

**Comments for NPRM  
USCG-1999-5150  
Marine Vapor Control Systems**

154.2011 Application for acceptance as a certifying entity.

I believe it is the USCG's intent to insure that all certifications and reviews of VC systems be performed by Certifying Entities that are unbiased and do not have a stake in the VCS operation. However, subparagraph (e) leaves open the potential for a certifying entity to perform recertifications and operational reviews on systems which they have had operational or design input.

If that is the USCG's intent then, 154.2011(e) should be modified to include the recertification and operational review functions also.

Suggested wording...

*(e) A certifying entity may not certify, recertify or perform operational reviews on a facility VCS if that certifying entity was involved in the design, ~~or~~ installation or modification of the system. "Design, ~~or~~ installation or modification" includes but is not limited to—*

- (1) Performing calculations;*
- (2) Providing chemical data;*
- (3) Developing plans, specifications, and drawings;*
- (4) Conducting failure analysis; and*
- (5) Installing systems or components.*

END OF COMMENTS