Conditions
    - Predicted Tides/Currents along route
    - Whether personnel will remain aboard the vessel during the tow, how access for these personnel will be provided, and any hotel services that will remain operational
    - Lead Tug Name and horsepower, or bollard pull
    - Lead Tug Master Name

- Assist Tugs Name(s) and horsepower
  - Tug Working Radio Frequencies
  - Diagrams of Tow Configurations for Intended Route with size/strength specifications for all elements, including tow wire, chain, bits, pad-eyes and shackles
  - Use of appropriately licensed marine Pilots (if applicable)
  - Verification of seaworthiness and watertight integrity in accordance with B.1.b. above
  - Method and frequency of verifying towed vessel's condition during transit identified
  - Available emergency means of controlling flooding and dewatering during the tow
  - Number of personnel available to verify the vessel's condition during the transit and respond to emergency situations
  - Plan of action should the vessel begin flooding in a manner that cannot be controlled by available emergency resources
  - Amount, type and location of oil products and cargo on board towed vessel
  - Evidence of Financial Responsibility for any oil spill liability in accordance with Federal and Washington State law (if any oil or oil residue remains aboard)
  - International voyage plan (if applicable)\*
  - Towing Vessel POC/Responsible Party Name/24hr Phone
- d. Prior to the commencement of the scheduled tow, the Vessel Representative should hold a pre-departure conference with all concerned parties to review the tow plan and discuss the communications protocol to be used during operations .
2. In certain circumstances an International Load Line Exemption Certificate or a Coastwise Single Voyage Load Line Certificate may be required in accordance with 46 CFR 42 Subchapter E (Load Lines). In order to make this determination and schedule an examination if needed, requests for tows offshore should be submitted 7 days in advance.
3. Tugs assigned should adhere to industry standards for towing capacities and employ a towing arrangement that enables the towing vessel(s) to maintain control of the dead ship at all times.
- Emergency towlines should be rigged for coastwise routes
  - Towlines and bridles should be protected against chafing
4. Personnel assigned to conduct the tow should hold the appropriate licenses in accordance with Title 46 CFR, Part 15. It is recommended that a Licensed Pilot be contracted and in navigational control of all Dead Ship Tows greater than 500 feet LOA unless the company can demonstrate alternative measures that provide the same level of navigation safety.
5. Tugs assigned should report to Vessel Traffic Service (VTS) Puget Sound prior to conducting dead ship tow operations within the VTS Service Area in accordance with 33 CFR 161.18.