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November 28, 2016

Ahead Ocean Technology (Dalian) Co., Ltd
Attn: Wang Meng
Add: Room 4010. Block A,
Times Square, Zhongshan District,
Dalian City, China

ALTERNATE MANAGEMENT SYSTEM ACCEPTANCE

The Coast Guard has completed its review of the Alternate Management System (AMS) application submitted by Ahead Ocean Technology (Dalian) Co., Ltd for the AHEAD ballast water treatment system (BWTS). This letter grants AMS acceptance in accordance with the requirements of 33 CFR 151.2026 for the AHEAD BWTS models specified below. The models are type approved under Authority of the Maritime Safety Administration of the Peoples Republic of China by the China Classification Society, as detailed in type approval certificates No. DL15t00021_01 through 09 issued March 25, 2016.

AHEAD models with the following treatment rated capacity (TRC), as expressed in cubic meters per hour (m³/hr), are accepted for use as an AMS in U.S. waters:

- AHEAD I System with a TRC of 200 m³/h
- AHEAD II System with a TRC of 350 m³/h
- AHEAD III System with a TRC of 500 m³/h
- AHEAD IV System with a TRC of 600 m³/h
- AHEAD V System with a TRC of 800 m³/h
- AHEAD VI System with a TRC of 1000 m³/h
- AHEAD VII System with a TRC of 1200 m³/h
- AHEAD VIII System with a TRC of 1500 m³/h

The AHEAD models are assigned the following AMS identification number:

AMS-2016-AHEAD-001

Coast Guard acceptance of the AHEAD BWTS as an AMS does not accord or imply conformance to or compliance with any other Federal, state, or local water discharge effluent limitations that may apply to the vessel on which the AMS operates or the regulatory regimes and locations within which it operates. The owner and operator of the vessel must comply with all applicable laws, regulations, and treaties, including the Clean Water Act and associated

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provisions of the Vessel General Permit (VGP); the Federal Insecticide, Fungicide, and Rodenticide Act of 1972, as amended (FIFRA); other Coast Guard safety regulations and requirements; and other applicable laws and regulations.

In accordance with 33 CFR 151.2026 (a)(5), the AMS application required the submittal of a type approval application for the BWTS. The type approval information submitted with the AMS application does not have any bearing on the type approval status of the BWTS, nor does Coast Guard acceptance of the AHEAD BWTS as an AMS indicate that the BWTS meets requirements for Coast Guard type approval.

The following conditions apply for the operation of the AHEAD BWTS in U.S. waters:

1. The AMS manufacturer must comply with all general conditions of certification stipulated in the type approval certificate issued under the Authority of the Maritime Safety Administration of the Peoples Republic of China by the China Classification Society, as referenced above. Revocation of type approval by the approving authority will result in revocation of this AMS acceptance. Copies of all reports required under the stated conditions of use must be submitted to the Office of Environmental Standards (OES-3) at the following address or email:

COMMANDANT (CG-OES-3)
U.S. Coast Guard Stop 7509
2703 Martin Luther King Jr. Ave SE
Washington DC 20593-7509
e-mail: environmental_standards@uscg.mil

2. Installation and repairs of the AMS must be performed in accordance with the manufacturer's instructions and approved by the flag administration or its representative.
3. Operation and maintenance must be conducted in accordance with all specifications and limiting conditions stipulated on the type approval certificate and with the manufacturers instructions, including any limitations posed by the environment (for example, water quality, temperature, salinity, or other parameters) or vessel operations (for example, voyage duration, pumping rates, or other constraints). The following specific conditions apply:
 - a. **Flow rates:** The flow rate of ballast water through the system should not exceed the TRC for the installed AHEAD model, as specified on the type approval certificate.
 - b. **Differential pressure across the filter:** The filter operates automatically in the ballast mode. Automatic back flushing begins according to a set time or if the differential pressure across the filter reaches 0.3 bar. The filter can be manually back-flushed by clicking the manual button on the touch screen. Regular back-flush of the filter is to ensure the filter remains unobstructed and flow rate is stable. If the

differential pressure across the filter exceeds 0.5 bar, a warning alarm is sounded by the control system, and the system will shut down.

