

MARINE ENGINEERS' BENEFICIAL ASSOCIATION (AFL-CIO)

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ADAM VOKAC
PRESIDENT



ROLAND "REX" REXHA
SECRETARY-TREASURER

January 12, 2023

Captain Zeita Merchant, USCG
Captain of the Port
USCG Sector New York
212 Coast Guard Dr.
Staten Island, NY 10305

Dear Captain Merchant,

Based upon preliminary interviews, the Union has concluded that inadequate and haphazard training of Ollis-class vessel crews is a causative factor in the engine room fire aboard the *Sandy Ground* on December 22, 2022. We therefore request that the Coast Guard investigate this (and other) safety-related shortcomings and order any necessary corrective action.

Although not yet corroborated, MEBA understands that an operating error constituted an important link in the chain of missteps that led to the fire. Specifically, the Union has reason to believe that a fuel return valve was mistakenly shut down, causing the increase in fuel pressure that precipitated the fuel leaks at the filters.

Based upon the Union's own inquiries and information shared with MEBA, it is apparent that insufficient and disorganized training was the root cause of this mistake. Training on the Ollis-class vessels has been a boondoggle since inception, with substantial public funds being used to pay for training manuals prepared by a shipyard contractor (Quantic) that were so deficient that SIF management almost immediately directed our members to create an alternate training plan and SMS procedures from scratch.

Worse, it is the Union's understanding that some procedures have still not been written, resulting in different crews operating identical vessel systems differently. Also, some systems were non-operational when training was implemented, so crews never received any training on those systems.

When the first Ollis-class vessel was placed into service on February 14, 2022, MEBA had still not received official training plan documents, despite having asked for them months earlier.¹ Indeed, to this day, MEBA has not been notified of what training has been done and who provided it, leading the Union to question the priority ferry management assigns to this training and/or its integrity and organization.

¹ See attached correspondence dated November 5 and 9, 2021.

While management has told us that all crew members are fully trained on Ollis-class vessels, our members report otherwise. According to our members, training was supposed to consist of four days of familiarization followed by observed operation by a qualified trainer (our Captains and Chief Engineers). However, this training was not provided, due to staffing shortages especially in the engine rooms, which management dealt with by requiring crew members to perform their regular operational duties instead of participating in the new vessel training. As a consequence, employees who had not completed training were still directed by management to begin operating the new vessels.²

Apparently, this accumulation of errors came to a head on the *Sandy Ground*. In addition to the training problems detailed above, which were present on day one, standard operating procedures for the fuel systems are different for each class of vessel. Thus, although standard procedures on other classes called for the fuel return to be adjusted to regulate tank levels, the same could not be done on the Ollis-class vessels. Yet, this quirk was not made the subject of training, nor even a written advisory from management. As a direct consequence, our members tell us that an engine room crew member closed the fuel return on the *Sandy Ground* on December 22, leading to the fuel filter leaks and the fire, perhaps in the mistaken belief that fuel return procedures on the Ollis-class vessels were the same as on other vessels.

This episode is emblematic of an unfortunate deterioration of the safety culture at SIF, which we also urge the Coast Guard to investigate. In the aftermath of the crash of ferry boat *Barberi* in October, 2003, the NTSB issued a written report identifying SIF's overly casual safety culture as a leading cause. In response, SIF, with Captain James Desimone leading the way, took concrete steps to implement a safety-first mentality, including conducting a workplace survey and launching the SMS.

Now, almost 20 years later, we believe the safety culture has again declined to a point where passenger and crew safety are under-emphasized. The SMS is disregarded; safety drills are made optional, due to staffing shortages; calls from Captains and Chief Engineers to allow them to run emergency drills as a full crew are dismissed by management; staffing shortages force management to scramble to cobble together ad hoc crews and move individuals between different classes of vessels (sometimes daily) on a seemingly random basis; crew members report to work without knowing what vessel they will be working on that day or with whom they will be working; Captains, while ultimately responsible for the vessel, are told that any complaints about drills and safety will result in increased scrutiny of their overtime requests.

In addition, the facts suggest the possibility that Ollis-class design defects also played a role in the fire. Basic engineering principles require that discharges on positive displacement pumps have pressure relief valves that operate if the lines begin to pressurize above normal operating parameters. Filter housings should never be the weak point in a piping system, nor should they be the point of pressure relief, but that appears to be the case here and the root cause of the fire. This suggests a design flaw: either there is no pressure relief valve in the system, the pressure relieve mechanism is not designed

² Required recordkeeping was chaotic at best. Form 17, required by the SMS to verify full familiarization and attendance at all classes, were, we have been told, backdated or simply not filed. (See, Attached SMS Form 17 procedures.)


correctly, or the piping and components in the system are rated too low for operational pressures.

Even more troubling was that the “emergency” generator did not operate as intended in this emergency. The emergency generator is a last line of defense and its inability to function in a real emergency leaves crew members wondering if it will operate in a time of need. We do not know why the emergency generator failed to operate as designed during the fire and request that the Coast Guard make this part of its investigation. Concerningly, DOT continues to run the Michael H. Ollis vessel without knowing the cause of this failure of critical emergency equipment.

As the union representing all USCG licensed officer titles (Captains, Assistant Captains, Chief Marine Engineers, Marine Engineers and Mates) onboard the Staten Island Ferry vessels, who continue to provide essential and safe passage for millions of passengers and bravely saved hundreds of lives on the frigid evening of Thursday, December 22nd, we are again calling for an **immediate** docking of all Ollis-class vessels until proper familiarization and training can be held, as well as an understanding of why the fuel system failed catastrophically and why the emergency generator failed to operate as intended

Thank you for your attention to this urgent matter. I can be reached at 202-417-5294 anytime.

Sincerely,



Roland “Rex” Rexha
Secretary Treasurer
Marine Engineers’ Beneficial Association

cc: Morgan Turrell - Director, Office of Marine Safety - NTSB