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December 2, 2016

Wuxi Brightsky Electronic Co., Ltd.
Attn: Bae Chang Hyun
Luoshe Town, Wuxi City
Jiangsu Province
P.R. China

ALTERNATE MANAGEMENT SYSTEM ACCEPTANCE

The Coast Guard has completed its review of the Alternate Management System (AMS) application submitted by Wuxi Brightsky Electronic Co., Ltd. for the BSKY ballast water treatment system (BWTS), as well as additional materials submitted with type approval certificates issued by China Classification Society (CCS) on behalf of the Government of the People's Republic of China.

This letter grants AMS acceptance in accordance with the requirements of 33 CFR §151.2026 for the following listed Wuxi Brightsky BSKY BWTS models, as detailed in the CCS type approval certificate numbers: NJ15T00097_01 and NJ10T00090_01. This AMS acceptance letter, as well as an earlier AMS acceptance letter dated October 4, 2013, permits the use of the following Wuxi Brightsky BSKY BWTS models with varying treatment rated capacity (TRC) up to 6,000 cubic meters/hour (m^3/h). This letter remains valid for the duration that AMS acceptance is authorized in accordance with 33 CFR §151.2026(c) unless the AMS determination has been suspended, withdrawn, or terminated.

The following BSKY models are accepted for use as an AMS in U.S. waters:

- Model BSKY 100 with a TRC of 100 m^3/h ;
- Model BSKY 150 with a TRC of 150 m^3/h ;
- Model BSKY 200 with a TRC of 200 m^3/h ;
- Model BSKY 250 with a TRC of 250 m^3/h ;
- Model BSKY 300 with a TRC of 300 m^3/h ;
- Model BSKY 350 with a TRC of 350 m^3/h ;
- Model BSKY 400 with a TRC of 400 m^3/h ;
- Model BSKY 450 with a TRC of 450 m^3/h ;
- Model BSKY 500 with a TRC of 500 m^3/h ;
- Model BSKY 600 with a TRC of 600 m^3/h ;
- Model BSKY 700 with a TRC of 700 m^3/h ;
- Model BSKY 800 with a TRC of 800 m^3/h ;

- Model BSKY 900 with a TRC of 900 m³/h;
- Model BSKY 1000 with a TRC of 1,000 m³/h.
- Model BSKY 1100 with a TRC of 1,100 m³/h;
- Model BSKY 1200 with a TRC of 1,200 m³/h;
- Model BSKY 1300 with a TRC of 1,300 m³/h;
- Model BSKY 1400 with a TRC of 1,400 m³/h;
- Model BSKY 1500 with a TRC of 1,500 m³/h;
- Model BSKY 2000 with a TRC of 2,000 m³/h.
- Model BSKY 3000 with a TRC of 3,000 m³/h.
- Model BSKY 4000 with a TRC of 4,000 m³/h.
- Model BSKY 5000 with a TRC of 5,000 m³/h.
- Model BSKY 6000 with a TRC of 6,000 m³/h.

The Wuxi Brightsky BSKY BWTSs are assigned the following AMS identification number:

AMS-2016- BSKY BWTS-001

Coast Guard acceptance of the BSKY™ 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 BSKY™ BWTS as an AMS indicate that the BWTS meets requirements for Coast Guard type approval.

The following conditions apply for the operation of the BSKY™ 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 China Classification Society (CCS) on behalf of the Government of the People's Republic of China, 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)
United States Coast Guard Stop 7509
2703 Martin Luther King Jr. Ave SE
Washington DC 20593-7509
Tel: 202-372-1402
e-mail: environmental_standards@uscg.mil

2. Because the AMS 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.
3. 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.
4. Operation and maintenance must be conducted in accordance with all specifications and limiting conditions stipulated on the certificate of type approval and with the manufacturer's instructions, including any limitations posed by 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. **UV Intensity:** The designed UV dosage is between 200 and 250 mJ/cm². If the UV dosage falls below the set dosage lower limit alarm range an alarm is sounded by the control system and a low, low alarm will occur if the dosage goes below 160mJ/cm² for 60 seconds. These values are set on the Operating Data Set screen on the control and monitoring equipment.
 - b. **Flow rates:** The flow rate of ballast water through the system should not exceed the treatment rated capacity (TRC) for the installed system. A high alarm will occur if the treatment rated capacity exceeds 115% of system rated capacity.

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.

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 is specified in the ship's ballast water management plan (BW plan), required by 33CFR 151.2050(g). The BW plan must identify the following: (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
2703tin 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.

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, as provided by 33 CFR 160.
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 33CFR

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 installed AMS 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