

	CURRENT REGULATIONS		ANPRM PROPOSAL	Summary of Changes
	Federal Regulations	Massachusetts Regulations	Federal Regulations	
<b>Capacity Threshold</b>	5,000+ barrels of oil or hazardous materials	6,000+ barrels of oil	5,000+ barrels of oil or hazardous materials	State regulations do not apply to "hazardous materials," just oil.
<b>Pilotage &amp; Manning</b>	Tugs towing a single hull tank barges with 5,000+ barrels must be under control of a federal pilot who is not a member of the crew.	Tugs towing a single hull tank barge with 6,000+ barrels must have: <ul style="list-style-type: none"> <li>- a licensed deck officer or tow vessel operator serving exclusively as a lookout with no other concurrent duties, and</li> <li>- three licensed deck officers or tow vessel operators.</li> </ul> Single hull tank barges with 6,000+ barrels must have 2 personnel, 1 of whom is a certified tankerman.	All tugs towing a tank barge with 5,000+ barrels must be under control of a federal pilot who is not a member of the crew. No distinction is made between single and double hulls.	ANPRM expands pilot requirement to include double hull tank barges. During inclement weather, tugs will have to divert to Narragansett Bay, RI to pick up a Pilot, increasing risk of collisions, allisions, and groundings. In its current form, ANPRM does not include any references to manning on tank barges.
<b>Escort Tug</b>	Single hull tank barges with 5,000+ barrels require a tug escort.	There is no escort required for double hull tank barges. However, if you choose not to have an escort and the vessel is involved in a spill, you are subject to triple damages.	"Under certain conditions" double hull tank barges with 5,000+ barrels will require a tug escort. Single hull tank barges with 5,000+ barrels will always require a tug escort.	"Under certain conditions" is not defined in the ANPRM, however the USCG plans to set weather, equipment, and/or manning thresholds that would trigger the need for an escort tug. These thresholds could potentially be troubling.
<b>Reporting</b>	All commercial vessels transiting Buzzards Bay must register with the VMRS.	All commercial vessels must provide twenty-four hour advance notice to MassDEP before transits.	ALL tugs towing barges with 5,000+ barrels must register with the VMRS, which will "actively monitor" their transit. No other vessels must register with VMRS.	Does not mandate that other potentially dangerous vessels (tankers, for example) register with the VMRS.

Notes: VMRS = Vessel Movement Reporting System is monitored by the Army Corps of Engineers at the VMRS control center at the Cape Cod Canal