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5760 January 8, 2018

Semb-Eco Pte. Ltd. Attn: Prakash Balasubramaniam Admiralty Road West Singapore, 759956 prakash@sembmarine.com

ALTERNATE MANAGEMENT SYSTEM ACCEPTANCE

The Coast Guard has completed its review of the Alternate Management System (AMS) application submitted by Sembcorp Marine Repairs & Upgrades Pte. Ltd for the SEMB-ECO LUV ballast water treatment system (BWTS). This letter grants AMS acceptance in accordance with the requirements of 33 CFR 151.2026 for the SEMB-ECO LUV BWTS models specified below. The models are type approved by Lloyd's Register on behalf of the Director of Marine, Maritime and Port Authority of Singapore, as detailed in type approval certificate MCA 1600014/M2 reissued 13 November 2017.

The SEMB-ECO LUV 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:

- SEMB-ECO LUV 250 System with a TRC of 250 m³/h;
- SEMB-ECO LUV 500 System with a TRC of 500 m³/h;
- SEMB-ECO LUV 750 System with a TRC of 750 m³/h;
- SEMB-ECO LUV 1000 System with a TRC of 1,000 m³/h; and
- SEMB-ECO LUV 1500 System with a TRC of 1,500 m³/h.

The SEMB-ECO LUV models are assigned the following AMS identification number:

AMS-2018-SEMB-ECO LUV -001

Coast Guard acceptance of the SEMB-ECO LUV 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 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 SEMB-ECO LUV BWTS as an AMS indicate that the BWTS meets requirements for Coast Guard type approval.

The following conditions apply for the operation of the SEMB-ECO LUV BWTS in U.S. waters:

1. The AMS manufacturer must comply with all general conditions of certification stipulated in the type approval certificate issued by the Director of Marine, Maritime and Port Authority of Singapore, 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 minimum or maximum flow rates for the installed SEMB-ECO LUV model, as specified on the type approval certificate.
 - b. **Ballast Water Temperature:** The operations manual specifies a water temperature operating range between 0°C to 60°C.
 - c. **Differential pressure across the filter:** The self-cleaning filter is designed to operate automatically when the differential pressure across the filter is less than 0.9 bar. A warning alarm is sounded by the control system if differential pressure across the filter reaches 0.9 bar or greater. The BWTS should be stopped immediately and the filter checked.
 - d. UV intensity: Adequate UV dose is delivered if the minimal UV intensity measured by the UV sensor at the reactor is at least 80 W/m2. An alarm will sound if UV intensity is below the low alarm limit.

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. 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.
- 5. 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.
- 6. 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

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.

7. 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, as provided by 33 CFR 160.

- 8. 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.
- 9. 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 number of tanks treated by the AMS in the space labeled "Underwent Alternative Management";
 - b. Report the AMS identification number, located toward the beginning of this letter and in bolded text, in the space labeled "Please specify alternative method(s) used, if any," and;
 - c. Identify the management method as "ALT" under the heading "Method (ER/FT/ALT)" for each tank for which the AMS was used.

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,

Captain, U.S. Coast Guard

Office of Operating and Environmental Standards