- c. **Ultraviolet light (UV) dosage, transmittance, and intensity:** The technical manual for the AHEAD BWTS specifies a minimum UV dosage of 180 mJ/cm². UV transmittance is a function of water quality, water flow, and UV lamp intensity. The AHEAD control system has a UV lamps monitor sensor in the chamber of the UV so that UV dosage can be monitored in real time. If the dosage is abnormal, the system will alarm.

A historical record documenting that the system has been operated within these criteria, including a record of any alarm conditions, any deviations from the manufacturer's operating instructions, or any conditions and requirements noted above, shall be available for review onboard the vessel.

4. Because the AHEAD BWTS has not been adequately tested in freshwater, its use as an AMS is limited to the treatment of marine and brackish water with a practical salinity unit (PSU) concentration greater than 1.
5. If installed on a U.S. flag vessel, it must be shown that the system and installation comply with or provide an equivalent level of safety to the requirements of 46 CFR Subchapter F (Marine Engineering) and Subchapter J (Electrical Engineering). All electrical equipment located within hazardous areas must be explosion proof or intrinsically safe as certified by an independent laboratory recognized by USCG per 46 CFR 111.105-7.
6. Use of the AMS must be specified in the ship's ballast water management plan (BW plan), required by 33CFR 151.2050(g). The BW plan must identify: (1) the ballast water management practices to be used in the event the AMS cannot be used, and (2) the personnel responsible for the operation, maintenance, and repair of the BWTS. An up-to-date record of the operation, maintenance, and repair of the BWTS must be maintained onboard the ship.
7. Any change in design, materials, manufacturing, or intended operational conditions of this BWTS without prior notification to, and acceptance by, the U. S. Coast Guard will automatically invalidate this AMS acceptance. Prior to any such change, the manufacturer of an AMS must notify the Commanding Officer, U. S. Coast Guard Marine Safety Center (MSC), at the following address or e-mail:

Commanding Officer (MSC)
Attn: Marine Safety Center
U.S. Coast Guard Headquarters
2703 Martin Luther King Jr. Ave. SE
Washington, DC 20593-7509
e-mail: msc@uscg.mil

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The notification must include (1) a description of the change, the reason it is required, and its intended advantages; (2) an explanation of any effect of the change on installation, operation, maintenance, or repair requirements; and (3) an indication of whether or not the original configuration of the BWTS will be discontinued.

8. If the installed AMS does not operate properly when treating ballast water intended for discharge in U.S. waters, the person directing the movement of the vessel must ensure that the problem is reported to the nearest Coast Guard Captain of the Port (COTP) or District Commander as soon as practicable. The Coast Guard shall be notified of any treatment system or component failures, any irreparable or recurring damage to components of the AMS, frequent process upsets or out-of-bounds operating conditions, or other situations or process-related conditions that may reduce treatment effectiveness. The vessel may continue to the next U.S. port of call, subject to the directions of the COTP or District Commander.
9. All transport and handling of chemicals required for proper operation of the AMS must be conducted in accordance with 46 CFR 147 (Hazardous Ships' Stores), 49 CFR 171-180 (Hazardous Materials Regulations), and 46 CFR 98.30 (portable tanks), as appropriate.
10. Use of the AMS must be reported in the ship's ballast water management reports submitted to the National Ballast Information Clearinghouse, as required by 33 CFR 151.2060, as follows:
 - a. Report the AMS identification number, located toward the beginning of this letter and in bolded text, in "Vessel Information" section in the space labeled "Onboard BW Management System" and;
 - b. In the "Ballast Water History" section, for each tank for which the AMS was used, select the "Event" as "Onboard Treatment" for one of the reported tank events (e.g., Discharge, Onboard treatment, Source).

The Coast Guard may suspend, withdraw, or terminate the acceptance of this BWTS as an AMS in accordance with 46 CFR 2.75-40, 2.75-50(a) and 2.75-50(b), respectively.

A copy of this letter shall be provided to each vessel with this AMS installed and shall be available for review when the vessel is operating in U.S. waters.

I thank you for your dedicated efforts to seek out AMS acceptance, and we look forward to working with you throughout the type approval process. If you have any questions concerning this letter, you may contact Ms. Debbie Duckworth of my staff at (202) 372-1429 or Debbie.Duckworth@uscg.mil.

Sincerely,



S. J. KELLY

Captain, U.S. Coast Guard

Office of Operating and Environmental Standards