



119 Causeway Blvd.
Jefferson, LA 70121
Phone: 504-218-8162
Fax: 877-674-3450
david@minomarine.com

Subchapter M: Requirements in Effect Now

August 1, 2016

By David Bourg, Alex Sloan, David Muller

On June 20, 2016, the U.S. Coast Guard released the final rule for 46 CFR Subchapter M. This release comes after years of industry research and feedback on the Notice of Proposed Rulemaking released August 11, 2011. The final rule is now in effect as of July 20, 2016. Most requirements in the rule do not go into effect until July 20, 2018. There are, however, some requirements that are **in effect now**.

The requirements that are in effect today for existing vessels pertain to bulwarks, hull closures and new pressure vessel installations. The relevant requirements for existing towing vessels are contained in 46 CFR Part 143.300, Part 143.545, Part 144.105, and Part 144.320. All new-build vessels must comply with the full set of regulations as they are built.

Existing towing vessels must meet the requirements of 144.320 after July 20, 2016. These regulations detail requirements for scuppers and freeing ports on vessels with bulwarks, and for closure devices on main deck and hull penetrations. Scuppers and freeing ports must be provided in bulwarks to allow water to run off the deck quickly, and closures on main deck and hull penetrations must be fitted and be suitable for the intended route of the vessel.

Any pressure vessels installed on existing vessels after July 20, 2016 must meet the requirements of 143.545. This section outlines the requirements for new build pressure vessels and states: "Pressure vessels over 5 cubic feet in volume and more than 15 psi maximum allowable working pressure must meet ABS Rules for Building and Classing Steel Vessels under 90 Meters (295 Feet) in Length." The referenced ABS Rules include details regarding the design, construction, and testing of pressure vessels.

While these specific rules are in effect today, the myriad of other requirements need to be satisfied by July 20, 2018. MiNO Marine has completed our internal review of the final rule, and we are proud to offer our engineering and project management services to help you on the path to Subchapter M compliance for your fleet.

MiNO is an experienced, full-service, Louisiana-based Naval Architecture and Marine Engineering firm. We are prepared to evaluate your vessels and propose a compliance scheme for your vessels that won't compromise operations. Additionally, MiNO will schedule compliance work to coincide with regularly-scheduled maintenance periods to minimize costs and spread the cost of compliance over several years. You can find out more about us by visiting our website at www.minomarine.com or you can contact us directly for a proposal.

Please call or write me at 504-218-8162 or david@minomarine.com if you'd like to learn more about the services we provide.